

Operations Consult
Electricity Authority
via email
OperationsConsult@ea.govt.nz

7 November 2024

Dear Authority

First steps in improving outage co-ordination – consultation paper

Thank you for the opportunity to submit on the “First steps in improving outage co-ordination – consultation paper” (‘Consultation’). Our responses to the Consultation questions are attached at Appendix A; please don’t hesitate to contact me on 0212882276 or at jo.christie@mercury.co.nz if you have any queries.

Yours sincerely



Jo Christie
Regulatory Strategist

Appendix A: Mercury submission

Questions	Comments
Q1. Do you agree with the issues identified by the Authority?	Yes, we agree with the issues identified by the Authority.
Q2. What other outage coordination issues should the Authority consider for our future programme of work? Please expand.	<p>We recommend the Authority consider upgrades to the Planned Outage Coordination Process's (POCP's) electronic Application Programming Interface (API). At present, the API does not accommodate the following information share:</p> <ol style="list-style-type: none">1. Recall time – requires users to manually search and access individual outages within POCP to identify information. We recommend the Authority consider sharing this information within the existing API; and2. Outage change reports –user creates a filtered report of change that is emailed daily. We recommend the Authority consider sharing this information within the existing API. <p>Providing the above electronic data transfers provides opportunity for participants to access information to better deliver industry services.</p>



Q3. Do you agree with the proposed changes to outage coordination obligations on the system operator and asset owners? If not, what don't you agree with and why?

We support the changes proposed by the Authority but recommend the following changes for workability:

1. Need for a threshold at cl 2(1) of Technical Code D

We are concerned over the enormous administrative burden the change to the definition of outage to include capacity reduction and the requirement to disclose all outages will have on generators regardless of whether the outage will prevent the system operator from fulfilling its principal performance obligations (PPOs).

The proposed amendment in its current form would require generators to notify the system operator of every small wind turbine or solar panel trip or planned outage even if it is a minor issue that does not impact the forecast of generating potential (FOGP) or can be quickly resolved by the generator within the gate closure period. The turbine availability for wind farms is reflected in the FOGP as it considers wind resource and number of turbines available. Transpower will therefore be aware of the generation available from the wind farms so requiring individual turbine outages to be entered into the POCP is an unnecessary duplication of effort.

We recommend the Authority introduce a tolerance/threshold into the notification requirements so that short term planned outages or unplanned outages of individual units or combined inverter-based resources (IBR) resulting in a capacity loss of less than 10MW will not require notification to the system operator. This would mean that single wind turbine inverter outages would not need to be notified, but outages which affect multiple units would.

If there is a specific reason for the Authority requiring additional information in relation to what exact inverter-based resources are connected to the grid and what is not connected at any one time it would be helpful to understand this rationale. Improved understanding may create an opportunity for participants to provide alternate solutions.

2. "Immediately" in cl 2(1) of Technical Code D requires clarification

We recommend the Authority clarify what their expectation is when requiring generators to notify the system operator "immediately" after they become aware of an outage change or an unplanned outage.

To give generator's time to determine whether an outage can be corrected, we recommend the timeframe allowed should align with the gate closure period for the market offer i.e. 60 minutes. If an outage can't be resolved within this timeframe, the generator is obliged to inform the system operator prior to gate closure.

Alternatively, the word "immediately" could be replaced with "as soon as practicable" which would give generators more flexibility to determine the impact of the outage before requiring them to notify the system operator.

3. Suggested timeframe for system operator response cl 5(2) Technical Code D

	<p>Although potentially out of scope for this Consultation, we note that clause 5(2) of Technical Code D currently states that the system operator “may advise” an asset owner once they have submitted their programme of planned outages “when an appropriate time would be”. It would be very helpful for Mercury and no doubt other asset owners if clause 5(2) were a mandatory obligation on the system operator to:</p> <ul style="list-style-type: none"> i. respond to the asset owner regarding the appropriateness of the planned outage by providing the asset owner with a clear timeline and visibility of the broader outage schedule; and/or ii. requiring the system operator to actively involve the asset owner in setting timeframes and guidance. <p>Providing asset owners with this information would enhance their ability to support the system operator to fulfil its PPOs. As more inverter-based resources are connected to the grid, the system operator will be increasingly reliant on generators with synchronous assets for that support. It is therefore critical that asset owners and the system operator work together in a timely manner to ensure that outage coordination works for both parties.</p>
<p>Q4. Do you agree the analysis presented in this regulatory statement? If not, why not?</p>	<p>We agree with the analysis.</p>
<p>Q5. 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.</p>	<p>We agree that the proposed amendment, with the changes we have recommended in our submission, is preferable to the other options.</p>

Q6. Do you have any comments on the drafting of the proposed amendment?

We have the following comments on the drafting of the proposed amendment:

1. Schedule 8.3, Technical Code D clauses 2(1)(a) and (3) seem to contradict each other – i.e. the asset owner is required to give **immediate** notice of a planned outage under 2(1)(a) but then subclause (3) dispels the sense of urgency by stating that an asset owner only must give maximum 12 months' notice. It might be clearer to reword this clause 2(1) as follows:

Subject to subclause 1A, each asset owner must give notice to, and in a manner and form reasonably specified by, the system operator of each outage of each of its assets –

- (a) Up to 12 months prior to the date a planned outage is scheduled to occur; or**
- (b) If a planned outage is to occur within the following 12-month period, as soon as practicable after the asset owner has scheduled a planned outage, even if that outage is subject to change or otherwise unconfirmed; or*
- (c) As soon as practicable after the asset owner becomes aware of an unplanned outage or becomes aware that an unplanned outage may occur, whichever occurs first.*

Note we have also replaced the word “immediate” with the phrase “as soon as practicable” as per our comments above in response to question 3 (paragraph 2).

2. We have also added the words “up to” to the beginning of our proposed amendment to cl 2(1)(a) to better reflect the timeframes that Transpower requires to produce its annual outage plan. The words “up to” align with current wording and infer that generators can/will provide notice at any time preceding the 12-month cut off rather than potentially waiting to provide it “until” 12 months prior to the planned outage.