



This legislation is administered by the Electricity Authority. For more information please see:
Website: <https://www.ea.govt.nz/>
Contact phone: +64 4 460 8860
Contact address: PO Box 10041, Wellington 6143

Electricity Industry Participation Code (Wholesale market arrangements for battery energy storage systems) Amendment 2026

This amendment to the Electricity Industry Participation Code 2010 (Code) is made under section 38 of the Electricity Industry Act 2010 (Act) by the Electricity Authority having complied with section 39 of the Act.

Contents

1	Title	4
2	Commencement	4
3	Code amended	4

Part 1

Amendments to Parts 1, 8, 13 and 15 of the Electricity Industry Participation Code that come into force on 30 October 2026

4	Clause 1.1 amended (Interpretation)	4
5	Clause 8.25 amended (Other asset owner performance obligations and technical standards)	7
6	Clause 13.3A amended (Approval process for dispatch-capable load stations)	7
7	Clause 13.3E amended (Approval process for dispatch notification purchasers)	8
8	Clause 13.3F amended (Approval process for dispatch notification generators)	8
9	Clause 13.6 amended (Requirements for generators when submitting offers)	8
10	New clause 13.6A inserted (Requirements for battery energy storage system owners when submitting bids and offers)	8
	13.6A (Requirements for battery energy storage system owners when submitting bids and offers)	
11	Clause 13.7AA amended (Purchaser to submit bids for non-dispatch-capable load)	9
12	Clause 13.7AB amended (Timeframe for submitting bids to system operator)	9
13	Clause 13.8 amended (Deemed offers)	9
14	Clause 13.8A amended (Deemed nominated bids)	9

15	Clause 13.9A amended (Offer not to exceed capability)	9
16	New clause 13.9AA inserted (Battery energy storage system offers and bids not to exceed adjusted capability)	9
	13.9AA Battery energy storage system offers and bids not to exceed adjusted capability	
17	Clause 13.10 amended (Generators must specify units in offers)	9
18	Clause 13.11 amended (Offers may be made by unit or plant)	10
19	Clause 13.12 replaced (Offers may contain up to 5 price bands)	10
	13.12 Offers may contain a maximum number of price bands	
20	Clause 13.17 amended (Offers may be revised)	10
21	Clause 13.18 amended (When revised offer to be submitted)	10
22	New clause 13.18B inserted (When a battery energy storage system owner must revise offer and bid)	10
	13.18B When a battery energy storage system owner must revise offer and bid	
23	Clause 13.19 amended (When revised offers may be submitted during gate closure period)	11
24	New clause 13.19AAA inserted (When a battery energy storage system owner may submit revised offers or bids during gate closure)	11
	13.19AAA When a battery energy storage system owner may submit revised offers or bids during gate closure period	
25	Clause 13.19AA amended (Limitations on revised offers)	11
26	New clause 13.19AB inserted (Limitations on revised offers and bids for battery energy storage system owners)	12
	13.19AB Limitations on revised offers and bids for battery energy storage system owners	
27	Clause 13.19A amended (Bids may be revised)	13
28	Clause 13.19B amended (Bids must be revised)	13
29	Clause 13.21 amended (Authority informed of revised nominated dispatch bid or offer during gate closure period)	13
30	Clause 13.25 amended (Exception for small generation)	13
31	New clause 13.25A inserted (Exception for small battery energy storage systems)	13
	13.25A Exception for small battery energy storage systems	
32	Clause 13.39 amended (Inter-relationship between reserve and energy offers)	13
33	Clause 13.40A amended (Inter-relationship between reserve offers and nominated dispatch bids)	14
34	Clause 13.57 amended (The dispatch objective)	14
35	Clause 13.69B amended (Inputs for dispatch schedule)	14
36	Clause 13.72 amended (System operator to issue dispatch instructions and dispatch notifications)	14
37	Clause 13.73 amended (Content of dispatch instructions and dispatch notifications)	14
38	Clause 13.75 amended (Form of dispatch instruction and dispatch notification)	14

39	Clause 13.76 amended (System operator to issue and log dispatch instructions and dispatch notifications)	14
40	Clause 13.82 amended (Dispatch instructions to be complied with)	14
41	Clause 13.83A and heading amended (Dispatchable load purchasers to make staff or facilities available to meet dispatch instructions and dispatch notifications)	15
42	Clause 13.194 amended (Clearing manager to calculate constrained off amounts)	15
43	Clause 13.199 amended (Clearing manager to make details of constrained off amounts available)	15
44	Clause 13.201A amended (Dispatched purchasers entitled to constrained off compensation and purchasers to pay constrained off compensation)	15
45	Clause 13.204 amended (Calculation of constrained on amounts)	15
46	Clause 13.212 amended (Payment of constrained on compensation)	16
47	Clause 15.1 amended (Contents of this Part)	16
48	Clause 15.5A and heading amended (Dispatchable load purchaser must prepare dispatchable load information)	16
49	Clause 15.5C amended (Aggregating and rounding dispatchable load information)	16
50	Clause 15.5D amended (Dispatchable load information to be delivered to reconciliation manager)	16
51	Clause 15.20B amended (Reconciliation manager loss adjusts and summarises dispatchable load information)	17
52	Clause 15.20D and heading amended (Reconciliation manager to provide loss adjusted and summarised dispatchable load information to dispatchable load purchasers)	17
53	Clause 15.38 amended (Functions requiring certification)	17

Part 2

Amendments to Parts 1 and 13 of the Electricity Industry Participation Code that come into force on 31 March 2028

54	Clause 1.1 amended (Interpretation)	17
55	Clause 13.9 amended (Information that offers must contain)	20
56	Clause 13.9AA and heading amended (Battery energy storage systems offers and bids not to exceed adjusted capability)	20
57	Clause 13.13 amended (Information to be contained in bids)	20
58	Clause 13.17 amended (Offers may be revised)	21
59	Clause 13.18B amended (When a battery energy storage system owner must revise offer and bid)	21
60	Clause 13.19AAA amended (When a battery energy storage system owner may submit revised offers or bids during gate closure period)	22
61	Clause 13.19AB amended (Limitations on revised offers and bids for battery energy storage system owners)	22
62	Clause 13.19A amended (Bids may be revised)	23
63	Clause 13.38 amended (Ancillary service agents to submit reserve offers to system operator)	23

64	Clause 13.44 amended (How quantity is to be specified in reserve offers)	23
65	Clause 13.46 amended (Reserve offer may be revised)	23
66	Clause 13.58A amended (Inputs for price-responsive schedule and non-response schedule)	23
67	Clause 13.69B amended (Inputs for dispatch schedule)	24
68	Clause 13.105A amended (Information to be made available to purchasers, generators, and ancillary service agents)	24
69	Clause 13.192 amended (Constrained off situations may occur)	24
70	Clause 13.193 amended (Determining affected price bands for block dispatch groups and station dispatch groups)	25
71	Clause 13.194 amended (Clearing manager to calculate constrained off amounts)	25
72	Clause 13.204 amended (Calculation of constrained on amounts)	25
73	Schedule 13.1, new forms 10 and 11 inserted	25
74	Clause 1 of Schedule 13.3 amended	26
75	Clause 9A of Schedule 13.3 amended	26
76	New clause 9B of Schedule 13.3 inserted	27
	9B State of charge for battery energy storage systems	
77	Clause 10 of Schedule 13.3 amended	27
78	Clause 12 of Schedule 13.3 amended	27
79	Clause 1 of Schedule 13.3B amended	28

Schedule 29

New Schedule 13.1 Forms 10 and 11 inserted

Amendment

1 Title

This is the Electricity Industry Participation Code (Wholesale market arrangements for battery energy storage systems) Amendment 2026.

2 Commencement

This amendment comes into force on 30 October 2026, except for clauses 54 to 79, which come into force on 31 March 2028.

3 Code amended

This amendment amends the Electricity Industry Participation Code 2010.

Part 1

Amendments to Parts 1, 8, 13 and 15 of the Electricity Industry Participation Code that come into force on 30 October 2026

4 Clause 1.1 amended (Interpretation)

- (1) In clause 1.1(1), insert in their appropriate alphabetical order:

adjusted consumption capability means the maximum amount of power a **battery energy storage system station** can consume, expressed in **MW**, for the duration of a **trading period**, at the **point of connection** to the **grid** for which a **bid** is submitted, where that amount is:

- (a) calculated as the **battery energy storage system station's** headroom for storing energy, based on the difference between the maximum amount of energy the **battery energy storage system station** can store and the **state of charge** at the beginning of that **trading period**, converted into a maximum rate of consumption in **MW** for that **trading period**, and accounting for:
 - (i) the maximum continuous power capacity of the **battery energy storage system station**;
 - (ii) any relevant **commissioning** or testing limits for the **battery energy storage system station**;
 - (iii) any limits on conveying **electricity** between the **battery energy storage system station** and the **point of connection** to the **grid**, including any limits or constraints on the **battery energy storage system owner's assets** and any limits or constraints on relevant **distribution network assets**; and
 - (iv) any limits required to ensure personnel or plant safety; and
- (b) adjusted where necessary to account for:
 - (i) the effect of any relevant outages, including any such outages affecting the **battery energy storage system owner's** plant or equipment, or the relevant **distribution network**;
 - (ii) losses in conveying **electricity** between the **battery energy storage system** and the **grid**;
 - (iii) losses in converting between chemical and electrical energy; and
 - (iv) the auxiliary load expected when the **battery energy storage system station** is operating at maximum consumption; and
- (c) adjusted to ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions which the **battery energy storage system owner** intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer

adjusted generation capability means the maximum amount of power a **battery energy storage system station** can generate, expressed in **MW**, for the duration of a **trading period**, at the **point of connection** to the **grid** for which an **offer** is submitted, where that amount is:

- (a) calculated as the **battery energy storage system station's** available stored energy, based on the difference between the minimum amount of energy the **battery energy storage system station** can store and the **state of charge** at the beginning of that **trading period**, converted into a maximum rate of generation in **MW** for that **trading period**, and accounting for:
 - (i) the maximum continuous power capacity of the **battery energy storage system station**;
 - (ii) any relevant **commissioning** or testing limits for the **battery energy storage system station**;

- (iii) any limits on conveying **electricity** between the **battery energy storage system station** and the **point of connection** to the **grid**, including any limits or constraints on the **battery energy storage system owner's assets** and any limits or constraints on relevant **distribution network assets**; and
 - (iv) any limits required to ensure personnel or plant safety; and
- (b) adjusted where necessary to account for:
 - (i) the effect of any relevant outages, including any such outages affecting the **battery energy storage system owner's plant or equipment**, or the relevant **distribution network**;
 - (ii) losses in conveying **electricity** between the **battery energy storage system** and the **grid**;
 - (iii) losses in converting between chemical and electrical energy; and
 - (iv) the auxiliary load expected when the **battery energy storage system station** is operating at maximum generation; and
- (c) adjusted to ensure that, under any reasonably foreseeable circumstances, the **battery energy storage system owner** is able to meet any conditions which the **battery energy storage system owner** 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 owner means a person who owns a **battery energy storage system**, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such a **battery energy storage system**, to the extent that person is acting in respect of that **battery energy storage system**

battery energy storage system station means one 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**

state of charge means the energy stored in a **battery energy storage system** at a specific point in time, measured in **MWh**

- (2) In clause 1.1(1), definition of **bid**, paragraph (b), after “clause”, insert “13.19AB,”.
- (3) In clause 1.1(1), definition of **bona fide physical reason**, after subparagraph (b)(iv), insert:
 - (baa) in relation to a **battery energy storage system owner**, —
 - (i) a reasonably unforeseeable change in consumption capability from a **battery energy storage system station**; or
 - (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
- (4) In clause 1.1(1), definition of **dispatchable load information**, after “dispatch-capable load station”, insert “or **battery energy storage system station**”.
- (5) In clause 1.1(1), definition of **gate closure period**—

- (a) in the chapeau, after “or for which a **dispatchable load purchaser**”, insert “or **battery energy storage system owner**”; and
- (b) in paragraph (b), above subparagraph (i), insert:
 - (ia) a **battery energy storage system owner** (except for a **battery energy storage system owner** that is also an **embedded generator**) where that **battery energy storage system owner** is submitting an **offer** or a **reserve offer**:
- (6) In clause 1.1(1), definition of **generating station**, after “a single **point of injection**”, insert “, and includes a **battery energy storage system station**”.
- (7) In clause 1.1(1), definition of **generating unit**, after “produce **electricity**”, insert “, and includes a **battery energy storage system**”.
- (8) In clause 1.1(1), definition of **generator**, after “and includes”, insert “**battery energy storage system owners**,”.
- (9) In clause 1.1(1), definition of **nominated bid**:
 - (a) in paragraph (d), replace “clause” with “clauses 13.6A or”; and
 - (b) in subparagraph (d)(i), after “a **dispatch-capable load station**”, insert “or **battery energy storage system**”.
- (10) In clause 1.1(1), definition of **nominated dispatch bid**, after “in relation to”, insert “a **battery energy storage system station** or”.
- (11) In clause 1.1(1), definition of **offer**—
 - (a) after “clause 13.6(1)”, insert “or clause 13.6A”; and
 - (b) replace “13.19” with “13.19AAA”.
- (12) In clause 1.1(1), definition of **purchaser**, after “a person”, insert “, including a **battery energy storage system owner**,”.
- (13) In clause 1.1(1), definition of **reconciliation participant**, in subparagraph (a)(v), after “including a **dispatchable load purchaser**”, insert “and a **battery energy storage system owner**”.

5 Clause 8.25 amended (Other asset owner performance obligations and technical standards)

- (1) In clause 8.25(5)(a), after “an **embedded generator**”, insert “(except an **embedded generator** that is a **battery energy storage system owner**)”.
- (2) Before clause 8.25(5)(b), insert:
 - (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 10 MW 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
- (3) In clause 8.25(5)(b), after “the **embedded generator**”, insert “or **battery energy storage system owner**”.

6 Clause 13.3A amended (Approval process for dispatch-capable load stations)

- (1) In clause 13.3A(1), after “A **purchaser** at a **GXP**”, insert “, other than a **battery energy storage system owner**,”.

- (2) After clause 13.3A(5), insert:
- (6) The approval for any **battery energy storage system station** as a **dispatch-capable load station** prior to 30 October 2026 is revoked with immediate effect from 30 October 2026.
- 7 **Clause 13.3E amended (Approval process for dispatch notification purchasers)**
In clause 13.3E(1), after “A **purchaser**”, insert “, other than a **battery energy storage system owner**,”.
- 8 **Clause 13.3F amended (Approval process for dispatch notification generators)**
In clause 13.3F(1), after “A **generator**”, insert “, other than a **battery energy storage system owner**,”.
- 9 **Clause 13.6 amended (Requirements for generators when submitting offers)**
After clause 13.6(6), insert:
- (7) Nothing in this clause applies to a **battery energy storage system owner**.
- 10 **New clause 13.6A inserted**
After clause 13.6, insert:
- 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—
- (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.
- (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 first 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 —
- (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.
- (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** 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**.

11 Clause 13.7AA amended (Purchaser to submit bids for non-dispatch-capable load)

In clause 13.7AA(1)—

- (a) in paragraph (b), replace “.” with “; and”; and
- (b) after paragraph (b), insert:
- (c) is not a **battery energy storage system owner**.

12 Clause 13.7AB amended (Timeframe for submitting bids to system operator)

In clause 13.7AB(1) and clause 13.7AB(2), after “Each **purchaser**”, insert “, other than a **battery energy storage system owner**,”.

13 Clause 13.8 amended (Deemed offers)

- (1) In clause 13.8(2), replace “clause 13.9A applies” with “clauses 13.9A and 13.9AA apply”.
- (2) In clause 13.8(3), replace “13.19” with “13.19AAA”.

14 Clause 13.8A amended (Deemed nominated bids)

In clause 13.8A(3), after “with clause”, insert “13.19AAA or”.

15 Clause 13.9A amended (Offer not to exceed capability)

In clause 13.9A(2), after “**intermittent generator**”, insert “or a **battery energy storage system owner**”.

16 New clause 13.9AA inserted (Battery energy storage system offers and bids not to exceed adjusted capability)

After clause 13.9A, insert:

13.9AA Battery energy storage system 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 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**.

17 Clause 13.10 amended (Generators must specify units in offers)

In clause 13.10, after paragraph (a), insert:

- (ab) be specific to individual **battery energy storage system stations**; or

18 Clause 13.11 amended (Offers may be made by unit or plant)

In clause 13.11(1), after “other than an **intermittent generator**”, insert “or a **battery energy storage system owner**”.

19 Clause 13.12 replaced (Offers may contain up to 5 price bands)

Replace clause 13.12 with:

13.12 Offers may contain a maximum number of 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.
- (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.

20 Clause 13.17 amended (Offers may be revised)

- (1) In clause 13.17(3), replace “13.19, or” with “13.18B, 13.19, 13.19AAA, or”.
- (2) In clause 13.17(4), after “clause 13.19”, insert “or 13.19AAA”.

21 Clause 13.18 amended (When revised offer to be submitted)

In clause 13.18(1) and clause 13.18(1A), after “**intermittent generator**”, insert “or a **battery energy storage system owner**”.

22 New clause 13.18B inserted (When a battery energy storage system owner must revise offer and bid)

After clause 13.18A, insert:

13.18B When a battery energy storage system owner 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**.
- (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) if the **gate closure period** has started, one or more of the conditions in clause 13.19AAA(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.

23 Clause 13.19 amended (When revised offers may be submitted during gate closure period)

In clause 13.19(1), after “intermittent generator”, insert “or a **battery energy storage system owner**”.

24 New clause 13.19AAA inserted (When a battery energy storage system owner may submit revised offers or bids during gate closure period)

After clause 13.19, insert:

13.19AAA When a battery energy storage system owner may submit revised offers or bids during gate closure period

- (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** or **adjusted consumption capability**, whichever is applicable, 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 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.

25 Clause 13.19AA amended (Limitations on revised offers)

In clause 13.19AA, after “A **generator**”, insert “, other than a **battery energy storage system owner**”.

26 New clause 13.19AB inserted (Limitations on revised offers and bids for battery energy storage system owners)

After clause 13.19AA, insert:

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.
- (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 that 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 that the **MW** in the revised **offer** or **bid** does not—
 - (a) exceed the **adjusted generation capability** or **adjusted consumption capability**, whichever is applicable; or
 - (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; or
 - (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; or
 - (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**.

27 Clause 13.19A amended (Bids may be revised)

- (1) In clause 13.19A(1), after “Each **purchaser**”, insert “, other than a **battery energy storage system owner**,”.
- (2) After clause 13.19A(1B), insert:
- (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**.
- (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 the maximum output (including overload) provided for in its **bid** during a **gate closure period**, unless clause 13.19AAA applies.

28 Clause 13.19B amended (Bids must be revised)

In clause 13.19B(1), replace “the **purchaser** that submitted the **nominated bid**” with “a **purchaser**, other than a **battery energy storage system owner**, that submitted the **nominated bid**”.

29 Clause 13.21 amended (Authority informed of revised nominated dispatch bid or offer during gate closure period)

In clause 13.21(1) and clause 13.21(1A), after “**dispatchable load purchaser**”, insert “, **battery energy storage system owner**,”.

30 Clause 13.25 amended (Exception for small generation)

After clause 13.25(2), insert:

- (3) Subclauses (1) and (2) do not apply to a **battery energy storage system owner**.

31 New clause 13.25A inserted (Exception for small battery energy storage systems)

After clause 13.25, insert:

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** or **bids** for a **battery energy storage system station** that has a **maximum continuous MW output power** of 10 MW or smaller and any **electricity** sold to the **clearing manager** from the **battery energy storage system station** is regarded as **unoffered generation** for the purpose of this Code.
- (2) 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 station** with a **point of connection** to the **grid**.

32 Clause 13.39 amended (Inter-relationship between reserve and energy offers)

In clause 13.39, after “and 13.6(1) to (3)”, insert “or 13.6A(1) or (2)”.

- 33 Clause 13.40A amended (Inter-relationship between reserve offers and nominated dispatch bids)**
In clause 13.40A, after “13.7(1) to (3)”, insert “(or clause 13.6A(1) in respect of a **nominated dispatch bid** made by a **battery energy storage system owner**)”.
- 34 Clause 13.57 amended (The dispatch objective)**
In clause 13.57(a), after “**dispatch-capable load stations**”, insert “or **battery energy storage system stations**”.
- 35 Clause 13.69B amended (Inputs for dispatch schedule)**
In clause 13.69B(1)(b), after “revised **nominated dispatch bids** (clauses”, insert “13.19AAA,”.
- 36 Clause 13.72 amended (System operator to issue dispatch instructions and dispatch notifications)**
In clause 13.72(1)(a)(iii), after “(other than **dispatch notification purchasers**)”, insert “and **battery energy storage system owners**”.
- 37 Clause 13.73 amended (Content of dispatch instructions and dispatch notifications)**
In clause 13.73(1), after “or **dispatchable load purchaser**”, insert “or **battery energy storage system owner**”.
- 38 Clause 13.75 amended (Form of dispatch instruction and dispatch notification)**
In clause 13.75(1)(a), after “**dispatch-capable load station**,”, insert “**battery energy storage system station**”.
- 39 Clause 13.76 amended (System operator to issue and log dispatch instructions and dispatch notifications)**
In clause 13.76(1)(a)—
(a) after “to each **generator**”, insert “and each **battery energy storage system owner**”; and
(b) after “(other than a **generator**”, insert “or **battery energy storage system owner**”.
- 40 Clause 13.82 amended (Dispatch instructions to be complied with)**
(1) In clause 13.82(1)—
(a) in paragraph (c), replace “.” with “; and”; and
(b) after paragraph (c), insert:
(d) **a battery energy storage system owner.**
(2) In clause 13.82(2)(b), after “the **generating plant**”, insert “, **battery energy storage system station**”.
(3) In clauses 13.82(2)(f)(i) and 13.82(2)(g)(i), after “is a **dispatched purchaser**”, insert “or a **battery energy storage system owner**”.

41 Clause 13.83A and heading amended (Dispatchable load purchasers to make staff or facilities available to meet dispatch instructions and dispatch notifications)

- (1) In the heading to clause 13.83A, after “Dispatchable load purchasers”, insert “and battery energy storage system owners”.
- (2) In clause 13.83A, after “**dispatchable load purchaser**”, insert “or **battery energy storage system owner**” in each place.
- (3) In clause 13.83A(2), after “**dispatch-capable load stations**”, insert “or **battery energy storage system stations**”.

42 Clause 13.194 amended (Clearing manager to calculate constrained off amounts)

In clause 13.194(2)—

- (a) after “If a **constrained off situation** occurs in relation to a **dispatch-capable load station**”, insert “or **battery energy storage system station**”; and
- (b) after “must calculate the **constrained off amounts** for each **dispatch-capable load station**”, insert “or **battery energy storage system station**”; and
- (c) after “ConOffAmt_{disp} is the **constrained off amount** for a **dispatch-capable load station**”, insert “or **battery energy storage system station**”.

43 Clause 13.199 amended (Clearing manager to make details of constrained off amounts available)

In clause 13.199(b), after “the **generator**”, insert “, **battery energy storage system owner**”.

44 Clause 13.201A amended (Dispatched purchasers entitled to constrained off compensation and purchasers to pay constrained off compensation)

- (1) In clause 13.201A(1)—
 - (a) after “A **dispatched purchaser**”, insert “or **battery energy storage system owner**”; and
 - (b) after “in respect of whose **dispatch-capable load station**”, insert “or **battery energy storage system station**”.
- (2) In clause 13.201A(3)—
 - (a) after “**dispatch-capable load station**”, insert “or **battery energy storage system station**” in each place; and
 - (b) after “the **dispatched purchaser**”, insert “or **battery energy storage system owner**”.
- (3) In clause 13.201A(4), after “**dispatched purchaser**”, insert “or **battery energy storage system owner**” in each place.
- (4) In clause 13.201A(6), after “owing to all **dispatched purchasers**”, insert “and **battery energy storage system owners** whose **bids** were **dispatched**”.

45 Clause 13.204 amended (Calculation of constrained on amounts)

In clause 13.204(1)(aa), after “**dispatch-capable load station**”, insert “or **battery energy storage system station**” in each place.

46 Clause 13.212 amended (Payment of constrained on compensation)

- (1) In clause 13.212(1)(b), after “a **dispatched purchaser**”, insert “or **battery energy storage system owner**”.
- (2) In clause 13.212(1A)—
 - (a) after “**dispatch-capable load station**”, insert “or **battery energy storage system station**” in each place; and
 - (b) after “the **dispatched purchaser**”, insert “or **battery energy storage system owner**”.
- (3) In clause 13.212(3)—
 - (a) replace “and **dispatched purchaser**” with “**dispatched purchaser, and battery energy storage system owner**”; and
 - (b) replace “or **dispatched purchaser**” with “**dispatched purchaser, or battery energy storage system owner**”.

47 Clause 15.1 amended (Contents of this Part)

In clause 15.1(da), after “**dispatchable load purchasers**”, insert “and **battery energy storage system owners**”.

48 Clause 15.5A and heading amended (Dispatchable load purchaser must prepare dispatchable load information)

- (1) In the heading to clause 15.5A, after “Dispatchable load purchaser”, insert “and battery energy storage system owner”.
- (2) In clause 15.5A(1), after “Each **dispatchable load purchaser**”, insert “and **battery energy storage system owner**”.

49 Clause 15.5C amended (Aggregating and rounding dispatchable load information)

- (1) In clause 15.5C(1), replace “a **dispatchable load purchaser**” with “each **dispatchable load purchaser or battery energy storage system owner**”.
- (2) In clause 15.5C(2),
 - (a) after “a **dispatch-capable load station**”, insert “or a **battery energy storage system station**”; and
 - (b) after “the **dispatchable load purchaser**”, insert “or **battery energy storage system owner**”.

50 Clause 15.5D amended (Dispatchable load information to be delivered to reconciliation manager)

- (1) In clause 15.5D, after “**dispatchable load purchaser**”, insert “or **battery energy storage system owner**” in each place.
- (2) In clause 15.5D(1)(a), after “a **dispatch-capable load station**”, insert “or a **battery energy storage system station**”.

51 Clause 15.20B amended (Reconciliation manager loss adjusts and summarises dispatchable load information)

In clause 15.20B(1)(b), after “the **dispatchable load purchaser**”, insert “or **battery energy storage system owner**”.

52 Clause 15.20D and heading amended (Reconciliation manager to provide loss adjusted and summarised dispatchable load information to dispatchable load purchasers)

(1) In the heading to clause 15.20D, after “dispatchable load purchasers”, insert “and battery energy storage system owners”.

(2) In clause 15.20D—

(a) after “must provide each **dispatchable load purchaser**”, insert “and **battery energy storage system owner**”; and

(b) after “that relates to the **dispatchable load purchaser**”, insert “or **battery energy storage system owner**”.

53 Clause 15.38 amended (Functions requiring certification)

In clause 15.38(1A), after “a **dispatchable load purchaser**”, insert “or **battery energy storage system owner**”.

Part 2

Amendments to Parts 1 and 13 of the Electricity Industry Participation Code that come into force on 31 March 2028

54 Clause 1.1 amended (Interpretation)

(1) In clause 1.1(1), revoke the definitions of **adjusted consumption capability** and **adjusted generation capability**.

(2) In clause 1.1(1), insert in their appropriate alphabetical order:

adjusted consumption capacity means the maximum continuous 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**, where that amount is:

(a) calculated accounting for:

(i) the maximum continuous power capacity of the **battery energy storage system station**;

(ii) any relevant **commissioning** or testing limits for the **battery energy storage system station**;

(iii) any limits on conveying **electricity** between the **battery energy storage system station** and the **point of connection** to the **grid**, including any limits or constraints on the **battery energy storage system owner’s assets** and any limits or constraints on relevant **distribution network assets**; and

(iv) any limits required to ensure personnel or plant safety; and

(b) adjusted where necessary to account for:

- (i) the effect of any relevant outages, including any such outages affecting the **battery energy storage system owner's** plant or equipment, or the relevant **distribution network**;
 - (ii) any **distribution network** constraints;
 - (iii) losses in conveying **electricity** between the **battery energy storage system** and the **grid**;
 - (iv) losses in converting between chemical and electrical energy; and
 - (v) the auxiliary load expected when the **battery energy storage system station** is operating at maximum consumption; and
- (c) 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 capacity means the maximum continuous 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** where that amount is:

- (a) calculated accounting for:
 - (i) the maximum continuous power capacity of the **battery energy storage system station**;
 - (ii) any relevant **commissioning** or testing limits for the **battery energy storage system station**;
 - (iii) any limits on conveying **electricity** between the **battery energy storage system station** and the **point of connection** to the **grid**, including any limits or constraints on the **battery energy storage system owner's assets** and any limits or constraints on relevant **distribution network assets**; and
 - (iv) any limits required to ensure personnel or plant safety; and
- (b) adjusted where necessary to account for:
 - (i) the effect of any relevant outages, including any such outages affecting the **battery energy storage system owner's** plant or equipment, or the relevant **distribution network**;
 - (ii) any **distribution network** constraints;
 - (iii) losses in conveying **electricity** between the **battery energy storage system** and the **grid**;
 - (iv) losses in converting between chemical and electrical energy; and
 - (v) the auxiliary load expected when the **battery energy storage system station** is operating at maximum generation; and
- (c) 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 maximum storage limit means the maximum amount of energy a **battery energy storage system station** can store, in **MWh**, adjusted to:

- (a) account for any outages affecting the **battery energy storage system owner's** plant or equipment; 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

adjusted minimum storage limit for generation means the minimum amount of energy that a **battery energy storage system** can store, in **MWh**, adjusted to:

- (a) account for the effect of any outages affecting the **battery energy storage system owner's** plant or equipment; and
- (b) ensure that under reasonably foreseeable circumstances the **battery energy storage system owner** is able to meet any warranty conditions for the **battery energy storage system** that the owner intends to comply with, assuming that no generation reserve from the **battery energy storage system station** is activated

adjusted minimum storage limit for generation reserve means the minimum amount of energy that a **battery energy storage system** can store, in **MWh**, adjusted to:

- (a) account for the effect of any outages affecting the **battery energy storage system owner's** plant or equipment; and
- (b) ensure that under reasonably foreseeable circumstances the **battery energy storage system owner** is able to meet any warranty conditions for the **battery energy storage system** that the owner intends to comply with if **generation reserve** from the **battery energy storage system** is activated

BESS loss factor means a fixed or variable factor reflecting energy losses in respect of a **battery energy storage system station**

capped bid means, in relation to a **bid** made by a **battery energy storage system owner**, that **bid** adjusted as necessary to account for the **state of charge** constraint for the **battery energy storage system station** as provided for in clause 10 of Schedule 13.3

capped offer means, in relation to an **offer** made by a **battery energy storage system owner**, that **offer** adjusted as necessary to account for the **state of charge** constraint for the **battery energy storage system station** as provided for in clauses 9A(d) and (e) of Schedule 13.3

- (3) In clause 1.1(1), definition of **bona fide physical reason**—
 - (a) in paragraph (b)(i), after “**ancillary service agent**”, insert “, 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**”; and
 - (b) in paragraph (baa)(i), after “from a **battery energy storage system station**”, insert “, 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**”.

- (4) In clause 1.1(1), definition of **gate closure period**—
- (a) in subparagraphs (a)(i) and (ii), after “an **embedded generator**”, insert “(except for a **battery energy storage system owner**)” in each place; and
 - (b) in subparagraph (b)(ia), delete “(except for a **battery energy storage system owner** that is also an **embedded generator**) where that **battery energy storage system owner** is submitting an **offer** or **reserved offer**”.

55 Clause 13.9 amended (Information that offers must contain)

- (1) In clause 13.9(a), after “other than for”, add “**battery energy storage system owners**,”.
- (2) After clause 13.9(d), insert:
 - (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 discharging for a given **MW** of 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**.

56 Clause 13.9AA and heading amended (Battery energy storage systems offers and bids not to exceed adjusted capability)

- (1) In the heading of clause 13.9AA, replace “**capability**” with “**capacity**”.
- (2) In clause 13.9AA, replace “**capability**” with “**capacity**” in each place.
- (3) In clause 13.9AA, insert as subclauses (2) and (3):
 - (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 generation** or the **adjusted minimum storage limit for generation reserve**, whichever is applicable, for that **battery energy storage system station** for the relevant **trading period**.

57 Clause 13.13 amended (Information to be contained in bids)

- (1) In clause 13.13(1), after “A **purchaser**”, insert “, other than a **battery energy storage system owner**,”.
- (2) After clause 13.13(2), insert:
- (3) A **battery energy storage system owner** must ensure that each of its **nominated bids** contains:
 - (a) all information required by Form 10 in Schedule 13.1; and
 - (b) a variable **BESS loss factor** for charging for a given **MW** of consumption which, when taken together with the fixed **BESS loss factor**, constitutes a reasonable

estimate of the losses the **battery energy storage system owner** expects to incur in that **trading period**.

58 Clause 13.17 amended (Offers may be revised)

In clause 13.17(3), after “the **MW** specified in any price band”, insert “, the minimum storage limit for generation or the minimum storage limit for **generation reserve**”.

59 Clause 13.18B amended (When a battery energy storage system owner must revise offer and bid)

(1) Replace clause 13.18B(1) with:

(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**:

- (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 capacity** or **adjusted consumption capacity**, whichever is applicable, for that **battery energy 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 for generation 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 generation** for that **battery energy storage system station** for the relevant **trading period**; and
- (d) the minimum storage limit for **generation reserve** 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 generation reserve** for that **battery energy storage system station** for the relevant **trading period**.

(2) Replace clause 13.18B(2) with:

(2) A **battery energy storage system owner** must 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, (provided that, when the **gate closure period** has started, a **revised offer**, or **bid**, is required only where one or more of the conditions in clause 13.19AAA(1)(a) to (h) applies) if:

- (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 capacity**, or **adjusted consumption 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 for generation 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 generation** 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 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; or
 - (d) the minimum storage limit for **generation reserve** 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 for generation reserve** for that **battery energy storage system station** for the relevant **trading period** by more than 2.5 MWh.

60 Clause 13.19AAA amended (When a battery energy storage system owner may submit revised offers or bids during gate closure period)

- (1) In clause 13.19AAA(1)(d), replace “**capability**” with “**capacity**” in both places.
- (2) Revoke clause 13.19AAA(1)(e).
- (3) After clause 13.19AAA(1)(e), insert:

- (f) 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 the relevant **trading period**; or
- (g) the minimum storage limit for generation 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 for generation**, for that **battery energy storage system station** for the relevant **trading period**; or
- (h) the minimum storage limit for **generation reserve** 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 for generation reserve**, for that **battery energy storage system station** for the relevant **trading period**.

61 Clause 13.19AB amended (Limitations on revised offers and bids for battery energy storage system owners)

- (1) Replace clause 13.19AB(1) with:
- (1) Subject to subclause (3), a **battery energy storage system owner** that submits a revised **offer** or **bid** under clause 13.19AAA(1)(a), (b), (d), (f), (g) or (h) 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 capacity** or **adjusted consumption 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) Replace clause 13.19AB(3) with:

- (3) A **battery energy storage system owner** that submits a revised **offer** or **bid** under clause 13.19AAA(1)(a) during a **gate closure period**, where the **bona fide physical reason** is a situation where personnel or plant safety is at risk, must reduce the **offer** or **bid** only to the extent that it considers reasonably necessary to ensure that, if **dispatched**, complying with that **dispatch** does not put personnel or plant safety at risk.

62 Clause 13.19A amended (Bids may be revised)

In clause 13.19A(1E), after “any price band”, insert “or the maximum storage limit”.

63 Clause 13.38 amended (Ancillary service agents to submit reserve offers to system operator)

- (1) In clause 13.38(2), after “submitted by an **ancillary service agent**”, insert “, other than a **battery energy storage system owner**,”.

- (2) After clause 13.38(2), insert:

- (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 contain all the information required by Form 11 in Schedule 13.1.

64 Clause 13.44 amended (How quantity is to be specified in reserve offers)

- (1) In clause 13.44(1), after “For each price band, a **reserve offer**”, insert “submitted by an **ancillary service agent** that is not a **battery energy storage system owner**”.

- (2) After clause 13.44(1), insert:

- (1A) For each price band, a **reserve offer** submitted by an **ancillary service agent** that is a **battery energy storage system 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**; or
- (b) as the **demand** available to be reduced for **interruptible load**.

- (1B) For the avoidance of doubt, the **battery energy storage system owner** does not need to account for the **state of charge** in determining the generation or demand available under subclause (1A).

65 Clause 13.46 amended (Reserve offer may be revised)

In clause 13.46(3), after “an **ancillary service agent**”, insert “that is not a **battery energy storage system owner**”.

66 Clause 13.58A amended (Inputs for price-responsive schedule and non-response schedule)

- (1) After clause 13.58A(1)(aa), insert:

- (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 parameters agreed between the **battery energy storage system owner** and the **system operator**; and

(2) After clause 13.58A(2)(aa), insert:

(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 parameters agreed between the **battery energy storage system owner** and the **system operator**; and

67 Clause 13.69B amended (Inputs for dispatch schedule)

(1) In clause 13.69B(1)(j), replace “.” with “:”.

(2) After clause 13.69B(1)(j), insert:

(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 the **state of charge** for that **battery energy storage system station**; and
- (ii) any additional operational parameters agreed between the **battery energy storage system owner** and the **system operator**.

68 Clause 13.105A amended (Information to be made available to purchasers, generators, and ancillary service agents)

(1) In clause 13.105A(1)(c), replace “.” with “; and”.

(2) After clause 13.105A(1)(c), insert:

(d) for each **battery energy storage system owner** that has submitted an **offer** or **bid**, information from the current **price-responsive schedule** and **non-response schedule** relating to the scheduling of the **battery energy storage system owner’s capped offers** or **capped bids** for the **trading periods** covered in the **schedule length period**.

69 Clause 13.192 amended (Constrained off situations may occur)

In clause 13.192(2)—

- (a) in paragraph (a), after “an **offer** made by a **generator**”, insert “(other than a **battery energy storage system owner**)”; and
- (b) in paragraph (b),
 - (i) after “a **bid** made by a **purchaser**”, insert “(other than a **battery energy storage system owner**)”; and
 - (ii) replace “.” with “; and”; and
- (c) after paragraph (b), insert:
- (c) an **offer** or **bid** made by a **battery energy storage system owner** means the last **capped offer** or **capped bid**, as the case may be, made by the **battery energy storage system owner** which applied during the relevant **trading period**.

70 Clause 13.193 amended (Determining affected price bands for block dispatch groups and station dispatch groups)

Replace clause 13.193(2) with:

- (2) In this clause, —
 - (a) an **offer** made by a **generator** (other than a **battery energy storage system owner**) means the last **offer** made by the **generator** which applied during the relevant **trading period**;
 - (b) an **offer** made by a **battery energy storage system owner** means the last **capped offer** made by the **battery energy storage system owner** which applied during the relevant **trading period**.

71 Clause 13.194 amended (Clearing manager to calculate constrained off amounts)

- (1) In clause 13.194(2), in the definition of P_b , after “**dispatch-capable load station**”, insert “or **battery energy storage system station**”.
- (2) In clause 13.194(3)(b), replace “the ramp rate” with “any ramp rate”.
- (3) In clause 13.194(4)—
 - (a) in paragraph (a), after “an **offer** made by a **generator**”, insert “(other than a **battery energy storage system owner**)”; and
 - (b) in paragraph (b):
 - (i) after “a **bid** made by a **purchaser**”, insert “(other than a **battery energy storage system owner**)”; and
 - (ii) replace “.” with “; and”; and
 - (c) after paragraph (b), insert:
 - (c) an **offer** or **bid** made by a **battery energy storage system owner** means the last **capped offer** or **capped bid**, as the case may be, made by the **battery energy storage system owner** which applied during the relevant **trading period**.

72 Clause 13.204 amended (Calculation of constrained on amounts)

- (1) In clause 13.204(1)(b)(ii), replace “the ramp rate” with “any ramp rate”.
- (2) In clause 13.204(3)—
 - (a) in paragraph (a), after “an **offer** made by a **generator**”, insert “(other than a **battery energy storage system owner**)”; and
 - (b) in paragraph (b):
 - (i) after “a **bid** made by a **purchaser**”, insert “(other than a **battery energy storage system owner**)”; and
 - (ii) replace “.” with “; and”; and
 - (c) after paragraph (b), insert:
 - (c) an **offer** or **bid** made by a **battery energy storage system owner** means the last **capped offer** or **capped bid**, as the case may be, made by the **battery energy storage system owner** which applied during the relevant **trading period**.

73 Schedule 13.1, new forms 10 and 11 inserted

After Schedule 13.1, Form 9, insert new forms 10 and 11 as set out in the Schedule to this amendment.

74 Clause 1 of Schedule 13.3 amended

After clause 1(2A) of Schedule 13.3, insert:

- (2B) A **price-responsive schedule** and **non-response schedule** must use the predicted **state of charge** of each **battery energy storage system station** at the end of the previous **trading period** as the expected **state of charge** for the purpose of clause 9A(d).

75 Clause 9A of Schedule 13.3 amended

- (1) In clause 9A(b) of Schedule 13.3—

- (a) after “for each **generating unit** or **generating station**”, insert “, including a **battery energy storage system station**,”; and
- (b) after “ramp down rates of the **generating unit** or **generating station**,”, insert “if any,”.

- (2) In clause 9A(c)(iv) of Schedule 13.3, replace “:” with “; and”.

- (3) After clause 9A(c) of Schedule 13.3, insert:

- (d) the modelling system schedules **electricity** generation for each **battery energy storage system station** in a **trading period** such that:
 - (i) in relation to the **dispatch** schedule, the level of generation can be maintained for the time remaining in the **trading period**:
 - (ii) in relation to the **price-responsive schedule** and **non-response schedule**, the level of generation can be maintained for the **trading period**:
 - (iii) the scheduled quantity of **electricity** to be generated by the **battery energy storage system station** does not exceed the maximum of either:
 - (A) 0, or
 - (B) the positive difference between the **state of charge** at the beginning of the **trading period**, calculated in accordance with clause 9B, and the minimum storage limit for generation 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**, in MWh; and
- (e) the modelling system schedules **electricity** generation for each **battery energy storage system station** offering both generation and **generation reserve** in a **trading period** such that:
 - (i) in relation to the **dispatch** schedule, the level of generation can be maintained for the time remaining in the **trading period** and the level of **sustained instantaneous reserves** can be maintained for 15 minutes:
 - (ii) in relation to the **price-responsive schedule** and **non-response schedule**, the level of generation which can be maintained for the **trading period** and the level of **sustained instantaneous reserves** can be maintained for 15 minutes:
 - (iii) the scheduled quantity of **electricity** to be generated by the **battery energy storage system station** does not exceed the maximum of either:
 - (A) 0, or
 - (B) the positive difference between the **state of charge** at the beginning of the **trading period**, calculated in accordance with clause 9B, and the minimum storage limit for **generation reserve** 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**, in MWh.

76 New clause 9B of Schedule 13.3 inserted

After clause 9A of Schedule 13.3, insert:

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 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.

77 Clause 10 of Schedule 13.3 amended

Replace clause 10 of Schedule 13.3 with:

The constraint relating to **demand** for the purpose of clause 9(c) is that—

- (a) for each price band, the modelling system does not schedule **electricity demand** that would result in the scheduled quantity of **demand** being greater than:
 - (i) the quantity bid by the **purchaser** for the price band; and
 - (ii) either:
 - (A) 0 or;
 - (B) the positive difference between the **state of charge** at the beginning of the **trading period**, calculated in accordance with clause 9B, 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 **bid**, in MWh; and
- (b) the modelling system schedules **electricity** consumption for each **battery energy storage system station** in a **trading period** such that:
 - (i) in relation to the **dispatch schedule**, the level of consumption can be maintained for the time remaining in the **trading period**;
 - (ii) in relation to the **price-responsive schedule** and **non-response schedule**, the level of consumption can be maintained for the **trading period**.

78 Clause 12 of Schedule 13.3 amended

After clause 12(4) of Schedule 13.3, insert:

- (4A) The modelling system must not schedule **generation 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 **generation reserve** to be provided exceeding the maximum effective reserve capacity of that **battery energy storage system station** as specified in the **reserve offer** for that **battery energy storage system station**.

79 Clause 1 of Schedule 13.3B amended

- (1) In Schedule 13.3B, clause 1, row 38, after “(whichever applies)”, insert “and adjusted so that, for each **battery energy storage system station**, the total offered quantity is no greater than the total **capped offer** quantity”.
- (2) In Schedule 13.3B, clause 1, row 39, after “**offers from generators**”, insert “that are not **battery energy storage system owners**, and **capped offers from battery energy storage system owners**,”.
- (3) After Schedule 13.3B, clause 1, row 47, insert:

48	Capped offer and capped bid quantities (in MW) for each battery energy storage system station limited by state of charge constraints	X	X	X			
----	---	---	---	---	--	--	--

Schedule

Schedule 13.1, new forms 10 and 11 inserted

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 Station Maximum Output _____ MW

Trading Period: _____ Starting at _____ : _____ 0 hours

Battery Energy Storage System Station Minimum Storage Limit (generation): _____ 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 (charging): _____ MW

Battery Energy Storage System Station Variable BESS Loss Factor (discharging): _____ MW

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

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

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

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

Battery Energy Storage System Station Minimum Storage Limit (generation reserve): ____ MWh

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

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

Made at Wellington on 28 September 2026



JOHN HARBORD
Chair
Electricity Authority

Certified in order for signature:



Tiffany Matsis
Senior Legal Counsel
Electricity Authority
25 September 2026



Rachael Brown
Partner
Bell Gully
25 September 2026

Explanatory Note

This note is not part of the amendment but is intended to indicate its general effect.

This amendment to the Electricity Industry Participation Code 2010 comes into force on 30 October 2026.

The amendment amends Parts 1, 8, 13 and 15 of the Code to improve wholesale market arrangements for utility-scale battery energy storage systems (**BESS**) by:

- a. requiring BESS to be dispatchable while consuming as well as while generating;
- b. as an interim measure, allowing BESS owners to trade based on the expected capability of the BESS station and update offer and bid quantities after gate closure if that expected capability changes;
- c. as part of the final phase of the amendment (to come into effect on 31 March 2028), allowing BESS owners to trade their full capacity, with state of charge constraints acting to limit consumption and generation to what is achievable given the level of stored energy in the BESS station; and
- d. as part of the final phase of the amendment, requiring BESS owners to submit offers and bids using a single trade form and receive a single dispatch for their BESS station.

This is secondary legislation issued under the authority of the Legislation Act 2019 .	
Title	Electricity Industry Participation Code (Wholesale market arrangements for battery energy storage systems) Amendment 2026
Instrument ID	
Empowering provisions	Electricity Industry Act 2010, section 38
Date made	28 September 2026
Date as at	Not applicable
Date of publication	30 September 2026
Administering agency	Electricity Authority