

14 April 2026

Future Security and Resilience Team
Electricity Authority
Via email: fsr@ea.govt.nz

Tēnā koutou,

The CACTIS must be accurate and reflect the System Operator decision

We welcome the opportunity to respond to the Electricity Authority (**Authority**)'s proposal to incorporate the Connected Asset Commissioning, Testing and Information Standard (**CACTIS**) by reference into the Code.

Powerco agrees with the approach of incorporating the CACTIS by reference, and the proposed Code amendments to achieve this as set out in the *Connected Asset Commissioning, Testing and Information Standard – Decision paper*. This approach enables the technical detail of CACTIS to be reviewed and updated regularly in the evolving system of management of controllable load. We agree that the CACTIS should be reviewed at least every two years and the System Operator (**SO**) decision identifies several matters that will be addressed in the first review.

Following the SO consultation on the draft CACTIS in September 2025 and their response to submissions and proposed updates to the CACTIS reported in October 2025, the Authority's consultation released 31 March 2026 is the first opportunity to view the final CACTIS that will be referenced in the Code. The details in CACTIS are important. There are **two matters SO agreed to update in CACTIS clause 8.34 / Table J in response to submissions that are not accurately included in the final version** of CACTIS released by the Authority in March, nor is there any indication in the Authority's decision that these updates should not occur:

1. The SO response noted "We appreciate the feedback regarding accuracy requirements for controllable load. Upon further consideration, we have updated the proposed CACTIS to require reasonable endeavours for accuracy instead of a specific value". The CACTIS already provides that reasonable endeavours apply in accuracy of measurement (clause 8.21) but the final CACTIS does not include any updates to reflect the feedback on accuracy requirements for controllable load. As set out in Powerco's submission¹, controllable load is an estimate of load that will be available, not a measure of actual or calculated availability. In order to reflect the SO decision and ensure the Code incorporates requirements that can actually be complied with (even with reasonable endeavours), **Table J must be updated to remove the "(+/- 5% accuracy)"** to reflect it is an estimate of availability rather than an actual measurement.
2. The SO response noted "we acknowledge and share submitters' concerns about load controlled by third parties and understand that connected asset owners do not have visibility of these loads ... we have amended the proposed CACTIS to specify that only load controlled by connected asset owners is required in indications". This amendment is not apparent and could be addressed by an **update to the heading of Table J to "Specific requirements for load controlled by a Connected Asset Owner"**.

¹ Powerco's submission to the SO on CACTIS is [available on our website](#)



This submission does not contain any confidential information. We are always keen to meet with the Authority to discuss and develop the ideas in our submissions. In the meantime, if you have any questions or would like to talk further on the points we have raised, please contact Irene Clarke [REDACTED]

Nāku noa, nā,

A handwritten signature in black ink that reads "E. Wilson".

Emma Wilson

Head of Policy, Regulation and Markets

POWERCO