

8 November 2024

Distribution Feedback
Electricity Authority
PO Box 10041
Wellington 6143



Wellington Electricity
Lines Limited

85 The Esplanade
Petone, PO Box 31049
Lower Hutt 5040
New Zealand

Tel: +64 4 915 6100
Fax: +64 4 915 6130

By email: OperationsConsult@ea.govt.nz

Dear Electricity Authority,

Consultation Paper: first steps in improving outage coordination

Wellington Electricity Lines Limited (WELL) appreciates the opportunity to provide a submission in response to the above consultation. WELL is an electricity distribution business (EDB), managing the local distribution network across Wellington, the Hutt Valley and Porirua.

Given the nature and framing of this consultation, we do not believe that the proposed amendment is designed to capture EDBs as asset owners. Instead, we are of the view that the additional outage coordination obligations would apply only to Transpower as the grid owner, direct consumers¹, grid-connected generators, and embedded generators.

However, we have identified a potential area of ambiguity in the current definition of “asset owner”, set out below.

1. Current Code definition

As summarised by the Authority under paragraph 3.3 of the consultation paper, we have interpreted the definition of “asset owner” under the Code to mean an industry participant who owns/operates an asset used for the generation or conveyance of electricity, including, for the purpose of the proposed amendment, direct consumers.

“Asset” is defined as “equipment or plant that is connected to or forms part of the grid”, including, for the purpose of the proposed amendment, “equipment or plant of an embedded generator”.

To remove ambiguity, we ask the Authority to consider an additional Code amendment or otherwise clarify whether “connected to ... the grid” is intended to include distributor Connection Assets forming a point of connection at grid exit points (GXPs).

¹ Per the Code, a direct consumer means a consumer with a point of connection to the grid.

2. Proposed Code amendment

Our interpretation of the new definitions set out in the proposed amendment is that, in relation to WELL's local network, an "outage" would only refer to the temporarily unavailability of the equipment or plant of an embedded generator.

We believe that the drafting of the definition of "outage" – namely, the inclusion of the defined term "asset" – prevents EDBs from being captured **unless** an "asset" includes distributor Connection Assets at GXPs. In which case, we understand that these assets would become subject to the additional outage coordination obligations put forward.

As described under 1. *Current Code definition*, we would therefore appreciate clarification from the Authority on this point.

3. Summary

To summarise, WELL asks the Authority if it can consider clarifying whether the definition of "asset", as currently drafted, is intended to include distributor Connection Assets forming a point of connection at grid exit points (GXPs).

In any case, we note that, through its switching requests to Transpower, WELL provides asset outage notifications to the system operator by default for distributor Connection Assets at GXPs. However, this is not always required and is not submitted through POCP.

WELL does not believe that placing the additional outage coordination obligations on EDBs (beyond those which EDBs undertake in the normal course of their business) would contribute to the objectives of the proposed amendment as it would neither:

- better reflect the current practice of outage disclosure (EDBs do not typically provide asset outage notifications to the system operator); nor
- better support security of supply monitoring and coordination (local network outages are typically of no consequence to system security).

Although we do not believe that EDBs are intended to be captured under the proposed amendment, we ask that the Authority ensures that this does not become an unintended consequence.

If the Authority is of the view that EDBs *should* be captured under the proposed amendment, WELL would appreciate further consultation.

Thank you for taking the time to read our submission. If you wish to discuss any of our points in more detail, please email Ben Tuifao-Jenkinson, Economic Regulation & Pricing Specialist at ben.tuifaojenkinson@welectricity.co.nz.

Yours sincerely,



Greg Skelton
Chief Executive Officer