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Submissions
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TRUSTPOWER SUBMISSION: WIND OFFER ARRANGEMENTS

- 1.1.1 Trustpower Limited (**Trustpower**) would like to thank the Electricity Authority (**the Authority**) for the opportunity to comment on its *Wind Offer Arrangements – Consultation Paper* (the **Consultation Paper**¹). The Consultation Paper proposes changes to the Code to allow wind generators to offer their generation in up to 5 price bands, like most other generators.
- 1.1.2 We support the modifications to how wind generation is able to participate in the NZ electricity market proposed by the Authority in the Consultation Paper. These changes will provide market benefits by enabling a more level playing field for all generation technologies.
- 1.1.3 The proposal states that it expects wind generators would offer their nameplate capacity in their offer bands. We note that there are instances, particularly with wind generators that are also embedded generators, where a transmission MW limit is imposed on the generation connection. While these restrictions are typically less than 30MW, we consider that these limitations would be better reflected by reducing quantity in the offer bands, effectively creating a MW dispatch cap.
- 1.1.4 We do not have any specific comments with respect to the questions posed by the Authority in the Consultation Paper.

If you would like to discuss the challenges identified in this submission further please contact me on 07 572 9888.

Regards,

EVAN BOYT
OPERATIONS CENTRE TEAM LEADER

¹<https://www.ea.govt.nz/development/work-programme/pricing-cost-allocation/wind-generation-offers/consultations/#c16714>