

Submission: Dispatch notification enhancements and clarifications

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Introduction

solarZero is the first participant in the market to use DNL. We welcome the enhancements and clarifications set out in the consultation paper.

Q1. Do you think the current requirement to bid at each GXP where resources are located imposes material costs on load aggregators and do you think this may cause a potential barrier to entry? Please provide details.

Yes. For aggregators with thousands of systems it is impractical to offer the unaggregated set of resources at each GXP.

Q2. Do you agree with our framing of the problem?

Yes. Bidding at each GXP when you are offering thousands of devices is potentially a major challenge and barrier to entry.

Q3. Do you agree with our proposed solution? If not, why not? Are there other solutions you consider would better solve the problem?

We agree with the proposed solution. It seems practical and workable.

Q4. Do you agree with the proposed solution to clarify that obligations relating to dispatch notification purchasers should only impact trading arrangements, which are covered in Part 13?

Yes. Ensuring that appropriate data re provided is important.

Q5. Do you agree with our proposed solution to ensure dispatch notification participants provide the Authority with appropriate data for compliance monitoring purposes?

The key word is appropriate. We support the proposed solution.

Q6. Do you agree the benefits of the proposed amendments outweigh its costs? If not, please explain.

Yes. If the Code as currently drafted was rigorously followed it would be very difficult for DNL providers to enter the market.

Q7. Do you consider there are any other options that better meet the objectives? If so, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.

The proposed Code changes appear to achieve the desired objectives.