

Via email to fsr@ea.govt.nz

30 July 2025

A regulatory roadmap for battery energy storage systems (BESSs)

Mercury welcomes the opportunity to submit on the Electricity Authority's (Authority's) consultation paper, *A regulatory roadmap for battery energy storage systems*, 24 June 2025.

The regulatory roadmap sets out the Authority's BESS-related work over the next two years and discusses some of the initiatives underway led by others within the industry.

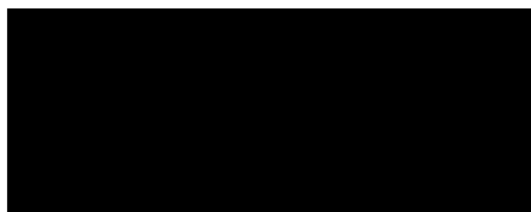
Mercury agrees with the Authority that energy storage systems, particularly BESSs, will play an increasingly important role in New Zealand's power system with the growth in variable renewable generation. As the share of generation becomes increasingly variable, BESSs in concert with other solutions will be required to firm electricity supply so that it meets demand.

The regulatory regime, therefore, needs to be updated so that it enables the investment and deployment of BESSs across the power system. The fact that the impact of BESSs will be wide ranging is reflected in the by the broad scope of the work programme set out in the regulatory roadmap.

Mercury agrees with the scope of programme captured in the current roadmap and looks forward to engaging on each project. We also note that as the Authority works through these projects, we envisage that the Authority and sector will gain a better understanding of the opportunities and quick wins presented by BESSs, which in turn may suggest adapting the work programme and/or other actions. Mercury therefore suggests that the Authority review its roadmap and projects from time to time.

We look forward to continuing to engage with the Authority and the sector on this work programme.

Yours sincerely



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Classification: Restricted

