

10 May 2022

Submissions Electricity Authority

By email: fsr@ea.govt.nz

## Future security and resilience roadmap

Meridian appreciates the opportunity to provide feedback to the Authority on the future security and resilience project, specifically the draft roadmap developed for phase two of the project. It is good to be aware of this project, the activities that may result, and the upcoming opportunities for further engagement under the roadmap.

Meridian has a keen interest in many of the challenges or opportunities identified including:

- operating with low system strength;
- enabling distributed energy resources (DER) services for efficient power systems operations;
- visibility and observability of DER;
- balancing renewable generation;
- managing reduced system inertia; and
- leveraging new technology to enhance ancillary services.

We will contribute to the detailed consideration of these challenges and opportunities when the Authority and system operator progress them. At this stage Meridian's comments are confined to the prioritisation and timing of actions under the roadmap.

Many of the proposed actions involve consideration of new or revised ancillary services (see actions 4.2, 5.1, 5.2, 6.3 and 8.1). It appears that the soonest the Authority and system

operator will consider new or revised ancillary services is 2025. Meridian queries whether this should be brought forward given the potential consumer benefits of reserve products in the minutes to hours range to support system security and resilience to mitigate the risk of events like those of 9 August 2021, as well as meet future needs with an increasingly renewable and intermittent generation mix. This potential need was also identified through the MDAG consultation on price discovery in a 100% renewable electricity market.

Setting the rules and product specifications early for any new or revised ancillary services would enable developers to build technologies such as battery storage, vehicle to grid and demand response aggregation in a manner that meets the security and resilience needs of the future. Delaying consideration of new or revised ancillary services could lead to investments being made in the interim that do not comply with the specifications, i.e. a missed opportunity. Meridian encourages the Authority and system operator to prioritise consideration of new or revised ancillary services ahead of the timeframes indicated in the draft roadmap.

We look forward to further engagement as the project progresses.

Please contact me if you have any queries regarding this submission.

Nāku noa, nā

Sam Fleming Manager Regulatory and Government Relations