

Electricity Authority
By email: extended.reserve@ea.govt.nz

16 April 2021

Extended reserve Code amendment

Mercury welcomes the opportunity to comment on the 'Extended reserve Code amendment' consultation paper.

The paper proposes to transition the North Island Automatic Underfrequency Load Shedding scheme from two blocks to four blocks. Mercury agrees the current two block AUFLS setting may not be enduring in the face of a changing electricity generation mix and supports the proposed change. We also agree the benefits will outweigh the costs of the proposal.

Mercury's only comment is that each of the four blocks should be able to be disconnected quickly. Mercury's generation plant will be more at risk if the system is in a state of low inertia and the speed of response for the AUFLS blocks are not able to be met.

We recommend that there is a regular system of end to end testing to ensure the scheme works as intended.

Yours sincerely,



John Bright
Regulatory Strategist

