9 June 2026

Electricity Authority
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Submitted via email to distribution.feedback@ea.govt.nz

Consultation paper: Code Review Programme number 7

Introduction

1. Orion welcomes the opportunity to provide feedback to the Electricity Authority (Authority) on the Consultation paper: Code Review Programme number 7 (Consultation Paper).
2. Orion owns and operates the electricity distribution infrastructure in central Canterbury, including Ōtautahi Christchurch City and Selwyn District. The network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. Orion delivers electricity to more than 233,000 homes and businesses and is New Zealand's third largest Electricity Distribution Business (EDB).
3. The Consultation Paper proposes fourteen distinct changes to the Electricity Industry Participation Code (Code).

Submission

4. This submission focuses on the four proposals CRP7-004, CRP7-005, CRP7-008 and CRP7-009.
5. Orion is supportive of CRP7-001 to align terminology for maximum export power. Orion has no views on the remaining proposals not discussed in this submission.

CRP7-004 Extend participant audit to include use of EIEPs

6. This proposal will require audits of distributors' and reconciliation participants' processes and procedures relating to the sharing of information in accordance with EIEPs. The proposal is intended to address a concern that mistrust of the information exchanged can cause participants unnecessary work to complete manual checks and reworkings.

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7. It is unclear from the Consultation Paper whether this is a problem that is currently being experienced in the industry. Orion sees that the risk of inaccurate information being provided via EIEP is very low. For example, the Consultation Paper refers to consumption and billing data. If a distributor was to provide late or inaccurate information in an EIEP1 or EIEP2, then a retailer would be within its rights to not pay its invoices. There is a clear commercial incentive in place to ensure complete and accurate data is provided. There may be an argument for auditing other EIEPs but the proposed Code drafting is very broad and without a better understanding of the problem the Authority is trying to resolve, it is difficult to support.

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

8. This proposal is to amend the definition of ICP and clarify that an ICP identifier may include more than one point of connection for a single consumer, where practical. The intention of this proposal is to address instances of where an ICP can consist of more than one physical point of connection to the network. The Authority sees that in some cases it is more practical for multiple points of connection to be included within the same ICP. This will avoid instances of multiple daily charges for some customers.

9. Orion does not support this proposal. Whilst it may appear to resolve the issue of multiple daily charges for customers with multiple connection points, it does not take into account the practicalities of how networks are managed. This change would have implications for how limits and information is recorded in Orion's systems. These systems require unique identifiers to differentiate between network areas. This differentiation is of particular importance for sending out outage notifications and managing disconnections safely. Any proposal that risks unclear information of connections raises significant safety concerns.

10. The Code drafting allowing for this change to only apply "where practical" does not damper these concerns. It is a very broad term and though it appears that it would be up to the distributor's discretion, this is not made sufficiently clear and would cause uncertainty and confusion for both distributors and customers.

11. As well as these safety concerns, this proposal will create a lot of complexity. Orion has begun to think through some of the logistics that would need to be contemplated and understood before any change is made. These include:

    - Consideration would need to be given to how SAIDI and SAIFI calculations are managed when outages are recorded against an ICP where only one of the multiple connection points experienced an outage.
    - With regards to the double fixed daily charges, there would need to be clarity around who owns and is responsible for the lines between each connection. If it is the customer and they would like one combined ICP, then they would need to cover the future replacement costs of the lines. If it is distributors, then it needs to be two separate ICPs.

- There needs to be thought given to how a combined ICP is treated if the land is subdivided and the ICP needs to be separated.
- The registry only holds one address and so there is a risk that the physical location data of additional connections is lost.
- There is a risk that it will not be clear which connection has what consumption, and knowledge of meter numbers would be required instead.

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

12. This proposal will allow distributor discretion for applying the reduction in distribution charges for non-supply and the ability to revert the ICP status back to "Active" when the interruption to supply has been resolved.

13. Orion is not supportive of having the ability to revert the ICP status back to "Active". This ability would make it more difficult to identify whether a connection is inactive as this status has traditionally been managed by the retailer. Operationally, Orion treats both active and inactive ICPs as live connections on the network, regardless of their status. Orion is concerned that by allowing distributors to change this status that it will create confusion and make the distinction between statuses less clear.

CRP-009 Enable faster implementation of distribution price codes

14. This proposal will enable a price category code to take effect in less than two months where the retailer and customer both consent. Orion is supportive of this change and sees it is a great outcome. It would be useful however, if it could be broadened further to include loss code creation.

Concluding remarks

15. Orion urges the Authority to consider the above points before progressing any proposed Code changes. These changes have been framed in the Consultation Paper as minor but some of the proposals would have significant, wide-reaching impacts. Including them in an omnibus type consultation is not an effective way of addressing issues as they pull resource and expertise from across organisations. This is particularly tricky to manage at a time when there is already considerable engagement required by the Authority on a range of other issues.

Yours sincerely,

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