

20 December 2024



Building Code Fire Safety review
Building System Performance
Ministry of Business, Innovation and Employment
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To whom it may concern,

Building Code fire safety review

Wellington Electricity Lines Limited (WELL) is an electricity distribution business (EDB), managing the local distribution network across Wellington, the Hutt Valley and Porirua.

WELL acknowledges that submissions on this consultation closed on 6 December 2024, however we had incorrectly taken the updated due date of 24 December 2024 (shown on the [web page](#)) to be an extension. We have since become aware that this later date is for NZSL submissions only, but we hope that you can consider our feedback regardless. Please accept our apologies for this late submission.

We wish to provide comment on section 2.2 (“Requirements are not always set at the right fire risk level for different types of buildings”) of the discussion document, which states the following:

The Building Code also does not address the hazards from electric transformers, overhead power lines, storage outside of buildings, and fires involving hazardous substances. These hazards can lead to fires starting or spreading to buildings. These Building Code gaps in fire protection can result in greater effects from fire events and a lower overall level of safety in buildings.

The main hazard from the proximity of electricity distribution equipment to buildings tends to be the risk of electric shock from overhead power lines – or, in cases where a line is so close to a building that it can make contact during high winds, the added risk of fire. While the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) prescribes minimum safe electrical distances from overhead power lines, these distances are not always adhered to.

NZECP 34 violations can and do occur despite compliance with the Building Code, even when building consent authorities (i.e. local councils) have issued a building consent. Some councils stipulate the need for compliance with electrical codes of practice etc., but they do not necessarily require confirmation of this from an applicant in order to issue a building consent.

While WELL’s expertise is in electricity distribution and not building performance, we note that only ‘electrical installations’ are currently referenced in the Building Code. We believe that there is a case for NZECP 34 to be specifically addressed within the Building Code to improve electrical and/or fire

safety. We acknowledge that other solutions may be available but ask that MBIE considers the inclusion of NZECP 34 in the Building Code as part of its review.

We also make reference to MBIE's 'Making it easier to build granny flats' summary of submissions¹ document which states: "Electricity companies were concerned that due to the removal of council oversight, granny flats would be built too close to power lines. Some recommended that explicit reference to the electrical code of practice, NZECP34, is made within the Building Act."

There is no confidential or personal information provided in this submission that cannot be published. This submission may be publicly disclosed in its entirety.

If you have any questions about our submission that you would like to discuss with us, please email Ben Tuifao-Jenkinson, Economic Regulation & Pricing Specialist at ben.tuifaojenkinson@welectricity.co.nz.

Yours faithfully,



Greg Skelton
Chief Executive Officer

¹ <https://www.mbie.govt.nz/assets/making-it-easier-to-build-granny-flats-summary-of-submissions.pdf>
(Accessed 18 December 2024).