



**T R A N S P O W E R**

*Keeping the energy flowing*

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## **Extended Reserve Code amendment**

Transpower appreciates the opportunity to respond to the Electricity Authority's (the Authority's) consultation on the Extended Reserve Code amendment.

We agree with the key issues the Authority has identified and broadly support its proposed Code amendment. We have noted a few points of clarification to align the Code amendment with how the system operator would enact these amendments based on our present understanding.

Our response to the Authority's questions are provided in Appendix 1.

Yours faithfully,

Joel Cook

Regulatory Affairs and Pricing Manager

## Appendix 1

#	Questions	Response
1	Do you agree the issues identified by the Authority are worthy of attention?	Yes
2	Do you agree with the objectives of the proposed amendment? If not, why not?	<p>Yes. However, we make the following comments:</p> <p><b>Comment # 1</b></p> <p>In relation to Part 3 of the Consultation Paper, section 3.20 (<b>Establishing a data portal for AUFLS load data</b>):</p> <p>3.20 To aid in this, a data portal will be implemented that will allow distributors to submit load data for their proposed scheme and assess their compliance. The system operator will require distributors to submit load data for each of their AUFLS feeders on an annual basis for monitoring purposes. Direct connect consumers will not be required to submit load data via the portal for the purposes of assessing and monitoring equivalence arrangements.</p> <p>We consider that the above wording should be changed to ensure that it clarifies that the system operator expects direct connect customers to include their demand data in the data portal to allow overall scheme visibility in a single location</p> <p><b>Comment # 2</b></p> <p>In relation to Part 3 of the Consultation Paper, section 3.29 (<b>Enhanced data for compliance</b>):</p> <p>3.29 In addition to providing the raw data, The Authority may request the system operator to provide an assessment, based on the information provided by AUFLS providers, as to whether the AUFLS scheme is secure.</p> <p>We consider that a clarification of the level of assessment is needed here. We expect the assessment for the Authority would be limited to identifying any over- or under- provision of</p>

#	Questions	Response
		AUFLS on request. Any dynamic power system analysis to assess the expected performance of the AUFLS scheme would be outside the scope of the above-mentioned assessment.
3	Do you agree with the proposed changes to the monitoring data resolution and requirements? If you disagree, what monitoring regime do you think would be more efficient?	Yes
4	Do you agree with the incorporation by reference of the ATR and the proposed process for amending the ATR?	Yes
5	Do you agree that a 30 June 2025 deadline will provide enough time for providers to transition their systems to the 4-block AUFLS scheme?	Yes
6	Do you agree with the use of equivalence arrangements to allow previously exempted parties to work towards compliant AUFLS provision?	Yes
7	Do you agree the benefits of the proposed amendment outweigh its costs?	Yes
8	Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010	Yes
9	Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	Yes
10	Do you have any comments on the drafting of the proposed amendment?	No