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## Decision to incorporate by reference, the CACTIS (connected asset commission testing and information standard)

Transpower as grid owner and system operator welcomes the opportunity to comment on the Electricity Authority's (the Authority's) decision to incorporate the CACTIS by reference, into the Electricity Industry Participation Code (the Code).

Section 64 of the Legislation Act 2019 empowers the Authority to incorporate by reference a wide range of material, including a standard, framework, code of practice, recommended practice, or requirement of an international organisation or a national organisation, or any other written material that deals with technical matters if it is reasonable to consider that it is impracticable to include the material in the Code.

Transpower agrees that the CACTIS meets appropriate criteria under the Legislation Act 2019. The technical nature of the common quality information for connected assets means it is more practical for the system operator, with its expertise in the matters under the CACTIS, to author and maintain the document.

Transpower supports the CACTIS as an addition to the system operator's existing suite of documents that are already incorporated by reference into the Code.<sup>1</sup> Changes to these documents are governed by transparent processes under Part 7 of the Code.

Yours sincerely

**Joel Cook**

**Head of Strategy and Regulation**

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<sup>1</sup>The security of supply forecasting and information policy; the emergency management policy; the policy statement; the procurement plan; the AUFLS technical requirements report; the system operator rolling outage plan.