

Submission on Ancillary Services Procurement Plan

Eric Pyle, Director Public Affairs and Policy, solarZero, 6th December 2021

Q1. Do you agree with the Authority's overall assessment of the proposal? If not, what alternative assessment would you make and why?

Yes we do. We consider that enabling batteries to participate in the reserves market will result in a more stable and efficient power system. These proposals are timely given the growth in amount of battery storage and that batteries can do a much better job in power system stability management than electro-mechanical generation.

In time we would like to see distributed batteries playing a role in a range of ancillary services, including new services that have not yet been designed in New Zealand, but we are seeing emerging in some other jurisdictions. These services reflect the technical characteristics of batteries – particularly their fast and accurate responses enabled by software.

Q2. Are there alternative means to any of the individual amendments proposed by the system operator that you consider better meet the proposal objectives? If so, please describe the alternative and why you prefer it.

We are comfortable with the proposed amendments on the basis that we understand that the proposed amendments will enable distributed battery systems to provide reserves.

Q3. What comments do you have on the proposed drafting of the amendments, as set out in Appendix D? If you disagree with the drafting or can suggest improved drafting, please provide this.

We are comfortable with the drafting on the basis that we understand that the draft will enable distributed battery systems to provide reserves.