

29 September 2025

The System Operator

Transpower

Wellington

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**Re Connected Asset Commissioning, Testing and Information Standard (CACTIS) submission.**

Thank you for the opportunity to submit on this consultation document. It was helpful to meet with System Operator (SO) representatives to put some perspective around some of the detail in the document.

This submission is from the perspective of a large industrial load consumer with direct connection to a Transpower GXP, and with two smaller but load significant sites embedded in EDB networks.

We fully support the SO having information necessary to meet obligations relating to the power system. This requires two-way cooperation with the provision of, and response to information. The existing Code and proposed Transpower CACTIS document aim to achieve.

Our submission is made cognizant that “The proposed amendment primarily clarifies existing obligations and streamlines information-sharing processes, rather than introducing significant new obligation”<sup>1</sup>. While most of the requirements placed on connecting parties are not changing, we acknowledge more complexity largely coming from increasing connection of wind, solar and BESS, necessitates more rigour from the SO to maintain system standards. We are not able to add value to discussion on those specifics but do have concern to fully understand how the existing and proposed changes will impact load consumers such as NZ Steel. What is apparent is a ‘one-rule’ fits all approach is inappropriate. Capacity of connecting equipment, capacity at the local GXP, and location in the country, are all relevant to requirements under CACTIS.

Load connections are clearly included in the information requirements, but what those requirements are is not specified to the extent of that for generation or BESS type connections. This makes it difficult to make informed comment on the proposals. The new approach will mean requirements will fall between the CACTIS document, The Electricity Participation Code, and in some respects the Electricity Act. We are not sure all the definitions have been linked through nor are fully understood for those that need to work with this very prescriptive CACTIS document.

- We remain unclear as to when the relevant connection is to the Grid and when to a Network.
- The term “connected to” continues to lack clarity. How does that relate to point of connection? Our experience is this is not a new uncertainty, but it is critical to have good understanding for the CACTIS requirements – in the extreme every piece of electrical equipment or appliance is connected to the grid, just in most cases not directly.

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<sup>1</sup> Electricity Authority, [Promoting reliable electricity supply – a Code amendment proposal on common quality-related information](#), para 6.8

We have concluded that only our STATCOM equipment potentially comes within the new requirements. We say potentially because none of this equipment is directly connected to the grid.

Our responses to the Q&A document are included with this submission.

NZ Steel will welcome an opportunity to engage further with Transpower and the Electricity Authority to ensure common understanding of these and other Common Quality initiatives.



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