



Via email: OperationsConsult@ea.govt.nz

30 June 2026

Wholesale Market Arrangements for Battery Energy Storage Systems – Code Amendment

Mercury welcomes the opportunity to provide feedback on the two related consultation papers related to wholesale market arrangements for battery energy storage systems (BESS) released by the Electricity Authority (Authority), no part of our submission is confidential. We have considered both consultations as a package and are supportive of the direction of travel.

In principle, we support regulatory design that aims for consistent treatment across all BESS and maximises flexible use of the resource. We also support BESS being compensated for the system services it supplies.

We strongly support gate closure rules being neutral to all generation technologies regardless of fuel type and storage capability.

We note the Authority has decided not to progress moving to a 5-minute settlement period currently. We support further investigation in the future and incorporating the ability to revise volume decisions after gate closure as a pragmatic work around while these investigations are undertaken.

Yours sincerely

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Principal Regulatory Advisor



