Code Review Programme number 7

Consultation paper

12/05/2026

ELECTRICITY AUTHORITY
TE MANA HIKO

Contents

1 Purpose of this consultation paper **3**

2 How to make a submission **3**

3 Code Review Programme number 7 ..... **4**

Table 1: List of proposed amendments in Appendix A 4

4 Regulatory statement for the proposed amendments **5**

5 Technical and non-controversial Code amendments **5**

6 Submission questions **5**

Code amendment proposals 5

Technical and non-controversial amendments 6

7 Attachments **6**

Appendix A Proposed Code amendments **7**

CRP7-001 Align terminology for maximum export power 7

CRP7-002 Retailers without websites 10

CRP7-003 Require a policy where a distributor's generation or retail business is not a separate business 13

CRP7-004 Extend participant audit to include use of EIEPs 17

CRP7-005 Clarify that several points of connection may be recorded under a single ICP 20

CRP7-006 Require action when insufficient load to certify metering 24

CRP7-007 Update metering standards references 28

CRP7-008 Process for updating the registry and reducing distribution charges for non-supply 32

CRP7-009 Enable faster distributor price codes establishment 36

CRP7-010 Billing obligations on retailers who operate multiple brands 38

CRP7-011 Repeal the Authority's power to grant Part 6A dispensations and the definition of specified person 42

CRP7-012 Amend clauses 10.29B and 10.29C 46

CRP7-013 Access to an ICP for disconnection 51

CRP7-014 Clearing manager's payment obligations and the clearing manager's liability to pay interest 54

Appendix B Submission form **57**

Printable form – Code amendment proposals 57

Printable form – Technical and non-controversial amendments 58

Appendix C Technical and non-controversial amendments **59**

1 Purpose of this consultation paper

1.1 This consultation paper presents the Electricity Authority Te Mana Hiko's (Authority) latest set of proposed minor changes to the Electricity Industry Participation Code 2010 (Code): The Code Review Programme #7. The purpose of this paper is to consult with interested parties on the proposed changes.

1.2 Ordinarily, Code change proposals have a single theme and give effect to new policy or market settings, or significant changes in policy settings. In contrast, the Code Review Programme enables the Authority to make a number of relatively small amendments, with different themes, all at once. This allows us to use our resources efficiently and has the benefit of incorporating improvements in the Code that might not otherwise occur.

1.3 The 14 proposed Code amendments in the consultation paper cover a broad range of topics that seek to:

(a) address gaps in various Code provisions

(b) clarify obligations on participants.

1.4 Consistent with the Authority's statutory objectives, the primary aim of these proposed changes is to promote the efficient operation of the electricity industry for the long-term benefit of consumers. Workable regulation that evolves through industry changes in technology and changes in consumer behaviour and demands is key to delivering better outcomes. The Code Review Programme facilitates these changes in regulation in a transparent way.

1.5 Under the Electricity Industry Act 2010, before making any changes to the Code, the Authority must consult on the proposed amendment and a corresponding regulatory statement. It also requires the regulatory statement to include a statement of the objectives of the proposed amendment, an evaluation of the costs and benefits of the proposed amendment, and an evaluation of alternative means of achieving the objectives of the proposed amendment. More detail about the regulatory statements is set out in section 4 of this paper.

1.6 For each discrete proposal, the regulatory statement is included in the relevant table for the proposed amendment in Appendix A.

1.7 The Authority also proposes to make a small number of minor corrections to the Code. These are included in Appendix C of this paper. These changes are considered technical and non-controversial under section 39(3)(a) of the Act. Although the Authority is not required to consult on technical and non-controversial changes, it invites comment on all proposals in Code Review Programme #7.

2 How to make a submission

2.1 The Authority's preference is to receive submissions in a Word document in the format shown in Appendix B. We have published a separate Microsoft Word version of the submission form on our website.

2.2 Submissions should be emailed to distribution.feedback@ea.govt.nz with 'Consultation - Code Review Programme #7' in the subject line by 5pm, Tuesday 9 June 2026.

2.3 The Authority will confirm receipt of all submissions.

2.4 If you cannot send your submission electronically, please email info@ea.govt.nz or call 04 460 8860 to discuss alternative arrangements.

2.5 We will publish all submissions. If you consider that we should not publish any part of your submission, please:

(a) indicate which part should not be published and explain why,

(b) provide a version of your submission that we can publish (if we agree not to publish your full submission).

2.6 All submissions, including any parts the Authority does not publish, can be requested under the Official Information Act 1982. This means the Authority would be required to release material not published unless good reason existed under the Act.

3 Code Review Programme #7

3.1 The 14 Code change proposals in this Code Review Programme #7 are set out in Appendix A. Each proposal has a unique proposal number (in its top row) for ease of reference. The Authority has described and assessed each proposal separately, as each proposal is discrete from the others. This means the format of this consultation paper is different from the consultation papers the Authority usually publishes.

3.2 For each proposal in Appendix A, there is a problem definition, a proposed solution (including proposed Code drafting), and an assessment against the Authority's statutory objectives (section 15 of the Act), the Code content requirements (section 32(1) of the Act), and the Authority's Code amendment principles. Each proposal in Appendix A also contains a regulatory statement that includes:

(a) a statement of the objectives of the proposed amendment

(b) an evaluation of the costs and benefits of the proposed amendment

(c) an evaluation of alternative means of achieving the objectives of the proposed amendment.

3.3 Because each proposal stands on its own, after submissions have been assessed some proposals may proceed unchanged, some may proceed with changes, and others may not proceed. Showing the draft amendments separately allows submitters to assess how each proposed amendment would affect Code obligations.

Table 1: List of proposed amendments in Appendix A

Reference	Topic	Page
CRP7-001	Align terminology for maximum export power	7
CRP7-002	Retailers without websites	10
CRP7-003	Require a policy where a distributor's generation or retail business is not a separate business	13
CRP7-004	Extend participant audit to include use of EIEPs	17
CRP7-005	Clarify that several points of connection may be recorded under a single ICP identifier	20
CRP7-006	Require action when insufficient load to certify metering	24
CRP7-007	Updating metering standards references	28
CRP7-008	Process for updating the registry and reducing distribution charges for non-supply	32
CRP7-009	Enable faster distributor price codes establishment	36
CRP7-010	Billing obligations on retailers who operate multiple brands	38

CRP7-011	Repeal the Authority's power to grant Part A dispensations and the definition of specified person	42
CRP7-012	Amend clauses 10.29B and 10.29C	46
CRP7-013	Access to ICP for disconnection	51
CRP7-014	Clearing manager's payment obligations and the clearing manager's liability to pay interest	54

4 Regulatory statement for the proposed amendments

4.1 As noted above, this consultation paper differs in format from the consultation papers the Authority usually publishes. For each proposed amendment in Appendix A, the regulatory statement is included in the relevant table for the proposed amendment.

4.2 The primary economic benefit described in the regulatory statements is a reduction in transaction costs across the electricity industry, which is a productive efficiency benefit. Having said this, some of the proposals also promote the competition limb of the Authority's main objective. In addition, by improving the clarity and operation of the Code, the proposed amendments could also deliver dynamic efficiency benefits.

4.3 Lastly, the Authority notes that a clear, predictable, and up-to-date set of industry rules is good regulatory practice and can facilitate increased participation in the electricity markets. This in turn might be expected to facilitate all three limbs of the Authority's statutory objective and provide both static and dynamic efficiency benefits to the economy.

5 Technical and non-controversial Code amendments

5.1 This Code Review Programme #7 also includes a standalone proposal to make a small number of amendments to correct typographical and other errors and resolve unclear wording in the Code. These include resolving incorrectly bolded (or incorrectly not bolded) terms, references to incorrect clauses, or to add minor words missing from clauses to improve their readability.

5.2 Appendix C is a table of proposed changes that the Authority is satisfied are technical and non-controversial. Although the Authority is not required to consult on the technical and non-controversial changes, it invites comments on all proposals in the Code Review Programme #7.

6 Submission questions

Code amendment proposals

6.1 For each proposal, we are asking the same questions. Please complete a new submission form for each proposal you wish to comment on.

6.2 Please note the proposal number at the top of each submission form. A printable copy of the form is in Appendix B if you are unable to send your submission electronically.

6.3 The questions are:

Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?
Q2. Do you agree with the objectives of the proposed amendment? Any comments?

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Any comments?
Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.
Q5. Do you have any comments on the drafting of the proposed amendment?
Q6. Do you have any further comments on the proposal?
Q7. Is any part of your submission confidential? If yes, please explain what part, why it is confidential and provide a publishable replacement (refer paragraphs 2.5 to 2.6 of the consultation paper)

Technical and non-controversial amendments

6.4 Only complete this section if you have feedback on the technical and non-controversial amendments. Please insert the row number at the top of each submission form.

6.5 The questions are:

Q1. Do you agree the issue(s) identified by the Authority need attention? Any comments?
Q2. Do you agree with the objectives of the proposed amendment? Any comments?
Q3. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 2.5 to 2.6 of the consultation paper)

7 Attachments

7.1 The following appendices are attached to this paper.

(a) Appendix A Proposed amendments

(b) Appendix B Format for submissions

(c) Appendix C Proposed technical and non-controversial amendments

Appendix A Proposed Code amendments

CRP7-001 Align terminology for maximum export power

Reference number(s)	CRP7-001: Align terminology for maximum export power
Problem definition	<u>Inconsistent use of term 'maximum export power' in the Code</u> Part 1 of the Code defines 'maximum export power' as: > the maximum active power exported into the local network or embedded network at an ICP of a distributed generator, and is equal to: > (a) the nameplate capacity of the distributed generation minus the minimum load at the point of connection; or > (b) the power export limit imposed by an active export control device. Part 6 of the Code uses the defined term 'maximum export power' throughout. In contrast, clause 7(1)(o)(i) of Schedule 11.1 of the Code refers to: > the maximum amount of electricity that can be injected into the distributor's network from distributed generation connected to the ICP, which is the sum of the maximum amount of electricity each generating unit connected to the ICP can inject into the distributor's network, in kW The clause is largely the same as the Code's definition of 'maximum export power' using different words. It would be consistent with the rest of the Code and clearer for clause 7(1)(o)(i) to use the defined term of 'maximum export power'. There are several Code amendments which will come into force over the coming year via the Network Connections[1] programme (stage one changes and stage two changes to Part 6 connections in December and May, respectively), making it timely now to assess and align all instances in the Code dealing with maximum export power. <u>Inconsistent use of terminology in the Registry Functional Specification and related guidelines</u> The Registry Functional Specification, and related guidelines (the Guideline for entering distributed generation information into the registry), refer to 'Maximum Deliverable Generation Capacity' and define it as 'the maximum amount of electricity (in kW) that can be exported from the ICP into the network'. To ensure consistency with the Code, it is desirable that the Authority instruct the registry manager to amend these documents so they align with the Code's definition of 'maximum export power'. While the Act does not require the Authority to consult on changes to guidelines, these guidelines would be included in the terminology review.

[1] https://www.ea.govt.nz/projects/all/network-connections/

Proposal	Amend references to terms in the Code that are analogous to the definition of 'maximum export power' in Part 1, to use the term 'maximum export power'.
Proposed Code amendment	**Clause 7 of Schedule 11.1 Distributors to provide ICP information to registry manager** … (o) if the **ICP** connects the **distributor's network** to **distributed generation**,— (i) the ~~maximum amount of **electricity** that can be injected into the **distributor's network** from~~ **maximum export power** of the **distributed generation** connected to the **ICP**, ~~which is the sum of the maximum amount of **electricity** each **generating unit** connected to the **ICP** can inject into the **distributor's network**,~~ in kW; and ….
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment would improve the efficient operation of the electricity industry by making the Code easier to understand and would reduce compliance costs for the Authority and participants. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to clarify Code requirements relating to maximum export power of distributed generation by aligning terminology used.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. *Benefits* We expect the proposed Code amendment's main benefit will be to

	clarify the Code. This would reduce the time and effort that participants expend in understanding the Code in order to meet their Code obligations.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-002 Retailers without websites

Reference number(s)	CRP7-002: Retailers without websites
Problem definition	Clause 6 of Schedule 11A.1 of the Code provides that consumer care policies should be displayed on retailer websites, alongside other specified information. Retailers without a website have sought clarity whether such a website is required in order to comply with the Code. The intent of clause 6 is to require retailers who do have a consumer-facing website to prominently display their consumer care policy, and other specific information, in a dedicated space on that website. Neither clause 6, nor the former Consumer Care Guidelines, had a policy intention to require retailers to create a consumer-facing website if they did not have one already. Given feedback of uncertainty around this clause, we consider clarification is needed to ensure retailers understand their obligations, and to limit these specific compliance obligations to retailers that already operate a website. This would also clarify that the Code does not impose any obligation or cost to create or maintain a website, as these are voluntary business decisions.
Proposal	Amend clause 6 of Schedule 11A.1 to clarify that obligations to display specific information on a retailer's website only apply to retailers who already maintain a website.
Proposed Code amendment	**6 Customer-facing website requirements** Each **retailer** who maintains a **customer**-facing website must clearly and prominently **publish** the following information in a dedicated section of their **customer**-facing website: (a) a statement that the **retailer** has a **consumer care policy** which complies with the **Consumer Care Obligations**; (b) the **retailer's consumer care policy** or a direct hyperlink to it; (c) how to contact the **retailer** with any questions regarding the **retailer's consumer care policy** or the **retailer's** compliance with the **Consumer Care Obligations**; (d) a hyperlink to the page of the **Authority's** website prescribed for the purposes of this clause; and (e) information, including hyperlinks to the websites and contact details of: (i) one or more **support agencies** offering advice on the efficient use of **electricity**; (ii) one or more **support agencies** offering financial mentoring services; and (iii) the dispute resolution scheme identified under clause 3 of Schedule 4 of the **Act**.

Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry by making the Code easier to understand by clarifying that the requirements concerning consumer-facing websites only apply to retailers with existing websites. This will remove uncertainty that currently exists for some retailers that they may be breaching the Code. Alternatively, the amendment will avoid the cost of operating a website where one would be needed only to meet this requirement, which is not necessary or intended under the Authority's policy objectives. The proposed Code amendment maintains protections for the interests of domestic and small business consumers in relation to the supply of electricity to those consumers. Other clauses in Part 11A still require retailers without a consumer-facing website to provide consumer care policy information directly to consumers. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to clarify Code requirements relating to retailers' obligations in relation to consumer care.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. *Benefits* We expect the proposed Code amendment's main benefit will be to clarify that the obligations under clause 6 of Schedule 11A.1 apply only to retailers that already operate a website. This avoids uncertainty and potential costs for retailers who decide not to maintain a website or alternatively, the costs of establishing a website only for the purpose of clause 6. Two retailers who service less than 10 ICPs sought clarity as part of completing the Authority's 2025 Consumer Care compliance report. While we expect the proposed amendment would impact only a few retailers (likely servicing a very low number of ICPs), such costs

	could disproportionately impact such smaller-sized retailers. While we estimate the initial impact will be minimal, this proposed amendment will provide enduring clarity for current and future retailers.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-003 Require a policy where a distributor's generation or retail business is not a separate business

Reference number(s)	CRP7-003: Require a policy where a distributor's generation or retail business is not a separate business.
Problem definition	Part 6A of the Code includes corporate separation, arm's-length rules and other rules (collectively referred to as the 'arm's-length rules'). These rules are intended to promote competition in the electricity industry by restricting relationships between a distributor and a generator or a retailer where those relationships may not otherwise be at arm's length. The Authority may grant an industry participant an exemption from certain obligations covered in Part 6A of the Code, or a dispensation to a specified person (see CRP7-011 for related changes proposed to Part 6A regarding dispensations). Clause 6A.4(1) requires every distributor in respect of which there is a connected retailer or connected generator to have a 'comprehensive, written distributor agreement that provides for the supply of line function services and information to the connected retailer or connected generator (as the case may be)'. The distributor must ensure that the terms of the agreement do not discriminate in favour of one business and do not contain or omit the terms that the business usually includes in distributor agreements with parties that are unrelated and independent. In cases where the Authority has granted an exemption or dispensation to allow a distributor to carry on a generation or retail business through the same entity, the distributor is required to have a written distributor agreement as if the distribution business and generation or retail business were separate legal persons (clause 6A.4(2)). However, it is unclear how a distributor can enter into an agreement with itself in order to comply with the clause 6A.4(2) rule. Uncertainty regarding compliance with the clause 6A.4(2) requirement could result in inadequate documentation existing and a lack of transparency around how the arm's-length rules are being applied.
Proposal	Amend Part 6A to clarify that distributors are required to maintain and publish a policy, rather than a distribution agreement, when they hold exemptions to operate a connected generation or retail business as a single legal entity.
Proposed Code amendment	**Part 1** **connected generator policy** means a policy a **distributor** is required to maintain in respect of a connected generator connected to the **distributor's network** when the **distributor** is not subject to the corporate separation rule under clause 6A.3 **connected retailer policy** means a policy a **distributor** is required to maintain in respect of a connected retailer connected to the **distributor's network** when the **distributor** is not subject to the corporate separation rule under clause 6A.3

…

6A.4 Distributor agreements and policies

(1) Every **distributor** in respect of which there is a connected retailer or a connected generator carrying on business in a different company or other entity to the **distributor** must—

(a) have a comprehensive, written **distributor agreement** that provides for the supply of **line function services** and information to the connected retailer or connected generator (as the case may be); and

(b) ensure that the terms of that **distributor agreement** do not discriminate in favour of one business and do not contain arrangements that include elements that the business usually omits, or omit elements that the business usually includes, in **distributor agreements** with **unrelated parties** ~~that are—~~

~~connected or related only by the transaction or dealing in question; and~~

~~acting independently; and~~

~~each acting in its own best interests~~; and

(c) operate in accordance with that **distributor agreement**; and

(d) **publish** that **distributor agreement** and provide it to the **Authority**.

(2) ~~A **distributor agreement** required by subclause (1)(a) must be entered into, in the case of a business to which the corporate separation rule does not apply, as if the **distribution** business and the connected retailer or connected generator were separate legal persons.~~ In the case of a **distributor** in respect of which there is a connected retailer or a connected generator and the corporate separation rule under clause 6A.3 does not apply, instead of having a **distributor agreement** in accordance with subclause (1), the **distributor** must—

(a) maintain a comprehensive, written internal **connected generator policy** or **connected retailer policy** (as the case may be) that—

(i) details the supply of **line function services** and information to the connected retailer or connected generator;

(ii) sets out how the **distributor** will not discriminate in favour of the connected retailer or connected generator;

(iii) sets out how the **distributor** will ensure that the way it deals with the connected retailer or connected generator is on the same terms under which the **distributor** usually contracts with **unrelated parties**;

(b) operate in accordance with that **connected generator policy** or **connected retailer policy**; and

(c) **publish** that **connected generator policy** or **connected retailer policy** and provide it to the Authority.

(3) In this clause, unless the context otherwise requires,—

connected generator, in relation to a **distributor**, means a generator—

(a) that has connected generation of more than 10 MW of generation that is connected to any of the **distributor's** networks; and

(b) in respect of which the **distributor**, or any other person involved in the **distributor**, is involved

connected retailer, in relation to a **distributor**, means a **retailer**—

	(a) that is involved in retailing more than 5 GWh of **electricity** on the **distributor's** local network in a financial year to customers who are connected to that network; and (b) in respect of which the **distributor**, or any other person involved in the **distributor**, is involved **local network** means a network operated by a **distributor** in a contiguous geographic area or areas. **unrelated parties**, in relation to a **distributor**, means parties that are— (a) connected or related only by the transaction or dealing in question; and (b) acting independently; and (c) each acting in its own best interests. (4) A **distributor** required to have a **distributor agreement** or a **connected generator policy** or a **connected retailer policy** under this clause must submit to the **Authority** a statement indicating whether, in the preceding calendar year,— (a) the terms in the **distributor agreement** or the **connected generator policy** or the **connected retailer policy** are a true and fair view of the terms on which **line function services** and information were supplied in respect of the retailing or generating to which the agreement or the policy relates; and (b) this clause was otherwise fully complied with. …
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment would improve the efficient operation of the electricity industry by giving clarity to parties exempted from the Part 6A corporate separation rules on their obligations. The proposed Code amendment is expected to have a positive impact on competition as it will clarify any uncertainty regarding appropriate steps in respect to a distributors' connected generation or retail business. It is expected to have no effect on the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and

summarised	is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to provide a clearer method for distribution businesses which have been exempted from certain Part 6A rules to maintain documentation that serves the same intended purpose as a distributor agreement.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. *Benefits* We expect the proposed Code amendment's main benefit will be to ensure that there are necessary records in place that contribute to the avoidance of anti-competitive behaviours.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-004 Extend participant audit to include use of EIEPs

Reference number(s)	CRP7-004: Extend participant audit to include use of EIEPs
Problem definition	Part 16A of the Code contains requirements for certain participants to be audited on a regular basis. Electricity Information Exchange Protocols (EIEPs) provide standardised formats that support the reliable exchange of information between participants, and participants and other parties. EIEPs are either regulated or non-regulated. Clause 11.32F, clause 2 of Schedule 12A.2, and clause 52 of Schedule 11A.1 set out the Authority's ability to prescribe EIEPs. Clause 11.32EG sets out the Authority's ability to prescribe an EIE system for the purposes of consumers' access to their consumption information via an agent. EIEPs enable parties to exchange regular and/or large volumes of information efficiently to support processes such as billing and provision of consumption information to consumers. The consistent and correct use of EIEPs by participants is important for the efficient operation of the electricity industry, as they are an enabler of more automated processes. A mistrust of the information exchanged under an EIEP can cause participants (or consumers and their agents, in the case of EIEP13A and B) unnecessary work to complete manual checks and reworkings. Part 16A of the Code does not require audits when information is exchanged in accordance with an EIEP. As a result, the Authority cannot monitor whether participants are using EIEPs correctly and consistently.
Proposal	Amend Part 16A of the Code to require audits of distributors' and reconciliation participants' processes and procedures relating to the sharing of information in accordance with EIEPs.
Proposed Code amendment	**Subpart 4 – Distributor audits** **…** **16A.23 Additional requirements for distributor audits** In addition to the requirements specified in clauses 16A.3 to 16A.16, a **distributor** must ensure that the **auditor** carrying out an **audit audits** the **distributor's** processes and procedures in relation to— (a) the creation of **ICP identifiers** for **ICPs**; and (b) the provision of **ICP** information to the **registry manager** and the maintenance of that information in the **registry**; and (c) the creation and maintenance of **loss factors**~~.~~; and (d) the sharing of information a **distributor** is required to share in accordance with an **EIEP**, including the timeframes and manner in which that information is shared. … **Subpart 5 – Reconciliation participant audits**

	16A.24A Additional requirements for reconciliation participant audits In addition to the requirements specified in clauses 16A.3 to 16A.16, a **reconciliation participant** must ensure that the **auditor** carrying out an **audit audits** the **reconciliation participant's** processes and procedures in relation to the sharing of information the **reconciliation participant** is required to share in accordance with an **EIEP**, including the timeframes and manner in which that information is shared.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment would improve the efficient operation of the electricity industry by improving the ability to identify common errors in EIEP files and exchanges processes. This will reduce instances of errors in the exchange of information between participants, meaning processes that rely on the exchange of information can take place with less manual checks and rework. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to reduce electricity market operational costs by reducing instances of errors and inconsistencies in the use of EIEPs, thereby reducing instances of manual checks and corrections to EIEP files.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal to be minor. Auditors will need to make minor changes to their distributor and reconciliation participant audit processes.

	Benefits We expect the proposed Code amendment's main benefit will be to reduce the costs associated with errors and inconsistencies in the use and exchange of information in accordance with EIEPs, including reducing instances of manual checks and rework.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-005 Clarify that several points of connection may be recorded under a single ICP

Reference number(s)	CRP7-005: Clarify that several points of connection may be recorded under a single ICP identifier
Problem definition	There is some uncertainty under the Code about whether multiple points of connection related to a single consumer can constitute a single Installation Control Point (ICP) and be recorded under a single ICP identifier. The issue may arise, for example, in the case of a farm with a house and separate water pump. Clause 11.3 of the Code governs when points of connection must have ICP identifiers. Clause 11.4 of the Code requires distributors to create ICP identifiers for ICPs. Clause 11.3 is not clear as to whether an ICP identifier comprises only a single point of connection, or whether it can comprise multiple points. As clause 11.4 refers to the creation of an ICP identifier for each ICP, this clause needs to be interpreted alongside the definition of ICP. The Code's definition of 'ICP' as 'a point of connection' can be read as limiting an ICP to a single point of connection (notwithstanding that definitions listed in Part 1 of the Code are premised with the proviso that 'unless the context otherwise requires'). In practice, however, an ICP can consist of more than one physical point of connection to the network, and in some cases it is more practical for multiple points of connection to be included within the same ICP. Not doing so can cause practical issues for consumers whose retail bills relate to two ICPs, for example, when moving into a property where there are two related points of connection with separate ICP identifiers.
Proposal	(a) Amend the definition of ICP in Part 1 and Schedule 12A.4 of Part 12A of the Code to clarify that an ICP in respect of an electrical facility that connects a retailer's customer to a network may comprise one or more points of connection. (b) Amend clause 11.3 of the Code to clarify that an ICP identifier may include more than one point of connection for a single consumer, where practical.
Proposed Code amendment	**Part 1** **ICP** means an installation control point being ~~1~~one of the following: (a) one or more ~~a~~ **points of connection** at which the electrical facility for a retailer's customer is connected to a network other than the grid: (b) a point of connection between a **network** and an **embedded network:** (c) a point of connection between a network and shared unmetered load: (d) a point of connection at which the electrical facility for a generator or direct purchaser is connected to a network other than the grid …

11.3 Certain points of connection must have ICP identifiers

(1) This clause applies to the following:

(a) a **trader** who has agreed to purchase **electricity** from an **embedded generator** or sell **electricity** to a **consumer**:

(b) an **embedded generator** who sells **electricity** directly to the **clearing manager**:

(c) a **direct purchaser** connected to a **local network** or an **embedded network**:

(d) an **embedded network** owner in relation to a **point of connection** on an **embedded network** that is settled by differencing:

(e) a **network** owner in relation to a **shared unmetered load point of connection** to the network owner's network:

(f) a **network** owner in relation to a **point of connection** between the **network** owner's **network** and an **embedded network**.

(2) A **participant** to whom this clause applies must, before the **participant** assumes responsibility for a **point of connection** described in subclause (3) on a **local network** or **embedded network**, obtain an **ICP identifier** for the **point of connection**.

(3) The **points of connection** for which **ICP identifiers** must be obtained under subclause (2) are **points of connection** at which any of the following occurs:

(a) a **consumer** purchases **electricity** from a **trader**:

(b) a **trader** purchases **electricity** from an **embedded generator:**

(c) a **direct purchaser** purchases **electricity** from the **clearing manager**

(d) an **embedded generator** sells **electricity** directly to the **clearing manager**:

(e) a **network** is settled by differencing:

(f) there is a **distributor** status **ICP**—

(i) at the **point of connection** between an **embedded network** and the **distributor's network**; or

(ii) at the **point of connection** of **shared unmetered load**.

(4) A single **ICP identifier** may be created for more than one **point of connection** if:

(a) each **point of connection** relates to the same **consumer**; and

(b) it is practical in the circumstances.

…

Part 12A, Schedule 12A.4 Appendix A

….

"**ICP**" means an installation control point being ~~1~~one of the following:

(a) one or more Points of Connection at which a Customer's Installation is connected to the Network;

(b) a Point of Connection between the Network and an embedded network;

	(c) a Point of Connection between the Network and shared Unmetered Load; …
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. By clarifying that an ICP and an ICP identifier can relate to multiple points of connection in circumstances where it is practical, costs would reduce for distributors creating and managing multiple ICP identifiers and the associated registry data for related points of connection. It would simplify matters for consumers as they would not need to handle multiple ICPs when, for example, comparing retailers. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to reduce electricity market operational costs by clarifying that an ICP and ICP identifier can consist of multiple points of connection.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposed Code amendment are negligible. The proposed amendment will restrict ICP identifiers being created for multiple points of connection to situations where it is practical in the circumstances. This threshold will prevent points of connection being grouped together where it is inappropriate and could cause issues. *Benefits* We expect the proposed Code amendment's main benefit will be to clarify that a single ICP and ICP identifier can be created for properties with multiple points of connection, thereby avoiding the need to create multiple ICPs. This will also reduce the distributors'

	costs for creating and managing the data for multiple ICPs. An approach where a single ICP and identifier is created in these circumstances going forward will also improve the consumers' ability to compare and switch retailers.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-006 Require action when insufficient load to certify metering

Reference number(s)	CRP7-006 Require action when insufficient load to certify metering
Problem definition	If there is insufficient electricity conveyed through a point of connection to complete the tests to certify a metering installation as a half-hour metering installation, clause 14 of Schedule 10.7 of the Code applies. Clause 14 enables the certifying ATH to certify the metering installation provided certain requirements are met. Clause 14(3) of Schedule 10.7 requires the metering equipment provider (MEP) to obtain and monitor raw meter data for the metering installation at least once each month during the period of certification to determine if load during the month is sufficient for a prevailing load test to be completed. Subclause (4) states that, if the raw meter data monitored by the MEP demonstrates that there is sufficient electricity for a prevailing load test to be completed, the MEP must ensure that a certifying ATH makes a subsequent visit to the metering installation as soon as practicable but within 20 business days. However, the way subclauses (5) and (6) are written assume that there will be sufficient load to complete testing when the certifying ATH makes the subsequent visit to the metering installation pursuant to subclause (4). This is evident because subclauses (5) and (6) assume that the tests undertaken at the subsequent visit *will* or *will not* demonstrate that the metering installation performs within the relevant maximum permitted error set out in Table 1 of Schedule 10.1. There is therefore no contingency provided for the event that there is insufficient load to certify the metering during the subsequent visit by the certifying ATH. This could occur, for example, if the electricity at the metering installation is consumed intermittently, such as at night or at times outside the hours the ATH is at the site. This can result in costs for repeat visits being incurred or uncertified metering continuing to operate indefinitely.
Proposal	Amend the Code to require the MEP and retailer to take action if, at the time of the subsequent visit to the metering installation required under clause 14(4) of Schedule 10.7, there is insufficient load to complete testing, by ultimately disconnecting the supply if access cannot be arranged at times the metering installation will have sufficient load for certification.
Proposed Code amendment	**Schedule 10.7, clause 14 Insufficient load for metering installation certification tests** (1) This clause only applies if there is insufficient **electricity** conveyed through a **point of connection** to allow an **ATH** to complete a prevailing load test for a **metering installation** that is being certified as a **half-hour metering installation** (2) When this clause applies, the **ATH** must, when **certifying** the **metering installation**, ensure that— (a) it performs an additional integrity check of the **metering installation** wiring, and records the results of this check in the **certification report**; and

(b) it records in the **certification report** that the **metering installation** is **certified** under this clause.

(3) A **metering equipment provider** must, for each **metering installation** for which it is responsible, and that is **certified** under this clause, obtain and monitor **raw meter data** from the **metering installation** at least once each month during the period of **certification** to determine if load during the month is sufficient for a prevailing load test to be completed.

(4) Despite subclause (1), the **metering equipment provider** must, if **raw meter data** obtained under subclause (3) demonstrates, at any time, that there is sufficient **electricity** conveyed through the **point of connection** for a prevailing load test to be completed, ensure that the **certifying ATH** makes a subsequent visit to the **metering installation** as soon as practicable, but no later than 20 **business days** after the **metering equipment provider** has obtained the **raw meter data**, to carry out and complete the tests set out in Table 4 of Schedule 10.1.

(5) The **certifying ATH** must, if the tests referred to in subclause (4) demonstrate that the **metering installation** performs within the relevant maximum permitted error set out in Table 1 of Schedule 10.1,—

(a) update the **metering installation certification report**, within 5 **business days** of completing the tests, to include the results of the tests carried out; and

(b) leave the original **metering installation certification** expiry date unchanged.

(6) If the tests referred to in subclause (4) demonstrate that the **metering installation** does not perform within the relevant maximum permitted error set out in Table 1 of Schedule 10.1—

(a) the **metering installation certification** is automatically cancelled from the date of the tests; and

(b) the **certifying ATH** must advise the **metering equipment provider** of the cancellation within 1 **business day** of carrying out the tests; and

(c) the **metering equipment provider** must follow the procedure set out in clauses 10.43 to 10.48.

(7) If the **certifying ATH** makes a subsequent visit to the **metering installation** under subclause (4) and there is insufficient **electricity** conveyed through the **point of connection** to allow the **certifying ATH** to complete the tests set out in Table 4 of Schedule 10.1—

(a) the **certifying ATH** must notify the **metering equipment provider** that there was insufficient **electricity** to complete the tests; and

(b) within 3 **business days** of receiving notice from the **certifying ATH** under subclause (7)(a), the **metering equipment provider** must notify the **trader** responsible for that **metering installation** that there was insufficient **electricity** to complete the tests.

(8) A **trader** notified under subclause (7)(b) must, within 5 **business days** notify the **meter equipment provider** of one or more days and times at which there is likely to be sufficient **electricity** conveyed through the **point of connection** for the prevailing load tests to be completed.

(9) The **meter equipment provider** notified under subclause (8) must ensure that a **certifying ATH** makes a subsequent visit to the **metering**

	installation which occurs— (a) as soon as practicable, but no later than 20 **business days** after the **meter equipment provider** receives notification under subclause (8); and (b) at a day and time identified by the **trader** under subclause (8). (10) If the **certifying ATH** makes a subsequent visit to the **metering installation** pursuant to subclause (9)— (a) subclauses (5) or (6) apply, as the case may be; or (b) the **certifying ATH** must notify the **metering equipment provider** within one **business day** if there is insufficient **electricity** conveyed through a **point of connection** to allow the **certifying ATH** to complete the tests. (11) The **metering equipment provider** notified under subclause (10)(b) must either— (a) **electrically disconnect** the **metering installation** as soon as practicable, if authorised by the **trader** responsible for that **metering installation**; or (b) if not authorised by the **trader** to perform the **electrical disconnection**, within one **business day** notify the **trader** responsible for that **metering installation** that it is required to take the action required in subclause (12). (12) A **trader** notified under subclause (11)(b) must, within 5 **business days**, **electrically disconnect**— (a) the **ICP**; or (b) the load at the **metering installation** if there is more than one **metering installation** at the **ICP**.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment would improve the efficient operation of the electricity industry by providing a process under clause 14 of Schedule 10.7 when, at a subsequent site visit to attempt prevailing load testing, there is insufficient load to test. Providing this process would also reduce any potential inaccurate metering because, if there continues to be insufficient load to complete the tests, the process requires the ICP or the load at the meter to be electrically disconnected. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.

Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to reduce electricity market operational costs by: (a) providing a clear process to follow where insufficient load to certify meters recurs, and (b) reducing any unaccounted electricity due to an inaccurate uncertified metering installation.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. Any costs associated with performing additional site visits are likely to be lower than the current costs associated with incomplete or inconsistent processes to test meter installations. *Benefits* We expect the proposed Code amendment's main benefit will be to reduce participants' time by making the Code easier to follow when meter installation tests cannot be completed at subsequent visits due to recurring insufficient load. By establishing a process to identify suitable times and dates for subsequent meter installation tests, this would reduce the rate of subsequent tests that are unable to be completed and avoid repeated site visits and associated costs. This amendment would also reduce the system costs associated with unaccounted electricity due to inaccurate uncertified metering installations.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-007 Update metering standards references

Reference number(s)	CRP7-007: Update metering standards references
Problem definition	Table 5 of Schedule 10.1 of the Code (Metering) contains several references to metering standards that are now out of date. Some standards have been amended, some have been withdrawn and some have been superseded. Some require amendment to identify the year of issue. Meter and data storage device standards: EN 50470-1 This standard has been updated with Amendment 1 in 2018. EN 50470-2 This standard has been updated with Amendment 1 in 2018. EN 50470-3 This standard has been superseded with a new version in 2022. IEC 62053-11 This standard has been updated with Amendment 1 in 2016. IEC 62053 -21, -22, -23 These standards have been superseded with new versions in 2020. IEC 62053 -61 There has been no change to this standard but the reference in the Table should identify its year of release, 1998. IEC 62052 -11 This standard has been superseded with a new version in 2020. Measuring transformer standards: IEC 60044-1,2,3, and 5 These standards have been withdrawn and replaced by the IEC 61869 product family standard. This standard includes a general requirements part that needs to be read alongside the parts that are specific to each type of instrument. Therefore IEC 61869-1 (general requirements) needs to be added to the list of standards in Table 5. The equivalent standards for the withdrawn IEC 60044-1,2,3, and 5 standards are IEC 61869-2, 3, 4 and 5 respectively.

	IEC 60358 This standard has been replaced in 2013 by four standards, each covering various aspects of the original 1990 standard. Part 1 is General Rules, Part 2 covers power line carrier (PLC) applications, Part 3 covers harmonic filter applications, and Part 4 covers DC and AC single-phase capacitor dividers. Part 1 has been subsequently updated in 2025. IEC 60044-7 There has been no change to this standard but the reference in the Table should identify its year of release, 1999. IEC 60044-8 There has been no change to this standard but the reference in the Table should identify its year of release, 2002 Other standards: IEC 62054-11 This standard has been updated with Amendment 1 in 2016. IEC 62054-21 This standard has been updated with Amendment 1 in 2017. It is necessary to update Table 5 to reflect these changes. The Authority intends to update Table 5 through the following procedure: 1. After consultation, the Authority will incorporate references to the updated standards by issuing a notice adopting the updated or replaced versions, publishing it in the *Gazette* and publicising the notice in accordance with section 131B of the Electricity Industry Act 2010. 2. The references in Table 5 will then be changed as part of the Code amendments in this Code review programme.
Proposal	The Authority proposes to update the metering and data storage device standards references in Table 5 of Schedule 10.1 of the Code to the current versions, and to include the version (year) of each Standard.
Proposed Code amendment	**Schedule 10.1** … **Table 5**

Meter and data storage device standards	**Standards**
Electricity metering equipment (AC) – Part 1: General requirements, tests and test conditions (class indexes ~~0.5~~A, ~~1~~B and ~~2~~C)	EN 50470-1 +A1:2018
Electricity metering equipment (AC) – Part 2: Particular requirements – Electromechanical meters for active energy (class indexes ~~1~~A and ~~2~~B)	EN 50470-2+AMD1:2018
Electricity metering equipment (AC) – Part 3: Particular requirements – Static meters for active energy (classes 0.5, 1 and 2)	EN 50470-3:2022
Electricity metering equipment (AC) – Particular requirements – Part 11: Electromechanical meters for active energy (classes 0.5, 1 and 2)	IEC 62053-11+AMD1:2016

	Electricity metering equipment (AC) – Particular requirements – Part 21: Static meters for active energy (classes 1 and 2)	IEC 62053-21:2020
	Electricity metering equipment (AC) – Particular requirements – Part 22: Static meters for active energy (classes 0.1 S, 0.2 S and 0.5 S)	IEC 62053-22:2020
	Electricity metering equipment (AC) – Particular requirements – Part 23: Static meters for reactive energy (classes 2 and 3)	IEC 62053-23:2020
	Electricity metering equipment (AC) – Particular requirements – Part 61: Power consumption and voltage requirements	IEC 62053-61:1998
	Electricity metering equipment (AC) – General requirements, tests and test conditions – Part 11: Metering equipment	IEC 62052-11:2020
	Measuring transformer standards	
	Instrument transformers – Part 1: General requirements	IEC 61869-1:2023
	Instrument transformers – Part ~~1~~ 2: Additional requirements for c~~C~~urrent transformers	IEC ~~60044-1~~61869-2:2012
	Instrument transformers – Part ~~2~~ 3: Additional requirements for i~~I~~nductive voltage transformers	IEC ~~60044-2~~61869-3:2011
	Instrument transformers – Part ~~3~~ 4: Additional requirements for c~~C~~ombined transformers	IEC ~~60044-3~~61869-4:2013
	Instrument transformers – Part 5: Additional requirements for Capacitor voltage transformers	IEC ~~60044~~61869-5:2011
	Coupling capacitors and capacitor dividers - Part 1: General rules	IEC 60358-1:2025
	Coupling capacitors and capacitor dividers - Part 2: AC or DC single-phase coupling capacitor connected between line and ground for power line carrier-frequency (PLC) application	IEC 60358-2:2013
	Coupling capacitors and capacitor dividers - Part 3: AC or DC coupling capacitor for harmonic-filters applications	IEC 60358-3:2013
	Coupling capacitors and capacitor dividers - Part 4: AC or DC single phase capacitor dividers	IEC 60358-4:2018
	Instrument transformers – Part 7: Electronic voltage transformers	IEC 60044-7:1999
	Instrument transformers – Part 8: Electronic current transformers	IEC 60044-8:2002
	Other standards	
	Electricity metering equipment (AC) – Tariff and load control – Part 11: Particular requirements for electronic ripple control receivers	IEC 62054-11:2004+AMD1:2016
	Electricity metering equipment (AC) – Tariff and load control – Part 21: Particular requirements for time switches	IEC 62054-21+AMD1:2017
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment would improve the efficient operation of the electricity industry by referencing up to date standards, reducing time spent by industry participants cross-referencing former standard references with current standards. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.	

Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to reduce electricity market operational costs by: (a) improving certainty for participants (b) reducing time spent cross-referencing outdated metering standard references with current references.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers there are zero or negligible costs to participants from this Code amendment. *Benefits* We expect the proposed Code amendment's main benefit will be to improve the efficient operation of the electricity industry by referring to current standards and reducing the need for cross-referencing historical and new standards by participants.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-008 Process for updating the registry and reducing distribution charges for non-supply

Reference number(s)	CRP7-008: Process for updating the registry and reducing distribution charges for non-supply
Problem definition	The Authority made a suite of amendments to Schedule 12A.4 of the Code (the Default Distributor Agreement (DDA) template) in 2024. One change was to amend the status of 'recorded terms' in the DDA template to either become 'core terms' which must be consistent across all DDAs published by distributors, or 'operational terms', which reflect the local practices and policies of distributors. One of these 'recorded terms', which was amended to become a 'core term', was clause 9.10. This clause requires distributors to reduce charges when there is a service disruption of 24 hours or longer as a consequence of a fault on the network. The method and timing for reducing charges under the current wording of clause 9.10(b) may not be aligned with some distributors' billing systems. <u>Problem 1</u> Clause 9.10(b) requires the reduction in charges to be passed onto Traders in the next billing cycle. Some distributors' systems are automated to take information from the registry regarding the 'inactive' system to set billed quantities to zero. As a result, manual re-working can sometimes be required to ensure reductions in charges are set correctly, especially if the registry has not been updated when distributors are generating invoices. More discretion over how and when to apply the reduction in charges under clause 9.10 would allow distributors more flexibility to work more efficiently with their systems. <u>Problem 2</u> Clause 9.10(b) also requires the distributor to reduce distribution charges by setting billed quantities for each day during which the interruption continues and the day the interruption ends, but not the first day during which the interruption began, to zero. The registry applies the change in status to be effective from 00:00 hours at the start of the day the change occurs. If the distributor's billing system reduces the charge to zero on the day the status is set to inactive, and back again on the day the status is changed to active, the resulting amount of reduction is correct but the days on which the reduction applies is one day offset from the requirement. <u>Problem 3</u> A consequential amendment was made in 2024 to Part 11 of the Code, Schedule 11.1 clause 19, which allows distributors to change ICPs' status to 'Inactive' in the registry when there has been an interruption in supply to the ICP. Under clause 17, however, only a 'trader' has ability to manage an ICP's status to 'Active'. This means that in instances where the distributor is aware that electricity supply has been restored to an ICP, it does not have the ability to change the status of the ICP in the registry back to 'Active', and needs to inform the retailer so that the

	trader can change the ICP status.
Proposal	Amend the Code to: (a) allow distributor discretion in how and when to apply the reduction in distribution charges for non-supply (b) allow distributors to revert the ICP status back to 'Active' when the interruption to supply has been resolved.
Proposed Code amendment	**Part 12A, Schedule 12A.4 Appendix A** **9.10 Reduction of charges due to electricity supply interruption:** If, as a consequence of a fault on the Network, there is a continuous interruption affecting a Customer's Point of Connection for 24 hours or longer, the Distributor must: (a) advise the Trader of the ICPs that are so affected either as part of the invoicing information for the next monthly billing cycle or separately prior to the next month's billing cycle (for example by updating the registry status to "Inactive", or by sending a separate report); and (b) despite clauses 21 and 24, ~~in the next monthly billing cycle,~~ reduce the Distribution Services charges paid by the Trader in respect of the ICP or ICPs for that Customer during which supply of electricity was interrupted for longer than 24 continuous hours, either by: (i) setting the billed quantities for each day during which the interruption continues and the day the interruption ends, but not the first day during which the interruption began, to zero~~.~~; or (ii) setting the billed quantities for each day during which the interruption continues and the day the interruption began, but not the last day during which the interruption ends, to zero; and (c) provide the reduction in Distribution Services charges referred to in subclause (b) to the Trader either: (i) in the next monthly billing cycle; or (ii) by the Distributor and Trader agreeing to the Distributor giving a rebate to the Trader to be made within 3 months of the day the interruption ended. … **Part 11, Schedule 11.1** **17 "Active" status** (1) Except as provided in subclause (3), the **ICP identifier** status of "Active" must be managed by the relevant **trader** and indicates that— (a) the associated **electrical facilities** are **electrically connected**; and (b) a **trader** must provider information related to the **ICP identifier**, in accordance with Part 15, to the **reconciliation manager** for the purpose of compiling **reconciliation information**. (2) Before an **ICP** is given the "Active" status, the **trader** must ensure that— (a) the **ICP identifier** has only 1 **embedded generator**, **direct purchaser**, or customer of a **retailer**; and

	(b) the **electricity** consumed is quantified by a **metering installation** or a method of calculation approved by the **Authority**. (3) The **ICP** status of "Active" may be managed by a **distributor** where: (a) the relevant **distributor** has managed the "Inactive" status of the **ICP** under clause 19(2); and (b) the interruption of electricity supply affecting the **ICP** indicated by the "Inactive" status has been resolved.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment to the DDA in Schedule 12A.4 to Part 12A would better align with some distributors' automated systems and avoid manual re-workings of reductions for supply interruptions. The proposed amendment to Schedule 11.1 of Part 11 would improve the efficient operation of the electricity industry by ensuring prompt return of an ICP to 'Active' status when electricity supply has been restored after an interruption. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to reduce electricity market operational costs by: (a) avoiding the need for distributors to manually re-work reductions in respect of supply interruptions (b) clarifying responsibility for reflecting the status of an ICP.

Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. *Benefits* We expect the proposed Code amendment's main benefit will be to reduce costs to participants by reducing the need for manual work, or changes to billing systems, when applying DDA clause 9.10(b) after interruptions to service. The amendment to allow distributors to amend the status in the registry of an ICP when service is returned will also achieve efficiency benefits by removing the current process step where the distributor informs the retailer to revert the ICP status to 'Active'.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-009 Enable faster implementation of distributor price codes

Reference number(s)	CRP7-009: Enable faster implementation of distributor price codes
Problem definition	Clause 23(3) of Schedule 11.1 of the Code provides that a new distributor price code category can only take effect after two months from when the distributor enters the new price code in the registry. The intent of this rule is to allow sufficient time for affected retailers to update their billing systems to accommodate the new distributor price code and advise customers of a price change, if required. However, there are situations where this rule does not need to apply, if the affected retailer and retailer's customers consent to the relevant distributor price code taking effect earlier. This scenario has come about in recent trials through the Authority's 'Power Innovation Pathway', where distributors have developed innovative network tariffs that enable customers with solar panels to donate the payments for excess energy. For instance, they may donate to vulnerable customers or community groups across a network, irrespective of which retailer either customer uses. To support similar developments that have potential to provide consumer benefits, an amendment to clause 23 would prevent the two-month delay from presenting a barrier where participants and customers can agree to implement a distributor price code sooner.
Proposal	Amend clause 23 of Schedule 11.1 to add a new subclause (6) to enable a price category code to take effect in less than two months where the retailer and customer both consent.
Proposed Code amendment	**Schedule 11.1 clause 23 Updating table of price category codes** (1) Each **distributor** must keep up to date the table in the **registry** of the **price category** codes that may be assigned to **ICPs** on each **distributor's network**, by entering in the table any new **price category** codes that may be assigned to an **ICP** on the **distributor's network**. (2) Each entry in the table must specify the date on which each **price category** code takes effect. (3) The date that a **price category** code takes effect must not be earlier than 2 months after the date on which the **price category** code is entered in the table. (4) A **price category** code takes effect on the specified date. (5) To avoid doubt, subclause (3) does not apply to the creation of an **ICP** or to the transfer of an **ICP** from one **distributor's network** to another **distributor's network**. (6) Despite subclauses (2), (3) and (4), a **price category** code may take effect in respect of any **ICP** earlier than the specified date, provided the **trader** who trades at that **ICP** and the customer at that **ICP** have given written consent to the **distributor** for that **price category** code to take effect on an earlier date.
Assessment of proposed Code amendment	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.

against section 32(1) of the Act	The proposed amendment would improve the efficient operation of the electricity industry by inserting a mechanism for consenting parties to accelerate when a distributor price code change takes effect, and therefore avoid delayed benefits. The mechanism ensures that there are no needless delays to applying a distributor price code. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to enable consumer benefits to be realised faster when new distributor price codes are implemented.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. *Benefits* The proposed Code amendment's main benefit will be to enable faster implementation of new services involving innovative tariff designs, meaning consumers can benefit sooner.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-010 Billing obligations on retailers who operate multiple brands

Reference number(s)	CRP7–010: Billing obligations on retailers who operate multiple brands
Problem definition	New obligations are coming into effect on 30 October 2026 under the Electricity Industry Participation Code (Improving Electricity Billing) Amendment 2026 (billing amendment). These obligations improve electricity billing to make invoices clearer, more consistent, and more useful for consumers. In its submission on the consultation paper, *Improving electricity billing in New Zealand,* Meridian expressed concern about the application of some of the obligations in the billing amendment when retailers operate multiple brands, specifically the obligations on retailers to: • publish and keep updated a plan catalogue (new clause 11A.17), and • perform better plan checks for its customers (new Schedule 11A.2, clause 7). Meridian remains concerned that these obligations, as imposed in the final Code amendment, will apply at the retailer level and may undermine the provision of distinct retail brands by requiring, for example, Meridian customers to be advised on Powershop plans, and vice versa. This is not how the Authority intends these obligations to be interpreted and applied. Retailers should have flexibility as to how they comply with these obligations, as there are many ways that different retailers operate their businesses. When a retailer operates different brands, either under the same company structure or under separate companies, it should be able to choose to publish separate plan catalogues for its different brands and should not be required to provide better plan advice across its different brands, although it may wish to do so. In the same way, under the existing Consumer Care Obligations, a retailer can maintain separate consumer care policies for its separate brands. This approach ensures customers receive information relevant to the brand they have chosen to purchase power from. It would likely be confusing for customers to receive information about another brand. When obligations are deliberately intended to apply across a retailer's brands, such as the upcoming prohibition on exit fees, that is made explicit in the Code drafting (new clause 11A.18 in the billing amendment). While this interpretation is being clarified in forthcoming guidance on the billing obligations, we wish to amend the Code to remove uncertainty and support retailers' compliance with the Code.
Proposal	Amend better plan check and plan catalogue obligations due to come into effect on 30 October to clarify that these obligations can be applied at a retailer brand level, where applicable. Clarify application of existing obligations relating to product offerings and related pricing plans in Schedule 11A.1 to ensure adoption of a consistent approach.

Proposed Code amendment	**Part 11A Consumer Care** … **11A.17 Retailer to publish plan catalogue** (1) Each retailer must **publish** and keep updated a plan catalogue containing the following information: (a) the name of every **generally available retail tariff plan**: (b) the **product identification code** for every plan referred to in paragraph (a): (c) the structure of, and prices available under, every plan referred to in paragraph (a) including GST, if any: (d) a high-level summary of how the plan is tailored for different customers. (2) The **retailer** must not charge any person a fee to access the plan catalogue. (3) Where a **retailer** offers different **product offerings** and **pricing plans** under different brands, the **retailer** may satisfy subclause (1) by **publishing** and keeping updated different plan catalogues for the **retailer's** different brands, each detailing the different **product offerings** and **pricing plans** of the relevant brand only. … **Schedule 11A.1 — Consumer Care Obligations** *Part 1 – Interpretation* … 1A **Interpretation where multiple brands used** Where a **retailer** offers different **product offerings** and **pricing plans** under different brands, each reference to available **product offerings** and related **pricing plans** in clauses 8, 17, 17A, 23 and 25 is a reference to the available **product offerings** and related **pricing plans** of the relevant brand only. … **Schedule 11A.2 — Billing Standards** … **7 Better plan check** (1) Each **retailer** required to perform a **better plan check** for a **customer** must consider whether, based on the **customer's** consumption over the past 12 months, the **retailer** has one or more **pricing plans** that could provide a lower cost of **electricity** to the **customer** taking into account the **customer's** current household circumstances known to the **retailer**. (2) If the **retailer** reasonably considers that the **retailer** has one or more **pricing plans** that could provide a lower cost of **electricity** to the **customer**, the **retailer** must advise the **customer** of that **pricing plan** or those **pricing plans** (provided the **retailer** does not need to advise the **customer** of more than 3 **pricing plans**). (3) If the **retailer** advises the **customer** of more than one **pricing plan**, the **retailer** must identify the **pricing plan** which the **retailer** reasonably considers is the lowest cost option for the **customer**, taking into account those aspects of the **customer's** circumstances of which the **retailer** has knowledge.

	(4) Where a **retailer** offers different **pricing plans** under different brands, each reference to **pricing plan** in this clause is a reference to the **pricing plans** of the relevant brand only.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry by making the Code easier to understand and apply, reducing compliance costs for both affected retailers and the Authority. The proposed Code amendment maintains protections for consumers established by the billing amendment, and builds on these with proposed new clause 1A of Schedule 11A.1 by ensuring both the amendments and existing provisions operate as intended so that customers have access to information that is relevant to the retail brand they currently use. For more information about how the underlying billing improvements in the billing amendment promote the Authority's objectives, see the decision paper and consultation paper available on the Authority's website.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to clarify a retailer's obligations relating to better plan checks and plan catalogues, and existing, related obligations to provide product offering and pricing plan information, when the retailer operates more than one retail brand.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. The billing amendment has not yet come into force and there is still time to clarify, through a Code amendment, how these will apply to any retailer that choose to operate more than one retail brand. We understand that retailers have been applying the existing Consumer Care Obligations at a brand level, so the proposed Code amendment will mean no change in existing practice. *Benefits* We expect the proposed Code amendment's main benefit will be to clarify the application of the Code, which will provide certainty for both the affected retailers in complying with their Code obligations and the Authority in monitoring compliance.

Evaluation of alternative means of achieving the objectives of the proposed amendment	We considered the alternative of relying on guidance to clarify the intended application of these obligations. However, guidelines that set out the Authority's interpretation are not binding, and do not provide legal certainty. This option is not preferred, given the need for certainty for retailers operating different brands.

CRP7-011 Repeal the Authority's power to grant Part 6A dispensations and the definition of specified person

Reference number(s)	CRP7-011: Repeal the Authority's power to grant Part 6A dispensations and the definition of specified person
Problem definition	Problem 1 Clause 6A.9 was inserted to the Code to provide a mechanism for the Authority to grant dispensations to 'specified persons' in respect of their involvement in two or more classes of industry participant under Part 6A of the Code. This responded to a gap created by the Electricity Industry Amendment Act 2022, which inadvertently prevented the Authority from using section 11 of the Electricity Industry Act 2010 (Act) to grant exemptions to 'specified persons'. Section 11 of the Act has since been amended by the Regulatory Systems (Economic Development) Amendment Act 2025. The amendment closed the gap in section 11 by enabling the Authority to grant exemptions to specified persons. It is now undesirable for clause 6A.9 to provide a duplicate exemption regime. The Authority's power to grant Part 6A dispensations under clause 6A.9 can therefore be repealed and section 11 of the Act can be relied on for future exemptions from Part 6A for specified persons. Three dispensations have been granted under clause 6A.9 since it was introduced, all of which remain in effect. Provision should be made in the Code to: (a) clarify that these dispensations remain in effect, and (b) retain the Authority's powers under the Code to amend or revoke these dispensations. Problem 2 Part 1 of the Code defines a 'specified person' as having the meaning given in section 32(6) of the Act. The Regulatory Systems (Economic Development) Amendment Act 2025 moved the definition of specified person to section 5 of the Act and replaced section 32(6) with an unrelated provision. Consequently, the reference in the Code's definition of specified person to section 32(6) of the Act is erroneous and requires updating.
Proposal	Amend the Code to: (a) revoke the Authority's power to grant Part 6A dispensations under clause 6A.9 (b) clarify the status of dispensations that have already been granted by the Authority under clause 6A.9 (c) change the Code's definition of 'specified person' to refer to the correct provision of the Act.
Proposed Code amendment	**Part 1** … **Part 6A dispensation** means an exclusion from compliance with Part 6A or any provisions of Part 6A granted by the **Authority** ~~in accordance with the~~

~~process set out in~~ under clause 6A.9 as it was in effect immediately before [date this amendment comes into effect]

…

specified person has the meaning given in section ~~32(6)~~5 of the **Act**

…

Part 6A

…

6A.9 Effect of ~~Authority may grant~~ Part 6A dispensation to specified person

~~(1) A **specified person** may apply to the **Authority** for a **Part 6A dispensation** in respect of their involvement in two or more classes of industry **participant** that are the subject of this Part, or specific provisions of this Part.~~

(1A) A **Part 6A dispensation** continues in force until it is amended or revoked in accordance with subclause (6), or until it expires according to its terms.

~~(2) The application must be submitted in the form and by the means specified by the **Authority**.~~

~~(3) Where the **Authority** receives an application under this clause, it may grant a **Part 6A dispensation** to a **specified person** if the **Authority** is satisfied that —~~

~~(a) it is not necessary, for the purpose of achieving the **Authority's** objectives under section 15 of the Act, for the **specified person** to comply with this Part or the specific provisions of this Part; or~~

~~(b) granting a **Part 6A dispensation** in respect of the **specified person** would better achieve the **Authority's** objectives than requiring compliance.~~

~~(4) The **Authority** must give reasons for its decisions under subclause (3).~~

~~(5) The **Authority** may grant a **Part 6A dispensation** on any terms or conditions that it reasonably considers are necessary.~~

(6) The **Authority** may amend or revoke a **Part 6A dispensation** ~~granted under subclause (3)~~ by issuing a notice that identifies the **specified person** subject to the **Part 6A dispensation** and gives reasons for the amendment or revocation, but only if the **Authority**—

(a) has given notice of the proposed amendment or revocation to the **specified person** subject to the **Part 6A dispensation** and given them a reasonable opportunity to comment; and

(b) in relation to an amendment, is satisfied that the amendment is necessary or desirable for the purpose of achieving the **Authority's** objectives in section 15 of the **Act**; and

(c) in relation to a revocation, is no longer satisfied ~~of the matters in subclause (3)~~ that it is not necessary, for the purpose of achieving the **Authority's** objectives under section 15 of the

	Act, for the **specified person** to comply with this Part or the specific provisions of this Part. (7) The **Authority** must publish a list of all current **Part 6A dispensations** ~~granted under this clause~~.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendments are consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because they would contribute to the efficient operation of the electricity industry. The proposed amendments would improve the efficient operation of the electricity industry by: (a) removing an unnecessary dispensation power from the Code, clarifying the Authority's functions in relation to exemptions and dispensations, and simplifying processes for participants and (b) correcting an erroneous reference in the Code's definitions. The proposed Code amendments are expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendments are consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendments are consistent with principle 1 in that they address identified problems with the Code, which require Code amendments to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendments. Hence, a qualitative assessment of the proposed amendments' costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposals is to reduce electricity market operational costs by removing ambiguity in the regulatory framework regarding the relationship between Part 6A dispensation process and exemptions granted under section 11 of the Act.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendments would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposals are negligible. *Benefits* We expect the proposed Code amendments' main benefit will be to clarify the mechanism for specified persons to seek exemption from Code obligations.

Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-012 Amend clauses 10.29B and 10.29C

Reference number(s)	CRP7-012: Amend clauses 10.29B and 10.29C
Problem definition	As part of a suite of Code changes implemented in 2021 to metering related registry processes, the Authority inserted two new clauses into Part 10: • Clause 10.29B governs the circumstances in which the grid owner may electrically connect a point of connection to the grid. • Clause 10.29C governs the circumstances in which the grid owner may disconnect, or electrically disconnect, a point of connection to the grid. The grid owner has raised operational concerns in relation to the clauses with the Authority, which has resulted in the Authority granting an exemption from clauses 10.29B(2) and 10.29C(2) to allow it to continue operations. <u>Problem 1:</u> Clause 10.29B(2) sets out that the grid owner may only electrically connect a point of connection to the grid, subject to clause 10.33A, when there is a responsible party under Part 15 for the delivery of submission information for the electricity conveyed at the point of connection to the grid. Clause 10.29B(2)(b) and (c), which cover the electrical connection of a local network, requires that there is at least one trader responsible for the delivery of Part 15 submission information. In practice, the grid owner must confirm there is a trader via the registry. However, the grid owner does not have access to the registry, nor a list of ICPs connected to the point of connection, so it is impractical for the grid owner to perform these checks. For a local network, the distributor is best placed to confirm that there is at least one trader responsible for the delivery of Part 15 submission information, as it has the contractual relationship with the traders. <u>Problem 2:</u> The wording of clauses 10.29B and 10.29C allows only the grid owner to electrically connect, electrically disconnect, or disconnect a point of connection to the grid. In practice however, transmission customers may operate grid switches in accordance with their agreements with the grid owner. The current clauses 10.29B and 10.29C do not reflect this operational practice and therefore drives a need for exemptions from the Code. <u>Problem 3:</u> Clause 10.29C(2) permits the grid owner to disconnect or electrically disconnect a point of connection only if the action is required for the grid owner to meet its obligations: (a) under an enactment, including the Code or (b) under its contract with the party identified in current clause

	10.29B(2) as responsible in accordance with Part 15 for the delivery of submission information for the electricity conveyed at the point of connection to the grid. However, for Grid Exit Points, the grid owner is responsible for the delivery of submission information and does not have a contract with itself. The purpose of clause 10.29(C) is to protect connected parties from inadvertent disconnection. Therefore, it would be more appropriate for the clause to ensure that electrical disconnection or disconnection only be allowed where it is required for the grid owner to meet either its Code or transmission agreement obligations.
Proposal	Overall, the proposed amendments aim to enable efficient electrical connection and disconnection processes for the grid owner, while ensuring that there is accountability for the electricity when a point of connection is energised. We propose to address problem 1 by: (a) amending clause 10.29B to oblige the connected party (ie, the direct consumer, generator, or distributor) to either: i. confirm that one or more traders are identified as responsible for the delivery of submission information or ii. confirm that the distributor is responsible for the delivery of submission information. We propose to address problem 2 by: (b) expanding the scope of clause 10.29B to permit a designated transmission customer, where the connection agreement permits that customer to do so, to electrically connect a point of connection to the grid, and (c) expanding the scope of 10.29C to permit a designated transmission customer, where the connection agreement permits that customer to do so, to electrically disconnect or disconnect a point of connection from the grid. We propose to address problem 3 by: (d) replacing clause 10.29C(2)(b) with the power for the grid owner to disconnect a point of connection when it is permitted to do so under its transmission agreement with the designated transmission customer.
Proposed Code amendment	**10.29B: Grid owner or designated transmission customer may electrically connect point of connection to grid** (1) Subject to clause 10.33A, the only parties who ~~a **grid owner**~~ may **electrically connect** a **point of connection** to the **grid** are— ~~that it owns or operates~~ (a) a **grid owner**; or (b) a **designated transmission customer**. (2) A **grid owner** may only **electrically connect** a **point of connection** under subclause (1) if— (a) in the case of the **electrical connection** of a **direct consumer** or **grid** connected **generator**, the **grid owner** has received written confirmation from the **direct consumer** or **grid** connected **generator** that there is a **trader** identified as responsible under Part

15 for the delivery of **submission information** for the **electricity** conveyed at the **point of connection** from the time of **electrical connection**; or

(b) in the case of the **electrical connection** of a **local network**, the **grid owner** has received written confirmation from the **distributor** for that **local network** that either—

(i) ~~has one or more **consumers** connected to the **local network** or to an **embedded network** that is connected to the **local network** (either directly or through another **embedded network**~~ one or more **traders** are identified as responsible under Part 15 for the delivery of **submission information** for the **electricity** conveyed at the **point of connection** from the time of **electrical connection**; or

(ii) ~~(c)in the case of the **electrical connection** of a **local network** that has no **consumers** connected to the **local network** or to any **embedded network** that is connected to the **local network** (either directly or through another **embedded network**), if~~ the **distributor** for that **local network** is identified as responsible under Part 15 for the delivery of **submission information** for the **electricity** conveyed at the **point of connection** from the time of **electrical connection**.

(3) A **designated transmission customer** may only **electrically connect** a **point of connection** to the **grid** under subclause (1) if—

(a) the **designated transmission customer** and the **grid owner** have a **transmission agreement** in place that permits the **designated transmission customer** to **electrically connect** that **point of connection** to the **grid**; and

(b) the **designated transmission customer** is, or one or more **traders** are identified as, responsible under Part 15 for the delivery of **submission information** for the **electricity** conveyed at the **point of connection** from the time of **electrical connection**.

10.29C: Grid owner or designated transmission customer may electrically disconnect or disconnect point of connection to grid

(1) Subject to subclause (2), only a **grid owner** or **designated transmission customer** may—

(a) **electrically disconnect** a **point of connection** to the **grid**; or

(b) disconnect a **point of connection** to the **grid**.

(2) A **grid owner** may disconnect or **electrically disconnect** a **point of connection** to the **grid** that it owns or operates only if the action is required for the **grid owner** to meet its obligations—

(a) under an enactment, including this Code; or

(b) under its ~~contract~~ **transmission agreement** with the ~~party~~ **designated transmission customer** ~~identified in clause 10.29B(2) as responsible in accordance with Part 15 for the delivery of **submission information** for the **electricity** conveyed at the~~ **point of connection** ~~to the **grid**~~.

(3) A **designated transmission customer** may disconnect or **electrically**

	disconnect a **point of connection** to the **grid** only when it is permitted to do so under its **transmission agreement** with the **grid owner**.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendments are consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry in the following ways. Proposed amendment to address problem 1 The proposed amendment would continue to ensure that there is a responsible party for the submission of information for the electricity conveyed through a point of connection once energised. However, rather than requiring the grid owner to confirm there is a responsible party, the amendment will place responsibility on the party best placed to give this confirmation, making the process more efficient. It also reduces the potential costs of exemption applications, where the grid owner has contracted with transmission customer to complete switches, but the Code does not allow for this. Proposed amendment to address problem 2 The proposed amendment would enable points of connection to be connected or disconnected from the grid in a way that reflects operational practice. This will clarify participants' responsibilities under the Code. It will prevent participants having to apply, and the Authority having to process, applications for exemptions. Proposed amendment to address problem 3 The proposed amendment would clarify that the grid owner's powers to disconnect or electrically disconnect a point of connection apply only to meet either its Code or transmission agreement obligations. The proposed Code amendments are expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendments are consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendments are consistent with principle 1 in that they address identified problems with the Code, which require a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendments. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed	The objectives of the proposals are to: (a) reduce electricity market operational costs by assigning responsibilities to the party that is best placed to confirm

amendment	there is a party responsible for delivery of submission information (b) reduce potential compliance costs by avoiding the need for further exemption applications by enabling connections and disconnections to the grid to reflect operational practice (c) reduce potential compliance risk to designated transmission customers of operating switches and (d) clarify the circumstances in which the grid owner may disconnect or electrically disconnect a point of connection to the grid.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendments would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible. *Benefits* In respect of the proposed amendments to address problem 1, we expect the main benefit will be a reduction in operational costs by assigning responsibilities to the party that is best placed to confirm there is a party responsible for delivery of submission information. In respect of the proposed amendments to address problem 2, we expect the main benefits will be avoiding the costs in applying for and processing exemptions. In respect of the proposed amendments to address problem 3, we expect the main benefit will be reduced costs for the grid owner in understanding and applying the Code.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objectives of the proposed Code amendment.

CRP7-013 Access to an ICP for disconnection

Reference number(s)	CRP7-013: Access to ICPs for disconnection
Problem definition	Clause 3(1) of Schedule 11.1 of the Code requires that ICPs created after 7 October 2002 must be able to be electrically disconnected independently of any other ICP. However, there are instances where an ICP that requires disconnection may not be readily accessible to the party performing the disconnection. For example: • a block of multiple units with ICPs located in a locked meter room managed by a body corporate or one of the unit owners, or • a property split into flats and the switchboard with all the fuses (points of connection for each ICP) being located in one of the flats. In either case, an individual unit's ICP cannot be readily accessed for disconnection in a timely manner. This could result in either: • an inadvertent disconnection of neighbouring ICP(s) because the disconnecting technician would disconnect at an upstream point without realising this disconnected an array of ICPs or • the ICP remaining connected, despite needing to be disconnected. To help to prevent these scenarios, it would be preferable that the Code prevents distributors from creating an ICP identifier or connecting an ICP where access to independently disconnect an ICP is likely to be an issue.
Proposal	Add a new subclause to clause 3 of Schedule 11.1 that clarifies that a distributor may only create an ICP identifier or connect an ICP if it has been established that there is an accessible ICP.
Proposed Code amendment	**Schedule 11.1 clause 3 Electrically disconnecting** (1) Subject to subclause (2), a **distributor** must not create an **ICP identifier** or connect an **ICP** created after 7 October 2002 unless— (a) the **ICP identifier** is for an **ICP** that can be **electrically disconnected** without **electrically disconnecting** another **ICP**; ~~and~~ (b) the **ICP** can be **electrically disconnected** without **electrically disconnecting** another **ICP**. (c) for **ICPs** created after [date], there is reasonable access to enable the **ICP** to be **electrically disconnected** and either of the following applies — (i) the **ICP** is located at the premises at which the electricity conveyed from the ICP is consumed; or (ii) the owner of the premises at which the electricity is conveyed from the **ICP** is consumed has a right of access to the ICP. (2) Subclause (1) does not apply if the **ICP** is—

	(a) the **point of connection** between a **network** and an **embedded network**; or (b) an **ICP** that represents the consumption calculated by the difference between the total consumption for the **embedded network** and all other **ICPs** on the **embedded network**. (3) A **distributor** must not— (a) connect a new **ICP** to an existing **ICP** in series unless the existing **ICP** is of the type described in subclause (2)(a) or (2)(b); or (b) create a new **ICP identifier** for a new or existing **ICP** in series with an existing **ICP** unless the existing **ICP** is of the type described in subclause (2)(a) or (2)(b) and the **distributor** is responsible for both the new and existing **ICPs**.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment would improve the efficient operation of the electricity industry by helping to prevent scenarios where an ICP cannot be disconnected due to an inaccessible location. This should lead to a reduction in instances of unsuccessful visits to the location because of inaccessibility. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code, which requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	It has not been practicable to quantify the costs and benefits of the proposed Code amendment. Hence, a qualitative assessment of the proposed amendment's costs and benefits has been undertaken and is summarised below.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to reduce electricity market operational costs by reducing inefficiencies from the process of disconnecting ICPs.
Evaluation of the costs and benefits of the proposed amendment	The Authority considers the proposed Code amendment would have a positive net benefit, for the reasons set out below. *Costs* The Authority considers the costs of the proposal are negligible.

	Benefits We expect the proposed Code amendment's main benefit will be to: • reduce inadvertent disconnections of neighbouring ICPs • reduce instances where an ICP remains connected due to inaccessibility, and • reduce instances of unsuccessful attempts to disconnect inaccessible ICPs and therefore reduced operational costs.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

CRP7-014 Clearing manager's payment obligations and the clearing manager's liability to pay interest

Reference number(s)	CRP7-014: Clearing manager's payment obligations and the clearing manager's liability to pay interest
Problem definition	<u>Clearing manager's payment obligations</u> Clause 14.34(1) states the clearing manager must pay each participant by 4.00pm on the final business day for payment. Clause 14.34(2) states the clearing manager must pay each participant in cleared funds. Clause 14.34 does not allow flexibility when delays occur that are outside the clearing manager's control, such as late participant payments or banking-processing delays. Participants must ensure their payments reach the clearing manager by 1pm (under clauses 14.31 and 14.32) and they typically pay early to manage that risk. However, the clearing manager cannot control delays when making outbound payments and the payment relies on processing by a third party. The three-hour window between the 1pm cutoff and the 4pm payment deadline is often too tight. If a participant defaults, the clearing manager must follow the processes in clauses 14.42 and 14.43 and may need to scale payments under clause 14.44 or Subpart 8. These steps can cause delays, as can bank processing (which normally takes around one hour but may take two or more hours). Because of these issues, the clearing manager may be unable to comply with the clause as written. <u>The clearing manager's liability to pay interest</u> Clause 14.64(1) makes the clearing manager liable to pay interest if the participant does not receive the full amount payable under Part 14. According to clause 14.54, clause 14.64(1) applies only where the clearing manager does not receive funds from a participant in time and needs to exercise options available to the clearing manager to address the shortfall. The subpart 8 interest remedies require the clearing manager to pay interest on the unpaid amount (the difference between the full amount payable and the amount paid) if the clearing manager exercises its remedies under clause 14.44. The clause could be amended to avoid misunderstanding by clarifying that the clearing manager is not liable for interest payments in situations unrelated to late payment or shortfall of funds from a participant.
Proposal	Amend clause 14.34 to provide more flexibility to the clearing manager's payment obligations. Amend clause 14.64 to clarify that the clearing manager is only liable to pay interest in the circumstances to which subpart 8 of Part 14 applies.

Proposed Code amendment	**14.34 Payments by clearing manager** (1) Subject to subparts 7 and 8, the **clearing manager** must issue payment instructions to the **bank** with which each **operating account** is held to pay each **participant** the amount advised to the **participant** under subpart 4 as payable by the **clearing manager** to the **participant** by 1600 hours on the final **business day** for payment under clause 14.31. (2) The **clearing manager** must use reasonable endeavours to pay each **participant** in **cleared funds**. **14.64 Interest payable to participants** (1) If a **participant** does not receive the full amount payable under this Part and subpart 8 applies, the **clearing manager** is liable to pay interest on the unpaid amount.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's statutory objectives, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. The proposed amendment would improve the efficient operation of the electricity industry by: (a) relaxing a strict obligation on a market operation service provider which can be difficult to meet, due to causes beyond the control of the clearing manager and (b) clarifying the circumstances in which the clearing manager is liable to pay interest on unpaid amounts. The proposed Code amendment is expected to have no effect on competition and the reliable supply of electricity, or the interests of domestic and small business consumers in relation to the supply of electricity to those consumers, or the performance by the Authority of its functions.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Clear case for regulation	The proposed Code amendment is consistent with principle 1 in that it addresses an identified problem with the Code that requires a Code amendment to resolve.
Principle 2: Costs and benefits are summarised	The Authority considers the proposed Code amendment would have a positive net benefit. *Costs* The Authority considers the costs of the proposal are negligible. The proposal fits with the clearing manager's processes and there are no system changes to implement. No material costs will be borne by other participants or the Authority. *Benefits* We expect the main benefit of the proposed Code amendment will

	be: (a) a reduction in costs for the clearing manager associated with transfers of funds to participants and (b) clarity for participants on when the clearing manager is liable to pay interest, thereby reducing the time and effort for participants to understand their Code obligations and reducing the potential for disputes about the interest payable.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to: (a) reduce electricity market operational costs by removing an impractical requirement on a market operation service provider and (b) clarify when the clearing manager is liable to pay interest on unpaid amounts.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.

Appendix B Submission form

Printable form – Code amendment proposals

Submitter	
Organisation	
Proposal number	**CRP7-0**

Questions	Comments
Q1. Do you agree the issues identified by the Authority are worthy of attention?	
Q2. Do you agree with the objectives of the proposed amendment? If not, why not?	
Q3. Do you agree the benefits of the proposed amendment outweigh its costs?	
Q4. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	
Q5. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	
Q6. Do you have any comments on the drafting of the proposed amendment?	
Q7. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 2.5-2.6 of the consultation paper)	

Submissions are due 5.00pm Tuesday 9 June 2026, to distribution.feedback@ea.govt.nz with "Code review programme #7 consultation" in the subject line.

Printable form – Technical and non-controversial amendments

Submitter	
Organisation	
Row number	

Questions	Comments
Q1. Do you agree the issues identified by the Authority are worthy of attention? Any comments?	
Q2. Do you agree with the objectives of the proposed amendment? If not, why not?	
Q3. Is any part of your submission confidential? If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 2.5-2.6 of the consultation paper)	

Submissions are due 5.00pm Tuesday 9 June 2026, to distribution.feedback@ea.govt.nz with “Code review programme #7 consultation” in the subject line.

Appendix C Technical and non-controversial amendments

	Clause	Issue	Proposed amendment
1.	Clause 1.1 definition of 'active metre'	The defined term is not used in the Code and should be removed.	~~**active meter** means a **meter** used for the measurement of **active energy**~~
2.	Clause 1.1 definition of 'Consumer Price Index'	The word 'published', as it is used here, is not a defined term and should not be in bold.	**Consumers Price Index** means the Consumers Price Index (all groups) published by Statistics New Zealand or, if that index ceases to be ~~**published**~~published, any measure certified by the Government Statistician as being equivalent to that index
3.	Clause 1.1 definition of 'distributor kvar reference node'	Amendments in 2015 rationalised the definition of 'distributor' and 'connected asset owner'. As a result, clause 8.67 now refers to 'connected asset owner kvar reference node' as the relevant defined term. However, the 2015 amendments did not change the related definition in Part 1. The former definition, 'distributor kvar reference node', remains and needs updating.	~~**distributor**~~ **connected asset owner kvar reference node** means a notional node that represents a group of **grid exit points** within a **zone** for which a **distributor** nominates peak demand in kvar, and for which the individual kvar quantities measured at the individual **grid exit points** within the group are aggregated for **voltage support** charging purposes, as approved by the **system operator** (such approval not to be unreasonably withheld)
4.	Clause 17(1)(a) of Schedule 6.1	The term 'the first application' is not a defined term and should not be in bold.	(a) a **distributor** receives a **final application** (the ~~**first application**~~first application); and
5.	Clause 6B.4(1)	The term 'capacity' is not a defined term and should not be in bold.	(1) Subject to subclauses (2) to (4), each **distributor** in determining the **connection charges** that it requires a **connection applicant** to pay for or in respect of a **connection** or any increase in security or ~~**capacity**~~capacity at a **point of connection** or for an **asset**—
6.	Clause 6B.7(5)	The term 'purchasing distributor' should refer instead to 'buying distributor'.	(5) If a **pioneer scheme** is an **acquired pioneer scheme**, the ~~**purchasing**~~**buying distributor**—
7.	Clause 6B.7(5)(b)	The term 'must' is not a defined term and should not be in bold.	(b) ~~**must**~~must continue to administer, and comply with, those requirements and that **pioneer scheme policy** in complying with this clause and clauses 6B.8 and 6B.9.
8.	Clause 6B.9(1)(c)	The term 'details' is not a defined term and should not be in bold	(c) **publish** the ~~**details**~~details of each **pioneer scheme** it administers, applying the requirements in clause 6B.7, including the following information:
9.	Clause 6B.11(4)	The clause refers to the 'incremental distribution revenue and incremental transmission revenue estimates' when it should refer to 'incremental distribution revenue estimate and	(4) A **distributor** must assess the **incremental distribution revenue estimate** and **incremental transmission revenue** ~~estimates~~ **estimate**, and show this assessment

	Clause	Issue	Proposed amendment
		incremental transmission revenue estimate'.	in the connection charge reconciliation, by—
10.	Clause 6B.11(4)(d)	The reference to 'incremental distribution revenue' is missing the word 'estimate'. The word 'the' before 'incremental cost estimate' should not be in bold.	(d) for an **incremental distribution revenue estimate** only, and only where ~~**the**~~the **incremental cost estimate** includes an **operating cost loading** which is not zero, multiplying the amount derived after the application of paragraph (c) by the **distributor's incremental opex scaling factor** calculated in accordance with subclause (5).
11.	Clause 7.18(4)	The word 'to' should be removed from the wording 'does not to consent to'.	(4) If the **Authority** does not ~~to~~ consent to a proposal for consultation under subclause (3), the **system operator** must decide either—
12.	Clause 11.5(2)(b)	There is an incorrect reference to clause 11.6. The correct reference should be 11.16.	(b) for all other **traders**, an arrangement with the **distributor** for **distribution** services in accordance with clause 11.16.
13.	Clause 11.30B(5)	There is an incorrect reference to clause 11.30A. The reference should be 11.30B.	(5) If the **Authority** changes the web address of the electricity plan comparison website, establishes a new platform to perform the same purpose, or changes that platform or its location descriptor, each **retailer** must change the information published or provided under clause 11.30~~A~~B to refer to the new address, platform or location descriptor as soon as reasonably possible and no later than 3 months from the date the change is notified on the **Authority's** website.
14.	Clause 11.32EA(2)(a)	The semicolon at the end of the clause should not be in bold.	(a) consider whether any further information could reasonably be provided by the agent to satisfy the **retailer**~~:~~; and
15.	Clause 7(6) of Schedule 11.1	There should be a space between '10' and 'MW' in the reference to '10MW'.	(6) If a **distributor** assigns a **loss category** code to an **ICP** on the **distributor's network** that connects the **distributor's network** to an **embedded generating station** that has a capacity of ~~10MW~~10 **MW** or more—
16.	Clause 48(2) of Schedule 11A.1	The wording "…which must be least 21 business days…" is missing the word "at".	(2) The **retailer** must advise the **customer** or **residential consumer** under subclause (1) that if the **retailer** does not receive an application (in any form) within a period specified by the **retailer**, which must be at least 21 **business days**, the **retailer** may decide to no longer regard that **customer** or **residential**

	Clause	Issue	Proposed amendment
			consumer as someone who may be a **medically dependent consumer**.
17.	Clause 12A.7(1)	The reference '…designed to target residential or business consumers…' should be '…designed to target residential consumers or business consumers…'	(1) A **distributor's** pricing methodology must, for any **price category** that has eligibility criteria that are designed to target residential consumers or business consumers with a connection capacity of 45kVA or less, include a negative charge for injection of **electricity** into the **distributor's network** that:
18.	Clause 12A.7(1A)	The reference to '…is not required to be offered or paid to any distributed generation…' should be '…is not required to be offered or paid in in respect of any distributed generation'	(1A) Despite subclause (1), a negative charge for injection of **electricity** is not required to be offered or paid ~~to~~ in respect of any **distributed generation** with maximum deliverable generation capacity of more than 45kW in total across three phases.
19.	Clause 6 of Schedule 12A.4	Row 1 – column 1 of the table includes the wording "1 one" when it should just be "one".	Each **distributor** that owns or operates a **local network**, and has an **interposed arrangement** with ~~1~~ one or more **traders** trading on the **local network**
20.	Clause 13.6(3)	The clause uses "1st time" which should be changed to "first time".	(3) Despite subclauses (1) and (2), a **generator** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager** before the **generator** makes an **offer** for the ~~1~~st first time in respect of the **generating plant** that is the subject of the offer.
21.	Clause 2 definition of 'floating price' in Form 1 of Schedule 14.4	The definition of 'floating price' is missing the word 'calculated'	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** calculated by reference to the **hedge reference point** [rounded to two decimal places]
22.	Clause 2 definition of 'floating price' in Form 2 to Schedule 14.4	The definition of 'floating price' is missing the word 'calculated'	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** calculated by reference to the **hedge reference point** [rounded to two decimal places]
23.	Clause 2 definition of 'floating price' in Form 3 of Schedule 14.4	The definition of 'floating price' is missing the word 'calculated'	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** calculated by reference to the **hedge reference point** [rounded to two decimal places]
24.	Clause 2 definition of 'floating price' in Form 4 to Schedule 14.4	The definition of 'floating price' is missing the word 'calculated'	**floating price** means, in relation to a **calculation period**, the **final price** per **MWh** for that **calculation period** calculated by reference to the **hedge reference point** [rounded to two decimal places]
25.	Clause 2 definition of 'maximum	The term 'MWh' is a defined term and should be in bold.	**maximum variable quantity** means the maximum amount in ~~MWh~~**MWh**

	Clause	Issue	Proposed amendment
	variable quantity' in Form 4 of Schedule 14.4		that the variable quantity must not exceed
26.	Schedule to Form 4 of Schedule 14.4	The term 'MWh' referred to twice in this schedule is a defined term and should be in bold.	Baseload: [insert amount] ~~MWh~~**MWh** Maximum variable quantity: [insert amount] ~~MWh~~**MWh**
27.	Clause 17.1(3)	Amendments in 2015 rationalised the definition of 'distributor' and 'connected asset owner'. As a result, the Code now refers to 'connected asset owner kvar reference node' as the relevant defined term. However, the 2015 amendments did not change clause 17.1(3). The former definition, 'distributor kvar reference node', remains and needs updating.	A distributor kvar reference node approved by the system operator in accordance with the definition of distributor kvar reference node in rule 1 of part A of the **rules** that was in force immediately before this Code came into force, is deemed to be a ~~**distributor**~~**connected asset owner kvar reference node** approved by the **system operator** in accordance with the definition of ~~**distributor**~~**connected asset owner kvar reference node** in clause 1.1(1).