

1 October 2024

Electricity Authority

By email: policyconsult@ea.govt.nz

Tēnā koe

Code review programme #6 consultation

We appreciate the opportunity to provide our views on the proposed changes to the Electricity Industry Participation Code 2010 (Code): the Code Review Programme Number 6. We welcome the Code Review Programme as it's an efficient way to make discrete amendments to code when required. However, we share the Electricity Network Association's (ENA) concerns that dual load control is broader and more complex issue than what has been indicated in the consultation paper. The changes proposed in CRP6-002 regarding sharing of control load should be considered as part of a wider programme of Code development relating to enabling flexibility of resources, in order to give equal consideration to the potential risks dual control poses to network stability, particularly during grid and local network emergencies.

Powerco is one of Aotearoa's largest gas and electricity distributors, supplying around 340,000 (electricity) and 113,000 (gas) urban and rural homes and businesses in the North Island. These energy networks provide essential services and are fundamental to Aotearoa achieving a net-zero economy in 2050. Electricity distributors are at the forefront of attempting to enable and facilitate new load management by retailers and it is critical there are no adverse unintended consequences as a result of Code changes. The development of new customer propositions for managing consumer devices loads and injection, is evolving the way load is managed, and by whom. Load management services are evolving quickly, and definitions need to be future proofed and technology neutral.

As this evolution occurs, it's critical that new load management services are rolled out safely and securely, to ensure new load management practices (either by retailers or non-retailers) do not create network emergencies. The Electricity Authorities (EA) proposal on CRP6-002 has brought to light the critical distinction between grid and local network emergencies, and the importance of the EA to make further clarifications that would improve the changes of coherent and effective load management protocols to be agreed upon. Areas where this is essential are detailed in the ENA submission, which we support in entirety.

In addition to the above, we would also like the EA to confirm that the timing of change to a NSP creation date (CRP6-013) is intended to always allow (i.e. even when an NPS creation/decommissioning date is amended) the 30-day notice period of subclause 5, but the drafting appears ambiguous.

Yours sincerely,



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