



TRANSPOWER

Keeping the energy flowing

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By email: info@nzuag.org.nz

Proposed amendments to the National Code of Practice (Utility operators' access to transport corridors)

Transpower NZ Ltd appreciates the opportunity to submit to the proposed changes to the National Code of Practice. Transpower is the owner and operator of the National Grid, with 11,000 km of high voltage transmission lines, and 37,000 towers and poles, connecting 169 substations and switching stations. Much of this infrastructure is located in transport corridors.

The problem described in the Code is that poor location data may contribute to service strikes and third-party damage leading to reduced performance of utility structures.¹ We support accurate location information and records on assets in Transport Corridors and consider the 2022 LINZ Standard (the Standard)² provides good practice guidance on what information should be recorded.

However, LINZ prepared and consulted on the Standard on the understanding that it would be non-mandatory.³ As the effect of incorporating the Standard by reference would make it mandatory and enforceable, we consider it inappropriate for the Standard to be applied to legacy (existing) assets. The Standard states:

It is not expected that the Standard will be applied to existing records of utility assets, as this would require re-survey at huge expense. Rather it provides a standard that can be used whenever there is physical interaction with the asset, such as during maintenance or fault repair.⁴

The Office of the Surveyor-General decision states that the Standard is "*intended to be used for new determinations of asset location, such as for a new asset or during maintenance or repair of an existing asset.*"⁵ We consider that as the retrospective matter has already been assessed by the Surveyor-General, following input from affected parties, then it is inappropriate for the Code to adopt a contrary position to the Standard.

The proposed Code of Practice would impose significant costs on affected parties.

¹ Refer proposed Code of Practice page 29

² Utility Location Standard, LINZ OP S 01287, June 2022

³ Utility Location Standard, LINZ OP S 01287, June 2022, page 1.

⁴ Utility Location Standard, LINZ OP S 01287, June 2022, Page 5

⁵ [Draft Utility Location Standard: Decision Report following consultation on draft standard](#), 1 June 2022, page 4

Consistent with the Standard, location information for legacy assets can be amended when assets are being changed or maintained, and we support new (or relocated) assets having information recorded as the Standard portrays. We also agree with the general premise in the Code that location information is made available to other parties, on request.

We publish our maps and GIS data⁶ and third parties can sign up to our Open Data site⁷ that allows users to search, access, view and download Transpower's public geospatial/map data.

Proposed amendments to the draft Code of Practice

Transpower seeks the following changes to the proposed amendments to the following clauses: 2.5, 2.8.1.1(d) and 2.8.1.4.

2.5 Health and Safety

.... h) ensuring accurate records are maintained in the course of works and made available to other parties on request in the interests of safety

2.8.1 Maintaining and Providing Information on Utility Structures

...

1. Each Utility Operator must, in respect of existing Utility Structures:

...

(d) maintain a Data Improvement Plan ~~aligned with that~~:

- supports industry Service Strike aspirations set out in clause 8.2.3.c; ~~and~~
- ~~describing in a quantifiable way how legacy information will be upgraded to Utility Location Standard 2022 (but only where doing so would be practicable); and~~
- ~~providing mitigation strategies where it is not practicable to meet the LINZ Utility Location Standard 2022;~~

...

4. information that the Utility Operator captures on the location of new and exposed Utility Structures should be accurate enough to enable future location and identification of the Utility Structures. If practicable, the Utility Operator must ensure accuracy for new location data for new assets meets or exceeds the LINZ Utility Location Standard 2022.

We also consider the existing text proposed to be removed - *"it is important that all Parties take the opportunity to confirm asset location when they expose Utility Structures during Works"* - should be reinstated as a pragmatic starting point between parties.

Finally, we only recently became aware of the proposed consultation through ENA's newsletter of 19 September and would be keen to be notified directly as this process progresses.

⁶ [Maps and GIS Data | Transpower](#)

⁷ [Transpower New Zealand \(arcgis.com\)](#)

We would be happy to discuss this submission with you, please contact micky.cave@transpower.co.nz in the first instance.

Kind regards,

Joel Cook
Head of Regulation