

Submission form

Promoting reliable electricity supply: Options to address a harmonics issue

Submitter	Meridian Energy Limited
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Questions	Comments
Q1. Do you agree the Authority should be short listing Option 1 for further consideration? If you disagree, please explain why.	Yes, Meridian considers this to be the most sensible option.
Q2. Do you agree the Code should not mandate harmonics management requirements, other than harmonics planning levels? If you disagree, please explain why.	Meridian agrees with this in principle.
Q3. What regulatory instrument (ie, the Code or the Electricity (Safety) Regulations) do you consider should be used to regulate installation standards for harmonics?	Meridian considers the issue to be wider than the Code – and so it does make sense for the regulation of harmonics to continue to be done via separate regulations like the Electricity (Safety) Regulations.
Q4. Which, if any, aspects of AS/NZS 61000 do you consider need substituting or adapting in order to accommodate New Zealand conditions?	Meridian agrees that AS/NZS 61000 will need adaptation however we have not reviewed the standard in detail and details of adaptation will need to be part of any next steps.
Q5. Do you consider the establishment, monitoring and enforcement of harmonics requirements should be a contractual matter between electricity network owners and their customers, or a Code-enforceable matter? Please give reasons with your answer.	Meridian does not have a strong view on this issue at this stage, but notes that having these matters addressed by the Code could lead to a more consistent approach for the industry.
Q6. Do you consider distributors should have a mandated responsibility to investigate and resolve security of supply or reliability issues caused by non-compliance with the harmonic levels specified for distribution networks?	Meridian does not have a firm view on this issue – but notes that any case for further obligations on distributors should be established with reference to a need.
Q7. What guidance for industry participants do you consider would be necessary under Option 1?	Clear guidance on the changes, and options for meeting compliance requirements.
Q8. What do you consider to be the main benefits and costs associated with Option 1?	We see benefit in adopting modern and appropriate requirements. We don't have a clear view on the costs but note that all options will come with costs.
Q9. Do you agree the Authority should be short listing Option 2 for further consideration? If you disagree, please explain why.	No. Our main concern is that this option will make it difficult for generators to specify their requirements to international suppliers and OEMs.
Q10. What do you consider to be the main benefits and costs associated with Option 2?	This option is ostensibly the cheapest, however it may create unforeseen costs and issues.
Q11. Do you agree the Authority should be short listing Option 3 for further consideration? If you disagree, please explain why.	No. We agree with the downsides the Authority has pointed out.
Q12. What do you consider to be the main benefits and costs associated with Option 3?	Familiarity will be the main benefit, however this will come at the expense of cost and modernisation of the standard.
Q13. What do you consider to be the benefits and costs of the current arrangements for obtaining harmonics data from distributors and from Transpower, as a transmission network owner?	At present we find obtaining information to be project specific and suitable for our purposes (e.g. project planning).
Q14. What do you consider to be the benefits and costs of a database of harmonics measurements?	We consider that there will be significant costs associated with preparing the database. It is unclear to use whether this will drive benefits.

Q15. Would access to raw harmonics measurement data be useful for your organisation? If so, why?	Possibly, but we do not currently have a use case for raw harmonics data. We find we can already access what we need (provided it is available and exists, cf a site with no nearby measurements) through Transpower.
Q16. Who do you consider should host a database of harmonics measurement data? Please give reasons	If there is to be a database, it should be the EA so that its management and operation is carried out independently.