



22 May 2018

Submissions  
Electricity Authority  
By email: [submissions@ea.govt.nz](mailto:submissions@ea.govt.nz)

### **Enabling the system operator's dispatch service enhancement**

Meridian welcomes the opportunity to comment on the Authority's proposal to amend the Code and Approved Systems Document to allow the system operator to replace the existing GENCO system used for electronic dispatch.

We agree that there are a range of problems with GENCO and that the two proposed alternate communication protocols (ICCP and web services) will:

- provide an efficient solution for current dispatch participants;
- enable greater participation, particularly by smaller participants;
- enable new dispatch products and functionality;
- provide increased resilience because of the dual platforms; and
- facilitate real-time pricing (should the Authority decide to progress this).

Meridian therefore supports the changes proposed by the Authority, which will enable the project to proceed. We will continue to engage with the system operator throughout the implementation of the dispatch service enhancement project to ensure we are ready to receive and acknowledge dispatch instructions using the new protocols.

Appendix A provides Meridian's responses to the specific consultation questions. Please contact me if you have any questions regarding this submission.

Yours sincerely

Sam Fleming  
Regulatory Analyst

DDI 04 803 2581  
Mobile 021 732 398  
Email [sam.fleming@meridianenergy.co.nz](mailto:sam.fleming@meridianenergy.co.nz)

## A. Responses to consultation questions

	Question	Response
1	Do you agree the issues identified by the Authority warrant amending the Code provisions for dispatch instructions and the Approved Systems Document?	Yes.
2.	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.
3.	Do you agree with the objectives of the proposed amendment? If not, why not?	Yes.
4.	Do you agree the benefits of the proposed amendment outweigh its costs?	Yes.
5.	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.
6.	Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?	Yes.
7.	Do you have any comments on the drafting of the proposed amendment to the Code?	No.
8.	Do you have any comments on the drafting of the proposed amendment to the Approved Systems Document?	No.