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Chris Otton
Senior Advisor Market Design
Electricity Authority
By email to WholesaleConsultation@ea.govt.nz

Dear Chris

Extended reserve code amendment – consultation paper 13 April 2021

New Zealand Steel has contributed to the preparation of the MEUG submission on this paper and commends that submission for consideration by the Authority and Transpower.

It is in the interests of all consumers that there is an AUFLS mechanism that will operate effectively for the (fortunately) very few events that occur.

In the absence of a dynamic load shedding mechanism, we generally agree with the objectives set out in the consultation paper and refinement to the current 4-block scheme, and how that operates for mass market consumers. However, further consideration is required for sites with large electrical loads, and how load to be shed relates to pre-event load. While the consultation paper provides for such sites to work with Transpower on some of the detail, there is lack of clarity in aspects of the draft code amendments. There is risk that a 'one-size fits all' requirement will result in unintended consequences particularly where cogeneration and Interruptible load are involved, and given the uniqueness of New Zealand large industrial sites that no "equivalence" may exist.

We support the MEUG recommendation for simultaneous finalisation of the Code amendment and ATR

Regards

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