

12 May 2026

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Electricity Authority

By email: fsr@ea.govt.nz

Consultation submission: Omnibus of common quality code amendment proposals

Nova has reviewed the proposed changes to various provisions of the code related to Common Quality and agrees with changes as proposed in principle subject to consideration of two matters as outlined below.

FSR-105 Clarify who provides information to assess compliance with fault ride through obligations

Nova recommends the addition of a reasonableness condition to the proposed clause 8.25.AB. This will provide the generator some recourse should the System Operator expect the generator to evaluate an unreasonable number of networks models (or case studies) provided under subclause (2). The System Operator is afforded related protection under subclause (4), whereas the generator is not.

*“... the power system analysis the generator must **reasonably** undertake in compliance with the fault ride through study obligations...”*

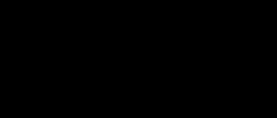
FSR-106 Clarify obligations related to frequency management and frequency support

With respect to 8.19 (1), It does not seem plausible for an intermittent generation station to comply with the proposed (and current) requirement to “at a minimum, sustain pre-event output...” when there has been a subsequent post-event reduction in its variable and/or intermittent power source.

We recommend consideration be given to explicit recognition of this consistent with the proposed Clause 8.25B (3) under the FSR-104 change.

Please don't hesitate to contact us if you have any queries regarding this submission

Yours sincerely



Charles Teichert
Nova Energy