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Sent: Tuesday, 16 December 2025 4:01 pm
To: Operations Consult <OperationsConsult@ea.govt.nz>
Subject: BESS consultation

The title is too constrained in definition. It should be:

Wholesale market arrangements for pumped storage and battery energy storage systems

And the preamble should include:

As Aotearoa New Zealand transitions to a more variable power system, BESS and pumped storage will play critical roles in maintaining security and resilience.

Given the similarities between BESS and pumped storage, it would seem logical that pumped storage should be considered now, together with BESS. That is, not waiting for announcements of coming pumped storage schemes. In this way, future pumped storage scheme developers will know where they stand re the wholesale market arrangements that they will operate under.

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