

## Enabling the system operator's Dispatch Service Enhancement project

Submitter	Nova Energy Limited, Paul Baker
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	Questions	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.  Subject to the replacement systems addressing the identified issues at a reasonable cost.
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?	Agree in principle of including a sunset clause.  We note that the GENCO sunset date, the end of 2020, seems tight given the replacement systems are estimated only to be available by mid-2019 (given how long it took for Transpower to establish ICCP).
Q3	Do you agree with the objectives of the proposed amendment? If not, why not?	In principle, though there is no mention of any objective of reducing overall industry costs, which should be a consideration of any solution.
Q4	Do you agree the benefits of the proposed amendment outweigh its costs?	Nova has not reviewed the CBA in detail, though it notes that the stated cost-benefits are marginal in the context of the overall investment required.  It is clear that the costs of this project must be closely managed to ensure the net expected benefits are in fact realised.