



27 August 2025

Electricity Authority
PO Box 10041
Wellington 6143

Via email: taskforce@ea.govt.nz

Consultation Paper – Establishing an Emergency Reserve Scheme

The WEL Networks appreciates the opportunity to provide feedback on the above consultation.

WEL Networks (WEL) is New Zealand's sixth largest electricity distribution company and is 100% owned by our community through our sole shareholder WEL Energy Trust. Our guiding statement of strategic intent is to be leading Waikato's energy future, and we work to ensure that our customers have access to reliable, affordable, and environmentally sustainable energy.

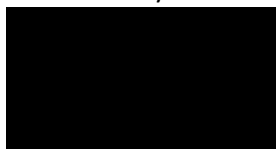
WEL agrees with the rationale for the need for the establishment for an Emergency Reserve Scheme (ERS), and supports the creation of such a scheme and agree with process and payment structure proposed for the ERS particularly the retention of scarcity pricing.

We do wonder though if the need to determine ahead of time whether a response is required (including the determination of activation costs against VoLL) may lead to situations developing faster in real time than the proposed process can respond to, and lead straight to load shedding.

Of most concern to us the exclusion of off market generation and batteries. Our experience is that consumers with these resources do not use them to avoid purchase costs, but they are in fact held in stand-by for times of outage. We believe that allowing these resources to participate in the ERS may expose significant additional MW to the market.

Should you require clarification on any part of this submission, please do not hesitate to contact me.

Yours sincerely



Andrew Maseyk
Regulatory Specialist

M [REDACTED]
E [REDACTED]

