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Electricity Authority
Wellington

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By email: OperationsConsult@ea.govt.nz

Omnibus of Common Quality Code amendment proposals

Transpower welcomes the opportunity to submit on the Electricity Authority's (Authority's) consultation *Omnibus of common quality Code amendment proposals*, published 31 March 2026.

We support the Authority's approach to use this omnibus Code change route to attend to small but effective changes to update Code terminology, clarify requirements, and remove inconsistencies in the common quality requirements for the power system.

Our response to the specific questions is attached as an appendix to this letter. We agree with the intent of all the proposed changes, but we have comments on two of the proposals.

For FSR-103: Amend the 'fast instantaneous reserve' and 'sustained instantaneous reserve' definitions, we agree with the proposals, but have noted potential further improvements that would better future-proof the definitions.

For FSR-105: Clarify who provides information to assess compliance with fault ride through obligations, we propose drafting changes to clarify the System Operator's role in assessing fault ride through performance.

Yours sincerely

Katherine Moore

Head of Power Systems

Appendix

Submitter		Transpower NZ Ltd (as System Operator)
Proposal	Questions	Comments
FSR 101 Align over-frequency limits between the Code and the Policy Statement	Q1. Do you agree the proposed Code amendment will achieve the objective? If you disagree, please explain why and give alternative options to achieve the objective.	The Authority proposes a principal performance obligation for the System Operator to ensure frequency does not exceed 52 Hertz in the North Island or 55 Hertz in the South Island (during a contingent event and an extended contingent event). We agree the amendment will achieve the objective of the proposal.
	Q2. Do you agree with the analysis presented in this Regulatory Statement? If not, please state why you do not agree.	Yes, we agree
FSR 102 Clarify requirements for voltage control systems and connection transformers	Q3. Do you agree the proposed Code amendment will achieve the objective? If you disagree, please explain why and give alternative options to achieve the objective.	The Authority proposes to amend clause 5 of Technical Code A of Schedule 8.3 of the Code to clarify that the requirement to provide a connection transformer applies at the point of connection between the transmission grid and a generating station or generating unit. We agree the amendment will achieve the objective of the proposal.
	Q4. Do you agree with the analysis presented in this Regulatory Statement? If not, please state why you do not agree.	Yes, we agree
FSR 103 Amend the 'fast instantaneous reserve' and 'sustained instantaneous reserve' definitions	Q5. Do you agree the proposed Code amendment will achieve the objective? If you disagree, please explain why and give alternative options to achieve the objective.	The Authority proposes to primarily define fast instantaneous reserve (FIR) and sustained instantaneous reserve (SIR) in the Procurement Plan, a document incorporated by reference in the Code. We agree with the proposal to primarily define FIR and SIR in the

Proposal	Questions	Comments
		<p>Procurement Plan, and the proposed Code amendments will do this.</p> <p>However, we note the retention of “....that is sustained until at least 15 minutes....” in the proposed drafting related to SIR does not align with performance requirements for interruptible load SIR in the Procurement Plan.</p> <p>To future proof against this and subsequent deviations in FIR and SIR obligations between the Code and the Procurement Plan we suggest the Authority considers changes to the Code definition of FIR and SIR to simply refer to the procurement plan. We acknowledge this may be a larger change than is currently necessary.</p> <p>As identified in the consultation paper, this proposal will require an update to the Procurement Plan. Changes to the Procurement Plan are governed by a formal process detailed in the Code. The System Operator will work with the Authority to ensure the change processes (Procurement Plan and Code change) are correctly sequenced.</p>
	Q6. Do you agree with the analysis presented in this Regulatory Statement? If not, please state why you do not agree.	Yes, we agree , noting the comments we have provided to Q5.
FSR 104 Revise two fault ride through exclusions	Q7. Do you agree the proposed Code amendment will achieve the objective? If you disagree, please explain why and give	The Authority proposes to provide that all forms of transmission-connected variable and intermittent generation do not have to comply with clause 8.25B(2) ¹ if there is a reduction in the intermittent power source during the

¹ 8.25 B(2) Each generator must ensure that each of its generating units provides active power output relative to pre-fault active power output at least in proportion to the grid voltage at the grid injection point for the period of 6 seconds immediately following the clearance of a fault on the grid of a type described in clause 8.25A(1).

Proposal	Questions	Comments
	alternative options to achieve the objective.	<p>six seconds following the commencement of a transmission fault.</p> <p>We agree the amendment will achieve the objective of the proposal.</p>
	Q8. Do you agree with the analysis presented in this Regulatory Statement? If not, please state why you do not agree.	<p>Yes, we agree. Specifically, generators and the System Operator will avoid costs for the dispensations necessitated by the inability of a variable and intermittent generating station being unable to comply with clause 8.25B(3), and the System Operator no longer monitoring compliance with clause 8.25D(a).</p>
FSR 105 Clarify who provides information to assess compliance with fault ride through obligations	Q9. Do you agree the proposed Code amendment will achieve the objective? If you disagree, please explain why and give alternative options to achieve the objective.	<p>The Authority proposes to clarify that fault ride through compliance is to be assessed using network models of the System Operator, and remove an existing requirement to use study cases of the grid owner in that assessment.</p> <p>In addition, the Authority proposes to clarify each party's role in ensuring a generator's asset complies with clause 8.25A. The System Operator's role has always been limited to a technical assessment of the power system analysis.</p> <p>As such, to promote further clarity of the System Operator's role, we propose an amendment to clause 8.25AB(1) to remove the words "<i>whether each of a generator's assets, when electrically connected to a network, meets the requirements of clauses 8.25A(1) and 8.25A(2) by reviewing</i>" for the avoidance of any doubt that the System Operator's technical assessment of the generator's power system analysis will not extend to any approval process as to the generator's compliance obligations under clauses 8.25A(1) and 8.25A(2) of the Code.</p>

Proposal	Questions	Comments
		<p>With the change suggested in the above paragraph, we agree the amendment will achieve the objective of the proposal. We have included below the exact wording and proposed changes in the box below.</p>
	<p>Code drafting proposal (SO changes highlighted green):</p> <p>8.25AB Assessing fault ride through compliance (1) The system operator must assess whether each of a generator's assets, when electrically connected to a network meets the requirements of clauses 8.25A(1) and 8.25A(2) by reviewing the power system analysis the generator must undertake in compliance with the fault ride through study obligations in the connected asset commissioning, testing and information standard. (2).....</p>	
	Q10. Do you agree with the analysis in this Regulatory Statement? If not, please state why you do not agree.	Yes, we agree
FSR 106 Clarify obligations related to frequency management and frequency support	Q11. Do you agree the proposed Code amendment will achieve the objective? If you disagree, please explain why and give alternative options to achieve the objective.	<p>The Authority proposes to remove inconsistencies in respect of what assets are excluded from the obligations to support frequency management and frequency during under-frequency events.</p> <p>We agree the amendment will achieve the objective of the proposal.</p>
	Q12. Do you agree with the analysis presented in this Regulatory Statement? If not, please state why you do not agree.	Yes, we agree