



Via email: WholesaleConsulation@ea.govt.nz

18 July 2022

Consultation paper – Final elements real-time pricing

Mercury welcomes the opportunity to provide comment on the final elements of real-time pricing design. No part of our submission is confidential. Overall, we support the proposed changes. We note that dispatch-capable load stations will at times enter bids into the energy market. We believe that the market should have up to date visibility over this. Therefore, we would like the Authority to request that the System Operator regularly publish the nominated dispatch bid stack at the same time as they release the supply stacks.

If you have any questions please contact andrew.anderson@mercury.co.nz.

Yours sincerely

Andrew Anderson
Trading Manager



Appendix 1 Consultation Questions

Consultation Question	Mercury Response
Q1. Do you agree with the proposed revised FIR and SIR risk-violation values for CE reserve deficit? If not, why?	Yes
Q2. Do you agree with the proposed surplus bus generation value? If not, why?	Yes
Q3. Do you agree with the proposed change to how purchasers communicate with the system operator for significant changes to demand bids? If not, why?	Yes
Q4. Do you agree with the proposal to allow generators, other than an intermittent generator to revise offers within a trading period for certain circumstances? If not, why?	Yes, this will impose compliance costs on us but we will manage them.
Q5. Do you agree with the proposal to update the definition for 'pricing error'? If not, why?	Yes
Q6. Do you agree with the proposal to remove participant obligations, relating to the system operator and Authority requests during a pricing claim investigation? If not, why?	Yes
Q7. Do you agree with the proposal that the price error claimant no longer requires to be materially affected? If not, why?	Yes
Q8. Do you agree with the proposal to align Clauses 13.170 and 13.170A with the proposed pricing error claim process? If not, why?	Yes
Q9. Do you agree with the proposal to amend Clauses 13.177 and 13.178 to reflect the proposed pricing error claim process? If not, why?	Yes
Q10. Do you agree with the proposal that trading periods not associated with a pricing error claim should have final prices published without delays? If not, why?	Yes
Q11. Do you agree with the proposal to exclude approved dispatch notification generators from the definition for intermittent generating station? If not, why?	Yes
Q12. Do you agree with the proposed method for scheduling and dispatching binary loads? If not, why?	Yes
Q13. Do you agree with the proposal to introduce a new definition for binary loads, and the associated changes to the modelling and price calculation process? If not, why?	Yes
Q14. Do you agree with the proposal to co-optimize interruptible load and dispatchable load? If not, why?	Yes



Q15. Do you agree with the proposal to reinstate clauses related to information flow between generators, the grid operator and the clearing manager? If not, why?	Yes
Q16. Do you agree with the proposal to accommodate scarcity pricing in the real-time pricing process? If not, why?	Yes, noting this is dependent on the integrity and transparency of the demand forecast.
Q17. Do you agree that the proposed schedule adequately describes the RTDP pricing process? If not, why?	Yes
Q18. Do you agree with the proposal to update the definition of dispatch notification purchaser to include load aggregators and virtual powerplants? If not, why?	Yes
Q19. Do you agree with the proposed method for handling dispatch notification loads under a non-dispatch flag? If not, why?	Yes
Q20. Do you agree with the proposed provision for handling pricing publications during stand-alone dispatch? If not, why?	Yes
Q21. Do you agree with the proposed technical and noncontroversial Code changes? If not, why?	Yes
Q22. Do you agree with the proposed drafting of the Code amendment? Any concerns or feedback?	Yes

