



Submissions

Electricity Authority

PO Box 10041
The Terrace
Wellington 6143

08/08/2019

Dear Sir / Madam,

Submission on Draft Determination on 14 December 2018 UFE

Tilt Renewables Limited ("**Tilt Renewables**") owns and operates seven wind farms across Australia and New Zealand. Tilt Renewables' electricity generation infrastructure in New Zealand includes the Tararua Wind Farm (161 MW) in the Manawatu and the Mahinerangi Wind Farm (36 MW)¹ in Otago. Consented wind farms not yet constructed include the Kaiwera Downs and Waverley wind farms.

We do not agree with the Authority's draft determination that Transpower, as the grid owner, was the causer of the 14 December 2018 UFE. This is for two reasons.

Firstly, from a technical perspective, given the grid configuration at the time, it is Tilt Renewables's view that lightning on the Huntly – Stratford 1 circuit caused the loss of generation leading to the UFE on 14 December 2018. This generation loss caused by the lightning strike was unavoidable from the moment that the lightning strike occurred. The correct action of the Grid Owner's protection confined the affected assets to the Huntly – Stratford 1 circuit and Huntly Unit 4. Thus, in our view, the Grid Owner's protection systems limited the loss of generation (caused by the lightning strike) to Huntly Unit 4, rather than caused its loss.

Secondly, we consider that enabling the dispatch of Huntly Unit 4 with the grid configuration that existed on the 14th of December was consistent with the efficient operation of the New Zealand electricity industry for the long-term benefit of consumers. Generator units typically operate with n-security, so if the grid connection is also n-secure, this does not alter the reserves that must be procured for the generator unit. Tilt Renewables is concerned that the Authority's interpretation in this case is inconsistent with the Authority's objective of promoting the efficient operation of the New Zealand electricity industry, in that it could have the unfortunate consequence of discouraging the Grid Owner from making available n-secure grid connections (whether temporary or permanent) for generators.

We would be happy to engage and discuss this submission with the EA. Philip Wong Too (philip.wongtoo@tiltrenewables.com) would be first point of contact in regards to this submission.

Regards,

Nigel Baker

Executive General Manager Generation and Trading

¹ It is noted that the resource consent held for the Mahinerangi Wind Farm allows for a development with an installed capacity of up to 200 MW.

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