

25 September 2025

Transpower New Zealand Ltd  
22 Boulcott St  
Wellington  
By email.

## Consultation: Connected Asset Commissioning, Testing and Information Standard

### 1. Introduction

- 1.1. Orion welcomes this opportunity to provide feedback on the System Operator's (SO) consultation document, *'Connected Asset Commissioning, Testing and Information Standard'*.
- 1.2. No part of this submission is confidential.
- 1.3. Orion owns and operates the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch city and Selwyn district. Our 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. We deliver electricity to more than 228,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB).

### 2. General

- 2.1. With one exception, Orion is generally supportive of the draft CACTIS and has no concerns that the requirements can be complied with.
- 2.2. Our principal concern is that the modelling requirements in section 4 are overly prescriptive and there may be occasions where full use of this information is not made.
- 2.3. We also reiterate our concern, conveyed in our submission<sup>1</sup> to the Electricity Authority's Part 8 information requirements consultation, regarding mandating specific proprietary modelling software, rather than specifying the required outputs of dynamic power flow modelling.

Yours sincerely



Alec Findlater  
Regulatory Lead – Commerce Commission

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<sup>1</sup> Orion. (2025). [Submission – Code amendment proposal on common quality-related information](#). 12 August 2025, paragraph 3.3, p2.