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Electricity Authority
Wellington
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Wholesale market arrangements for battery energy storage systems

Transpower welcomes the opportunity to submit to the Electricity Authority's consultation on wholesale market arrangements for battery energy storage systems (BESS). This submission is from Transpower in our role as System Operator.

In summary, Transpower supports a BESS framework that preserves gate closure discipline, applies state of charge constraints within the trading period, and adopts a more technology-neutral reserve offer design. However, we have concerns about the Authority's two-phase implementation approach, and aspects of the proposed Code drafting, in particular:

- the inclusion of BESS and BESS owners in the definitions of "generator", "generating station" and "generating unit", and the use of the term "generation" associated with BESS output; and
- the obligations relating to revising bids/offers after gate closure.

We support the Authority considering the framework to allow full BESS participation in the Multiple Frequency Keeping (MFK) market as part of this initiative. This approach is consistent with the System Operator's planned work to trial an increase in the MFK band, which may help encourage greater BESS participation in MFK near-term.

Gate closure arrangements

We support aligning gate closure arrangements across BESS operational states and connection types. However, post gate closure revisions should remain tightly limited to genuine changes in physical capability so that forecast schedules, prices, and compliance expectations remain robust.

The System Operator is operating in an environment of increasing uncertainty and operational complexity, driven by the rapidly growing contribution of intermittent wind and solar generation (IG) to the power system and the emerging real-time involvement of consumer energy resources (CER). While BESS provides important capability to help mitigate emerging system security risks, the different modes of BESS participation in markets for energy and ancillary reserves have also introduced additional complexity for system operations tools and processes. Near-term schedules have become less certain and more contingency planning is needed to maintain real-time security. This is consistent with trends observed in other power systems internationally.

Given this context, we do not consider that reducing gate closure is sufficiently urgent to be a current priority. The Electricity Authority, the System Operator, and the wider industry already face a substantial change programme, including urgent work to better manage IG and interim BESS dispatch uncertainty and risk assessments in scheduling and dispatch. Other priorities include:

- addressing risks associated with the impact of increasing IG and BESS on power system frequency, voltage, stability, system strength, reactive power, and harmonics,
- monitoring and strengthening dispatch compliance for all types of generation,
- reviewing the existing 30-minute gate closure for a growing contribution from embedded generation, and
- progressing a more complete enduring BESS framework, including common quality arrangements for BESS and BESS-hybrid connections.

These initiatives are likely to add uncertainty to current gate closure arrangements, particularly given that there is no gate closure for IG and a 30-minute gate closure for embedded generation. Reducing gate closure would add further complexity and may reduce confidence in post gate closure security constraints and reserve requirements, where changes currently need to settle through repeated scheduling runs using a stable set of inputs. A shorter gate closure would reduce the time available for those interactions to converge, increasing the risk that security constraints and reserve requirements become less stable or less predictable close to real time.

The Authority has suggested reassessing gate closure after the System Operator has completed a project to improve its ability to assess a range of potential future power system scenarios. However, a trial to test reducing gate closure is not currently in our 2026/27 programme and would divert resources from other established projects. Furthermore, to undertake such a trial would require more extensive scoping than has currently been provided and results may be difficult to interpret, as normal conditions may show little effect, while tighter or emergency conditions are unlikely to provide a reliable basis for testing. Consequently, and given other pressing priorities, we do not consider the proposed next step for the System Operator to start a trial to reduce gate closure is sufficiently developed to warrant near-term focus.

State of Charge (SoC)

We do not agree that the SoC constraint should be based on a fixed half-hour or 5minute period. We consider it should reflect the energy available over the time remaining in the current trading period, including where a BESS is dispatched at the start of, or part way through, that period. We agree that BESS dispatch should account for round-trip losses. However, a remaining gap is treatment across trading periods. In our view, intertemporal treatment would provide a more robust and operationally reliable outcome than relying solely on BESS traders to structure their offers, particularly where energy, reserve, or frequency keeping obligations need to be preserved into the next trading period or during grid emergencies.

A single reserve offer

We do not support maintaining a strict separation between interruptible load and generation reserve for BESS reserve offers. That separation does not adequately reflect BESS capability, as

a BESS can provide reserve by reducing or stopping charge, increasing discharge, or both. A BESS also remains subject to frequency support obligations as a "generator", regardless of whether it is charging or discharging.

A single, technology-neutral reserve offer structure using simple MW quantity and price pairs with multiple tranches would better support efficient dispatch. It would allow reserve to be provided through reducing charge, increasing discharge, or both, provided the relevant service requirements are met. It would also be simpler to understand for participants, lower cost, and lower risk for the System Operator to implement in modelling, Scheduling, Pricing and Dispatch (SPD), dispatch logic, and operational processes. This would not prevent BESS traders from offering and pricing reserves in the form of interruptible load while charging, and injection (discharge), separately including to account for the different operating cost of each mode of operation.

Drafting and timing of Code changes

We consider that including BESS and BESS owners in the definitions of "generating station", "generating unit", and "generator" may have unintended consequences in the long term, particularly for the Connected Asset Commissioning, Testing and Information Standard Code (CACTIS) and the Transmission Pricing Methodology. We also consider that the proposed Code drafting should use "output" consistently in relation to BESS, rather than alternating between "generation" and "output". This would better reflect that BESS does not generate electricity in the conventional sense.

While we support the Authority's approach to implementing the proposed Code changes in two phases, we query the proposed timing for implementation of the "final" Code changes. Further amendments to defined terms and dispatch compliance may be needed following industry feedback on the "Common quality and wholesale market arrangements for BESSs and BESS-hybrid stations" paper, which remains in the initial consultation stage as at the date of this submission. The Common quality consultations will also provide further insight into the scope and any potential limitations or complexities in classifying BESS as a "generating asset" that will need to be fully considered before the long-term Code changes can be finalised. The period between implementing the "interim" and "final" changes presents an opportunity for the Authority to refine the longer-term Code drafting, taking into account operational experience and industry feedback following implementation of the "interim" Code changes.

Yours sincerely

Rebecca Osborne

Head of Market Services

Appendix A – Responses to Questions

Submitter	**Transpower NZ Ltd.**

Questions	**Comments**
Issue 1: Dispatch requirements for BESS when charging	
Q1. Do you agree with our proposal to require BESSs to be dispatchable while consuming?	Yes.
Q2. Do you have any comments on our proposed Code drafting for issue 1?	The System Operator supports the intent. Consideration should be given to whether system or tooling constraints are needed to operationalise the requirement, for example by ensuring BESS can only submit dispatchable bids via WITS. We, however, do not consider that the term "consuming" is the appropriate term for BESS as they don't consume energy other than in respect of losses and parasitic load.
Issue 2: bids and offer forms for BESS	
Q3. Do you agree with our proposal to have separate offers and dispatch for interruptible load and generation reserve?	No. We do not support maintaining a strict separation between interruptible load and generation reserve for BESS reserve offers. That separation does not adequately reflect BESS capability, as a BESS can provide reserve by reducing or stopping charge, increasing discharge, or both. A BESS is also subject to Part 8 frequency support obligations as a "generator", regardless of whether it is charging or discharging. Discharge capability must therefore remain available following a contingent event. In our view, a strict separation is unlikely to produce the most efficient or technology-neutral outcome. We also do not agree that separate reserve treatment would materially reduce implementation costs for new BESS. Additional modelling and dispatch logic would still be required to avoid non-physical outcomes, such as a BESS being cleared to inject through its energy offer while also being cleared for interruptible load. Separate reserve treatment is therefore unlikely to be simpler, lower cost, or lower risk for either implementation by the System Operator or participant understanding. For these reasons, we recommend the Authority adopt a single, technology-neutral reserve offer structure using simple MW quantity and price pairs with multiple tranches would

	better support efficient dispatch. It would allow reserve to be provided through reducing charge, increasing discharge, or both, provided the relevant service requirements are met. It would also be simpler to understand for participants, lower cost, and lower risk for the System Operator to implement in modelling, Scheduling, Pricing and Dispatch (SPD), dispatch logic, and operational processes. This would not prevent BESS traders from offering and pricing reserves in the form of interruptible load while charging, and injection (discharge), separately including to account for the different operating cost of each mode of operation.
Q4. Do you agree with our proposal that BESS owners have 10 price bands for their bids and 10 price bands for their offers. If not, how many price bands do you think they should have?	We do not have a strong view on the appropriate number of price bands and acknowledge that BESS traders are best placed to comment on their operational and commercial needs. However, we have not observed the existing 5 offer price tranches being fully utilised and uses appear even lower for bids. Additional bands may increase offer complexity and make price effects more difficult to assess. On that basis, we do not oppose the proposed 10 price bands, however, consider the case for increasing the number of bands should be supported by clear evidence of need.
Q5. Do you agree with our proposal that BESS owners not be required to submit maximum up and down ramp rates?	Yes. BESS can generally ramp up or down to dispatch setpoints very quickly, so we do not consider maximum up and down ramp rates need to be submitted as separate standing parameters. However, while BESS can follow dispatch setpoints quickly within dispatch intervals, large and rapid state changes across trading-period boundaries, and in some cases within a trading period, can create significant step changes in net load or generation, potentially up to around twice the BESS MW capacity. These changes can contribute to frequency excursions, higher rates of change of frequency (RoCoF), and increased stress on frequency keeping. The practical response is to ensure strong dispatch compliance arrangements, effective frequency keeping control, and clear frequency support obligations. This reinforces the importance of progressing MFK work in parallel, including the System Operator's planned trial to increase the MFK band, to help manage the operational impacts of increasing BESS participation and other fast-changing generation and load technologies.
Q6. Do you agree with our proposal to address issue 2?	Yes, in principle except Q3 as above.

Q7. Do you have any comments on our proposed Code drafting for issue 2?	We support the overall direction of the proposed Code drafting for issue 2, provided it preserves gate closure discipline, supports state of charge constraints within the trading period, and aligns with a more technology-neutral reserve offer design for BESS. Consistent with our response to Q3, the drafting should not embed unnecessary separation between interruptible load and generation reserve where a single reserve offer structure would better reflect BESS capability. We also support the Authority considering changes to allow full BESS participation in the MFK market as part of this initiative. This would be consistent with the System Operator's planned work to trial an increase in the MFK band, which may help encourage greater near-term BESS participation in MFK.
Issue 3: gate closure arrangements for BESS	
Q8. Should BESS owners be able to withhold energy if requested to do so in a grid emergency?	Yes. Without considering BESS dispatch optimisation across trading periods, also referred to as intertemporal optimisation, dispatch may schedule BESS to discharge before it is most needed, depleting stored energy before peak periods or grid emergencies. The expectation (which was not covered in the paper) is that some operational discretion from the System Operator is therefore needed to preserve capability for later, including withholding energy and, where appropriate, charging to maintain SoC. Constrained on and constrained off payments would continue to apply in those circumstances.
Q9. Should BESS bid and offer arrangements be aligned?	Yes. We support aligning BESS bid and offer arrangements for consistency while preserving gate closure discipline. Alignment should reduce unnecessary complexity and support clearer compliance expectations. The aligned arrangements also support consistency with the SoC treatment described in our responses to Q11 and Q12.
Q10. Do you think greater clarity is needed around the circumstances which allow trade revisions after gate closure?	Yes. Greater clarity is needed on when trade revisions may be permitted after gate closure, given its role in supporting system security, dispatch certainty, and forecast price integrity. Clearer expectations would also provide a common basis for compliance monitoring. Some flexibility may still be justified where there is a genuine change in physical capability, particularly for BESS. However, compliance expectations need to be clear on what information that should support a revision, how that information should be recorded, and how compliance will be assessed after the event. This clarity is needed to distinguish genuine capability changes from revisions that could weaken gate closure discipline. As

	grid emergencies already allow greater flexibility, any broader relaxation should be approached cautiously to avoid reducing market predictability and the value of forward schedules and forecast prices. To achieve this, we suggest in the proposed Code drafting that: - the word "includes" is removed from the definition of "bona fide physical reason" as this will help strengthen and clarify the limitations BESS owners (and other generators) can use to revise their trades after gate closure; and - it is further clarified that revised offers regarding a total bid or offer quantity exceeding more than 5 MW must be submitted before and after gate closure. Further information on our suggestions to the proposed Code changes is provided in Appendix A below. The Authority has suggested reassessing gate closure after the System Operator has completed a project to improve its ability to assess a range of potential future power system scenarios. However, a trial to test reducing gate closure is not currently in our 2026/27 programme and would divert resources from other established projects. Furthermore, to undertake such a trial would require more extensive scoping than has currently been provided and results may be difficult to interpret, as normal conditions may show little effect, while tighter or emergency conditions are unlikely to provide a reliable basis for testing. Consequently, and given other pressing priorities, we do not consider the proposed next step for the System Operator to start a trial to reduce gate closure is sufficiently developed to warrant near-term focus.
Q11. Do you agree that, to align with forecast schedules, the SoC constraint that applies in the dispatch schedule should be based on energy availability over a half hour period? If not, do you think it should be based on energy availability over a 5 minute period, or the energy availability over the	No. The System Operator considers the SoC constraint should be based on capacity available over the time remaining in the current trading period, rather than a fixed half-hour or 5-minute period. This approach adapts to dispatch both at the start of and part way through a trading period, e.g. at the start, it is effectively equivalent to a half-hour constraint, while later it reflects the shorter duration over which the BESS must sustain its output. A 5-minute approach would risk overstating BESS flexibility and could lead to infeasible or inefficient dispatch in later dispatch intervals and trading periods. A fixed half-hour constraint may also distort outcomes where a BESS is first dispatched part way through a trading period. However, this approach would not by itself ensure feasibility across trading periods. The Authority therefore needs to

time remaining before the end of the trading period?	decide whether to apply intertemporal treatment across trading periods or instead rely on BESS owners to structure their offers accordingly. In our view, intertemporal treatment would provide a more robust and operationally reliable outcome, particularly where scheduled energy, reserve, and frequency keeping obligations must be preserved into the next period, including during grid emergencies. Based on real-time operational experience, BESS have at times depleted their charge partway through a trading period when dispatched to discharge, despite being expected to sustain output for the full period. This highlights both the importance of accurately reflecting SoC in real time and the limitations of relying solely on offers.
Q12. Should state of charge constraints account for round trip losses? If not, why not?	Yes. The System Operator agrees that SoC constraints for BESS should account for round-trip losses. Accordingly, the constraint should be formulated in terms of net deliverable energy so that dispatch instructions remain aligned with physical capability and with the time-remaining framework described in Q11. Ignoring round-trip losses would overstate available capability within the trading period and increase the risk of infeasible dispatch outcomes, post-gate closure revisions, and dispatch non-compliance, particularly where dispatch, frequency keeping, or reserve obligations must be sustained over time.
Q13. Do you agree that the WITS manager and clearing manager require SoC constrained bid and offer information to perform their functions?	If the information is required, we suggest the WITS manager and clearing manager should be directly involved in the detailed design to confirm their data requirements and the source, timing, and format of the information they need to perform their functions. It should not be assumed that all required SoC constrained bid and offer information will be available, or available in the required form, through existing market schedules. The final design should clearly specify what information is needed to support their functions.
Issue 3: final proposal	
Q14. Do you agree with our proposal to make gate closure arrangements the same between operational states and between grid-connected and embedded BESSs?	Yes. We support making gate closure arrangements consistent across BESS operational states and between grid-connected and embedded BESS. A BESS can both charge and discharge energy, and consistent arrangements (including aligned bids/offers arrangements see above Q9) will improve transparency, support clearer compliance expectations, and create more efficient incentives as embedded generation and CER continue to increase. We note the existing gate closure arrangements for offered embedded generators are effectively unchanged since the

	market began, therefore recommend updating gate closure requirements for offered embedded generators to align with grid connected generating units.
Q15. If we decided to make gate closure one hour for embedded BESSs, do you consider a legacy clause may be warranted? If so, what do you consider the details of that clause should be?	No. We do not consider a legacy clause necessary, given the small number of existing embedded BESS and the early stage of BESS development in the New Zealand market.
Q16. Do you agree with how we propose to incorporate round-trip losses in calculating state of charge constraints? If not, is there a better alternative to ensure state of charge constraint accuracy?	Yes, in principle. However, the detailed formulation should be refined so the time element reflects the time remaining in the trading period, rather than relying on a fixed value. See above Q11.
Q17. Are there any other factors that need to be taken into account in adjusted capacities and limits?	Yes. While this consultation is primarily focused on utility-scale BESS and BESS-hybrid arrangements are being considered separately, we are receiving increasing queries about BESS-hybrid configurations while the relevant rules and tools are still being developed. The final design should therefore consider how adjusted capacities and limits apply to DC-coupled BESS-hybrid stations, where total injection capability may be less than the sum of the individual technology components because they share a common inverter or other limiting plant. In those cases, it may be unclear when adjusted capacities require the BESS trader to revise its offers, particularly if the binding limit sits at the shared inverter rather than within the BESS component itself. The drafting should make clear how adjusted capacities and revision obligations apply in those configurations. International experience also suggests adjusted capacities and limits should reflect shared inverter constraints, deliverable capability over the relevant period, and simultaneous energy and ancillary service obligations for integrated and hybrid BESS assets. Consistent with our response to Q11, additional

	intertemporal treatment may also be needed to preserve feasibility across trading periods.
Q18. Are there any other reasons why a BESS owner should be able to, or need to, revise their trades after gate closure? If so, what?	We are not aware of any other reasons at this stage. However, BESS traders may be better placed to identify any additional operational or commercial circumstances that could justify post gate closure revisions, and we would be interested to understand their perspectives.
Q19. Do you agree with our proposal to address issue 3?	Yes, in principle. See above our responses to Q16 and Q17.
Q20. Do you have any comments on our proposed Code drafting to address issue 3?	The drafting should ensure that SoC constraints and adjusted capacities remain aligned with forecast schedules and do not create ambiguity for dispatch, compliance monitoring, or settlement. It would also be helpful for the drafting to clarify whether changes in actual physical capability arising from prior dispatch outcomes that could not reasonably have been anticipated at gate closure are intended to justify a post gate closure revision or instead be managed solely through SoC constraint or BESS offers. The new term "capped" is also unclear. Section 6.138 appears to use it to refer to the MW quantities achievable after applying SoC constraints. However, the proposed interim and final drafting, including clause 13.105A(1)(d), appears to allow those quantities to be derived from different schedule inputs, which may produce inconsistent capped quantities. In addition, as currently drafted, there is a lack of clarity as to how "capped bids and offers" will be taken into consideration in clause 13.194 to achieve the purpose stated in section 6.138 of the Consultation Paper. If the System Operator is required to provide capped bid and offer quantities to WITS manager as part of schedule information, and to the clearing manager so constrained off amounts can be calculated accurately, the drafting should specify a clear and deterministic input source for constrained off payment.
Issue 3: Interim proposal	
Q21. Are there any other factors that need to be taken into account in adjusted capabilities under	Under the interim proposal, adjusted capabilities should take account of the time remaining in the trading period, round-trip losses, and any simultaneous energy, reserve, or frequency keeping obligations. They should also be framed so that post gate closure revisions are limited to genuine capability changes rather than changes in trading intent.

our interim proposal?	
Q22. Are there any other reasons why a BESS owner should be able to, or need to, revise their trades after gate closure under our interim proposal? If so, what are these reasons?	See above our responses to Q18.
Q23. Do you agree with our interim proposal to address issue 3?	Yes, as an interim measure. The interim proposal is a pragmatic way to improve BESS participation in the near term, provided trade revisions after gate closure are tightly limited to genuine changes in expected capability. It should not, however, be treated as the preferred enduring design if it weakens gate closure discipline, forecast certainty, or compliance monitoring.
Q24. Do you have any comments on our proposed Code drafting for our interim proposal to address issue 3?	The interim drafting should make clear that post gate closure revisions are exceptional and must be supported by a demonstrable change in underlying capability. The drafting should also avoid creating ambiguity around compliance expectations, particularly where revised quantities affect forecast schedules, forecast prices, or the assessment of dispatch non-compliance.
Issue 4: constrained off payments	
Q25. Do you agree with the Authority's decision not to propose removing constrained off payments for BESSs while charging at this stage? If not, why not?	Yes. We agree constrained off payments should not be removed for BESS while charging at this stage. BESS traders are different from conventional unidirectional generation or load because charging is often undertaken to enable later discharge when that stored energy has greater value. If a BESS is constrained off while charging, the opportunity cost is not limited to the immediate bid or offer price effect. It may also include the loss, reduction, or delay of later discharge value. Given these different trading incentives, we consider it appropriate to retain constrained off payments for BESS while further work could be undertaken on whether a BESS-specific constrained-costs regime is needed.
BESS owners' existing obligations	
Q26. Do you consider our proposed Code	Yes. We consider the proposed Code amendment broadly captures BESS owners' obligations under Parts 13.

amendment accurately captures BESS owners' obligations in Parts 13, 14, and 15 of the Code?	
Regulatory Statement for the proposed Code amendment	
Q27. Do you agree with the objectives of the proposed amendment? If not, why not?	Yes.
Q28. Do you agree the benefits of the proposed amendment outweigh its costs?	Yes. The proposed amendment should improve the ability of BESS to participate efficiently in the market and support more feasible dispatch outcomes. The benefits are likely to outweigh the costs, provided the final design preserves gate closure discipline, supports robust compliance monitoring, and does not embed avoidable long-term complexity in reserve arrangements.
Q29. Can you provide any evidence or further information about potential benefits or costs?	Potential benefits include more efficient BESS participation in energy and ancillary service markets, better alignment between dispatch instructions and physical capability, and lower risk of infeasible dispatch. Potential costs include software, modelling, testing and operational process changes for the System Operator and BESS owners. Costs and complexity would increase if the final design embedded separate or non-technology-neutral reserve treatment for BESS, rather than adopting a single reserve offer structure that better reflects BESS capability.
Q30. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Act.	Yes, subject to refinement to the continued separation of interruptible load and generation reserve. See above Q3.
Q31. Do you agree the Authority's	Yes.

proposed amendment complies with section 32(1) of the Act?	
Code drafting	
Q32. Do you have any comments on the drafting of the proposed amendment?	Please see additional comments on the proposed Code amendments that have not been raised above (attached as Appendix 1 to this letter). More generally, the drafting should avoid creating unintended consequences by treating BESS and BESS owners as "generator", "generating station" or "generating unit" for all Code purposes where those terms were originally designed for conventional generation. We also consider the drafting should use "output" consistently when referring to BESS, rather than alternating between "generation" and "output". This would better reflect that BESS stores and releases energy and does not generate electricity in the conventional sense. While we support the Authority's approach to implementing the BESS changes in two phases, we query the proposed timing for the "final" Code changes. Final drafting should not be locked in before feedback on the "Common quality and wholesale market arrangements for BESSs and BESS-hybrid stations" paper has been considered, given that consultation remains at an initial stage as at the date of this submission. 1. the alignment of the definitions of "generating asset" and clauses relating to generating stations across Parts 8 and 13; and 2. whether dispatch compliance for BESS and in particular, for BESS-hybrid stations, should apply at a component level, rather than at a station level. The period between implementing the "interim" and "final" changes provides an important opportunity for the Authority to refine the longer-term Code drafting, taking into account operational experience, industry feedback, and any further issues identified through the Common quality process. This will help ensure the enduring framework is coherent across Parts 8, and 13, and is suitable for both standalone BESS and BESS-hybrid stations.

APPENDIX 1: Proposed Code amendment

Proposed amendments to the Code are displayed as follows:

(a) text or formatting is red underlined if it is to be added to the existing Code as part of the **interim** amendment
(b) text or formatting is shown in ~~red strikethrough~~ if it is to be deleted from the existing Code as part of the interim amendment.
(c) text or formatting is blue underlined if it is to be added to the amended Code as part of the **final** amendment.
(d) text or formatting is shown in ~~blue strikethrough~~ if it is to be deleted from the amended Code as part of the final amendment.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
Part 1 **Preliminary provisions**	**Part 1** **Preliminary provisions**
1.1 Interpretation (1) In this Code, unless the context otherwise requires,— …	**1.1 Interpretation** (1) In this Code, unless the context otherwise requires,— …
adjusted consumption capability means the maximum **electricity** a **battery energy storage system station** is capable of consuming, in **MWh**, at the **point of connection** to the **grid** for which a **bid** is submitted in respect of that **battery energy storage system station**, adjusted to ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer	~~**adjusted consumption capability** means the maximum **electricity** a **battery energy storage system station** is capable of consuming, in **MWh**, at the **point of connection** to the **grid** for which a **bid** is submitted in respect of that **battery energy storage system station,** adjusted to ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer~~
no change	**adjusted consumption capacity** means the maximum power a **battery energy storage system station** can consume, in **MW**, at the **point of connection** to the **grid** for which a **bid** is submitted in respect of that **battery energy storage system station**, adjusted to: (a) account for any outages; and

Commented [SO1]: We query whether the word "consume" is appropriate for BESS as they don't consume energy other than in respect of losses and parasitic load.

Commented [SO2]: In relation to both the "interim" and "final" drafts, we consider that the definitions of "adjusted generation/consumption capacity" should specify that the maximum power may need to be adjusted when the system operator issues a formal notice (which is the circumstance in clause 13.19AAA(1)(b)).

Commented [SO3]: In relation to the "final" draft, it is unclear whether "outages" here refers to BESS and/or also network outages.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
	(b) account for any **distribution network** constraints; and (c) ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer
adjusted generation capability means the maximum **electricity** a **battery energy storage system station** is capable of generating, in **MWh**, at the **point of connection** to the **grid** for which an **offer** is submitted in respect of that **battery energy storage system station**, adjusted to ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer	~~**adjusted generation capability** means the maximum **electricity** a **battery energy storage system station** is capable of generating, in **MWh**, at the **point of connection** to the **grid** for which an **offer** is submitted in respect of that **battery energy storage system station**, adjusted to ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer~~
no change	**adjusted generation capacity** means the maximum power a **battery energy storage system station** can generate, in **MW**, at the **point of connection** to the **grid** for which an **offer** is submitted in respect of that **battery energy storage system station** adjusted to: (a) account for any outages; and (b) account for any **distribution network** constraints; and (c) ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer
no change	**adjusted maximum storage limit** means the maximum amount of energy a **battery energy storage system station** can physically and practically store, in **MWh**, adjusted to: (a) account for any outages; and

Commented [SO4]: BESS do not generate electricity. The wording in other proposed Code clauses further down uses "output" for BESS. We consider that this is a better description and suggest replacing generation/generating with "output" in relation to BESS, for consistency.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
no change	(b) ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer, **adjusted minimum storage limit** means the minimum amount of energy a **battery energy storage system station** can physically and practically store, in **MWh**, adjusted to: (a) account for any outages; and (b) ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer
battery energy storage system means an **energy storage system** in which the energy is stored exclusively in electro-chemical form	**battery energy storage system** means an **energy storage system** in which the energy is stored exclusively in electro-chemical form
battery energy storage system owner means a person who owns **battery energy storage systems**, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such **battery energy storage systems**, to the extent that person is acting in respect of that **battery energy storage system**	**battery energy storage system owner** means a person who owns **battery energy storage systems**, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such **battery energy storage systems**, to the extent that person is acting in respect of that **battery energy storage system**
battery energy storage system station means 1 or more **battery energy storage systems** that are directly connected to a **network** and that inject into the **network** at a single **point of connection**	**battery energy storage system station** means 1 or more **battery energy storage systems** that are directly connected to a **network** and that inject into the **network** at a single **point of connection** **BESS loss factor** means a fixed or variable factor reflecting energy losses in respect of a **battery energy storage system station**
no change	

Commented [SO5]: In relation to the "final" draft, we query whether both "physically" and "practically" is required here and what the difference would be.

Commented [SO6]: "Battery energy storage system owner" is used with reference to both individual BESS and a station of BESS. As such we suggest amending the definition to refer to "*a battery energy storage system or battery energy storage system station*". This will also remove the reference to plurals in the drafting.

Commented [SO7]: We query whether the words "*on behalf of any person who owns such battery energy storage systems"* adequately captures aggregators of BESS systems, noting that aggregation of domestic systems is a real likelihood/ already takes place.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
bid,— (a) means— (i) a **nominated bid**: (ii) a **difference bid**; and (b) includes a **bid** revised in accordance with clause 13.19AB, 13.19A or 13.19B (c) *[Revoked]* **bona fide physical reason** includes,— (a) in relation to a **generator**, or a **purchaser**, or an **ancillary service agent** or a **grid owner**, a situation where personnel or plant safety is at risk; and (b) in relation to a **generator** or an **ancillary service agent** providing **generation reserve** or **frequency keeping**,— (i) a reasonably unforeseeable change in generating capability, reserve capability, or **frequency keeping** capability (as the case may be) from an item of **generating plant** that is the subject of an existing **offer**, **reserve offer**, or offer to provide **frequency keeping** by that **generator** or **ancillary service agent**; or (ii) a reasonably unforeseeable change in the level of expected uncontrollable water inflows into the head pond of a hydro station that is the subject of an existing **offer**, **reserve offer**, or offer to provide **frequency keeping** by that **generator** or **ancillary service agent**; or (iii) a reasonably unforeseeable change in circumstances such that the **generator** or **ancillary service agent** will breach any consent held by it under the Resource Management Act 1991; or (iv) a reasonably unforeseeable physical infeasibility that arises	**bid,**— (a) means— (i) a **nominated bid**: (ii) a **difference bid**; and (b) includes a **bid** revised in accordance with clause 13.19AB, 13.19A or 13.19B (c) *[Revoked]* **bona fide physical reason** includes,— (a) in relation to a **generator**, or a **purchaser**, or an **ancillary service agent** or a **grid owner**, a situation where personnel or plant safety is at risk; and (b) in relation to a **generator** or an **ancillary service agent** providing **generation reserve** or **frequency keeping**,— (i) a reasonably unforeseeable change in generating capability, reserve capability, or **frequency keeping** capability (as the case may be) from an item of **generating plant** that is the subject of an existing **offer**, **reserve offer**, or offer to provide **frequency keeping** by that **generator** or **ancillary service agent,** but, in the case of an **offer** by a **battery energy storage system owner**, does not include a reasonably unforeseeable change in generation capability arising solely due to the effect of **dispatch instructions** on the **battery energy storage system's state of charge**; or (ii) a reasonably unforeseeable change in the level of expected uncontrollable water inflows into the head pond of a hydro station that is the subject of an existing **offer**, **reserve offer**, or offer to provide **frequency keeping** by that **generator** or **ancillary service agent**; or (iii) a reasonably unforeseeable change in circumstances such that

Commented [SO8]: We consider that the definition of "bona fide physical reason" should be exhaustive. We consider that will help strengthen, clarify and limit the circumstances which permit revisions during gate closure, limit the extent to which BESS owners could revise their trades, ensure bids and offers do not get revised during gate closure due to "lazy trading".

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
from a **price-responsive schedule**, a **non-response schedule**, or a **dispatch schedule**; and	the **generator** or **ancillary service agent** will breach any consent held by it under the Resource Management Act 1991; or
(baa) in relation to a **battery energy storage system owner**, —	(iv) a reasonably unforeseeable physical infeasibility that arises from a **price-responsive schedule**, a **non-response schedule**, or a **dispatch schedule**; and
(i) a reasonably unforeseeable change in consumption capability from a **battery energy storage system station**; or	(baa) in relation to a **battery energy storage system owner**, —
(ii) a reasonably unforeseeable change in circumstances which the **battery energy storage system owner** reasonably expects to result in a breach of one or more conditions with which the **battery energy storage system owner** reasonably considers it must comply for the purposes of maintaining any warranty provided by the original equipment manufacturer; and	(i) a reasonably unforeseeable change in consumption capability from a **battery energy storage system station**, excluding a reasonably unforeseeable change in consumption capability arising solely due to the effect of **dispatch instructions** on the **battery energy storage system's state of charge**; or
(bb) in relation to an **ancillary service agent** providing **emergency reserve**,—	(ii) a reasonably unforeseeable change in circumstances which the **battery energy storage system owner** reasonably expects to result in a breach of one or more conditions with which the **battery energy storage system owner** reasonably considers it must comply for the purposes of maintaining any warranty provided by the original equipment manufacturer; and
(i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) that is the subject of an **alternative ancillary service arrangement** to provide **emergency reserve**; or	(bb) in relation to an **ancillary service agent** providing **emergency reserve**,—
(ii) a reasonably unforeseeable full or partial loss of generating capability from an item of **generating plant** that is the subject of an **ancillary service arrangement** to provide **emergency reserve**; or	(i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) that is the subject of an **alternative ancillary service arrangement** to provide **emergency reserve**; or
(iii) a reasonably unforeseeable change in circumstances such that the **ancillary service agent** will breach any consent held by it under the Resource Management Act 1991; and	(ii) a reasonably unforeseeable full or partial loss of generating capability from an item of **generating plant** that is the subject of an **ancillary service arrangement** to provide **emergency reserve**; or
(c) in relation to a **purchaser**, or an **ancillary service agent** providing **interruptible load**,—	(iii) a reasonably unforeseeable change in circumstances such that the **ancillary service agent** will breach any consent held by it
(i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) at a **grid exit point** that is the subject of an existing **bid** or **reserve offer** by the **purchaser** or the **ancillary service agent**; or	

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
(ii) a reasonably unforeseeable change in circumstances such that the **purchaser** or **ancillary service agent** will breach any consent held by it under the Resource Management Act 1991; or (iii) a reasonably unforeseeable full or partial loss of generating capability from an item of **generating plant** owned by, or the subject of a supply contract with, that **purchaser** during the relevant **trading periods**; and (d) in relation to a **grid owner**, a reasonably unforeseeable loss of full or partial capacity on transmission plant forming part of the **grid** …	under the Resource Management Act 1991; and (c) in relation to a **purchaser**, or an **ancillary service agent** providing **interruptible load**,— (i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) at a **grid exit point** that is the subject of an existing **bid** or **reserve offer** by the **purchaser** or the **ancillary service agent**; or (ii) a reasonably unforeseeable change in circumstances such that the **purchaser** or **ancillary service agent** will breach any consent held by it under the Resource Management Act 1991; or (iii) a reasonably unforeseeable full or partial loss of generating capability from an item of **generating plant** owned by, or the subject of a supply contract with, that **purchaser** during the relevant **trading periods**; and (d) in relation to a **grid owner**, a reasonably unforeseeable loss of full or partial capacity on transmission plant forming part of the **grid** …
dispatchable load information means the **volume information**— (a) of each **dispatch-capable load station** or **battery energy storage system station** for each trading period in a consumption period; and (b) that is— (i) prepared under clause 15.5A or 15.5B; and (ii) aggregated and rounded in accordance with clause 15.5C …	**dispatchable load information** means the **volume information**— (a) of each **dispatch-capable load station** or **battery energy storage system station** for each trading period in a consumption period; and (b) that is— (i) prepared under clause 15.5A or 15.5B; and (ii) aggregated and rounded in accordance with clause 15.5C …
gate closure period, in relation to a **trading period** for which a **generator** or **ancillary service agent** has submitted an **offer** or **reserve offer**, or for which a **dispatchable load purchaser** or **battery energy storage system owner** has submitted a **nominated dispatch bid** means— (a) the **trading period** to which the **offer** or **reserve offer** relates, and	**gate closure period**, in relation to a **trading period** for which a **generator** or **ancillary service agent** has submitted an **offer** or **reserve offer**, or for which a **dispatchable load purchaser** or **battery energy storage system owner** has submitted a **nominated dispatch bid** means— (a) the **trading period** to which the **offer** or **reserve offer** relates, and

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
the **trading period** immediately preceding that **trading period** for— (i) an **embedded generator** (except for a **battery energy storage system owner**): (ii) an **ancillary service agent** that is also an **embedded generator** (except for a **battery energy storage system owner**): (iii) a **dispatch notification purchaser**: (iv) a **dispatch notification generator**; and (b) the **trading period** to which the **offer**, **reserve offer**, or **nominated dispatch bid** relates, and the 2 **trading periods** immediately preceding that **trading period**, for— (ia) a **battery energy storage system owner**: (i) any other **generator**: (ii) any other **ancillary service agent**: (iii) a **dispatchable load purchaser** (other than a **dispatch notification purchaser**)	the **trading period** immediately preceding that **trading period** for— (i) an **embedded generator** (except for a **battery energy storage system owner**): (ii) an **ancillary service agent** that is also an **embedded generator** (except for a **battery energy storage system owner**): (iii) a **dispatch notification purchaser**: (iv) a **dispatch notification generator**; and (b) the **trading period** to which the **offer**, **reserve offer**, or **nominated dispatch bid** relates, and the 2 **trading periods** immediately preceding that **trading period**, for— (ia) a **battery energy storage system owner**: (i) any other **generator**: (ii) any other **ancillary service agent**: (iii) a **dispatchable load purchaser** (other than a **dispatch notification purchaser**)
generating station means 1 or more **generating units** that are directly connected to the **grid** or to a **local network** and that inject into the **grid** or a **local network** (as the case may be) at a single **point of injection**, and includes a **battery energy storage system station**	**generating station** means 1 or more **generating units** that are directly connected to the **grid** or to a **local network** and that inject into the **grid** or a **local network** (as the case may be) at a single **point of injection**, and includes a **battery energy storage system station**
generating unit means all equipment functioning together as a single entity to produce **electricity**, and includes a **battery energy storage system**	**generating unit** means all equipment functioning together as a single entity to produce **electricity**, and includes a **battery energy storage system**
generator means, except in Part 6A, a person who owns **generating units** connected to a **network**, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such **generating units**, and includes **battery energy storage system owners**, **embedded generators**,	**generator** means, except in Part 6A, a person who owns **generating units** connected to a **network**, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such **generating units**, and includes **battery energy storage system owners**, **embedded generators**,

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
intermittent generators, **type A co-generators**, and **type B co-generators**	**intermittent generators**, **type A co-generators**, and **type B co-generators**
nominated bid— (a) *[Revoked]* (b) *[Revoked]* (c) *[Revoked]* (d) means the information that a **purchaser** submits to the **system operator** under clauses 13.6A or 13.7 to indicate a reasonable estimate of the— (i) **electricity** that the **purchaser** will purchase for a **dispatch-capable load station** or **battery energy storage system** at a **GXP**; or (ii) **non-dispatch-capable load** that the **purchaser** will purchase at a **nonconforming GXP**; and (e) includes a deemed **nominated bid** under clause 13.8A	**nominated bid**— (a) *[Revoked]* (b) *[Revoked]* (c) *[Revoked]* (d) means the information that a **purchaser** submits to the **system operator** under clauses 13.6A or 13.7 to indicate a reasonable estimate of the— (i) **electricity** that the **purchaser** will purchase for a **dispatch-capable load station** or **battery energy storage system** at a **GXP**; or (ii) **non-dispatch-capable load** that the **purchaser** will purchase at a **nonconforming GXP**; and (e) includes a deemed **nominated bid** under clause 13.8A
nominated dispatch bid means a **nominated bid** that a **purchaser** submits to the **system operator** in relation to a **battery energy storage system** or a **dispatch-capable load station** that the **purchaser** is making available to be **dispatched**	**nominated dispatch bid** means a **nominated bid** that a **purchaser** submits to the **system operator** in relation to a **battery energy storage system** or a **dispatch-capable load station** that the **purchaser** is making available to be **dispatched**
offer means the information that a **generator** submits to the **system operator** under clause 13.6(1) or 13.6A, and clause 13.9B(1), includes any revised **offer** that a **generator** submits under clauses 13.17 to 13.19AAA	**offer** means the information that a **generator** submits to the **system operator** under clause 13.6(1) or 13.6A, and clause 13.9B(1), includes any revised **offer** that a **generator** submits under clauses 13.17 to 13.19AAA
purchaser means a person who buys **electricity** from the **clearing manager** and, for the purposes of Parts 8, 13, 14, and 14A, has the	**purchaser** means a person who buys **electricity** from the **clearing manager** and, for the purposes of Parts 8, 13, 14, and 14A, has the

Commented [SO9]: In relation to the "Final" draft, there may be additional changes required to the definition of "generator" and "generating station" stemming from the BESS Common Quality Consultation Paper (which is still undergoing the initial consultation process as at the date of this submission).

We consider that there may be potential unintended consequences stemming from the inclusion of BESS and BESS owners in the definitions of **generation station, generating unit, and generator**, in particular, in relation to CACTIS and the Transmission Pricing Methodology.

A related issue is whether the definition of "generating plant" should then also be changed to include BESS (it does not currently).

Commented [SO10]: This should refer to "battery energy storage system *station*".

Commented [SO11]: There is proposed wording in the "final" draft that refers to demand-side information appearing in an offer rather than a bid (e.g. clause 13.9(e)(ii), which refers to "consumption", and clause 10(b) of schedule 13.3, which is about demand).

The potential confusion this creates could be avoided by, in the longer-term, defining and using a more generic term for combined BESS offers/bids, e.g. "BESS trade".

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
additional meaning set out in clause 1.5, and includes a **battery energy storage system owner**	additional meaning set out in clause 1.5, and includes a **battery energy storage system owner**
reconciliation participant means a **participant** that— (a) is one of the following: (i) a **retailer** when purchasing **electricity** from, or selling **electricity** to, the **clearing manager**: (ii) a **generator**: (iii) a **network owner**: (iv) a **distributor**: (v) a person who purchases **electricity** from or sells **electricity** to the **clearing manager**, including a **dispatchable load purchaser** and a **battery energy storage system owner**: and (b) provides information to the **reconciliation manager** in accordance with clauses 15.4 to 15.11	**reconciliation participant** means a **participant** that— (a) is one of the following: (i) a **retailer** when purchasing **electricity** from, or selling **electricity** to, the **clearing manager**: (ii) a **generator**: (iii) a **network owner**: (iv) a **distributor**: (v) a person who purchases **electricity** from or sells **electricity** to the **clearing manager**, including a **dispatchable load purchaser** and a **battery energy storage system owner**: and (b) provides information to the **reconciliation manager** in accordance with clauses 15.4 to 15.11
no change	**state of charge** means the energy stored in a **battery energy storage system** at a specific point in time, measured in **MWh**
Part 8 **Common quality**	**Part 8** **Common quality**
… **8.25 Other asset owner performance obligations and technical standards** … (5) If the **system operator** reasonably considers it necessary to assist the **system operator** in planning to comply, and complying, with the **principal performance obligations** and achieving the **dispatch objective**, the **system operator**—	… **8.25 Other asset owner performance obligations and technical standards** … (5) If the **system operator** reasonably considers it necessary to assist the **system operator** in planning to comply, and complying, with the **principal performance obligations** and achieving the **dispatch objective**, the **system operator**—

Commented [SO12]: As currently drafted, every BESS owner is a purchaser, including at the micro/household level. We think this should be limited to BESS owners required to submit bids under clause 13.6A.

Commented [SO13]: We consider that clause 8.25(6) also needs to be updated to reflect the proposed changes to clause 8.25(5) to the effect that the SO may require a group of embedded stations and/or battery energy storage systems that add up to 10MW behind a single GXP to offer, subject to a directive from the EA.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
(a) may require that an **embedded generator** (except an **embedded generator** that is a **battery energy storage system owner**) provide information regarding the intended output of each **embedded generating station** greater than 10 **MW** in capacity, that must be either— (i) submitted as an **offer** in accordance with subpart 1 of Part 13; or (ii) provided in a form and manner agreed between the **system operator** and the **embedded generator**; and	(a) may require that an **embedded generator** (except an **embedded generator** that is a **battery energy storage system owner**) provide information regarding the intended output of each **embedded generating station** greater than 10 **MW** in capacity, that must be either— (i) submitted as an **offer** in accordance with subpart 1 of Part 13; or (ii) provided in a form and manner agreed between the **system operator** and the **embedded generator**; and
(aa) may require that a **battery energy storage system owner** that is an **embedded generator** provide information regarding the intended output and consumption of each **battery energy storage system station** greater than 10MW in capacity, that must be either— (i) submitted as an **offer** and a **bid** in accordance with subpart 1 of Part 13; or (ii) provided in a form and manner agreed between the **system operator** and the **battery energy storage system owner**; and	(aa) may require that a **battery energy storage system owner** that is an **embedded generator** provide information regarding the intended output and consumption of each **battery energy storage system station** greater than 10MW in capacity, that must be either— (i) submitted as an **offer** and a **bid** in accordance with subpart 1 of Part 13; or (ii) provided in a form and manner agreed between the **system operator** and the **battery energy storage system owner**; and
(b) must advise the **embedded generator** or **battery energy storage system** of its requirement at least 20 **business days** in advance of the requirement coming into effect.	(b) must advise the **embedded generator** or **battery energy storage system** of its requirement at least 20 **business days** in advance of the requirement coming into effect.
Part 13 **Trading arrangements**	**Part 13** **Trading arrangements**
…	…
13.3A Approval process for dispatch-capable load stations	**13.3A Approval process for dispatch-capable load stations**
(1) A **purchaser** at a **GXP**, other than a **battery energy storage system owner**, may apply to the **system operator** for approval for a device or a group of devices at the **GXP** to be a **dispatch-capable load**	(1) A **purchaser** at a **GXP**, other than a **battery energy storage system owner**, may apply to the **system operator** for approval for a device or a group of devices at the **GXP** to be a **dispatch-capable load**

Commented [SO14]: This should be bolded as it is a defined term

Commented [SO15]: This should refer to "battery energy storage system *owner*"

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
station under Schedule 13.8.	**station** under Schedule 13.8.
(1A) In addition to subclause (1), a **purchaser** who intends to operate devices or a group of devices as a **dispatch notification purchaser** may apply to the **system operator** for approval for devices or a group of devices located at more than one **GXP** to be a **dispatch-capable load station** under Schedule 13.8.	(1A) In addition to subclause (1), a **purchaser** who intends to operate devices or a group of devices as a **dispatch notification purchaser** may apply to the **system operator** for approval for devices or a group of devices located at more than one **GXP** to be a **dispatch-capable load station** under Schedule 13.8.
(2) The **system operator** must consider an application under subclause (1) or (1A) in accordance with Schedule 13.8.	(2) The **system operator** must consider an application under subclause (1) or (1A) in accordance with Schedule 13.8.
(3) If the **system operator** approves a device or a group of devices as a **dispatch-capable load station** following an application by a **purchaser** under subclause (1) or (1A)— (a) the approval is valid until the date the approval is revoked under clause 10 of Schedule 13.8; but (b) a device or group of devices in respect of which the approval is granted is not a **dispatch-capable load station** while its approval is suspended under clause 10 of Schedule 13.8.	(3) If the **system operator** approves a device or a group of devices as a **dispatch-capable load station** following an application by a **purchaser** under subclause (1) or (1A)— (a) the approval is valid until the date the approval is revoked under clause 10 of Schedule 13.8; but (b) a device or group of devices in respect of which the approval is granted is not a **dispatch-capable load station** while its approval is suspended under clause 10 of Schedule 13.8.
(4) The **system operator** must suspend or revoke an approval for devices or a group of devices located at more than one **GXP** to be a **dispatch-capable load station** in accordance with clause 10 of Schedule 13.8 if the **purchaser** is not, will not in the future or states that it no longer intends to operate as, a **dispatch notification purchaser** in respect of the relevant **dispatch-capable load station**.	(4) The **system operator** must suspend or revoke an approval for devices or a group of devices located at more than one **GXP** to be a **dispatch-capable load station** in accordance with clause 10 of Schedule 13.8 if the **purchaser** is not, will not in the future or states that it no longer intends to operate as, a **dispatch notification purchaser** in respect of the relevant **dispatch-capable load station**.
(5) Where the **system operator** suspends such an approval under subclause (4), the **system operator** must continue such suspension until— (a) the **purchaser** re-commences operating as a **dispatch notification purchaser** in respect of the relevant **dispatch capable load station**; or (b) the **system operator** revokes the approval for devices or a group of devices located at more than one **GXP** to be a	(5) Where the **system operator** suspends such an approval under subclause (4), the **system operator** must continue such suspension until— (a) the **purchaser** re-commences operating as a **dispatch notification purchaser** in respect of the relevant **dispatch capable load station**; or (b) the **system operator** revokes the approval for devices or a group of devices located at more than one **GXP** to be a

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
dispatch-capable load station in accordance with clause 10 of Schedule 13.8.	**dispatch-capable load station** in accordance with clause 10 of Schedule 13.8.
(6) The approval for any **battery energy storage system station** as a **dispatch-capable load station** prior to [DATE of Code amendment] is revoked with immediate effect from [DATE of Code amendment].	(6) The approval for any **battery energy storage system station** as a **dispatch-capable load station** prior to [DATE of Code amendment] is revoked with immediate effect from [DATE of Code amendment].
13.3E Approval process for dispatch notification purchasers	**13.3E Approval process for dispatch notification purchasers**
(1) A **purchaser**, other than a **battery energy storage system owner**, may apply to become a **dispatch notification purchaser** by applying to the **system operator** for approval of the relevant device or group of devices as a **dispatch-capable load station** under Schedule 13.8.	(1) A **purchaser**, other than a **battery energy storage system owner**, may apply to become a **dispatch notification purchaser** by applying to the **system operator** for approval of the relevant device or group of devices as a **dispatch-capable load station** under Schedule 13.8.
(2) If the **system operator** receives an application under subclause (1), the **system operator** must consider the application in accordance with Schedule 13.8.	(2) If the **system operator** receives an application under subclause (1), the **system operator** must consider the application in accordance with Schedule 13.8.
(2A) The **system operator** may only approve an application if the **Authority** has confirmed to the **system operator** that the applicant will be able to comply with clause 13.82B.	(2A) The **system operator** may only approve an application if the **Authority** has confirmed to the **system operator** that the applicant will be able to comply with clause 13.82B.
(3) If the **system operator** approves a **purchaser's** application to become a **dispatch notification purchaser**,—	(3) If the **system operator** approves a **purchaser's** application to become a **dispatch notification purchaser**,—
(a) the **purchaser** is a **dispatch notification purchaser** in relation to the **dispatch-capable load station** to which the application relates; and	(a) the **purchaser** is a **dispatch notification purchaser** in relation to the **dispatch-capable load station** to which the application relates; and
(b) the approval is valid until the date on which the approval is revoked under clause 10 of Schedule 13.8; but	(b) the approval is valid until the date on which the approval is revoked under clause 10 of Schedule 13.8; but
(c) the **purchaser** in respect of which approval is granted is not **a dispatch notification purchaser** while approval for the relevant **dispatch-capable load station** is suspended under clause 10 of Schedule 13.8.	(c) the **purchaser** in respect of which approval is granted is not **a dispatch notification purchaser** while approval for the relevant **dispatch-capable load station** is suspended under clause 10 of Schedule 13.8.
(4) The **system operator** may suspend or revoke an approval for a **dispatch notification purchaser** in accordance with clause 10 of Schedule 13.8 if the **purchaser** has repeatedly submitted revised bids	(4) The **system operator** may suspend or revoke an approval for a **dispatch notification purchaser** in accordance with clause 10 of Schedule 13.8 if the **purchaser** has repeatedly submitted revised bids

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under clause 13.19C(1) such that it is no longer appropriate for the **purchaser** to remain a **dispatch notification purchaser**, taking into account any criteria set out in the policy statement.	under clause 13.19C(1) such that it is no longer appropriate for the **purchaser** to remain a **dispatch notification purchaser**, taking into account any criteria set out in the policy statement.
13.3F Approval process for dispatch notification generators	**13.3F Approval process for dispatch notification generators**
(1) A **generator**, other than a **battery energy storage system owner**, may, by notice in writing to the **system operator**, apply to become a **dispatch notification generator** in respect of a **generating station** that exports less than 30 **MW** to the **grid** or a **local network**.	(1) A **generator**, other than a **battery energy storage system owner**, may, by notice in writing to the **system operator**, apply to become a **dispatch notification generator** in respect of a **generating station** that exports less than 30 **MW** to the **grid** or a **local network**.
(2) The notice must specify the **generating station** in respect of which the **generator** wishes to be a **dispatch notification generator**.	(2) The notice must specify the **generating station** in respect of which the **generator** wishes to be a **dispatch notification generator**.
(3) The **system operator** must approve an application received under subclause (1) if the application—	(3) The **system operator** must approve an application received under subclause (1) if the application—
(a) relates to a **generating station** that exports less than 30 **MW** to the **grid** or a **local network**; and	(a) relates to a **generating station** that exports less than 30 **MW** to the **grid** or a **local network**; and
(b) meets any criteria for approval set out in the **policy statement**.	(b) meets any criteria for approval set out in the **policy statement**.
(3A) Notwithstanding subclause (3), the **system operator** may only approve an application received under subclause (1) if the **Authority** has confirmed to the **system operator** that the applicant will be able to comply with clause 13.82B.	(3A) Notwithstanding subclause (3), the **system operator** may only approve an application received under subclause (1) if the **Authority** has confirmed to the **system operator** that the applicant will be able to comply with clause 13.82B.
(4) The **system operator** may revoke an approval for a **dispatch notification generator** if—	(4) The **system operator** may revoke an approval for a **dispatch notification generator** if—
(a) the **generator** no longer meets the approval requirements; or	(a) the **generator** no longer meets the approval requirements; or
(b) the **generator** has repeatedly submitted revised offers under clause 13.19C(2) such that it is no longer appropriate for the **generator** to remain a **dispatch notification generator**, taking into account any criteria set out in the **policy statement**.	(b) the **generator** has repeatedly submitted revised offers under clause 13.19C(2) such that it is no longer appropriate for the **generator** to remain a **dispatch notification generator**, taking into account any criteria set out in the **policy statement**.
…	…

Bids and offer preparation	*Bids and offer preparation*
13.6 Requirements for generators when submitting offers (1) Each **generator** with a **point of connection** to the **grid** and each **embedded generator** required by the **system operator** to submit an **offer** under clause 8.25(5), must— (a) for a **generator** other than an **intermittent generator**; (i) submit to the **system operator** an **offer** for each **trading period** in the **schedule period**, under which the **generator** is prepared to sell **electricity** to the **clearing manager**; and (ii) ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period** to which the **offer** relates.; and (b) subject to subclause (2), for an **intermittent generator**; (i) submit to the **system operator** an offer for each **trading period** and **intermittent generating station** in respect of which the **intermittent generator** is prepared to sell **electricity** to the **clearing manager**; and (ii) ensure that the **system operator** receives an **offer** within 25 minutes of the first **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates; or (iii) if there is no **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates 72 **trading periods** before the beginning of the **trading period**, ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period**. (2) Subclauses (1)(b)(ii) and (iii) do not apply to **intermittent generators** using an alternative forecast in accordance with clause 13.9B(4).	**13.6 Requirements for generators when submitting offers** (1) Each **generator** with a **point of connection** to the **grid** and each **embedded generator** required by the **system operator** to submit an **offer** under clause 8.25(5), must— (a) for a **generator** other than an **intermittent generator**; (i) submit to the **system operator** an **offer** for each **trading period** in the **schedule period**, under which the **generator** is prepared to sell **electricity** to the **clearing manager**; and (ii) ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period** to which the **offer** relates.; and (b) subject to subclause (2), for an **intermittent generator**; (i) submit to the **system operator** an offer for each **trading period** and **intermittent generating station** in respect of which the **intermittent generator** is prepared to sell **electricity** to the **clearing manager**; and (ii) ensure that the **system operator** receives an **offer** within 25 minutes of the first **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates; or (iii) if there is no **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates 72 **trading periods** before the beginning of the **trading period**, ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period**. (2) Subclauses (1)(b)(ii) and (iii) do not apply to **intermittent generators** using an alternative forecast in accordance with clause 13.9B(4).

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(3) Despite subclauses (1) and (2), a **generator** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager** before the **generator** makes an **offer** for the 1st time in respect of the **generating plant** that is the subject of the offer.	(3) Despite subclauses (1) and (2), a **generator** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager** before the **generator** makes an **offer** for the 1st time in respect of the **generating plant** that is the subject of the offer.
(4) The notice must state— (a) the **point of connection** to the **grid** at which **electricity** generated by the **generator** is sold to the **clearing manager** under clause 14.3 or 14.4; and (b) whether the **generating plant** is an **intermittent generating station**.	(4) The notice must state— (a) the **point of connection** to the **grid** at which **electricity** generated by the **generator** is sold to the **clearing manager** under clause 14.3 or 14.4; and (b) whether the **generating plant** is an **intermittent generating station**.
(5) A **generator** must comply with any request from the **system operator** for information concerning **generating plant** that is the subject of a notice under subclause (3) if the **system operator** requires the information for the purposes of scheduling and **dispatch** in accordance with this Code.	(5) A **generator** must comply with any request from the **system operator** for information concerning **generating plant** that is the subject of a notice under subclause (3) if the **system operator** requires the information for the purposes of scheduling and **dispatch** in accordance with this Code.
(6) Despite subclauses (1) and (2), if a **generator** intends to permanently cease to submit **offers** to the **system operator** in respect of any **generating plant**, the **generator** must give at least **5 business days'** notice in writing to the **system operator** and the **clearing manager**.	(6) Despite subclauses (1) and (2), if a **generator** intends to permanently cease to submit **offers** to the **system operator** in respect of any **generating plant**, the **generator** must give at least **5 business days'** notice in writing to the **system operator** and the **clearing manager**.
(7) Nothing in this clause applies to **battery energy storage system owners**.	(7) Nothing in this clause applies to **battery energy storage system owners**.
13.6A Requirements for battery energy storage system owners when submitting bids and offers	**13.6A Requirements for battery energy storage system owners when submitting bids and offers**
(1) Each **battery energy storage system owner** with a **point of connection** to the **grid**, and each **battery energy storage system owner** which is an **embedded generator** and is required by the **system operator** to submit an **offer** under clause 8.25(5), must—	(1) Each **battery energy storage system owner** with a **point of connection** to the **grid**, and each **battery energy storage system owner** which is an **embedded generator** and is required by the **system operator** to submit an **offer** under clause 8.25(5), must—

Commented [SO16]: To aid Code navigation, we suggest clause 13.6A(1) be made expressly "subject to clause 13.25A".

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(a) submit to the **system operator** an **offer** and a **nominated bid** for each **trading period** in the **schedule period**, under which the **battery energy storage system owner** is prepared to sell **electricity** to, or buy **electricity** from, the **clearing manager**; and	(a) submit to the **system operator** an **offer** and a **nominated bid** for each **trading period** in the **schedule period**, under which the **battery energy storage system owner** is prepared to sell **electricity** to, or buy **electricity** from, the **clearing manager**; and
(b) ensure that the **system operator** receives an **offer** and **nominated bid** at least 71 **trading periods** before the beginning of the **trading period** to which the **offer** and **nominated bid** relates.	(b) ensure that the **system operator** receives an **offer** and **nominated bid** at least 71 **trading periods** before the beginning of the **trading period** to which the **offer** and **nominated bid** relates.
(2) Despite subclause (1) a **battery energy storage system owner** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager** before the **battery energy storage system owner** makes an **offer** and a **nominated bid** for the 1st time in respect of the **battery energy storage system station** that is the subject of the **offer** and **nominated bid**.	(2) Despite subclause (1) a **battery energy storage system owner** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager** before the **battery energy storage system owner** makes an **offer** and a **nominated bid** for the 1st time in respect of the **battery energy storage system station** that is the subject of the **offer** and **nominated bid**.
(3) The notice must state —	(3) The notice must state —
(a) the **point of connection** to the **grid** at which **electricity** generated by the **battery energy storage system station** is sold to the **clearing manager** under clause 14.3 or 14.4; and	(a) the **point of connection** to the **grid** at which **electricity** generated by the **battery energy storage system station** is sold to the **clearing manager** under clause 14.3 or 14.4; and
(b) the **point of connection** to the **grid** at which **electricity** stored by the **battery energy storage system station** is bought from the **clearing manager** under clause 14.3 or 14.4.	(b) the **point of connection** to the **grid** at which **electricity** stored by the **battery energy storage system station** is bought from the **clearing manager** under clause 14.3 or 14.4.
(4) A **battery energy storage system owner** must comply with any request from the **system operator** for information concerning the **battery energy storage system station** that is the subject of a notice under subclause (2) if the **system operator** requires the information for the purposes of scheduling and **dispatch** in accordance with this Code.	(4) A **battery energy storage system owner** must comply with any request from the **system operator** for information concerning the **battery energy storage system station** that is the subject of a notice under subclause (2) if the **system operator** requires the information for the purposes of scheduling and **dispatch** in accordance with this Code.
(5) Despite subclause (1), if a **battery energy storage system owner** intends to permanently cease to submit **offers** and **nominated bids**	(5) Despite subclause (1), if a **battery energy storage system owner** intends to permanently cease to submit **offers** and **nominated bids**

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
to the **system operator** in respect of any **battery energy storage system station**, the **battery energy storage system owner** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager**. … **13.7AA Purchaser to submit bids for non-dispatch-capable load** (1) This clause applies to each **purchaser** that— (a) purchases **non-dispatch-capable load**; and (b) in relation to a **nominated bid**, does not rely on clause 13.8A; and (c) is not a **battery energy storage system owner**. (2) The **purchaser**— (a) must, if it purchases **non-dispatch-capable load** at a **non-conforming GXP**, submit to the **system operator** for each **trading period** in the **schedule period** a **nominated non-dispatch bid** that represents a reasonable estimate of the total **non-dispatch-capable load** that the **purchaser** will purchase— (i) at the **GXP**; and (ii) for the **trading period**; and (iii) at the prices specified in the **nominated non-dispatch bid**; and (b) may, if it purchases **non-dispatch-capable load** at a **conforming GXP**, submit to the **system operator** for a **trading period** a **difference bid** that represents a reasonable estimate of an increase or decrease in the **purchaser's** usual **non-dispatch-capable load** purchased— (i) at the **GXP**; and (ii) for the **trading period**; and (iii) at the prices specified in the **difference bid**.	to the **system operator** in respect of any **battery energy storage system station**, the **battery energy storage system owner** must give at least 5 **business days'** notice in writing to the **system operator** and the **clearing manager**. … **13.7AA Purchaser to submit bids for non-dispatch-capable load** (1) This clause applies to each **purchaser** that— (a) purchases **non-dispatch-capable load**; and (b) in relation to a **nominated bid**, does not rely on clause 13.8A; and (c) is not a **battery energy storage system owner**. (2) The **purchaser**— (a) must, if it purchases **non-dispatch-capable load** at a **non-conforming GXP**, submit to the **system operator** for each **trading period** in the **schedule period** a **nominated non-dispatch bid** that represents a reasonable estimate of the total **non-dispatch-capable load** that the **purchaser** will purchase— (i) at the **GXP**; and (ii) for the **trading period**; and (iii) at the prices specified in the **nominated non-dispatch bid**; and (b) may, if it purchases **non-dispatch-capable load** at a **conforming GXP**, submit to the **system operator** for a **trading period** a **difference bid** that represents a reasonable estimate of an increase or decrease in the **purchaser's** usual **non-dispatch-capable load** purchased— (i) at the **GXP**; and (ii) for the **trading period**; and (iii) at the prices specified in the **difference bid**.

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13.7AB Timeframe for submitting bids to system operator	**13.7AB Timeframe for submitting bids to system operator**
(1) Each **purchaser**, other than a **battery energy storage system owner**, that submits a **nominated bid** to the **system operator** must submit the **nominated bid** at least 71 **trading periods** before the beginning of the **trading period** to which the **nominated bid** applies.	(1) Each **purchaser**, other than a **battery energy storage system owner**, that submits a **nominated bid** to the **system operator** must submit the **nominated bid** at least 71 **trading periods** before the beginning of the **trading period** to which the **nominated bid** applies.
(2) Each **purchaser**, other than a **battery energy storage system owner**, that submits a **difference bid** to the **system operator** must submit the **difference bid** at least 4 **trading periods** before the beginning of the **trading period** to which the **difference bid** applies.	(2) Each **purchaser**, other than a **battery energy storage system owner**, that submits a **difference bid** to the **system operator** must submit the **difference bid** at least 4 **trading periods** before the beginning of the **trading period** to which the **difference bid** applies.
…	…
13.8 Deemed offers	**13.8 Deemed offers**
(1) This clause applies if, on any **trading day** ("the current trading day"), a **generator** has not submitted an **offer** for a **trading period** in the **trading day** following the next **trading day**.	(1) This clause applies if, on any **trading day** ("the current trading day"), a **generator** has not submitted an **offer** for a **trading period** in the **trading day** following the next **trading day**.
(2) A **generator** is deemed to have submitted, for that **trading period**, an **offer** that is the same as the **offer** the **generator** made for the corresponding **trading period** on the current **trading day**, and clauses 13.9A and 13.9AA apply ~~applies~~ accordingly.	(2) A **generator** is deemed to have submitted, for that **trading period**, an **offer** that is the same as the **offer** the **generator** made for the corresponding **trading period** on the current **trading day**, and clauses 13.9A and 13.9AA apply ~~applies~~ accordingly.
(3) A deemed **offer** under subclause (2) applies until the **generator** revises the **offer** in accordance with clauses 13.17 to 13.19AAA.	(3) A deemed **offer** under subclause (2) applies until the **generator** revises the **offer** in accordance with clauses 13.17 to 13.19AAA.
13.8A Deemed nominated bids	**13.8A Deemed nominated bids**
(1) This clause applies if, on any **trading day** ("the current trading day"), a **purchaser** has not submitted a **nominated bid** for a **trading period** in the **trading day** following the next **trading day**.	(1) This clause applies if, on any **trading day** ("the current trading day"), a **purchaser** has not submitted a **nominated bid** for a **trading period** in the **trading day** following the next **trading day**.
(2) A **purchaser** is deemed to have submitted, for that **trading period**, a **nominated bid** that is the same as the **nominated bid** the **purchaser** made for the corresponding **trading period** on the current **trading day**.	(2) A **purchaser** is deemed to have submitted, for that **trading period**, a **nominated bid** that is the same as the **nominated bid** the **purchaser** made for the corresponding **trading period** on the current **trading day**.

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(3) A deemed **nominated bid** under subclause (2) applies until the **purchaser** revises the **nominated bid** in accordance with clause 13.19AAA or 13.19A.	(3) A deemed **nominated bid** under subclause (2) applies until the **purchaser** revises the **nominated bid** in accordance with clause 13.19AAA or 13.19A.
(4) A **purchaser** must ensure that each of its deemed **nominated bids** under this clause—	(4) A **purchaser** must ensure that each of its deemed **nominated bids** under this clause—
(a) if it is a **nominated bid** for a **dispatch-capable load station**, represents a reasonable estimate of the total quantity of **electricity** that the **purchaser** will purchase for the **dispatch-capable load station** at the specified prices for the **trading period**; or	(a) if it is a **nominated bid** for a **dispatch-capable load station**, represents a reasonable estimate of the total quantity of **electricity** that the **purchaser** will purchase for the **dispatch-capable load station** at the specified prices for the **trading period**; or
(b) if it is a **nominated bid** for **non-dispatch-capable load**, represents a reasonable estimate of the **non-dispatch-capable load** that the **purchaser** will purchase at the **GXP** at the specified prices for the **trading period**.	(b) if it is a **nominated bid** for **non-dispatch-capable load**, represents a reasonable estimate of the **non-dispatch-capable load** that the **purchaser** will purchase at the **GXP** at the specified prices for the **trading period**.
…	
no change	**13.9 Information that offers must contain** Each **offer** submitted by a **generator** must**—** (a) other than for **battery energy storage system owners, intermittent generators**, **type A co-generators**, and **type B co-generators**, contain all information required by Form 1 in Schedule 13.1; and (b) *[Revoked]* (c) if the **offer** is submitted by an **intermittent generator** for an **intermittent generating station**,**—** (i) contain the information required by Form 2 in Schedule 13.1; and (ii) *[Revoked]* (iii) *[Revoked]* (d) if the **offer** is submitted by a **type A co-generator** for a **type A industrial co-generating station** or by a **type B co-generator** for a **type B industrial co-generating station**,**—**

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	(i) contain the information required by Form 3 in Schedule 13.1; and (ii) have a maximum of 2 price bands for each **trading period**; and (iii) specify a price of either $0.00 (in accordance with clause 13.116) or $0.01 for the price band. (e) if the **offer** is submitted by a **battery energy storage system owner**, — (i) contain all information required by Form 10 in Schedule 13.1; and (ii) contain a variable **BESS loss factor** for a given **MWh** of consumption or generation, and a fixed **BESS loss factor**, for the **trading period** to which the **offer** relates which, taken together, constitute a reasonable estimate of the losses the **battery energy storage system owner** expects to incur in that **trading period**; and (iii) have a maximum of 10 price bands for each **trading period**.
13.9A Offer not to exceed capability (1) The total **MW** specified in each **offer** submitted by a **generator** must, in relation to the **generating plant** that is the subject of the **offer**, not exceed the total **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**. (2) Subclause (1) does not apply to an **intermittent generator** or a **battery energy storage system owner**.	**13.9A Offer not to exceed capability** (1) The total **MW** specified in each **offer** submitted by a **generator** must, in relation to the **generating plant** that is the subject of the **offer**, not exceed the total **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**. (2) Subclause (1) does not apply to an **intermittent generator** or a **battery energy storage system owner**.
13.9AA Battery energy storage systems offers and bids not to exceed adjusted capability The total **MW** specified in each **offer** and **bid** submitted by a **battery energy storage system owner** must, in relation to the **battery energy**	**13.9AA Battery energy storage systems offers and bids not to exceed adjusted ~~capability~~ capacity** (1) The total **MW** specified in each **offer** and **bid** submitted by a **battery energy storage system owner** must, in relation to the

Commented [SO17]: The proposed definition of "adjusted consumption capability" is measured in MWh, so the offer and bids should also be specified in MWh. There are similar inconsistencies throughout the proposed drafting.

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storage system station that is the subject of the **offer** and **bid**, not exceed the **adjusted generation capability** or **adjusted consumption capability,** whichever is applicable, for that **battery energy storage system station** for the relevant **trading period**.	**battery energy storage system station** that is the subject of the **offer** and **bid**, not exceed the **adjusted generation** ~~**capability**~~ **capacity** or **adjusted consumption** ~~**capability**~~ **capacity**, whichever is applicable, for that **battery energy storage system station** for the relevant **trading period**.
…	(2) The maximum storage limit specified in each **offer** and **bid** submitted by a **battery energy storage system owner** must, in relation to the **battery energy storage system station** that is the subject of that **offer** and **bid**, not exceed the **adjusted maximum storage limit** for that **battery energy storage system station** for the relevant **trading period**. (3) The minimum storage limit specified in each **offer** and **bid** submitted by a **battery energy storage system owner** must, in relation to the **battery energy storage system station** that is the subject of that **offer** and **bid**, not be less than the **adjusted minimum storage limit** for that **battery energy storage system station** for the relevant **trading period**.
13.10 Generators must specify units in offers Each **offer** submitted by a **generator** must— (a) be specific to individual **generating units** for **generating plant** in respect of which **electricity** is offered by that **generator** that cannot **synchronise** and come up to minimum load within the duration of a **trading period**; or (ab) be specific to individual **battery energy storage system stations**; or (b) be specific to individual **generating stations** for other **generating plant** in respect of which **electricity** is offered by that **generator**.	… **13.10 Generators must specify units in offers** Each **offer** submitted by a **generator** must— (a) be specific to individual **generating units** for **generating plant** in respect of which **electricity** is offered by that **generator** that cannot **synchronise** and come up to minimum load within the duration of a **trading period**; or (ab) be specific to individual **battery energy storage system stations**; or (b) be specific to individual **generating stations** for other **generating plant** in respect of which **electricity** is offered by that **generator**.

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13.11 Offers may be made by unit or plant	**13.11 Offers may be made by unit or plant**
(1) Despite clause 13.10, a **generator**, other than an **intermittent generator** or a **battery energy storage system owner**, may offer **electricity** in respect of any **generating plant** on a unit basis. A **generator** may exercise this option by giving the **system operator** at least 5 **business days**' notice in writing of the exercise of the option. The **system operator** must, during the 5 **business day** period, make any necessary changes to the scheduling **software**.	(1) Despite clause 13.10, a **generator**, other than an **intermittent generator** or a **battery energy storage system owner**, may offer **electricity** in respect of any **generating plant** on a unit basis. A **generator** may exercise this option by giving the **system operator** at least 5 **business days**' notice in writing of the exercise of the option. The **system operator** must, during the 5 **business day** period, make any necessary changes to the scheduling **software**.
(2) If a **generator** has offered **electricity** in respect of any **generating plant** on a unit basis in accordance with subclause (1), it may change to submitting **offers** in accordance with clause 13.10. Such a change may be effected by giving the **system operator** at least 5 **business days**' notice in writing of the change. The **system operator** must, during the 5 **business day** period, make any necessary changes to the scheduling **software**.	(2) If a **generator** has offered **electricity** in respect of any **generating plant** on a unit basis in accordance with subclause (1), it may change to submitting **offers** in accordance with clause 13.10. Such a change may be effected by giving the **system operator** at least 5 **business days**' notice in writing of the change. The **system operator** must, during the 5 **business day** period, make any necessary changes to the scheduling **software**.
13.12 Offers may contain ~~up to 5~~ price bands	**13.12 Offers may contain ~~up to 5~~ price bands**
(1) Subject to clause 13.9(d), an **offer** submitted by a **generator**, other than a **battery energy storage system owner**, may have a maximum of 5 price bands for each **trading period**, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.	(1) Subject to clause 13.9(d), an **offer** submitted by a **generator**, other than a **battery energy storage system owner**, may have a maximum of 5 price bands for each **trading period**, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.
(2) An **offer** submitted by a **battery energy storage system owner** may have a maximum of 10 price bands for each **trading period**, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.	(2) An **offer** submitted by a **battery energy storage system owner** may have a maximum of **10** price bands for each **trading period**, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.
no change	**13.13 Information to be contained in bids** (1) A **purchaser**, other than a **battery energy storage system owner**, must ensure that each of its **nominated bids**—

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	(a) contains all information required by Form 4 in Schedule 13.1; and (aa) if it is a **nominated bid** for a **dispatch-capable load station**, specifies whether it is— (i) a **nominated dispatch bid**; or (ii) a **nominated non-dispatch bid**. (b) *[Revoked]* (c) *[Revoked]* (1A) *[Revoked]* (2) A **purchaser** must ensure that each of its **difference bids** contains all information required by Form 4A in Schedule 13.1. (3) A **battery energy storage system owner** must ensure that each of its **nominated bids** contains all information required by Form 10 in Schedule 13.1.
	…
13.17 Offers may be revised	**13.17 Offers may be revised**
(1) Subject to subclauses (2) to (4) and clause 13.18A, a **generator** may revise an **offer** at any time before the end of the **trading period** to which the **offer** relates by submitting a new **offer** to the **system operator**.	(1) Subject to subclauses (2) to (4) and clause 13.18A, a **generator** may revise an **offer** at any time before the end of the **trading period** to which the **offer** relates by submitting a new **offer** to the **system operator**.
(2) A **generator** must not revise any of its **offer** prices during a **gate closure period**.	(2) A **generator** must not revise any of its **offer** prices during a **gate closure period**.
(3) A **generator** must not revise the **MW** specified in any price band in an **offer** during a **gate closure period**, unless clause 13.18(1), 13.18(1A), 13.18B 13.19, 13.19AAA or 13.19C applies.	(3) A **generator** must not revise the **MW** specified in any price band in an **offer** during a **gate closure period**, unless clause 13.18(1), 13.18(1A), 13.18B 13.19, 13.19AAA or 13.19C applies.
(4) A **generator** must not revise any of the following **offer** parameters during a **gate closure period**, unless clause 13.19 or 13.19AAA applies: (a) ramp rates: (b) maximum output (including overload).	(4) A **generator** must not revise any of the following **offer** parameters during a **gate closure period**, unless clause 13.19 or 13.19AAA applies: (a) ramp rates: (b) maximum output (including overload).

Commented [SO18]: For the "final" draft, we submit that ramp rates will not be required for BESS and BESS owners.

Commented [SO19]: For the "final" draft, the maximum output here needs to take into consideration the MWh limits to align with the proposed "adjusted maximum storage limit", and BESS loss calculations.

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13.18 When revised offer to be submitted (1) A **generator**, other than an **intermittent generator** or **battery energy storage system owner**, must immediately submit a revised **offer** to the **system operator** if the total **MW** specified in an **offer** exceeds, by more than 5 **MW**, the total **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**. (1A) A **generator**, other than an **intermittent generator** or **battery energy storage system owner**, may submit a revised **offer** to the **system operator** if the total **MW** specified in an **offer** exceeds, by 5 **MW** or less, the total **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**. (1B) The submission of a revised **offer** under subclause (1) or subclause (1A) does not relieve the **generator** of liability for breach of any other provision of this Code. (2) *[Revoked]* (3) *[Revoked]* … **13.18B When battery energy storage system owners must revise offer and bid** (1) A **battery energy storage system owner** must submit a revised **offer**, or **bid,** to the **system operator** if necessary to ensure that, as at the start of the **gate closure period** for the relevant **trading period**, the total **MW** specified in the **offer**, or **bid**, does not exceed the **adjusted generation capability**, or **adjusted consumption capability**, whichever is applicable, for that **battery energy storage system station** for the relevant **trading period**.	**13.18 When revised offer to be submitted** (1) A **generator**, other than an **intermittent generator** or **battery energy storage system owner**, must immediately submit a revised **offer** to the **system operator** if the total **MW** specified in an **offer** exceeds, by more than 5 **MW**, the total **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**. (1A) A **generator**, other than an **intermittent generator** or **battery energy storage system owner**, may submit a revised **offer** to the **system operator** if the total **MW** specified in an **offer** exceeds, by 5 **MW** or less, the total **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**. (1B) The submission of a revised **offer** under subclause (1) or subclause (1A) does not relieve the **generator** of liability for breach of any other provision of this Code. (2) *[Revoked]* (3) *[Revoked]* … **13.18B When battery energy storage system owners must revise offer and bid** (1) A **battery energy storage system owner** must submit a revised **offer**, or **bid**, to the **system operator** if necessary to ensure that, as at the start of the **gate closure period** for the **trading period**: (a) the total **MW** specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, does not exceed the **adjusted generation ~~capability~~ capacity**, or **adjusted consumption ~~capability~~ capacity**, whichever is applicable, for that **battery energy**

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(2) A **battery energy storage system owner** must immediately submit a revised **offer**, or **bid**, to the **system operator** if: (a) the total **MW** specified in that **offer**, or **bid**, exceeds, by more than 5 **MW**, the **adjusted generation capability**, or **adjusted consumption capability**, whichever is applicable, for that **battery energy storage system station**, for the relevant **trading period**; and (b) one or more of the conditions in clause 13.9AAA(1)(a) to (e) applies. (3) The submission of a revised **offer** or **bid** under this clause does not relieve the **battery energy storage system owner** of liability for breach of any other provision of this Code.	**storage system station** for the relevant **trading period**; (b) the maximum storage limit specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, does not exceed the **adjusted maximum storage limit** for that **battery energy storage system station** for the relevant **trading period**; (c) the minimum storage limit specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, is not lower than the **adjusted minimum storage limit** for that **battery energy storage system station** for the relevant **trading period**. (2) A **battery energy storage system owner** must ~~immediately~~ submit a revised **offer**, or **bid**, to the **system operator**, whether or not the **gate closure period** for the **trading period** to which that **offer** or **bid** relates has commenced, if one or more of the conditions in clause 13.9AAA(1)(a) to (f) applies and: (a) the total **MW** specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, exceeds the **adjusted generation** ~~**capability**~~ **capacity**, or **adjusted consumption** ~~**capability**~~ **capacity**, whichever is applicable, for that **battery energy storage system station** for the relevant **trading period** by more than 5 **MW**; or (b) the maximum storage limit specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, exceeds the **adjusted maximum storage limit** for that **battery energy storage system station** for the relevant **trading period** by more than 2.5 **MWh**; or (c) the minimum storage limit specified in the **offer**, or **bid**, in

Commented [SO20]: This should state 13.19AAA

Commented [SO21]: As currently drafted, clause 13.18B(2) only applies if the total bid or offer quantities exceeds by more than 5 MW, the adjusted generation capability or adjusted consumption capability AND 1 or more conditions relating to revised offers during gate closure in clause 13.19AAA(1)(a)-(e) applies.

This does not reflect the purpose of this proposed clause articulated in pg 61 of the Consultation paper. We consider that clause 13.18B(2) must apply at all times, including to offers before gate closure as well.

Commented [SO22]: Again, we consider that the 5MW and 2.5MWh thresholds should apply to all offers before and during gate closure. The current drafting does not provide for this.

As clause 13.19AAA is only in relation to revisions during gate closure specifically, the proposed "final" clause 13.18B(2) can only apply to offers during gate closure if any of the conditions under clause 13.19AAA(1)(a)-(f) applies.

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	relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, is less than the **adjusted minimum storage limit** for that **battery energy storage system station** for the relevant **trading period** by more than 2.5 **MWh**. (3) The submission of a revised **offer** or **bid** under this clause does not relieve the **battery energy storage system owner** of liability for breach of any other provision of this Code.
13.19 When revised offers may be submitted during gate closure period (1) A **generator**, other than an **intermittent generator** or **battery energy storage system owner**, may submit a revised **offer** to the **system operator** during a **gate closure period** if— (a) the revision is necessary due to a **bona fide physical reason**; or (b) the **system operator** issues a **formal notice** under clause 5 of **Technical Code** B of Schedule 8.3; or (c) a **bona fide physical reason** that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and— (i) the 1st **trading period** after the original **bona fide physical reason** ceases to exist is within 24 hours after the circumstances that constituted the original **bona fide physical reason** arose; and (ii) the total change in **MW** specified in the **offer** that is revised as a result of the **bona fide physical reason** ceasing to exist is the same or less than the total change in **MW** specified in the **offer** that was made as a result of the original **bona fide physical reason**.	**13.19 When revised offers may be submitted during gate closure period** (1) A **generator**, other than an **intermittent generator** or **battery energy storage system owner**, may submit a revised **offer** to the **system operator** during a **gate closure period** if— (a) the revision is necessary due to a **bona fide physical reason**; or (b) the **system operator** issues a **formal notice** under clause 5 of **Technical Code** B of Schedule 8.3; or (c) a **bona fide physical reason** that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and— (i) the 1st **trading period** after the original **bona fide physical reason** ceases to exist is within 24 hours after the circumstances that constituted the original **bona fide physical reason** arose; and (ii) the total change in **MW** specified in the **offer** that is revised as a result of the **bona fide physical reason** ceasing to exist is the same or less than the total change in **MW** specified in the **offer** that was made as a result of the original **bona fide physical reason**.

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(2) A **generator** that submits a revised **offer** under subclause (1)(c) must do so as soon as possible after the relevant **bona fide physical reason** ceases to exist.	(2) A **generator** that submits a revised **offer** under subclause (1)(c) must do so as soon as possible after the relevant **bona fide physical reason** ceases to exist.
13.19AAA When a battery energy storage system owner may submit revised offers or bids during gate closure (1) Subject to clause 13.19AB, a **battery energy storage system owner** may submit a revised **offer** or **bid** to the **system operator** during a **gate closure period** only if— (a) the revision is necessary due to a **bona fide physical reason**; or (b) the **system operator** issues a **formal notice** under clause 5 of **Technical Code** B of Schedule 8.3; or (c) a **bona fide physical reason** that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and the 1st **trading period** after the original **bona fide physical reason** ceases to exist is within 24 hours after the circumstances that constituted the original **bona fide physical reason** arose; or (d) the total **MW** specified in the **offer** or **bid** exceeds the **adjusted generation capability** or **adjusted consumption capability**, whichever is applicable, that a reasonable **battery energy storage system owner**, assessing the matter immediately before the start of the **gate closure period** for the relevant **trading period**, would have expected for that **trading period**; or (e) the **state of charge** the **battery energy storage system station** is expected to have at the beginning of the **trading period** to which the **offer** or **bid** relates differs from the **state of charge** a reasonable **battery energy storage system owner** assessing the matter immediately before the start of the **gate closure**	**13.19AAA When a battery energy storage system owner may submit revised offers or bids during gate closure** (1) Subject to clause 13.19AB, a **battery energy storage system owner** may submit a revised **offer** or **bid** to the **system operator** during a **gate closure period** only if— (a) the revision is necessary due to a **bona fide physical reason**; or (b) the **system operator** issues a **formal notice** under clause 5 of **Technical Code** B of Schedule 8.3; or (c) a **bona fide physical reason** that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and the 1st **trading period** after the original **bona fide physical reason** ceases to exist is within 24 hours after the circumstances that constituted the original **bona fide physical reason** arose; or (d) the total **MW** specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, exceeds the **adjusted generation** ~~**capability**~~ **capacity**, or **adjusted consumption** ~~**capability**~~ **capacity**, whichever is applicable and as determined at the start of the **gate closure period** for the relevant **trading period**, for that **battery energy storage system station** for the relevant **trading period**; or (e) the maximum storage limit specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, exceeds the **adjusted**

Commented [SO24]: This wording should also be included in the "interim" draft, as it gives the rest of the paragraph context.

Commented [SO23]: The definition of "state of charge" is only proposed to be added as a defined term in the "final" draft of the Code, so the use of the term in the "Interim" draft does not work

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period would have expected the **battery energy storage system station** to have at the beginning of that **trading period**. (2) A **battery energy storage system owner** that submits a revised **offer** or **bid** under subclause (1)(c) must do so as soon as possible after the relevant **bona fide physical reason** ceases to exist. (3) The submission of a revised **offer** or **bid** under this clause does not relieve the **battery energy storage system owner** of liability for breach of any other provision of this Code.	**maximum storage limit**, as determined at the start of the **gate closure period** for the relevant **trading period**, for that **battery energy storage system station** for the relevant **trading period**; or (f) the minimum storage limit specified in the **offer**, or **bid**, in relation to the **battery energy storage system station** that is the subject of the **offer** or **bid**, is less than the **adjusted minimum storage limit**, as determined at the start of the **gate closure period** for the relevant **trading period**, for that **battery energy storage system station** for the relevant **trading period**. (2) A **battery energy storage system owner** that submits a revised **offer** or **bid** under subclause (1)(c) must do so as soon as possible after the relevant **bona fide physical reason** ceases to exist. (3) The submission of a revised **offer** or **bid** under this clause does not relieve the **battery energy storage system owner** of liability for breach of any other provision of this Code.
13.19AA Limitations on revised offers A **generator,** other than a **battery energy storage system owner**, that submits a revised **offer** under clauses 13.18(1), 13.18(1A), or 13.19(1) during a **gate closure period** must ensure that— (a) the revised **offer** only differs from the original **offer** to the extent necessary to ensure that the **MW** specified in the revised **offer** is the **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**; and (b) the revised **offer** complies with the following: (i) the reduction in **MW** specified in the revised **offer** must be first deducted from the **MW** offered in the highest price band:	**13.19AA Limitations on revised offers** A **generator**, other than a **battery energy storage system owner**, that submits a revised **offer** under clauses 13.18(1), 13.18(1A), or 13.19(1) during a **gate closure period** must ensure that— (a) the revised **offer** only differs from the original **offer** to the extent necessary to ensure that the **MW** specified in the revised **offer** is the **MW** that the **generator** expects to be capable of generating at the relevant **point of connection** to the **grid** for the relevant **trading period**; and (b) the revised **offer** complies with the following: (i) the reduction in **MW** specified in the revised **offer** must be first deducted from the **MW** offered in the highest price band:

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(ii) if the reduction in **MW** exceeds the **MW** in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the **MW** in each price band is reduced to zero, until all of the reduction is reflected in the revised **offer**.	(ii) if the reduction in **MW** exceeds the **MW** in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the **MW** in each price band is reduced to zero, until all of the reduction is reflected in the revised **offer**.
13.19AB Limitations on revised offers and bids for battery energy storage system owners	**13.19AB Limitations on revised offers and bids for battery energy storage system owners**
(1) A **battery energy storage system owner** that submits a revised **offer** or **bid** in reliance on clause 13.19AAA(1)(a), (b) or (d) during a **gate closure period** must ensure that the **MW** specified in the revised **offer** or **bid** only differs from the original **offer** or **bid** to the extent necessary to ensure that the **MW** specified in the revised **offer** or **bid** is the **adjusted generation capability** or **adjusted consumption capability**, whichever is applicable.	(1) A **battery energy storage system owner** that submits a revised **offer** or **bid** under clause 13.19AAA(a), (b), ~~or~~ (d), (e) or (f) during a **gate closure period** must ensure that:
	(a) the **MW** specified in the revised **offer** or **bid** only differs from the original **offer** or **bid** to the extent necessary to ensure that the **MW** specified in the revised **offer** or **bid** is the **adjusted generation** ~~**capability**~~ **capacity** or **adjusted consumption** ~~**capability**~~ **capacity**, whichever is applicable; and
	(b) the maximum and minimum storage limits specified in the revised **offer** or **bid** only differ from the original **offer** or **bid** to the extent necessary to ensure that the maximum and minimum storage limits specified in the revised **offer** or **bid** are the **adjusted maximum storage limit** and **adjusted minimum storage limit**.
(2) A **battery energy storage system owner** that submits a further revised **offer** or **bid** under clause 13.19AAA(1)(c) during a **gate closure period** must ensure the total change in **MW** as between that further revised **offer** or **bid** and the **offer** or **bid** as revised to account for the **bona fide physical reason** is the same or less than the total change in **MW** made to the original **offer** or **bid** as a result of the **bona fide physical reason**.	(2) A **battery energy storage system owner** that submits a further revised **offer** or **bid** under clause 13.19AAA(1)(c) during a **gate closure period** must ensure the total change in **MW** as between that further revised **offer** or **bid** and the **offer** or **bid** as revised to account for the **bona fide physical reason** is the same or less than the total change in **MW** made to the original **offer** or **bid** as a result of the **bona fide physical reason**.
(3) A **battery energy storage system owner** that submits a revised **offer** or **bid** under clause 13.19AAA(1)(e) during a **gate closure period** must ensure the **MW** in the revised **offer** or **bid** does not—	~~(3) A **battery energy storage system owner** that submits a revised~~
(a) exceed the **adjusted generation capability** or **adjusted consumption capability**, whichever is applicable; and	
(b) exceed the **MW** specified in the original **offer** or **bid**, if there was a decrease in expected generation or consumption capability relative to that expected at the time the original **offer**	

Commented [SO25]: This should reference 13.19(1)(a)

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or **bid** was submitted; and (c) reduce the **MW** specified in the original **offer** or **bid**, if there was an increase in expected generation or consumption capability relative to that expected at the time the original **offer** or **bid** was submitted; and (d) differ from the **MW** in the original **offer** or **bid** by more than the change in expected capability from the original **offer** and **bid**. (4) A revised **offer** under this clause must comply with the following: (a) the reduction in **MW** specified in the revised **offer** must be first deducted from the **MW** offered in the highest price band: (b) if the reduction in **MW** exceeds the **MW** in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the **MW** in each price band is reduced to zero, until all of the reduction is reflected in the revised **offer**. (5) A revised **bid** under this clause must comply with the following: (a) the reduction in **MW** specified in the revised **bid** must be first deducted from the **MW** bid for in the lowest price band: (b) if the reduction in **MW** exceeds the **MW** in the lowest price band, the remainder must be deducted from the price bands above the lowest, in ascending order as the **MW** in each price band is reduced to zero, until all of the reduction is reflected in the revised **bid**.	~~**offer** or **bid** under clause 13.19AAA(1)(c) during a **gate closure period** must ensure the **MW** in the revised **offer** or **bid** does not~~ ~~(a) exceed the **adjusted generation capability** or **adjusted consumption capability**, whichever is applicable; and~~ ~~(b) exceed the **MW** specified in the original **offer** or **bid**, if there was a decrease in expected generation or consumption capability relative to that expected at the time the original **offer** or **bid** was submitted; and~~ ~~(c) reduce the **MW** specified in the original **offer** or **bid**, if there was an increase in expected generation or consumption capability relative to that expected at the time the original **offer** or **bid** was submitted; and~~ ~~(d) differ from the **MW** in the original **offer** or **bid** by more than the change in expected capability from the original **offer** and **bid.**~~ *[Revoked]* (4) A revised **offer** under this clause must comply with the following: (a) the reduction in **MW** specified in the revised **offer** must be first deducted from the **MW** offered in the highest price band: (b) if the reduction in **MW** exceeds the **MW** in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the **MW** in each price band is reduced to zero, until all of the reduction is reflected in the revised **offer**. (5) A revised **bid** under this clause must comply with the following: (a) the reduction in **MW** specified in the revised **bid** must be first deducted from the **MW** bid for in the lowest price band: (b) if the reduction in **MW** exceeds the **MW** in the lowest price band, the remainder must be deducted from the price bands above the lowest, in ascending order as the **MW** in each price

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	band is reduced to zero, until all of the reduction is reflected in the revised **bid**.
13.19A Bids may be revised (1) Each **purchaser** other than a **battery energy storage system owner** may, at any time before the end of a **trading period** in respect of which a **bid** is made,— (a) revise any of its **bid** prices or the **MW** specified in any price band in a **bid** for any **trading period** by submitting a new **bid** to the **system operator**; or (aa) revise a **nominated bid**— (i) from being a **nominated dispatch bid** to being a **nominated non-dispatch bid**; or (ii) from being a **nominated non-dispatch bid** to being a **nominated dispatch bid.** (b) *[Revoked]* (1A) Despite subclause (1), a **dispatchable load purchaser** must not do any of the following during a **gate closure period**: (a) revise the price of a **nominated dispatch bid**: (b) revise the **MW** specified in any price band in a **nominated dispatch bid**, unless subclause (1B) or clause 13.19B applies. (c) revise a **nominated non-dispatch bid** to being a **nominated dispatch bid**, unless the **system operator** declares a **grid emergency** in accordance with **Technical Code** B of Schedule 8.3. (1B) A **dispatchable load purchaser** may revise the **MW** specified in any price band in a **nominated dispatch bid** during a **gate closure period** if— (a) the revision is necessary due to a **bona fide physical reason**; or	**13.19A Bids may be revised** (1) Each **purchaser** other than a **battery energy storage system owner** may, at any time before the end of a **trading period** in respect of which a **bid** is made,— (a) revise any of its **bid** prices or the **MW** specified in any price band in a **bid** for any **trading period** by submitting a new **bid** to the **system operator**; or (aa) revise a **nominated bid**— (i) from being a **nominated dispatch bid** to being a **nominated non-dispatch bid**; or (ii) from being a **nominated non-dispatch bid** to being a **nominated dispatch bid.** (b) *[Revoked]* (1A) Despite subclause (1), a **dispatchable load purchaser** must not do any of the following during a **gate closure period**: (a) revise the price of a **nominated dispatch bid**: (b) revise the **MW** specified in any price band in a **nominated dispatch bid**, unless subclause (1B) or clause 13.19B applies. (c) revise a **nominated non-dispatch bid** to being a **nominated dispatch bid**, unless the **system operator** declares a **grid emergency** in accordance with **Technical Code** B of Schedule 8.3. (1B) A **dispatchable load purchaser** may revise the **MW** specified in any price band in a **nominated dispatch bid** during a **gate closure period** if— (a) the revision is necessary due to a **bona fide physical reason**; or

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(b) the **system operator** has declared a **grid emergency**; or	(b) the **system operator** has declared a **grid emergency**; or
(c) a **bona fide physical reason** that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and—	(c) a **bona fide physical reason** that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and—
(i) the 1st **trading period** after the original **bona fide physical reason** ceases to exist is within 24 hours after the circumstances that constituted the original **bona fide physical reason** arose; and	(i) the 1st **trading period** after the original **bona fide physical reason** ceases to exist is within 24 hours after the circumstances that constituted the original **bona fide physical reason** arose; and
(ii) the total change in **MW** specified in the **nominated dispatch bid** that is revised as a result of the **bona fide physical reason** ceasing to exist is the same or less than the total change in **MW** specified in the **nominated dispatch bid** that was made as a result of the original **bona fide physical reason**.	(ii) the total change in **MW** specified in the **nominated dispatch bid** that is revised as a result of the **bona fide physical reason** ceasing to exist is the same or less than the total change in **MW** specified in the **nominated dispatch bid** that was made as a result of the original **bona fide physical reason**.
(1C) Subject to subclauses (1D) to (1F) and clause 13.18B, a **battery energy storage system owner** may revise a **bid** at any time before the end of the **trading period** to which the **bid** relates by submitting a new **bid** to the **system operator**.	(1C) Subject to subclauses (1D) to (1F) and clause 13.18B, a **battery energy storage system owner** may revise a **bid** at any time before the end of the **trading period** to which the **bid** relates by submitting a new **bid** to the **system operator**.
(1D) A **battery energy storage system owner** must not revise any of its **bid** prices during a **gate closure period**.	(1D) A **battery energy storage system owner** must not revise any of its **bid** prices during a **gate closure period**.
(1E) A **battery energy storage system owner** must not revise the **MW** specified in any price band in a **bid** during a **gate closure period**, unless clause 13.18B or 13.19AAA applies.	(1E) A **battery energy storage system owner** must not revise the **MW** specified in any price band in a **bid** during a **gate closure period**, unless clause 13.18B or 13.19AAA applies.
(1F) A **battery energy storage system owner** must not revise any of the following **bid** parameters during a **gate closure period**, unless clause 13.19AAA applies:	(1F) A **battery energy storage system owner** must not revise any of the following **bid** parameters during a **gate closure period**, unless clause 13.19AAA applies:
(a) ramp rates:	(a) ramp rates:
(b) maximum output (including overload).	(b) maximum output (including overload).
(2) *[Revoked]*	(2) *[Revoked]*
(3) *[Revoked]*	(3) *[Revoked]*

Commented [SO26]: For the "final" draft, we consider that ramp rates will not be relevant for BESS and BESS owners.

Commented [SO27]: For the "final" draft, the maximum output here needs to take into consideration the MWh limits to align with the proposed "adjusted maximum storage limit", and BESS loss calculations.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
(3A) *[Revoked]* (3B) *[Revoked]* (4) *[Revoked]* (5) *[Revoked]* (6) *[Revoked]*. **13.19B Bids must be revised** (1) Before the end of the **trading period** to which a **nominated bid** relates, ~~the~~ a **purchaser**, other than a **battery energy storage system owner**, that submitted the **nominated bid** must immediately submit a revised **nominated bid** in respect of **MW** to the **system operator** if the **purchaser** expects, or ought reasonably to expect, that the **MW** it is likely to purchase at the prices indicated in the **nominated bid** will,— (a) if the **nominated bid** is a **nominated non-dispatch bid**, differ from the **MW** specified in the **nominated bid** by more than the lesser of— (i) 20 **MW**; and (ii) 20% of the **nominated bid MW**; or (b) if the **nominated bid** is a **nominated dispatch bid**, differ from the **MW** specified in the **nominated bid** by more than the lesser of— (i) 10 **MW**; and (ii) 10% of the **nominated bid MW**. (2) Despite subclause (1), a **purchaser** is not required to submit a revised **nominated bid** in respect of **MW** if the expected change in **MW** is less than 5 **MW**. …	(3A) *[Revoked]* (3B) *[Revoked]* (4) *[Revoked]* (5) *[Revoked]* (6) *[Revoked]*. **13.19B Bids must be revised** (1) Before the end of the **trading period** to which a **nominated bid** relates, ~~the~~ a **purchaser**, other than a **battery energy storage system owner**, that submitted the **nominated bid** must immediately submit a revised **nominated bid** in respect of **MW** to the **system operator** if the **purchaser** expects, or ought reasonably to expect, that the **MW** it is likely to purchase at the prices indicated in the **nominated bid** will,— (a) if the **nominated bid** is a **nominated non-dispatch bid**, differ from the **MW** specified in the **nominated bid** by more than the lesser of— (i) 20 **MW**; and (ii) 20% of the **nominated bid MW**; or (b) if the **nominated bid** is a **nominated dispatch bid**, differ from the **MW** specified in the **nominated bid** by more than the lesser of— (i) 10 **MW**; and (ii) 10% of the **nominated bid MW**. (2) Despite subclause (1), a **purchaser** is not required to submit a revised **nominated bid** in respect of **MW** if the expected change in **MW** is less than 5 **MW**. …

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
13.21 Authority informed of revised nominated dispatch bid or offer during gate closure period	**13.21 Authority informed of revised nominated dispatch bid or offer during gate closure period**
(1) A **dispatchable load purchaser**, **battery energy storage system owner**, or **generator** that submits a revised **nominated dispatch bid** or a revised **offer** to the **system operator** during a **gate closure period** must report each revision to the **Authority** in writing together with an explanation of the reasons for the revision.	(1) A **dispatchable load purchaser**, **battery energy storage system owner**, or **generator** that submits a revised **nominated dispatch bid** or a revised **offer** to the **system operator** during a **gate closure period** must report each revision to the **Authority** in writing together with an explanation of the reasons for the revision.
(1A) The **dispatchable load purchaser**, **battery energy storage system owner**, or **generator** must report the revision to the **Authority** no later than 1700 hours on the 1st **business day** following the **trading day** on which the revision was made.	(1A) The **dispatchable load purchaser**, **battery energy storage system owner**, or **generator** must report the revision to the **Authority** no later than 1700 hours on the 1st **business day** following the **trading day** on which the revision was made.
(1B) Subclauses (1) and (1A) do not apply to an **intermittent generator** submitting a revised **forecast of generation potential** under clause 13.18A.	(1B) Subclauses (1) and (1A) do not apply to an **intermittent generator** submitting a revised **forecast of generation potential** under clause 13.18A.
(2) *[Revoked]*	(2) *[Revoked]*
…	…
13.25A Exception for small battery energy storage systems	**13.25A Exception for small battery energy storage systems**
(1) Despite clause 13.6A(1), a **battery energy storage system owner** is not required to submit **offers** and **bids** for a **battery energy storage system station** that has a **maximum continuous MW output power** of 10 **MW** or smaller.	(1) Despite clause 13.6A(1), a **battery energy storage system owner** is not required to submit **offers** and **bids** for a **battery energy storage system station** that has a **maximum continuous MW output power** of 10 **MW** or smaller.
(2) Any **electricity** discharged by a **battery energy storage system station** to which subclause (1) applies and which is sold to the **clearing manager** is regarded as **unoffered generation** for the purpose of this Code.	(2) Any **electricity** discharged by a **battery energy storage system station** to which subclause (1) applies and which is sold to the **clearing manager** is regarded as **unoffered generation** for the purpose of this Code.
(3) The **system operator** may require the relevant **battery energy storage system owner** to provide information in a form reasonably determined by the **system operator** on the expected generation output for any **unoffered generation** from a **battery energy storage system owner** with a **point of connection** to the **grid**.	(3) The **system operator** may require the relevant **battery energy storage system owner** to provide information in a form reasonably determined by the **system operator** on the expected generation output for any **unoffered generation** from a **battery energy storage system owner** with a **point of connection** to the **grid**.

Commented [SO28]: This should state "offers *or* bids", otherwise there could be an interpretation that the exception only applies to submissions with both an offer and a bid (but not individually).

Commented [SO29]: We query why the term "discharged" is used here instead of "output". We consider that the term "output" should be used throughout the Code drafting for consistency.

Commented [SO30]: In the consultation paper (paragraph 4.27) the intention behind this proposed clause was to require small BESS owners to submit information about their consumption and generation, if required by the system operator. However, subclause (3) only applies to BESS output.

We also consider that "generation" should be deleted, as "output" is a better term in relation to BESS.

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… no change	… **13.38 Ancillary service agents to submit reserve offers to system operator** (1) Each **ancillary service agent** who has a contract described in clause 13.37 may submit **reserve offers** to the **system operator**. (1A) An **ancillary service agent** who submits a **reserve offer** must ensure that the **system operator** receives the **reserve offer** at least 71 **trading periods** before the beginning of the **trading period** to which the **reserve offer** applies. (2) Each **reserve offer** submitted by an **ancillary service agent**, other than a **battery energy storage system owner**, under subclause (1) may be for **fast instantaneous reserve**, **sustained instantaneous reserve** or both and must— (a) contain all the information required by Form 5(1) in Schedule 13.1 for **partly loaded spinning reserve** or Form 5(2) in Schedule 13.1 for all other categories of **generation reserve**; and (b) contain all the information required by Form 6 in Schedule 13.1 for **interruptible load**; and (c) be a reasonable estimate of the quantity of **instantaneous reserve** available from the **ancillary service agent** at that **grid injection point**, **grid exit point** or **interruptible load group GXP**. (2A) Each **reserve offer** submitted by an **ancillary service agent** that is a **battery energy storage system owner** under subclause (1) may be for **fast instantaneous reserve**, **sustained instantaneous reserve** or both and must— (a) contain all the information required by Form 11; and (b) in respect of **interruptible load**, not exceed a reasonable estimate of the **adjusted consumption capacity** for the

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	ancillary service agent's battery energy storage system station; and (c) in respect of **generation reserve**, not exceed a reasonable estimate of the **adjusted generation capacity** for the **ancillary service agent's battery energy storage system station**. (3) Each **reserve offer** submitted under subclause (1), by an **ancillary service agent** that is a **generator**, must be made by reference to the same **generating unit** or **generating station** that is the subject of an **offer** under clauses 13.10 or 13.11.
13.39 Inter-relationship between reserve and energy offers **Reserve offers** and **offers** made under clauses 13.38(1) and 13.6(1) to (3) or 13.6A(1) or (2) respectively, if they are in respect of the same individual **generating unit** or individual **generating station** (as required under clauses 13.10 and 13.11), are inter-related in that the greater the energy **dispatched** the lower the **instantaneous reserve** may be and vice versa. Accordingly, an **ancillary service agent** that is a **generator** does not breach clause 13.38(2)(c) if the **offer** quantity under clauses 13.6 to 13.27 and quantity of **instantaneous reserve** offered under clauses 13.37 to 13.54 are duplicated, and the **ancillary service agent** must not be scheduled by the **system operator** and a **dispatch instruction** from the **system operator** must not be given the effect of which is that the combined dispatch quantity and **instantaneous reserve** exceeds the capacity of the individual **generating unit** or individual **generating station**, as the case may be.	**13.39 Inter-relationship between reserve and energy offers** **Reserve offers** and **offers** made under clauses 13.38(1) and 13.6(1) to (3) or 13.6A(1) or (2) respectively, if they are in respect of the same individual **generating unit** or individual **generating station** (as required under clauses 13.10 and 13.11), are inter-related in that the greater the energy **dispatched** the lower the **instantaneous reserve** may be and vice versa. Accordingly, an **ancillary service agent** that is a **generator** does not breach clause 13.38(2)(c) if the **offer** quantity under clauses 13.6 to 13.27 and quantity of **instantaneous reserve** offered under clauses 13.37 to 13.54 are duplicated, and the **ancillary service agent** must not be scheduled by the **system operator** and a **dispatch instruction** from the **system operator** must not be given the effect of which is that the combined dispatch quantity and **instantaneous reserve** exceeds the capacity of the individual **generating unit** or individual **generating station**, as the case may be.
13.40A Inter-relationship between reserve offers and nominated dispatch bids **Reserve offers** and **nominated dispatch bids** made under clauses 13.38(1) and 13.7(1) to (3) (or clause 13.6A(1) in respect of a **nominated**	**13.40A Inter-relationship between reserve offers and nominated dispatch bids** **Reserve offers** and **nominated dispatch bids** made under clauses 13.38(1) and 13.7(1) to (3) (or clause 13.6A(1) in respect of a **nominated**

Commented [SO31]: As noted in our submission, we do not support a strict separation between interruptible load and generation reserve for BESS reserve offers.

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dispatch bid made by a **battery energy storage system owner**) respectively, if they are in respect of the same plant, are inter-related in that the lower the **demand dispatched** or **scheduled** the lower the **instantaneous reserve** may be. The **ancillary service agent** must not be **scheduled** by the **system operator** and a **dispatch instruction** from the **system operator** must not be given the effect of which is that the **instantaneous reserve** exceeds the **scheduled** or **dispatched demand** quantity of the **dispatch-capable load station**, as the case may be. … no change	**dispatch bid** made by a **battery energy storage system owner**) respectively, if they are in respect of the same plant, are inter-related in that the lower the **demand dispatched** or **scheduled** the lower the **instantaneous reserve** may be. The **ancillary service agent** must not be **scheduled** by the **system operator** and a **dispatch instruction** from the **system operator** must not be given the effect of which is that the **instantaneous reserve** exceeds the **scheduled** or **dispatched demand** quantity of the **dispatch-capable load station**, as the case may be. … **13.44 How quantity is to be specified in reserve offers** (1) For each price band, a **reserve offer** submitted by an **ancillary service agent** that is not a **battery energy storage owner** must specify the quantity of **instantaneous reserve** offered to respond as **fast instantaneous reserve** and/or **sustained instantaneous reserve**— (a) as the generation available to be injected as a proportion of **electricity** output up to a specified maximum quantity for **partly loaded spinning reserve**; or (b) as the generation available to be injected for all other categories of **generation reserve**; or (c) as the **demand** available to be reduced for **interruptible load**. (1A) For each price band, a **reserve offer** submitted by an **ancillary service agent** that is a **battery energy storage owner** must specify the quantity of **instantaneous reserve** offered to respond as **fast instantaneous reserve** and/or **sustained instantaneous reserve**— (a) as the generation available to be injected for **generation reserve** if unconstrained by **state of charge**; or (b) as the **demand** available to be reduced for **interruptible load** if unconstrained by **state of charge**. (2) The quantity that may be offered in a price band for a **trading period**

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no change	must be expressed in **MW** to not more than 3 decimal places and must not be less that 0.000 **MW**. **13.46 Reserve offer may be revised** (1) Subject to subclauses (1A) and (1B), an **ancillary service agent** may revise a **reserve offer** at any time before the end of the **trading period** in respect of which the **reserve offer** is made by submitting a new **reserve offer** to the **system operator**. (1A) An **ancillary service agent** must not revise its **reserve offer** prices during a **gate closure period**. (1B) An **ancillary service agent** must not revise the **MW** specified in any price band in a **reserve offer** during a **gate closure period** unless subclause (3) or clause 13.47 applies. (2) An **ancillary service agent** that revises a **reserve offer** for an **embedded generating station** must use reasonable endeavours to submit the **reserve offer** at least 1 hour before the beginning of the **trading period** in respect of which the **reserve offer** is made. (3) Before the end of the **trading period** to which the **reserve offer** applies, and despite clauses 13.97 to 13.101, an **ancillary service agent** that is not a **battery energy storage system owner** must immediately submit a revised **reserve offer** in respect of **MW** offered to the **system operator** if— (a) the **MW** specified in any price band in the **reserve offer** no longer represents a reasonable estimate of the **instantaneous reserve** available from the **ancillary service agent** at the **grid injection point**, **grid exit point** or **interruptible load group GXP** (b) *[Revoked]* (3A) Before the end of the **trading period** to which the **reserve offer** applies, and despite clauses 13.97 to 13.101, an **ancillary service**

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	agent that is a **battery energy storage system owner** must immediately submit a revised **reserve offer** in respect of **MW** offered to the **system operator** if the **MW** specified in any price band in the **reserve offer** exceeds— (a) in respect of **interruptible load**, a reasonable estimate of the adjusted consumption capacity for the **ancillary service agent's battery energy storage system station**; or (b) in respect of **generation reserve**, a reasonable estimate of the adjusted generation capacity for the **ancillary service agent's battery energy storage system station**.
13.57 The dispatch objective The **system operator's dispatch objective** is to maximise for each **half hour** the gross economic benefits to all **purchasers** of **electricity** at the **grid exit points**, less the cost of supplying the **electricity** at the **grid injection points** and the costs of **ancillary services** purchased by the **system operator** under subpart 3 of Part 8, in accordance with the methodology set out in Schedule 13.3, subject to— (a) the capability of generation, **dispatch-capable load stations** or **battery energy storage system stations** for which a **nominated dispatch bid** was submitted, and **ancillary services** and the configuration and capacity of the **grid** and information made available by **asset owners**; and (b) achieving the **principal performance obligations** and any arrangements of the type described in clause 8.6; and (c) meeting the requirements of clause 8.5 in relation to restoration of the power system— provided that in the case of any conflict between paragraphs (b) and (c), paragraph (c) takes priority. …	**13.57 The dispatch objective** The **system operator's dispatch objective** is to maximise for each **half hour** the gross economic benefits to all **purchasers** of **electricity** at the **grid exit points**, less the cost of supplying the **electricity** at the **grid injection points** and the costs of **ancillary services** purchased by the **system operator** under subpart 3 of Part 8, in accordance with the methodology set out in Schedule 13.3, subject to— (a) the capability of generation, **dispatch-capable load stations** or **battery energy storage system stations** for which a **nominated dispatch bid** was submitted, and **ancillary services** and the configuration and capacity of the **grid** and information made available by **asset owners**; and (b) achieving the **principal performance obligations** and any arrangements of the type described in clause 8.6; and (c) meeting the requirements of clause 8.5 in relation to restoration of the power system— provided that in the case of any conflict between paragraphs (b) and (c), paragraph (c) takes priority. …

Commented [SO32]: In relation to the "final" draft, "adjusted consumption capacity" should be bolded as it will be a defined term.

Commented [SO33]: Likewise.

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no change	**13.58A Inputs for price-responsive schedule and non-response schedule** (1) The **system operator** must prepare a **price-responsive schedule** using the following inputs: (a) **offers** and **reserve offers;** and (aa) the potential output of all **intermittent generating stations**, determined using the most recent **forecast of generation potential** for each **intermittent generating station** submitted under clause 13.18A; and (ab) for all **battery energy storage system stations**: (i) the current telemetered reading of the **state of charge** for that **battery energy storage system station**; and (ii) any additional operational parameter agreed between the **battery energy storage system owner** and the **system operator**; and (b) **nominated bids**; and (c) the forecast prepared by the **system operator** under clause 13.7A(1); and (d) **difference bids**; and (e) information provided to the **system operator** by a **grid owner** under clauses 13.29 to 13.34 about— (i) the AC transmission system configuration, capacity, and **losses**; and (ii) the capability of the **HVDC link** including the **HVDC link configuration**, the capacity of the **HVDC link**, the **losses** in the **HVDC link**, the direction of any transfer limit on the **HVDC link**, and any minimum or maximum transfer limits on the **HVDC link**; and (iii) transformer configuration, capacity, and **losses**; and

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	(f) the adjustments specified in subclause (2)(e), subject to any exceptions specified in the **policy statement**; and (g) information about **voltage support** from contracts held by the **system operator** under the **procurement plan**; and (h) information from **ancillary service agents** about **instantaneous reserves** procured under the **procurement plan; and** (i) any price and quantity values assigned by the **system operator** under clause 13.58AA(1)(a). (2) The **system operator** must prepare a **non-response schedule** using the following inputs: (a) **offers, nominated dispatch bids**, and **reserve offers**; and (aa) the potential output of all **intermittent generating stations**, determined using the most recent **forecast of generation potential** for each **intermittent generating station** submitted under clause 13.18A; and (ab) for all **battery energy storage system stations:** (i) the current telemetered reading of the **state of charge** for that **battery energy storage system station**; and (ii) any additional operational parameter agreed between the **battery energy storage system owner** and the **system operator**; and (b) **nominated non-dispatch bid** quantities (where, in the case of a **nominated non-dispatch bid** submitted by a **dispatch notification purchaser**, the relevant quantity is 0 **MW**); and (c) the forecast prepared by the **system operator** under clause 13.7A(1); and (d) information provided to the **system operator** by a **grid owner** under clauses 13.29 to 13.34 referring to—

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	(i) the AC transmission system configuration, capacity, and **losses**; and (ii) the capability of the **HVDC link** including the **HVDC link configuration**, the capacity of the **HVDC link**, the **losses** in the **HVDC link**, the direction of any transfer limit on the **HVDC link**, and any minimum or maximum transfer limits on the **HVDC link**; and (iii) transformer configuration, capacity, and **losses**; and (e) adjustments made by the **system operator** under clause 13(1) of Schedule 13.3, in order to meet the **dispatch objective**; and (f) information about **voltage support** from contracts held by **the system operator** under the **procurement plan**; and (g) information from **ancillary service agents** about **instantaneous reserves** procured under the **procurement plan; and** (h) any price and quantity values assigned by the **system operator** under clause 13.58AA(1)(b).
	…
13.69B Inputs for dispatch schedule (1) The **system operator** must use the following inputs to prepare a **dispatch schedule**: (a) **offers** and **reserve offers**, excluding the following: (i) **offers** submitted by an **intermittent generator** under clause 13.6: (ii) revised **offers** submitted by an **intermittent generator** under clause 13.18A: (iii) **offers** submitted by a **type B co-generator** under clause 13.6: (iv) revised **offers** submitted by a **type B co-generator** under clause 13.17; and	**13.69B Inputs for dispatch schedule** (1) The **system operator** must use the following inputs to prepare a **dispatch schedule**: (a) **offers** and **reserve offers**, excluding the following: (i) **offers** submitted by an **intermittent generator** under clause 13.6: (ii) revised **offers** submitted by an **intermittent generator** under clause 13.18A: (iii) **offers** submitted by a **type B co-generator** under clause 13.6: (iv) revised **offers** submitted by a **type B co-generator** under clause 13.17; and

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(b) the quantities and prices specified in **nominated dispatch bids** (clause 13.7) and the quantities and prices specified in revised **nominated dispatch bids** (clauses 13.19AAA, 13.19A and 13.19B):	(b) the quantities and prices specified in **nominated dispatch bids** (clause 13.7) and the quantities and prices specified in revised **nominated dispatch bids** (clauses 13.19AAA, 13.19A and 13.19B):
(c) any price and quantity values assigned by the **system operator** under clause 13.69AA:	(c) any price and quantity values assigned by the **system operator** under clause 13.69AA:
(d) the expected profile of **demand** until the next **dispatch schedule** is produced by the **system operator**, where in an **unsupplied demand situation**—	(d) the expected profile of **demand** until the next **dispatch schedule** is produced by the **system operator**, where in an **unsupplied demand situation**—
(i) the expected profile of **demand** used to calculate **dispatch instructions** and **dispatch notifications** must reflect the **demand** expected to be supplied by the available **offers**; and	(i) the expected profile of **demand** used to calculate **dispatch instructions** and **dispatch notifications** must reflect the **demand** expected to be supplied by the available **offers**; and
(ii) the expected profile of **demand** used to calculate **dispatch price** must be adjusted for the **demand** that was unable to be supplied by the available **offers** that was assigned a value by the **system operator** under clause 13.69AA(a), in accordance with the processes set out in Schedule 13.3AA:	(ii) the expected profile of **demand** used to calculate **dispatch price** must be adjusted for the **demand** that was unable to be supplied by the available **offers** that was assigned a value by the **system operator** under clause 13.69AA(a), in accordance with the processes set out in Schedule 13.3AA:
(e) the potential output of all **intermittent generating stations**, determined in accordance with subclause (4):	(e) the potential output of all **intermittent generating stations**, determined in accordance with subclause (4):
(f) the current output levels of each **generator** or, if no such data is available, a reasonable estimate of the current output levels of each **generator**:	(f) the current output levels of each **generator** or, if no such data is available, a reasonable estimate of the current output levels of each **generator**:
(g) information from the **grid owner** (clauses 13.29 to 13.34) and revised information from the **grid owner** (clause 13.33) about—	(g) information from the **grid owner** (clauses 13.29 to 13.34) and revised information from the **grid owner** (clause 13.33) about—
(i) the AC transmission system configuration, capacity and **losses**; and	(i) the AC transmission system configuration, capacity and **losses**; and

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(ii) the capability of the **HVDC link** including the **HVDC link configuration**, the capacity of the **HVDC link**, the **losses** in the **HVDC link**, the direction of any transfer limit on the **HVDC link**, and any minimum or maximum transfer limits on the **HVDC link**; and	(ii) the capability of the **HVDC link** including the **HVDC link configuration**, the capacity of the **HVDC link**, the **losses** in the **HVDC link**, the direction of any transfer limit on the **HVDC link**, and any minimum or maximum transfer limits on the **HVDC link**; and
(iii) transformer configuration, capacity and **losses**:	(iii) transformer configuration, capacity and **losses**:
(h) information about **voltage support**:	(h) information about **voltage support**:
(i) the price order in the current **dispatch schedule**:	(i) the price order in the current **dispatch schedule**:
(j) in relation to **intermittent generators**, any ramp rates agreed between the **intermittent generator** and the **system operator**	(j) in relation to **intermittent generators**, any ramp rates agreed between the **intermittent generator** and the **system operator**:
	(k) in relation to each **battery energy storage system station**:
	(i) the current telemetered reading of the **state of charge** for that **battery energy storage system station** or, if no such data is available for any reason, a reasonable estimate of that **battery energy storage system station**; and
	(ii) any additional operational parameter agreed between the **battery energy storage system owner** and the **system operator**.
(2) The **system operator** must incorporate, in each schedule prepared, any adjustments to the inputs described in subclause (1) that may be required to meet the **dispatch objective**.	(2) The **system operator** must incorporate, in each schedule prepared, any adjustments to the inputs described in subclause (1) that may be required to meet the **dispatch objective**.
(3) The **system operator** must use the information provided under clause 13.69AAA as part of its calculation of the expected profile of **demand**.	(3) The **system operator** must use the information provided under clause 13.69AAA as part of its calculation of the expected profile of **demand**.
(4) The **system operator** must, in determining the potential output of an **intermittent generating station** for the purposes of subclause (1)(e), use the following information:	(4) The **system operator** must, in determining the potential output of an **intermittent generating station** for the purposes of subclause (1)(e), use the following information:
(a) if the most recent **dispatch instruction** to the relevant **intermittent generator** for the **intermittent generating station** was not flagged, the actual output in **MW** of the **intermittent generating station**:	(a) if the most recent **dispatch instruction** to the relevant **intermittent generator** for the **intermittent generating**
(b) if the most recent **dispatch instruction** to the relevant **intermittent generator** for the **intermittent generating station** was flagged, the greater of—	
(i) the forecast of generation potential specified in the **intermittent generator's** final **offer** for the relevant **intermittent generating station** submitted under clause 13.18A; and	

Commented [SO34]: In relation to the "final" draft, this should be replaced with "*state of charge*".

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(ii) the actual output in **MW** of the **intermittent generating station**: (c) if the **intermittent generator** and the **system operator** have agreed in writing that an alternative estimate may be provided, the alternative estimate of the potential output of the **intermittent generating station** provided by the relevant **intermittent generator**. ...	**station** was not flagged, the actual output in **MW** of the **intermittent generating station**: (b) if the most recent **dispatch instruction** to the relevant **intermittent generator** for the **intermittent generating station** was flagged, the greater of— (i) the forecast of generation potential specified in the **intermittent generator's** final **offer** for the relevant **intermittent generating station** submitted under clause 13.18A; and (ii) the actual output in **MW** of the **intermittent generating station**: (c) if the **intermittent generator** and the **system operator** have agreed in writing that an alternative estimate may be provided, the alternative estimate of the potential output of the **intermittent generating station** provided by the relevant **intermittent generator**. ...
13.72 System operator to issue dispatch instructions and dispatch notifications (1) The **system operator** must implement each **dispatch schedule**, and any departure from a **dispatch schedule** under clause 13.70 by— (a) issuing **dispatch instructions** to,— (i) **generators**; and (ii) **ancillary service agents**; and (iii) **dispatchable load purchasers** (other than **dispatch notification purchasers**) and **battery energy storage system owners** that have submitted **nominated dispatch bids**; and (b) issuing **dispatch notifications** to **dispatch notification purchasers** and **dispatch notification generators**.	**13.72 System operator to issue dispatch instructions and dispatch notifications** (1) The **system operator** must implement each **dispatch schedule**, and any departure from a **dispatch schedule** under clause 13.70 by— (a) issuing **dispatch instructions** to,— (i) **generators**; and (ii) **ancillary service agents**; and (iii) **dispatchable load purchasers** (other than **dispatch notification purchasers**) and **battery energy storage system owners** that have submitted **nominated dispatch bids**; and (b) issuing **dispatch notifications** to **dispatch notification purchasers** and **dispatch notification generators**.

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(2) The **system operator** must issue each **dispatch instruction** and each **dispatch notification** in a reasonable and timely manner to enable the **participant** to which the **dispatch instruction** or **dispatch notification** is issued to comply with the **dispatch instruction** or **dispatch notification**.	(2) The **system operator** must issue each **dispatch instruction** and each **dispatch notification** in a reasonable and timely manner to enable the **participant** to which the **dispatch instruction** or **dispatch notification** is issued to comply with the **dispatch instruction** or **dispatch notification**.
(3) Despite subclause (1), the **system operator** is not required to issue a **dispatch instruction** to a **participant** if— (a) the **dispatch instruction** is— (i) to provide a quantity of **active power** under clause 13.73(1)(a); or (ii) to provide a quantity of **instantaneous reserve** under clause 13.73(1)(b); and (b) the **dispatch instruction** would differ from the most recent **dispatch instruction** issued to the **participant** by 1 **MW** or less.	(3) Despite subclause (1), the **system operator** is not required to issue a **dispatch instruction** to a **participant** if— (a) the **dispatch instruction** is— (i) to provide a quantity of **active power** under clause 13.73(1)(a); or (ii) to provide a quantity of **instantaneous reserve** under clause 13.73(1)(b); and (b) the **dispatch instruction** would differ from the most recent **dispatch instruction** issued to the **participant** by 1 **MW** or less.
…	…
13.73 Content of dispatch instructions and dispatch notifications	**13.73 Content of dispatch instructions and dispatch notifications**
(1) The **system operator** must ensure that each **dispatch instruction** and **dispatch notification** it issues under clause 13.72(1) instructs the **generator**, **ancillary service agent**, or **dispatchable load purchaser** or **battery energy storage system owner** to carry out 1 of the following: (a) provide a quantity of **active power**: (b) provide a quantity of **instantaneous reserve**: (c) provide a quantity and quality of reserve power or alternative to regulate frequency continuously: (d) provide a quantity of **reactive power**: (e) adjust transformer tap positions to maintain voltage levels: (f) provide a level of voltage:	(1) The **system operator** must ensure that each **dispatch instruction** and **dispatch notification** it issues under clause 13.72(1) instructs the **generator**, **ancillary service agent**, or **dispatchable load purchaser** or **battery energy storage system owner** to carry out 1 of the following: (a) provide a quantity of **active power**: (b) provide a quantity of **instantaneous reserve**: (c) provide a quantity and quality of reserve power or alternative to regulate frequency continuously: (d) provide a quantity of **reactive power**: (e) adjust transformer tap positions to maintain voltage levels: (f) provide a level of voltage:

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(g) **synchronise** or **de-synchronise generating plant** within the current **trading period** or the next **trading period** either directly or in accordance with any process that may be agreed with the **generator**:	(g) **synchronise** or **de-synchronise generating plant** within the current **trading period** or the next **trading period** either directly or in accordance with any process that may be agreed with the **generator**:
(h) switch on or switch off schemes for over frequency tripping where such capability exists in **generating plant** that a **generator** has offered to provide to the **system operator**:	(h) switch on or switch off schemes for over frequency tripping where such capability exists in **generating plant** that a **generator** has offered to provide to the **system operator**:
(i) manage the **generating plant** within a **block dispatch group** or **station dispatch group** so as to ensure the largest single reserve risk within that **block dispatch group** or **station dispatch group** does not exceed the relevant maximum reserve risk advised by the **system operator** for the North Island or the South Island for each **trading period**:	(i) manage the **generating plant** within a **block dispatch group** or **station dispatch group** so as to ensure the largest single reserve risk within that **block dispatch group** or **station dispatch group** does not exceed the relevant maximum reserve risk advised by the **system operator** for the North Island or the South Island for each **trading period**:
(j) manage the total aggregate generation for each **sub-block dispatch group** or **sub-station dispatch group** for that **generator** so as not to exceed the total sum of the **dispatched** quantities for each **generating plant** or **generating unit** comprising that **sub-block dispatch group** or **sub-station dispatch group** for the duration of the notice received under clauses 13.60, 13.61, or 13.64 to 13.66:	(j) manage the total aggregate generation for each **sub-block dispatch group** or **sub-station dispatch group** for that **generator** so as not to exceed the total sum of the **dispatched** quantities for each **generating plant** or **generating unit** comprising that **sub-block dispatch group** or **sub-station dispatch group** for the duration of the notice received under clauses 13.60, 13.61, or 13.64 to 13.66:
(k) manage the total aggregate generation for each **block dispatch group** or **station dispatch group** for that **generator** so as to meet the total sum of the **dispatched** quantities for each **generating station** or **generating unit** comprising that **block dispatch group** or **station dispatch group**:	(k) manage the total aggregate generation for each **block dispatch group** or **station dispatch group** for that **generator** so as to meet the total sum of the **dispatched** quantities for each **generating station** or **generating unit** comprising that **block dispatch group** or **station dispatch group**:
(l) use a specified quantity of **electricity**.	(l) use a specified quantity of **electricity**.
(1A) The **system operator** must include an indication (**flag**) in each **dispatch instruction** it issues to an **intermittent generator** under clause 13.72(1)(a) if the **intermittent generator** is **dispatched** for a	(1A) The **system operator** must include an indication (**flag**) in each **dispatch instruction** it issues to an **intermittent generator** under clause 13.72(1)(a) if the **intermittent generator** is **dispatched** for a

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trading period at a quantity less than the potential output of the relevant **intermittent generating station**.	**trading period** at a quantity less than the potential output of the relevant **intermittent generating station**.
(1B) For the purposes of subclause (1A), the potential output of an **intermittent generating station** is the potential output for the relevant **intermittent generating station** determined by the **system operator** under clause 13.69B(4).	(1B) For the purposes of subclause (1A), the potential output of an **intermittent generating station** is the potential output for the relevant **intermittent generating station** determined by the **system operator** under clause 13.69B(4).
(2) *[Revoked]*	(2) *[Revoked]*
…	…
13.75 Form of dispatch instruction and dispatch notification	**13.75 Form of dispatch instruction and dispatch notification**
(1) When issuing a **dispatch instruction** or **dispatch notification** under clause 13.72(1), the **system operator** must specify—	(1) When issuing a **dispatch instruction** or **dispatch notification** under clause 13.72(1), the **system operator** must specify—
(a) the **generating plant**, **generating unit**, **block dispatch group**, **station dispatch group**, **interruptible load**, **dispatch-capable load station**, **battery energy storage system station** or **frequency keeping units** to which the **dispatch instruction** or **dispatch notification** applies; and	(i) the **generating plant**, **generating unit**, **block dispatch group**, **station dispatch group**, **interruptible load**, **dispatch-capable load station**, **battery energy storage system station** or **frequency keeping units** to which the **dispatch instruction** or **dispatch notification** applies; and
(b) the desired outcome of the **dispatch instruction** or **dispatch notification**; and	(j) the desired outcome of the **dispatch instruction** or **dispatch notification**; and
(c) if the start time for the **dispatch instruction** or **dispatch notification** differs from the issue time, the start time within the current **trading period** or the next **trading period**; and	(k) if the start time for the **dispatch instruction** or **dispatch notification** differs from the issue time, the start time within the current **trading period** or the next **trading period**; and
(d) if specific ramp rates are concerned, a specific target time to reach the desired outcome; and	(l) if specific ramp rates are concerned, a specific target time to reach the desired outcome; and
(e) the time at which the **dispatch instruction** or **dispatch notification** was issued; and	(m) the time at which the **dispatch instruction** or **dispatch notification** was issued; and
(f) any **block security constraint** that occurs within a **block dispatch group** and how the **block security constraint** divides the **generating stations** or **generating units** of a **block dispatch group** into **sub-block dispatch groups** as part of such a **dispatch instruction** or **dispatch notification**; and	(n) any **block security constraint** that occurs within a **block dispatch group** and how the **block security constraint** divides the **generating stations** or **generating units** of a **block dispatch group** into **sub-block dispatch groups** as part of such a **dispatch instruction** or **dispatch notification**; and

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(g) any **station security constraint** that occurs within a **station dispatch group** and how the **station security constraint** divides the **generating stations** or **generating units** of a **station dispatch group** into **sub-station dispatch groups**; and (h) if it is a **dispatch instruction** or **dispatch notification** specified in clause 13.73(1)(i), the maximum reserve risk for the relevant **island**; and (i) when issuing a **dispatch instruction** or **dispatch notification** to a **dispatchable load purchaser**, the **trading period** for which the **dispatch instruction** or **dispatch notification** is issued.	(o) any **station security constraint** that occurs within a **station dispatch group** and how the **station security constraint** divides the **generating stations** or **generating units** of a **station dispatch group** into **sub-station dispatch groups**; and (p) if it is a **dispatch instruction** or **dispatch notification** specified in clause 13.73(1)(i), the maximum reserve risk for the relevant **island**; and (i) when issuing a **dispatch instruction** or **dispatch notification** to a **dispatchable load purchaser**, the **trading period** for which the **dispatch instruction** or **dispatch notification** is issued.
13.76 System operator to issue and log dispatch instructions and dispatch notifications (1) The **system operator** must issue **dispatch instructions** and **dispatch notifications**— (a) to each **generator** and each **battery energy storage system owner** (other than a **generator** or **battery energy storage system owner** receiving **dispatch instructions** in its capacity as an **ancillary service agent**) and each **dispatchable load purchaser**, using an approved system; and …	**13.76 System operator to issue and log dispatch instructions and dispatch notifications** (1) The **system operator** must issue **dispatch instructions** and **dispatch notifications**— (a) to each **generator** and each **battery energy storage system owner** (other than a **generator** or **battery energy storage system owner** receiving **dispatch instructions** in its capacity as an **ancillary service agent**) and each **dispatchable load purchaser**, using an approved system; and …
13.82 Dispatch instructions to be complied with (1) This clause applies to— (a) a **generator**; and (b) an **ancillary service agent**; and (c) a **dispatched purchaser**~~.~~; and (d) a **battery energy storage system owner**. (2) Each **participant** to which this clause applies must comply with a **dispatch instruction** properly issued by the **system operator** under	**13.82 Dispatch instructions to be complied with** (1) This clause applies to— (a) a **generator**; and (b) an **ancillary service agent**; and (c) a **dispatched purchaser**~~.~~; and (d) a **battery energy storage system owner**. (2) Each **participant** to which this clause applies must comply with a **dispatch instruction** properly issued by the **system operator** under

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clause 13.72(1)(a) unless,—	clause 13.72(1)(a) unless,—
(a) in the **participant's** reasonable opinion,—	(a) in the **participant's** reasonable opinion,—
(i) personnel or plant safety is at risk; or	(i) personnel or plant safety is at risk; or
(ii) following the **dispatch instruction** will contravene a law;	(ii) following the **dispatch instruction** will contravene a law;
or	or
(b) the **generating plant**, **battery energy storage system** or **dispatch-capable load station** is already responding to an automated signal to activate—	(b) the **generating plant**, **battery energy storage system** or **dispatch-capable load station** is already responding to an automated signal to activate—
(i) **capacity reserve**; or	(i) **capacity reserve**; or
(ii) **instantaneous reserve**; or	(ii) **instantaneous reserve**; or
(iii) **automatic under-frequency load shedding**; or	(iii) **automatic under-frequency load shedding**; or
(iv) **over frequency reserve**; or	(iv) **over frequency reserve**; or
(c) the **participant** is a **generator** or **ancillary service agent** acting in accordance with clause 13.86; or	(c) the **participant** is a **generator** or **ancillary service agent** acting in accordance with clause 13.86; or
(d) the **participant** is an **intermittent generator** and—	(d) the **participant** is an **intermittent generator** and—
(i) is generating **electricity** during a **trading period** at a rate that is not more than 30MW below the **forecast of generation potential** specified in the **intermittent generator's** final **offer**; and	(i) is generating **electricity** during a **trading period** at a rate that is not more than 30MW below the **forecast of generation potential** specified in the **intermittent generator's** final **offer**; and
(ii) the **system operator** has not **flagged** the **dispatch instruction** in accordance with clause 13.73(1A); or	(ii) the **system operator** has not **flagged** the **dispatch instruction** in accordance with clause 13.73(1A); or
(e) the **participant**—	(e) the **participant**—
(i) is a **generator**; and	(i) is a **generator**; and
(ii) deviates from a **dispatch instruction** for **active power** to comply with clause 8.17; or	(ii) deviates from a **dispatch instruction** for **active power** to comply with clause 8.17; or
(f) the **participant**—	(f) the **participant**—
(i) is a **dispatched purchaser** or **battery energy storage system owner**; and	(i) is a **dispatched purchaser** or **battery energy storage system owner**; and
(ii) deviates from the **dispatch instruction**—	(ii) deviates from the **dispatch instruction**—
(A) to comply with a request issued by the **system**	(A) to comply with a request issued by the **system**

Commented [SO35]: Does this mean that compliance is at the individual BESS level or station level?

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operator under clause 5(4) of **Technical Code** B of Schedule 8.3; or	**operator** under clause 5(4) of **Technical Code** B of Schedule 8.3; or
(B) to comply with clause 8.18; or	(B) to comply with clause 8.18; or
(g) the **participant**—	(g) the **participant**—
(i) is a **dispatched purchaser** or **battery energy storage system owner**; and	(i) is a **dispatched purchaser** or **battery energy storage system owner**; and
(ii) cannot comply with the **dispatch instruction** because **demand** has been **electrically disconnected** under clause 7(20) of **Technical Code** B of Schedule 8.3; or	(ii) cannot comply with the **dispatch instruction** because **demand** has been **electrically disconnected** under clause 7(20) of **Technical Code** B of Schedule 8.3; or
(ga) the **participant**—	(ga) the **participant**—
(i) is a **dispatched purchaser**; and	(i) is a **dispatched purchaser**; and
(ii) the **dispatch instruction** is issued for a **trading period** for which the latest **nominated bid** for the relevant **dispatch-capable load station** is a **nominated non-dispatch bid**; or	(ii) the **dispatch instruction** is issued for a **trading period** for which the latest **nominated bid** for the relevant **dispatch-capable load station** is a **nominated non-dispatch bid**; or
(h) the **participant**—	(h) the **participant**—
(i) is a **generator** or an **ancillary service agent**; and	(i) is a **generator** or an **ancillary service agent**; and
(ii) deviates from a **dispatch instruction** to comply with clause 9 of **Technical Code** B of Schedule 8.3; or	(ii) deviates from a **dispatch instruction** to comply with clause 9 of **Technical Code** B of Schedule 8.3; or
(i) the **participant**—	(i) the **participant**—
(i) is a **generator** or an **ancillary service agent**; and	(i) is a **generator** or an **ancillary service agent**; and
(ii) is acting in accordance with a **commissioning** plan or test plan that—	(ii) is acting in accordance with a **commissioning** plan or test plan that—
(A) is required under clause 2(6) of **Technical Code** A of Schedule 8.3; and	(A) is required under clause 2(6) of **Technical Code** A of Schedule 8.3; and
(B) expressly allows the **generator** or **ancillary service agent** to depart from the **dispatch instruction** for the purpose of the **commissioning** plan or test plan; and	(B) expressly allows the **generator** or **ancillary service agent** to depart from the **dispatch instruction** for the purpose of the **commissioning** plan or test plan; and
(iii) has no reasonable means of complying with the **dispatch**	(iii) has no reasonable means of complying with the **dispatch**

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instruction while acting in accordance with the **commissioning** plan or test plan; or	**instruction** while acting in accordance with the **commissioning** plan or test plan; or
(j) the **participant** is a **type B co-generator** and the **system operator** has not advised that there is—	(j) the **participant** is a **type B co-generator** and the **system operator** has not advised that there is—
(i) a **grid emergency**; or	(i) a **grid emergency**; or
(ii) a system **constraint** that directly affects the **type B co-generator**.	(ii) a system **constraint** that directly affects the **type B co-generator**.
(3) A **participant** to which the exception in subclause (2)(a) applies must immediately advise the **system operator** of the circumstance in which the exception arises.	(3) A **participant** to which the exception in subclause (2)(a) applies must immediately advise the **system operator** of the circumstance in which the exception arises.
(4) If a **dispatched purchaser** is issued with more than 1 **dispatch instruction** for the same **dispatch-capable load station** for the same **trading period**, the **dispatched purchaser** must comply with the latest **dispatch instruction**.	(4) If a **dispatched purchaser** is issued with more than 1 **dispatch instruction** for the same **dispatch-capable load station** for the same **trading period**, the **dispatched purchaser** must comply with the latest **dispatch instruction**.
(5) To avoid doubt, a **dispatch instruction** listed in clause 13.73(1)(b) to 13.73(1)(f) or 13.73(1)(h) is properly issued only if—	(5) To avoid doubt, a **dispatch instruction** listed in clause 13.73(1)(b) to 13.73(1)(f) or 13.73(1)(h) is properly issued only if—
(a) the **generator** or **ancillary service agent** to which the **dispatch instruction** is given has an enforceable contract with the **system operator** for the provision of services relating to the **dispatch instruction**; or	(a) the **generator** or **ancillary service agent** to which the **dispatch instruction** is given has an enforceable contract with the **system operator** for the provision of services relating to the **dispatch instruction**; or
(b) the **dispatch instruction** is consistent with an enforceable contract between the **system operator** and the **generator** or **ancillary service agent** for the provision of services relating to the **dispatch instruction**; or	(b) the **dispatch instruction** is consistent with an enforceable contract between the **system operator** and the **generator** or **ancillary service agent** for the provision of services relating to the **dispatch instruction**; or
(c) the **dispatch instruction** is given for the purposes of clause 8.5 or 13.70; or	(c) the **dispatch instruction** is given for the purposes of clause 8.5 or 13.70; or
(d) the **dispatch instruction** is consistent with—	(d) the **dispatch instruction** is consistent with—
(i) the **asset owner performance obligations** under clauses 8.22 to 8.24; or	(i) the **asset owner performance obligations** under clauses 8.22 to 8.24; or
(ii) the **technical codes** concerning voltage; or	(ii) the **technical codes** concerning voltage; or

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(iii) a **dispensation**.	(iii) a **dispensation**.
(6) A **dispatched purchaser** issued with a **dispatch instruction** for a **dispatch-capable load station** must not make changes to its other load at the same **GXP** with the intention of offsetting the **dispatch instruction** for the **dispatch-capable load station**.	(6) A **dispatched purchaser** issued with a **dispatch instruction** for a **dispatch-capable load station** must not make changes to its other load at the same **GXP** with the intention of offsetting the **dispatch instruction** for the **dispatch-capable load station**.
…	…
13.83A Dispatchable load purchasers to make staff or facilities available to meet dispatch instructions and dispatch notifications	**13.83A Dispatchable load purchasers to make staff or facilities available to meet dispatch instructions and dispatch notifications**
(1) Each **dispatchable load purchaser**, or **battery energy storage system owner**, that has submitted a **nominated dispatch bid** must ensure that appropriate personnel or facilities are available to receive and comply with each **dispatch instruction** or **dispatch notification** issued to the **dispatchable load purchaser** or **battery energy storage system owner**.	(1) Each **dispatchable load purchaser**, or **battery energy storage system owner**, that has submitted a **nominated dispatch bid** must ensure that appropriate personnel or facilities are available to receive and comply with each **dispatch instruction** or **dispatch notification** issued to the **dispatchable load purchaser** or **battery energy storage system owner**.
(2) Nothing in this clause limits the ability of a **dispatchable load purchaser** or **battery energy storage system owner** to have a control centre that operates 1 or more **dispatch-capable load stations** or **battery energy storage system stations** by remote control.	(2) Nothing in this clause limits the ability of a **dispatchable load purchaser** or **battery energy storage system owner** to have a control centre that operates 1 or more **dispatch-capable load stations** or **battery energy storage system stations** by remote control.
…	…
13.105A Information to be made available to purchasers, generators, and ancillary service agents	**13.105A Information to be made available to purchasers, generators, and ancillary service agents**
(1) At the same time as the **system operator** is required to make information available in accordance with clause 13.104(1), the **system operator** must make available on **WITS**—	(1) At the same time as the **system operator** is required to make information available in accordance with clause 13.104(1), the **system operator** must make available on **WITS**—
(aa) for each **dispatchable load purchaser** that has submitted a **nominated dispatch bid**, information from the current **non-response schedule** relating to the scheduling of the **dispatchable load purchaser's nominated dispatch bids** for the **trading periods** covered in the **schedule length period**; and	(aa) for each **dispatchable load purchaser** that has submitted a **nominated dispatch bid**, information from the current **non-response schedule** relating to the scheduling of the **dispatchable load purchaser's nominated dispatch bids** for the **trading periods** covered in the **schedule length period**; and

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(a) for each **purchaser**, information from the current **price-responsive schedule** relating to the scheduling of the **purchaser's bids** for the **trading periods** covered in the **schedule length period**; and	(a) for each **purchaser**, information from the current **price-responsive schedule** relating to the scheduling of the **purchaser's bids** for the **trading periods** covered in the **schedule length period**; and
(b) for each **generator**, information from the current **price-responsive schedule** and **non-response schedule** relating to the scheduling of the **generator's** offers for the **trading periods** covered in the **schedule length period**; and	(b) for each **generator**, information from the current **price-responsive schedule** and **non-response schedule** relating to the scheduling of the **generator's** offers for the **trading periods** covered in the **schedule length period**; and
(c) for each **ancillary service agent** who has submitted a **reserve offer** for the **scheduling period**, information from the current **price-responsive schedule** and **non-response schedule** relating to the scheduling of the **ancillary service agent's reserve offers** for the **trading periods** covered in the **schedule length period**~~.~~; and	(c) for each **ancillary service agent** who has submitted a **reserve offer** for the **scheduling period**, information from the current **price-responsive schedule** and **non-response schedule** relating to the scheduling of the **ancillary service agent's reserve offers** for the **trading periods** covered in the **schedule length period**~~.~~; and
(d) for each **battery energy storage system owner** that has submitted an **offer** or **bid**, information on the capped quantities scheduled for the **battery energy storage system owner's battery energy storage system stations** from the current **price-responsive schedule** and **non-response schedule** relating to the scheduling of the **battery energy storage system owner's offers** or **bids** for the **trading periods** covered in the **schedule length period.**	(d) for each **battery energy storage system owner** that has submitted an **offer** or **bid**, information on the capped quantities scheduled for the **battery energy storage system owner's battery energy storage system stations** from the current **price-responsive schedule** and **non-response schedule** relating to the scheduling of the **battery energy storage system owner's offers** or **bids** for the **trading periods** covered in the **schedule length period.**
…	…

Commented [SO36]: It is unclear what "capped quantities" refers to. We recommend "capped" being a defined term.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
Calculation of constrained off amounts … **13.194 Clearing manager to calculate constrained off amounts** **…** (2) If a **constrained off situation** occurs in relation to a **dispatch-capable load station** or **battery energy storage system station** during a **trading period**, the **clearing manager** must calculate the **constrained off amounts** for each **dispatch-capable load station** or **battery energy storage system station**, for each affected **nominated dispatch bid** price band, using the following formula: ConOffAmtdisp = ConOffQ * (Pb - Pf) where ConOffAmtdisp is the **constrained off amount** for a **dispatch-capable load station** or **battery energy storage system station** for the **nominated dispatch bid** price band … **13.199 Clearing manager to make details of constrained off amounts available** The **clearing manager** must, at the time specified in clause 13.197, **publish** the details of **constrained off amounts** for each **generator** and each **dispatched purchaser** for the previous **billing period** as follows: (a) the **constrained off amounts** calculated in accordance with clauses 13.194 to 13.196: (b) the **generator**, **battery energy storage system owner** or **dispatched purchaser** (as the case may be) that was **constrained off**: **(c)** the applicable **grid injection point**, or **grid exit point**, or **block dispatch group**, or **station dispatch group**.	*Calculation of constrained off amounts* … **13.194 Clearing manager to calculate constrained off amounts** **…** (2) If a **constrained off situation** occurs in relation to a **dispatch-capable load station** or **battery energy storage system station** during a **trading period**, the **clearing manager** must calculate the **constrained off amounts** for each **dispatch-capable load station** or **battery energy storage system station**, for each affected **nominated dispatch bid** price band, using the following formula: ConOffAmtdisp = ConOffQ * (Pb - Pf) where ConOffAmtdisp is the **constrained off amount** for a **dispatch-capable load station** or **battery energy storage system station** for the **nominated dispatch bid** price band … **13.199 Clearing manager to make details of constrained off amounts available** The **clearing manager** must, at the time specified in clause 13.197, **publish** the details of **constrained off amounts** for each **generator** and each **dispatched purchaser** for the previous **billing period** as follows: (a) the **constrained off amounts** calculated in accordance with clauses 13.194 to 13.196: (b) the **generator**, **battery energy storage system owner** or **dispatched purchaser** (as the case may be) that was **constrained off**: (c) the applicable **grid injection point**, or **grid exit point**, or **block dispatch group**, or **station dispatch group**.

Commented [SO37]: The purpose of this amendment (page 51 of the Consultation paper) is to require the "*clearing manager to use capped bids and offers when calculating constrained off amounts*". We don't consider that this purpose is adequately reflected in this section without a change to the definition of "constrained off situation" in clause 13.192 (depending on what is meant by "*capped bids and offers*").

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
…	…
13.201A Dispatched purchasers entitled to constrained off compensation and purchasers to pay constrained off compensation	**13.201A Dispatched purchasers entitled to constrained off compensation and purchasers to pay constrained off compensation**
(1) A **dispatched purchaser** or **battery energy storage system owner** in respect of whose **dispatch-capable load station** or **battery energy storage system station** there was a **constrained off situation** as described in clause 13.192(1)(c) is owed **constrained off compensation** for the **constrained off amounts** calculated under clause 13.194(2).	(1) A **dispatched purchaser** or **battery energy storage system owner** in respect of whose **dispatch-capable load station** or **battery energy storage system station** there was a **constrained off situation** as described in clause 13.192(1)(c) is owed **constrained off compensation** for the **constrained off amounts** calculated under clause 13.194(2).
(2) A **purchaser** that purchases **electricity** at a **grid exit point** incurs an amount owing to the **clearing manager** for **constrained off compensation**, calculated under subclause (6).	(2) A **purchaser** that purchases **electricity** at a **grid exit point** incurs an amount owing to the **clearing manager** for **constrained off compensation**, calculated under subclause (6).
(2A) The **clearing manager** must advise each **purchaser** of the amount owing by the **purchaser** for **constrained off compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.	(2A) The **clearing manager** must advise each **purchaser** of the amount owing by the **purchaser** for **constrained off compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.
(3) The **clearing manager** owes **constrained off compensation** received under subclause (2), for each **dispatch-capable load station** or **battery energy storage system station**, to the **dispatched purchaser** or **battery energy storage system owner** that purchased **electricity** for the **dispatch-capable load station** or **battery energy storage system station**.	(3) The **clearing manager** owes **constrained off compensation** received under subclause (2), for each **dispatch-capable load station** or **battery energy storage system station**, to the **dispatched purchaser** or **battery energy storage system owner** that purchased **electricity** for the **dispatch-capable load station** or **battery energy storage system station**.
(4) The **clearing manager** must advise each **dispatched purchaser** or **battery energy storage system owner** of the amount owing to the **dispatched purchaser** or **battery energy storage system owner** for **constrained off compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.	(4) The **clearing manager** must advise each **dispatched purchaser** or **battery energy storage system owner** of the amount owing to the **dispatched purchaser** or **battery energy storage system owner** for **constrained off compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.
(5) *[Revoked]*	(5) *[Revoked]*

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
(6) The **clearing manager** must calculate **constrained off compensation** owing by a **purchaser** under subclause (2) for each **trading period** using the following formula: $ConOffC_p = ConOffC_{DLPs} * (Pur_i / TotPur)$ where $ConOffC_p$ is the **constrained off compensation** owing by a **purchaser** $ConOffC_{DLPs}$ is the sum of **constrained off compensation** owing to all **dispatched purchasers** and **battery energy storage system owners** whose **bids** were dispatched for the **trading period** Pur_i is the total quantity in **MWh** of all purchases by the **purchaser** from the **clearing manager** during the **trading period**, as shown by **reconciliation information** calculated by the **reconciliation manager** under Part 15 TotPur is the quantity in **MWh** of all purchases by all **purchasers** from the **clearing manager** during the **trading period**, as shown by **reconciliation information** calculated by the **reconciliation manager** under Part 15.	(6) The **clearing manager** must calculate **constrained off compensation** owing by a **purchaser** under subclause (2) for each **trading period** using the following formula: $ConOffC_p = ConOffC_{DLPs} * (Pur_i / TotPur)$ where $ConOffC_p$ is the **constrained off compensation** owing by a **purchaser** $ConOffC_{DLPs}$ is the sum of **constrained off compensation** owing to all **dispatched purchasers** and **battery energy storage system owners** whose **bids** were dispatched for the **trading period** Pur_i is the total quantity in **MWh** of all purchases by the **purchaser** from the **clearing manager** during the **trading period**, as shown by **reconciliation information** calculated by the **reconciliation manager** under Part 15 TotPur is the quantity in **MWh** of all purchases by all **purchasers** from the **clearing manager** during the **trading period**, as shown by **reconciliation information** calculated by the **reconciliation manager** under Part 15.
…	…
13.204 Calculation of constrained on amounts	**13.204 Calculation of constrained on amounts**
(1) If a **constrained on situation** occurs during any **trading period** during a previous **billing period**,— (a) the **clearing manager** must calculate the **constrained on amounts** for a **constrained on situation** described in clause 13.202(1)(a) or (b) for each **generator** for each affected price band in accordance with the following formula:	(1) If a **constrained on situation** occurs during any **trading period** during a previous **billing period**,— (a) the **clearing manager** must calculate the **constrained on amounts** for a **constrained on situation** described in clause 13.202(1)(a) or (b) for each **generator** for each affected price band in accordance with the following formula:

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
$COC = Q_{con} * (P_o - P_f)$ where COC is the **constrained on amount** for a **generator** Q_{con} is the **dispatched** quantity in **MWh** (calculated under paragraph (b)) from that price band in the **offer** that was constrained on during a **trading period**, or the positive difference between the **reconciliation information** and the **scheduled quantity**, whichever is less P_o is the price offered for that price band by the **generator** for the quantity of **electricity** from the **generating plant** which was constrained on P_f is the **final price** for that **trading period** at the **grid injection point**; and	$COC = Q_{con} * (P_o - P_f)$ where COC is the **constrained on amount** for a **generator** Q_{con} is the **dispatched** quantity in **MWh** (calculated under paragraph (b)) from that price band in the **offer** that was constrained on during a **trading period**, or the positive difference between the **reconciliation information** and the **scheduled quantity**, whichever is less P_o is the price offered for that price band by the **generator** for the quantity of **electricity** from the **generating plant** which was constrained on P_f is the **final price** for that **trading period** at the **grid injection point**; and
(aa) the **clearing manager** must calculate the **constrained on amounts** for a **constrained on situation** described in clause 13.202(1)(d) for each **dispatch-capable load station** for each affected **nominated dispatch bid** price band, using the following formula: $ConOnAmt = ConOnQ* (P_f - P_b)$ where ConOnAmt is the **constrained on amount** for a **dispatch-capable load station** or **battery energy storage system station** for the **nominated dispatch bid** price band	(aa) the **clearing manager** must calculate the **constrained on amounts** for a **constrained on situation** described in clause 13.202(1)(d) for each **dispatch-capable load station** for each affected **nominated dispatch bid** price band, using the following formula: $ConOnAmt = ConOnQ* (P_f - P_b)$ where ConOnAmt is the **constrained on amount** for a **dispatch-capable load station** or **battery energy storage system station** for the **nominated dispatch bid** price band

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
ConOnQ is the amount in **MWh** by which the lowest of Q_{disp} and $Q_{rec\ exceeds}$ Q_b	ConOnQ is the amount in **MWh** by which the lowest of Q_{disp} and $Q_{rec\ exceeds}$ Q_b
where	where
Q_b is the quantity, in **MWh**, in the **nominated dispatch bid** price band where the bid price is below the final price.	Q_b is the quantity, in **MWh**, in the **nominated dispatch bid** price band where the bid price is below the final price.
Q_{disp} is the **dispatched** quantity in **MWh** in the **trading period**, calculated under paragraph (b), for the **nominated dispatch bid** price band in the **trading period**	Q_{disp} is the **dispatched** quantity in **MWh** in the **trading period**, calculated under paragraph (b), for the **nominated dispatch bid** price band in the **trading period**
Q_{rec} is the **reconciled quantity** provided by the **reconciliation manager** under clause 15.20C allocated by the **clearing manager** to the **nominated dispatch bid** price band in the **trading period**	Q_{rec} is the **reconciled quantity** provided by the **reconciliation manager** under clause 15.20C allocated by the **clearing manager** to the **nominated dispatch bid** price band in the **trading period**
P_f is the **final price** for the **trading period** at the **grid exit point**	P_f is the **final price** for the **trading period** at the **grid exit point**
P_b is the price bid for the **nominated dispatch bid** price band for the **dispatch-capable load station** **or battery energy storage system station** that was constrained on; and	P_b is the price bid for the **nominated dispatch bid** price band for the **dispatch-capable load station** **or battery energy storage system station** that was constrained on; and
(b) for the purposes of clauses 13.202 to 13.211 **dispatched** quantity must be calculated taking into account—	(b) for the purposes of clauses 13.202 to 13.211 **dispatched** quantity must be calculated taking into account—
(i) the quantity in **MW** recorded in the log kept by the **system operator** in accordance with clause 13.76; and if required, the **clearing manager** must aggregate such quantities for—	(i) the quantity in **MW** recorded in the log kept by the **system operator** in accordance with clause 13.76; and if required, the **clearing manager** must aggregate such quantities for—
(A) **generating stations** or **generating units** in the relevant **station dispatch group**; or	(A) **generating stations** or **generating units** in the relevant **station dispatch group**; or

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
(B) **generating units**, if the **clearing manager** requires a **dispatched** quantity to be determined on a **grid injection point** basis; and	(B) **generating units**, if the **clearing manager** requires a **dispatched** quantity to be determined on a **grid injection point** basis; and
(ii) for an **offer**, the ramp rate applying to that **constrained on situation** that is specified in the **offer** submitted by the **generator**, or—	(ii) for an **offer**, the ramp rate applying to that **constrained on situation** that is specified in the **offer** submitted by the **generator**, or—
(A) for a **block dispatch group** or a **station dispatch group**; or	(A) for a **block dispatch group** or a **station dispatch group**; or
(B) for **generating units**, if the **clearing manager** requires the **dispatched** quantity to be determined on a **grid injection point** basis—	(B) for **generating units**, if the **clearing manager** requires the **dispatched** quantity to be determined on a **grid injection point** basis—
the fastest of the ramp rates applying to that **constrained on situation** that are specified in the **offers** submitted by the **generator** in that **block dispatch group**, that **station dispatch group** or those **generating units electrically connected** to the relevant **grid injection point** (as the case may be); and	the fastest of the ramp rates applying to that **constrained on situation** that are specified in the **offers** submitted by the **generator** in that **block dispatch group**, that **station dispatch group** or those **generating units electrically connected** to the relevant **grid injection point** (as the case may be); and
(iii) plus or minus the **MW** bandwidth applicable for each **generator** affected by a **frequency keeping** requirement as advised by the **system operator** to the **clearing manager** under clause 13.76 and, if required, the **clearing manager** must aggregate the **MW** bandwidth applicable to determine the **MW** bandwidth on a **grid injection point** basis; and	(iii) plus or minus the **MW** bandwidth applicable for each **generator** affected by a **frequency keeping** requirement as advised by the **system operator** to the **clearing manager** under clause 13.76 and, if required, the **clearing manager** must aggregate the **MW** bandwidth applicable to determine the **MW** bandwidth on a **grid injection point** basis; and
(c) the **clearing manager** must calculate the **constrained on amounts** for a **constrained on situation** described in clause 13.202(1)(c) for each **ancillary service agent** for each affected price band in accordance with the following formula:	(c) the **clearing manager** must calculate the **constrained on amounts** for a **constrained on situation** described in clause 13.202(1)(c) for each **ancillary service agent** for each affected price band in accordance with the following formula:
$COC = Q_{con} * (P_o - P_f)$	$COC = Q_{con} * (P_o - P_f)$

Commented [SO38]: In relation to the "final" draft, ramp rates will not be relevant for BESS and should be reflected in the drafting

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
where	where
COC is the **constrained on amount** for an **ancillary service agent**	COC is the **constrained on amount** for an **ancillary service agent**
Q_{con} is the **dispatched** quantity of **instantaneous reserve** in **MW** (calculated under paragraph (d)) from that price band in the **reserve offer** that was constrained on during a **trading period**	Q_{con} is the **dispatched** quantity of **instantaneous reserve** in **MW** (calculated under paragraph (d)) from that price band in the **reserve offer** that was constrained on during a **trading period**
P_o is the price offered for that price band by that **ancillary service agent** for the quantity Q_{con}	P_o is the price offered for that price band by that **ancillary service agent** for the quantity Q_{con}
P_f is the **final reserve price** for that **trading period** at the **point of connection** on the **grid**; and	P_f is the **final reserve price** for that **trading period** at the **point of connection** on the **grid**; and
(d) for the purposes of paragraph (c), in determining the **dispatched** quantity, the **clearing manager** must take into account the quantity in **MW** of **instantaneous reserve dispatched** for the **ancillary service agent** recorded in the log kept by the **system operator** in accordance with clause 13.76; and	(d) for the purposes of paragraph (c), in determining the **dispatched** quantity, the **clearing manager** must take into account the quantity in **MW** of **instantaneous reserve dispatched** for the **ancillary service agent** recorded in the log kept by the **system operator** in accordance with clause 13.76; and
(e) the **constrained on amounts** for a **block dispatch group** or **station dispatch group** equal the sum of the amounts calculated in accordance with paragraphs (a) and (b) for the **generating plant** in that **block dispatch group** or **station dispatch group** (as the case may be); and	(e) the **constrained on amounts** for a **block dispatch group** or **station dispatch group** equal the sum of the amounts calculated in accordance with paragraphs (a) and (b) for the **generating plant** in that **block dispatch group** or **station dispatch group** (as the case may be); and
(f) in relation to any 2 adjacent **trading periods**, a **generator** is entitled to be paid for the 2nd **trading period** at the **final price** for the **grid injection point** if the **generator**—	(f) in relation to any 2 adjacent **trading periods**, a **generator** is entitled to be paid for the 2nd **trading period** at the **final price** for the **grid injection point** if the **generator**—

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
(i) was in a **constrained on situation** in the 1st **trading period**; and (ii) continues to generate in the 2nd **trading period** as a result of a **dispatch instruction** given for the 1st **trading period**; but (iii) has not made an **offer** in the 2nd **trading period**. (2) To avoid doubt, nothing in this clause entitles the **system operator** to issue any instruction to a **generator** in relation to **unoffered generation**. (3) In this clause,— (a) an **offer** made by a **generator** means the last **offer** made by the **generator** which applied during the relevant **trading period**; and (b) a **bid** made by a **purchaser** means the last **bid** made by the **purchaser** which applied during the relevant **trading period**.	(i) was in a **constrained on situation** in the 1st **trading period**; and (ii) continues to generate in the 2nd **trading period** as a result of a **dispatch instruction** given for the 1st **trading period**; but (iii) has not made an **offer** in the 2nd **trading period**. (2) To avoid doubt, nothing in this clause entitles the **system operator** to issue any instruction to a **generator** in relation to **unoffered generation**. (3) In this clause,— (a) an **offer** made by a **generator** means the last **offer** made by the **generator** which applied during the relevant **trading period**; and (b) a **bid** made by a **purchaser** means the last **bid** made by the **purchaser** which applied during the relevant **trading period**.
…	…
13.212 Payment of constrained on compensation (1) For each **trading period**,— (a) a **generator** or **ancillary service agent** is owed **constrained on compensation** for **constrained on amounts** determined under clauses 13.204 and 13.205; and (b) a **dispatched purchaser** or **battery energy storage system owner** is owed **constrained on compensation** for **constrained on amounts** determined under clause 13.204.	**13.212 Payment of constrained on compensation** (1) For each **trading period**,— (a) a **generator** or **ancillary service agent** is owed **constrained on compensation** for **constrained on amounts** determined under clauses 13.204 and 13.205; and (b) a **dispatched purchaser** or **battery energy storage system owner** is owed **constrained on compensation** for **constrained on amounts** determined under clause 13.204.
(1A) **Constrained on compensation** for each **dispatch-capable load station** or **battery energy storage system station** is an amount owing to the **dispatched purchaser** or **battery energy storage system owner** that purchased **electricity** for the **dispatch-capable load station** or **battery energy storage system station**.	(1A) **Constrained on compensation** for each **dispatch-capable load station** or **battery energy storage system station** is an amount owing to the **dispatched purchaser** or **battery energy storage system owner** that purchased **electricity** for the **dispatch-capable load station** or **battery energy storage system station**.

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
(2) The **system operator** must pay to a **generator**, or **ancillary service agent** any **constrained on amount** calculated under clause 13.205.	(2) The **system operator** must pay to a **generator**, or **ancillary service agent** any **constrained on amount** calculated under clause 13.205.
(3) The **clearing manager** must advise each **generator**, **ancillary service agent**, and **dispatched purchaser** or **battery energy storage system station owner** of the amount owing to the **generator**, **ancillary service agent**, or **dispatched purchaser** or **battery energy storage system station owner** for **constrained on compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.	(3) The **clearing manager** must advise each **generator**, **ancillary service agent**, and **dispatched purchaser** or **battery energy storage system station owner** of the amount owing to the **generator**, **ancillary service agent**, or **dispatched purchaser** or **battery energy storage system station owner** for **constrained on compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.
(4) *[Revoked]*	(4) *[Revoked]*
(5) Each **purchaser** that purchases **electricity** at a **grid exit point** incurs an amount owing to the **clearing manager** for **constrained on compensation**, calculated under subclause (7).	(5) Each **purchaser** that purchases **electricity** at a **grid exit point** incurs an amount owing to the **clearing manager** for **constrained on compensation**, calculated under subclause (7).
(5A) *[Revoked]*	(5A) *[Revoked]*
(6) **Instantaneous reserve constrained on compensation** is an **instantaneous reserve** cost that must be allocated in accordance with clauses 8.59 to 8.66.	(6) **Instantaneous reserve constrained on compensation** is an **instantaneous reserve** cost that must be allocated in accordance with clauses 8.59 to 8.66.
(7) The **clearing manager** must calculate **constrained on compensation** for each **trading period** using the following formula: $COC_p = (COC_g - COC_{so}) * (P_q / TP_q)$ where COC_p is the **constrained on compensation** owing by a **purchaser** COC_g is the sum of **constrained on compensation** owing to all **generators** and all **dispatched purchasers** for the **trading period** calculated in accordance with clause 13.204(1)(a) and 13.204(1)(aa)	(7) The **clearing manager** must calculate **constrained on compensation** for each **trading period** using the following formula: $COC_p = (COC_g - COC_{so}) * (P_q / TP_q)$ where COC_p is the **constrained on compensation** owing by a **purchaser** COC_g is the sum of **constrained on compensation** owing to all **generators** and all **dispatched purchasers** for the **trading period** calculated in accordance with clause 13.204(1)(a) and 13.204(1)(aa)

Commented [SO39]: "*Station*" should be deleted here

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
COC_{so} is the sum of **constrained on compensation** for that **trading period** payable by the **system operator** to **generators** under subclause (2)	COC_{so} is the sum of **constrained on compensation** for that **trading period** payable by the **system operator** to **generators** under subclause (2)
P_q is the total **electricity** purchased by that **purchaser** from the **clearing manager** during the **trading period** as shown by the **reconciliation information** calculated by the **reconciliation manager** under Part 15	P_q is the total **electricity** purchased by that **purchaser** from the **clearing manager** during the **trading period** as shown by the **reconciliation information** calculated by the **reconciliation manager** under Part 15
TP_q is the total **electricity** purchased by all **purchasers** from the **clearing manager** during the **trading period** as shown by **reconciliation information** calculated by the **reconciliation manager** under Part 15.	TP_q is the total **electricity** purchased by all **purchasers** from the **clearing manager** during the **trading period** as shown by **reconciliation information** calculated by the **reconciliation manager** under Part 15.
(8) The **clearing manager** must advise each **purchaser** of the amount owing by the **purchaser** for **constrained on compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.	(8) The **clearing manager** must advise each **purchaser** of the amount owing by the **purchaser** for **constrained on compensation** for a **billing period** when the **clearing manager** advises amounts owing under subpart 4 of Part 14.
…	…
Schedule 13.1 **Forms 1 to 9**	**Schedule 13.1** **Forms 1 to 9**
…	…
no change	Form 10 – Battery energy storage system owner offer
no change	Form 11 – Battery energy storage system owner instantaneous reserve offer
	…

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
no change	**Form 10: Battery energy storage system owner offer and bid** Date: _____ Battery Energy Storage System Owner Participant Identifier: _____ Battery Energy Storage System Owner Name: _____ Grid Injection Point : _____ Battery Energy Storage System Maximum Output _____MW Trading Period: _____ Starting at _____ : _____ 0 hours Battery Energy Storage System Station Minimum Storage Limit: _____MWh Battery Energy Storage System Station Maximum Storage Limit: _____MWh Battery Energy Storage System Station Fixed BESS Loss Factor : _____MWh Battery Energy Storage System Station Variable BESS Loss Factor: _____MWh/MWh **Battery energy storage system offer to sell electricity:** Band 1: From 0 MW to _____ MW @ $ _____ per MWh Band 2: plus _____ MW @ $ _____ per MWh Band 3: plus _____ MW @ $ _____ per MWh Band 4: plus _____ MW @ $ _____ per MWh Band 5: plus _____ MW @ $ _____ per MWh Band 6: plus _____ MW @ $ _____ per MWh Band 7: plus _____ MW @ $ _____ per MWh Band 8: plus _____ MW @ $ _____ per MWh

Commented [SO40]: The maximum output should be at station level (and to be consistent with the rest of the form).

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
	Band 9: plus _____ MW @ $ _____ per MWh Band 10: plus _____ MW @ $ _____ per MWh **Battery energy storage system bid to purchase electricity** Band 1: From 0 MW to _____ MW @ $ _____ per MWh Band 2: plus _____ MW @ $ _____ per MWh Band 3: plus _____ MW @ $ _____ per MWh Band 4: plus _____ MW @ $ _____ per MWh Band 5: plus _____ MW @ $ _____ per MWh Band 6: plus _____ MW @ $ _____ per MWh Band 7: plus _____ MW @ $ _____ per MWh Band 8: plus _____ MW @ $ _____ per MWh Band 9: plus _____ MW @ $ _____ per MWh Band 10: plus _____ MW @ $ _____ per MWh
no change	**Form 11: Battery energy storage system owner instantaneous reserve offer** Date: _____ Ancillary Service Agent: _____ Battery Energy Storage System Station Name: _____ Grid Injection Point: _____ Trading Period: _____ Starting at _____ 0 hours

Proposed **INTERIM** Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed **FINAL** Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)

Instantaneous reserve capability

Holds a Reserve Contract with the System Operator ¨ Yes

Fast Instantaneous Reserve Interruptible Load Available ¨ Yes

Sustained Instantaneous Reserve Interruptible Load Available ¨ Yes

Trading Period: _____ Starting at _____ : _____ 0 hours

Offer to provide reserve

1 Generation reserve

Band 1:

Up to a maximum of _____ **MW** @ $ _____ per **MW** as Fast Instantaneous Reserve

Up to a maximum of ____ **MW** @ $ ___ per **MW** as Sustained Instantaneous Reserve

Band 2:

Up to a maximum of _____ **MW** @ $ _____ per **MW** as Fast Instantaneous Reserve

Up to a maximum of ___ **MW** @ $ ____ per **MW** as Sustained Instantaneous Reserve

Band 3:

Up to a maximum of _____ **MW** @ $ _____ per **MW** as Fast Instantaneous Reserve

Up to a maximum of ____ **MW** @ $ ___ per **MW** as Sustained Instantaneous Reserve

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	2 Interruptible load Band 1: Up to a maximum of _____ **MW** @ $ _____ per **MW** as Fast Instantaneous Reserve Up to a maximum of _____**MW** @ $ ___per **MW** as Sustained Instantaneous Reserve Band 2: Up to a maximum of _____ **MW** @ $ _____ per **MW** as Fast Instantaneous Reserve Up to a maximum of ____**MW** @ $ ____per **MW** as Sustained Instantaneous Reserve Band 3: Up to a maximum of _____ **MW** @ $ _____ per **MW** as Fast Instantaneous Reserve Up to a maximum of ____ **MW** @ $ ____per **MW** as Sustained Instantaneous Reserve …
no change	**Schedule 13.3** **The Modelling System** **1 Purpose of modelling system** (1) The purpose of the modelling system is to provide schedules of quantities and prices that maximise the gross **purchaser** benefit from purchases of **electricity** from the **clearing manager** less the total cost of production of **electricity** and **instantaneous reserves** as specified in this Schedule. (2) *[Revoked]* (2A) A **price-responsive schedule** and **non-response schedule** must use the scheduled generation at the end of the previous **trading period** as the expected output for the purpose of clause 9A(b). (2B) A **price-responsive schedule** and **non-response schedule** must use the predicted **state of charge** of each **battery energy storage system**

Commented [SO41]: As noted in our submission, we do not support a strict separation between interruptible load and generation reserve for BESS reserve offers.

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no change	**station** at the end of the previous **trading period** as the expected **state of charge** for the purpose of clause 9A(d). (3) The modelling system must provide prices for **electricity** and **instantaneous reserve** that are consistent with the above purpose and the scheduled quantities of **electricity** and **instantaneous reserve**. (4) The modelling system must be used, using different inputs, to produce— (a) **price-responsive schedules**; and (b) **non-response schedules**; and (c) **dispatch schedules** (d) [Revoked] (e) [Revoked] (f) [Revoked] (g) [Revoked] … **9AConstraints relating to generation** The constraints for the purpose of clause 9(b) are that— (a) for each price band, the modelling system does not schedule **electricity** generation that would result in the scheduled quantity of **electricity** to be generated by a **generator** being greater than the quantity offered by the **generator** for the price band; and (b) the modelling system schedules **electricity** generation for each **generating unit** or **generating station**, including a **battery energy storage system station**, in a **trading period** within the offered maximum ramp up and ramp down rates of the **generating unit** or **generating station**, given the expected (or actual) output at the start of the trading period; and (c) the modelling system schedules **electricity** generation for each **intermittent generating station** in a **trading period** at a level that is

Commented [SO42]: In relation to the "final" draft, BESS will not be required to offer ramp rates

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no change	no higher than the potential output of the **intermittent generating station**, determined as follows: (i) in relation to the **price-responsive schedule**, in accordance with clause 13.58A(1)(aa): (ii) in relation to the **non-response schedule**, in accordance with clause 13.58A(2)(aa): (iii) in relation to the **dispatch schedule**, in accordance with clause 13.71(3): (iv) in relation to the **input information** referred to in clause 13.141, in accordance with clause 13.141(1)(caa)~~.~~; and (v) *[Revoked]* (d) the modelling system schedules **electricity** generation for each **battery energy storage system station** in a **trading period** such that: (i) the level of generation can be maintained for the **trading period**, or the level of **sustained instantaneous reserves** can be maintained for 15 minutes, whichever is applicable: (ii) the scheduled quantity of **electricity** to be generated by the **battery energy storage system station** does not exceed the difference between the **state of charge** at the beginning of the **trading period**, calculated in accordance with clause 10A, and the minimum storage limit specified in the **offer** submitted by the **battery energy storage system owner** for that **trading period**, adjusted for any **BESS loss factors** specified in the **offer**. **9B State of charge for battery energy storage systems** (1) For the purposes of clauses 9A and 10, the starting **state of charge** for a **battery energy storage system station** for each **trading period** is to be determined: (a) for the purposes of the **dispatch schedule**, using the current

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no change	telemetered reading for the **state of charge** at that **battery energy storage system station** at the commencement of that **dispatch schedule**; or (b) for the purposes of the **non-response schedule** and **price-responsive schedule**, using the current telemetered reading for the **state of charge** at that **battery energy storage system station** at the start of the trading period in which the **system operator** commences preparing the schedule. (2) For the purposes of the **non-response schedule** and **price-responsive schedule**, the **state of charge** for a **battery energy storage system station** at the end of each **trading period** must be determined accounting for the scheduled generation or consumption during that **trading period** and the **BESS loss factors** provided in Form 10. … **10 Constraint relating to demand** The constraint relating to **demand** for the purpose of clause 9(c) is that, for each price band, the modelling system does not schedule **electricity demand** that would result in the scheduled quantity of **demand** being greater than: (a) the quantity bid by the **purchaser** for the price band~~.~~; and (b) the difference between the **state of charge** at the beginning of the **trading period**, calculated in accordance with clause 10A, and the maximum storage limit specified in the **offer** submitted by the **battery energy storage system owner** for that **trading period**, adjusted for any **BESS loss factors** specified in the **offer**.
no change	**12 Constraints relating to instantaneous reserve** (1) The modelling system must simultaneously calculate the amount of **fast instantaneous reserve** and **sustained instantaneous reserve** to

Commented [SO43]: In relation to the "final" draft, while we recognise that there will only be one form, information about demand will be submitted in relation to the bid part of the form. On that basis, we think this clause should refer to the BESS bid, not offer

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	be provided by each **ancillary service agent** in each **island** to meet the requirements of the **dispatch objective** in each **island**. (2) In making the calculation in subclause (1), the modelling system must identify the risk (in **MW**) associated with the largest "Contingent Event" as the largest of— (a) the transfer on a single pole of the **HVDC link**; or (b) the generation from a single **generating unit** (whether or not this is a **generator's generating unit**); or (c) any other risk specified in the **dispatch objective**. (3) The modelling system must calculate the total amount of **fast instantaneous reserve** and **sustained instantaneous reserve** required to meet the requirements of the **dispatch objective**. The amount of **fast instantaneous reserve** and **sustained instantaneous reserve** to be provided by each **ancillary service agent** is this amount less any **instantaneous reserve** being provided by any other person who is not an **ancillary service agent** (as advised by the **system operator**). (4) The modelling system must not schedule **instantaneous reserve** at a **generating unit** or **generating station** that would result in the scheduled quantity of **electricity** to be generated plus the scheduled quantity of **instantaneous reserve** to be provided that is greater than the maximum **generator** effective reserve capacity of that **generating unit** or **generating station** as specified in the **reserve offer** for that **generating unit** or **generating station**. (4A) The modelling system must not schedule **instantaneous reserve** at a **battery energy storage system station** that would result in the scheduled quantity of **electricity** to be generated plus the scheduled quantity of **sustained instantaneous reserve** to be provided exceeding the maximum effective reserve capacity of that **battery**

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	energy storage system station as specified in the **reserve offer** for that **battery energy storage system station**. (5) The modelling system must use the price and quantity values set out in the table in clause 13.58AA(3) for the following model parameters: (a) **fast instantaneous reserve** contingent event risk violation: (b) **sustained instantaneous reserve** contingent event risk violation. …
no change	**Schedule 13.3B** **Information for schedules prepared by system operator** **1 Purpose of this schedule** (1) This Schedule sets out the information required to be contained in, and/or published by, the **dispatch schedule**, **price-responsive schedule** and **non-response schedule**. (2) Contents of schedules, columns 1, 2, and 3, are those values derived by the modelling system using the input information listed in clause 13.69B for the **dispatch schedule** and clause 13.58A for the **price-responsive schedule** and **non-response schedule**. (3) Published information, columns 4, 5, and 6, are those values that are required to be transmitted by the **system operator** to the **WITS manager** for public consumption at the time the schedules are published.

		1	2	3	4	5	6
Information required		**Contents of schedules**			**To be published**		
Row	**Schedule**	**PRS**	**NRS**	**Dispatch**	**PRS**	**NRS**	**Dispatch**
	…						
48	**Offers** and **bids** quantities (in **MW**) for each **battery energy storage system station** limited by **state of charge** constraints	X	X	X	X	X	X

…

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Part 15 **Reconciliation**	**Part 15** **Reconciliation**
15.1 Contents of this Part	**15.1 Contents of this Part**
This Part provides for the following:	This Part provides for the following:
(a) the improvement of information about **electricity** conveyed as more **volume information** becomes available over time:	(a) the improvement of information about **electricity** conveyed as more **volume information** becomes available over time:
(b) the correction of information to remedy errors in information provided:	(b) the correction of information to remedy errors in information provided:
(c) how **reconciliation participants** must gather, store and provide information about **electricity** conveyed:	(c) how **reconciliation participants** must gather, store and provide information about **electricity** conveyed:
(d) how **reconciliation participants** must prepare and provide **submission information**:	(d) how **reconciliation participants** must prepare and provide **submission information**:
(da) how **dispatchable load purchasers** and **battery energy storage system owners** must collect **volume information** in accordance with Schedule 15.2:	(da) how **dispatchable load purchasers** and **battery energy storage system owners** must collect **volume information** in accordance with Schedule 15.2:
(e) how the **reconciliation manager** must calculate responsibility for **electricity** among **reconciliation participants**:	(e) how the **reconciliation manager** must calculate responsibility for **electricity** among **reconciliation participants**:
(f) how the **reconciliation manager** must pass information to the **clearing manager**, for the calculation of amounts owing under Part 14:	(f) how the **reconciliation manager** must pass information to the **clearing manager**, for the calculation of amounts owing under Part 14:
(g) obligations of the **reconciliation manager** to pass the information to **reconciliation participants**, the **registry manager** and the **Authority**:	(g) obligations of the **reconciliation manager** to pass the information to **reconciliation participants**, the **registry manager** and the **Authority**:
(h) requirements for the creation, approval and maintenance of **profiles**:	(h) requirements for the creation, approval and maintenance of **profiles**:
(i) requirements for **audits**, approvals and **certifications**.	(i) requirements for **audits**, approvals and **certifications**.
. . .	
15.5A Dispatchable load purchaser and battery energy storage system owner must prepare dispatchable load information	**15.5A Dispatchable load purchaser and battery energy storage system owner must prepare dispatchable load information**
(1) Each **dispatchable load purchaser** and **battery energy storage system owner** must prepare **dispatchable load information** using	(1) Each **dispatchable load purchaser** and **battery energy storage system owner** must prepare **dispatchable load information** using

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volume information prepared in accordance with Schedule 15.2.	**volume information** prepared in accordance with Schedule 15.2.
(2) If clause 15.5B applies to a **dispatch-capable load station's metering installation**, the **dispatchable load purchaser** responsible for the **dispatch-capable load station** must comply with clause 15.5B in relation to the **dispatch-capable load station**.	(2) If clause 15.5B applies to a **dispatch-capable load station's metering installation**, the **dispatchable load purchaser** responsible for the **dispatch-capable load station** must comply with clause 15.5B in relation to the **dispatch-capable load station**.
…	…
15.5C Aggregating and rounding dispatchable load information	**15.5C Aggregating and rounding dispatchable load information**
(1) When preparing **dispatchable load information**, ~~a~~ each **dispatchable load purchaser** or **battery energy storage system owner** must—	(1) When preparing **dispatchable load information**, ~~a~~ each **dispatchable load purchaser** or **battery energy storage system owner** must—
(a) aggregate **volume information** to the following level:	(a) aggregate **volume information** to the following level:
(i) **NSP** code:	(i) **NSP** code:
(ii) **battery energy storage system station** identifier:	(ii) **battery energy storage system station** identifier:
(iii) **loss category** code:	(iii) **loss category** code:
(iv) **trading period**; and	(iv) **trading period**; and
(b) round the aggregated **volume information**—	(b) round the aggregated **volume information**—
(i) to 2 decimal places; and	(i) to 2 decimal places; and
(ii) so that if the digit to the right of the second decimal place is—	(ii) so that if the digit to the right of the second decimal place is—
(A) greater than or equal to 5, the second digit is rounded up; or	(A) greater than or equal to 5, the second digit is rounded up; or
(B) less than 5, the second digit is unchanged.	(B) less than 5, the second digit is unchanged.
(2) When aggregating **volume information** for a **dispatch-capable load station** or a **battery energy storage system station** to the **NSP**, the **dispatchable load purchaser** or **battery energy storage system owner** must use the **NSP** code as shown in the **registry** at the time the **volume information** is derived.	(2) When aggregating **volume information** for a **dispatch-capable load station** or a **battery energy storage system station** to the **NSP**, the **dispatchable load purchaser** or **battery energy storage system owner** must use the **NSP** code as shown in the **registry** at the time the **volume information** is derived.
15.5D Dispatchable load information to be delivered to reconciliation manager	**15.5D Dispatchable load information to be delivered to reconciliation manager**
(1) Each **dispatchable load purchaser** or **battery energy storage**	(1) Each **dispatchable load purchaser** or **battery energy storage**

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system owner must provide to the **reconciliation manager**— (a) **dispatchable load information** for each **GXP** at which the **dispatchable load purchaser** or **battery energy storage system owner** has purchased **electricity** for a **dispatch-capable load station** or **battery energy storage system station** during the **consumption period** immediately before each **reconciliation period**; and (b) if the **dispatchable load purchaser** or **battery energy storage system owner** knows that **dispatchable load information** previously provided has changed, revised **dispatchable load information** for the **consumption period** for which the **dispatchable load information** was initially provided. (2) Each **dispatchable load purchaser** or **battery energy storage system owner** must provide— (a) the information described in subclause (1)(a) by 1600 hours on the 4th **business day** of each **reconciliation period**; and (b) the information described in subclause (1)(b) by 1600 hours on the 13th **business day** of each **reconciliation period**.	**system owner** must provide to the **reconciliation manager**— (a) **dispatchable load information** for each **GXP** at which the **dispatchable load purchaser** or **battery energy storage system owner** has purchased **electricity** for a **dispatch-capable load station** or **battery energy storage system station** during the **consumption period** immediately before each **reconciliation period**; and (b) if the **dispatchable load purchaser** or **battery energy storage system owner** knows that **dispatchable load information** previously provided has changed, revised **dispatchable load information** for the **consumption period** for which the **dispatchable load information** was initially provided. (2) Each **dispatchable load purchaser** or **battery energy storage system owner** must provide— (a) the information described in subclause (1)(a) by 1600 hours on the 4th **business day** of each **reconciliation period**; and (b) the information described in subclause (1)(b) by 1600 hours on the 13th **business day** of each **reconciliation period**.
. . . **15.20B Reconciliation manager loss adjusts and summarises dispatchable load information** (1) The **reconciliation manager** must apply **loss factors** to **dispatchable load information** received under clause 15.5D— (a) for each **trading period**; and (b) using the **loss category** codes advised by the **dispatchable load purchaser** or **battery energy storage system owner** when submitting **dispatchable load information** under clause 15.5D. (2) After applying **loss factors** under subclause (1), the **reconciliation manager** must summarise—	… **15.20B Reconciliation manager loss adjusts and summarises dispatchable load information** (1) The **reconciliation manager** must apply **loss factors** to **dispatchable load information** received under clause 15.5D— (a) for each **trading period**; and (b) using the **loss category** codes advised by the **dispatchable load purchaser** or **battery energy storage system owner** when submitting **dispatchable load information** under clause 15.5D. (2) After applying **loss factors** under subclause (1), the **reconciliation manager** must summarise—

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(a) into 1 file for each **consumption period**, **dispatchable load information** received under clause 15.5D(1)(a); and (b) into 1 file for each **consumption period**, **dispatchable load information** received under clause 15.5D(1)(b) and updated under clause 15.20A. (3) The **Authority** may direct the **reconciliation manager** to apply specified values for **loss factors** for each **loss category** for a **reconciliation period** for which the **registry manager** does not provide the **reconciliation manager** with the **loss factors** for each **loss category** in accordance with clause 11.26(b). (4) If the **Authority** makes a direction under subclause (3), the **reconciliation manager** must apply the values as **loss factors** to the relevant **dispatchable load information** for all **reconciliation periods** during which the direction applies. . . . **15.20D Reconciliation manager to provide loss adjusted and summarised dispatchable load information to dispatchable load purchasers and battery energy storage system owners** At the same time the **reconciliation manager** provides the information described in clause 15.20C to the **clearing manager**, the **reconciliation manager** must provide each **dispatchable load purchaser and battery energy storage system owner** with the part of the information that relates to the **dispatchable load purchaser or battery energy storage system owner**. . . . **15.38 Functions requiring certification** (1) Subject to subclause (3), and to clauses 2A and 2B of Schedule 15.1, a **reconciliation participant** must obtain and maintain **certification** under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions	(a) into 1 file for each **consumption period**, **dispatchable load information** received under clause 15.5D(1)(a); and (b) into 1 file for each **consumption period**, **dispatchable load information** received under clause 15.5D(1)(b) and updated under clause 15.20A. (3) The **Authority** may direct the **reconciliation manager** to apply specified values for **loss factors** for each **loss category** for a **reconciliation period** for which the **registry manager** does not provide the **reconciliation manager** with the **loss factors** for each **loss category** in accordance with clause 11.26(b). (4) If the **Authority** makes a direction under subclause (3), the **reconciliation manager** must apply the values as **loss factors** to the relevant **dispatchable load information** for all **reconciliation periods** during which the direction applies. **15.20D Reconciliation manager to provide loss adjusted and summarised dispatchable load information to dispatchable load purchasers and battery energy storage system owners** At the same time the **reconciliation manager** provides the information described in clause 15.20C to the **clearing manager**, the **reconciliation manager** must provide each **dispatchable load purchaser and battery energy storage system owner** with the part of the information that relates to the **dispatchable load purchaser or battery energy storage system owner**. . . . **15.38 Functions requiring certification** (1) Subject to subclause (3), and to clauses 2A and 2B of Schedule 15.1, a **reconciliation participant** must obtain and maintain **certification** under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions

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under this Code: (a) maintaining **registry** information and performing **ICP** switching (except if the maintenance of **registry** information is carried out by a **distributor** under Part 11): (b) gathering and storing **raw meter data**: (c) creating and managing (including validating, estimating, storing, correcting and archiving)— (i) half hour volume information; or (ii) non half hour volume information; or (iii) half hour and non half hour volume information: (iv) *[Revoked]* (d) delivery of: (i) a report under clause 15.6 and the calculation of the number of **ICP days** detailed in the report: (ii) **electricity supplied** information under clause 15.7: (iii) information from **retailer** and **direct purchaser half hourly** metered **ICPs** under clause 15.8: (da) *[Revoked]* (db) *[Revoked]* (e) provision of **submission information** for reconciliation. (f) *[Revoked]*	under this Code: (a) maintaining **registry** information and performing **ICP** switching (except if the maintenance of **registry** information is carried out by a **distributor** under Part 11): (b) gathering and storing **raw meter data**: (c) creating and managing (including validating, estimating, storing, correcting and archiving)— (i) half hour volume information; or (ii) non half hour volume information; or (iii) half hour and non half hour volume information: (iv) *[Revoked]* (d) delivery of: (i) a report under clause 15.6 and the calculation of the number of **ICP days** detailed in the report: (ii) **electricity supplied** information under clause 15.7: (iii) information from **retailer** and **direct purchaser half hourly** metered **ICPs** under clause 15.8: (da) *[Revoked]* (db) *[Revoked]* (e) provision of **submission information** for reconciliation. (f) *[Revoked]*
(1A) In addition to the functions in subclause (1), a **reconciliation participant** that is a **dispatchable load purchaser** or **battery energy storage system owner** must obtain and maintain **certification** under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions under this Code: (a) *[Revoked]* (b) creating and managing (including validating, estimating, storing, correcting, and archiving) **dispatchable load information**; and	(1A) In addition to the functions in subclause (1), a **reconciliation participant** that is a **dispatchable load purchaser** or **battery energy storage system owner** must obtain and maintain **certification** under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions under this Code: (a) *[Revoked]* (b) creating and managing (including validating, estimating, storing, correcting, and archiving) **dispatchable load information**; and

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(c) providing **dispatchable load information**. (1B) *[Revoked]* (2) *[Revoked]* (3) A **distributor** that is a **reconciliation participant** need not obtain or maintain **certification** in accordance with subclause (1) if it is a **reconciliation participant** only because it is responsible for an **interconnection point**.	(c) providing **dispatchable load information**. (1B) *[Revoked]* (2) *[Revoked]* (3) A **distributor** that is a **reconciliation participant** need not obtain or maintain **certification** in accordance with subclause (1) if it is a **reconciliation participant** only because it is responsible for an **interconnection point**.