



31 May 2012

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### Consultation Paper - 2012 System Operator Policy Statement

Thank you for the opportunity to comment on the 2012 System Operator Policy Statement. No part of this submission is confidential.

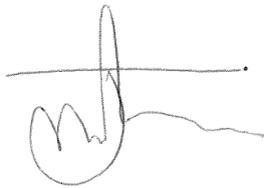
Mighty River Power appreciates the incorporation of many of its previous suggested amendments to the System Operator's consultation and offers the following short comments to for the Authority's consideration.

Question	Response
(a) Do you agree with the Authority's evaluation of the proposed changes? If not, what alternative evaluation would you make, and why?	Yes.
(b) Is there an alternative to any of the individual changes proposed by the system operator that you consider better meets the objectives of the proposal? If so, please describe the alternative and why you prefer it.	Regarding clauses 30B-30G, Mighty River Power supports the Authority's assessment in Appendix C that publishing indicative market constraints for a planned outage (when requested by a participant) will improve the availability of information to participants.  However, the preferred solution would be the publication of indicative market constraints for all planned outages, as per the Authority's second alternative. A participant would then be able to rely on indicative constraint information being

	<p>available for any and all outages of concern to them, without having to place a request with the System Operator. We recognise that the compliance costs could be excessive unless the generation of indicative constraints for outages is capable of being automated to a significant degree.</p>
<p>(c) What comment do you have on the proposed drafting to give effect to the changes proposed by the system operator? Please provide alternative drafting you consider more appropriate.</p>	<p>None.</p>

Please direct any queries on this submission to myself on [nick.wilson@mightyriver.co.nz](mailto:nick.wilson@mightyriver.co.nz) or 09 580 3623.

Yours sincerely,



**Nick Wilson**

Senior Market Regulatory Advisor