

21st May 2018

Submissions
 Electricity Authority
 PO Box 10041
 Wellington 6143

By email to: submissions@ea.govt.nz

Consultation Paper— Enabling the system operator's Dispatch Service Enhancement (DSE) project (ie GENCO replacement)

Dear sir

Thank you for the opportunity to make a submission on the proposed amendments to the Electricity Industry Participation Code and Approved Systems Documents.

Norske Skog Tasman (NST) supports the enabling of the System Operator's Dispatch Service Enhancement project. As a Genco user, NST agrees that replacing the GENCO with alternative communication protocols would improve competition, reliability and efficiency.

Question	Comment
Q1. Do you agree the issues identified by the Authority warrant amending the Code provisions for dispatch instructions and the Approved Systems Document?	Yes
Q2. Do you agree with the proposed sunset clause ending GENCO's status as an approved system on 31 December 2020? If not, why not?	Yes, provided that an alternative Dispatch system has been deployed
Q3. Do you agree with the objectives of the proposed amendment? If not, why not?	Yes
Q4. Do you agree the benefits of the proposed amendment outweigh its costs?	Yes
Q5. Do you agree the proposed amendment is preferable to the other option? 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
Q6. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	Yes
Q7. Do you have any comments on the drafting of the proposed amendment to the Code?	Yes, as below
Q8. Do you have any comments on the drafting of the proposed amendment to the Approved Systems Document	Yes; as below

In addition to the Genco Dispatches, asset owners (participants) are also required to transmit data to the grid owner or system operator's SCADA, complying with Clause 6 of Schedule 8.3, Technical Code C of Part 8 of the Code.

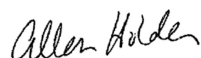
It could be cost effective for Asset owners (participants) who already use ICCP for SCADA data transmission, to expand their ICCP system to add (Genco) Dispatches.

Would asset owners (participants) who do not presently have ICCP and who wish to avoid the cost of ICCP servers and software licences, be permitted to use the alternative Web Services communications, for both Dispatches and SCADA data transmission ?

At this stage, it is unclear what the new Dispatch Service enhancement Application program is going to be and what the User Interface will look like.

Hopefully, when the Dispatch system's proposed Application User Interface is known, that users will be consulted about its ease of use; cost to implement and to maintain.

Yours sincerely



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