



16 June 2025

Submissions
Electricity Authority
Level 7, Harbour Tower
2 Hunter Street
Wellington

By email: fsr@ea.govt.nz

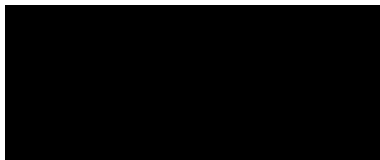
Subject: Consultation Paper- Promoting reliable electricity supply: Frequency-related Code amendment proposals

Contact welcomes the opportunity to provide comment on the Authority's consultation paper above.

Contact agrees that changes to the Code are required to manage real time frequency as increased renewables are connected to the power system, but consideration must be given to certain types of technologies and their ability to meet those changes.

Please see our feedback to the specific questions in Appendix A. Should you have any questions on the above, please let us know.

Yours sincerely



Gerard Demler

Transmission Manager, Contact Energy

Appendix A

Submitter	Contact Energy
Questions	Comments
Q1.1 Do you support the Authority's proposal to amend the Code to require smaller generating stations to comply with frequency-related asset owner performance obligations?	Somewhat support. Smaller binary type geothermal units cannot physically contribute to steady and non-steady state frequency management as their governor systems and operation differ from conventional plant. Consideration needs to be given to this type of generation when assessing compliance and the dispensation process associated with the proposed change.
Q1.2 Do you consider the 'legacy clause' provisions in the Code amendment proposal should apply to a generating station for a finite period of time (eg. 10 years)? Please explain your answer.	No, if the decision has been made to exclude existing generators that cannot physically or practically comply (or compliance costs would be excessive) with the proposed code then this decision should not be time bound as these conditions won't become more favourable over time.
Q1.3 Do you see any unintended consequences in making such an amendment? Please explain your answer.	Although not unintended, the system operator will need to schedule the additional resource required to process the expected increase in dispensation applications given that smaller generator stations may not be technically capable of meeting the proposed change.
Q1.4 Do you agree the proposed Code amendment is preferable to the other options identified? If you disagree, please explain why and give your preferred option in terms consistent with the Authority's main statutory objective in section 15 of the Electricity Industry Act 2010.	Agree but we support the system operator's continual review of option 3 to compliment this option in the future.
Q1.5 Do you agree with the analysis presented in the Regulatory Statement? If not, why not?	Agree
Q1.6 Do you have any comments on the drafting of the proposed amendment?	No comment

Q2.1 Do you consider there to be any type of generation technology that cannot, and never will be able to, comply with a dead band of $\pm 0.1\text{Hz}$? Please explain your answer.	Geothermal plant often have large inherent deadbands and their control systems are process driven based on fluid control rather than a reaction to changes in system frequency. The system operator will need to be prepared to approve dispensations for this type of plant under the proposed change.
Q2.2 Do you support the Authority's proposal to amend the Code to specify a permitted maximum dead band of $\pm 0.1\text{Hz}$, beyond which a generating station must contribute to frequency management and support?	Support, but as mentioned above consideration must be given to certain types of generation technologies that cannot physically meet the new requirement.
Q2.3 Do you see any unintended consequences in making such an amendment? Please explain your answer.	As mentioned in our response to 1.3 we expect an increase in transactional costs and additional resourcing will be required as more dispensation applications are expected to be submitted.
Q2.4 Do you agree the proposed Code amendment is preferable to the other options identified? If you disagree, please explain why and give your preferred option in terms consistent with the Authority's main statutory objective in section 15 of the Electricity Industry Act 2010.	Agree but we support the system operator's continual review of the current MFK band to compliment this option in the future.
Q2.5 Do you agree with the analysis presented in the Regulatory Statement? If not, why not?	Agree
Q2.6 Do you have any comments on the drafting of the proposed amendment?	No comment