

19 December 2025

Networks and System Change Team
Electricity Authority
By email: connection.feedback@ea.govt.nz

Tēnā koe,

Part C Electricity Industry Participation Minor Code Amendments Submission

We welcome the opportunity to respond to the Electricity Authority (**Authority**)’s Electricity Industry Participant Minor Code Amendment (Part C).

While the Connection Pricing re-consultation helpfully clarifies the treatment of vested assets, it’s important to define how these assets will be treated in the related Code amendments.

The definition of ‘**connection charge**’ should include vested assets to ensure that they are not used as a roundabout mechanism for recovering 100% of connection costs upfront from customers. This will promote consistency and comparability across EDBs in how vested assets are treated regarding their impact on the actual up-front cost consumers are facing and thus hopefully prevent practices that deter electrification.

The Commerce Commission’s (**Commission**) Input Methodologies Determination¹ defines Vested Assets as ‘*an asset associated with the supply of electricity distribution services received by an EDB without the provision of consideration or with provision of nominal consideration*’. We suggest the EA adopts the definition used by the Commission, we believe it is important that the definition of vested assets remains consistent across regulatory frameworks.

We have set out how this definition can be used in the Authority’s proposed Code amendments in the following:

Electricity Industry Participation Code Amendment 2025	Amendment
Part 1.1 - Interpretations	<p>Vested Asset means an asset associated with the supply of electricity distribution services received by an EDB without the provision of consideration or with provision of nominal consideration</p> <p>connection charge means—</p> <p>(a) any price, fee, tariff, charge or other similar monetary impost or cost, or any part of any price, fee, tariff, charge, or other similar monetary impost or cost and that is, either directly or indirectly, imposed, or required, or agreed by a distributor in relation to</p>

¹ Commerce Commission Input Methodologies Review 2023, page 61

https://www.comcom.govt.nz/_data/assets/pdf_file/0030/337683/Electricity-Distribution-Services-Input-Methodologies-IM-Review-2023-Amendment-Determination-2023.pdf

	connection works for a connection applicant or is otherwise applied for the purposes of, or has the effect of, recovering connection works costs directly or indirectly from a connection applicant; and (b) excludes any connection administration fees or pioneer scheme Contributions (C) includes Vested Assets
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Nāku noa, nā,



Emma Wilson

Head of Policy, Regulation and Markets

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