

31 July 2025

To: fsr@ea.govt.nz

Helios Energy Limited (**Helios**) submission on the Electricity Authority's (**EA**) regulatory roadmap for battery energy storage systems (**BESS**)

Tēnā koutou,

Helios welcomes the opportunity to submit feedback on the EA's BESS regulatory roadmap. As a developer of utility-scale solar generation and BESS across Aotearoa, we are strongly supportive of the EA's focus on enabling BESS deployment. Timely regulatory clarity and targeted reforms are essential to building investor confidence and realising the full system value of BESS.

This submission expresses our support for the overall direction of the roadmap, while drawing attention to several key areas we consider vital for ensuring investment certainty for utility-scale BESS.

General Support for the Roadmap

Helios supports the EA's targeted, staged approach to enabling BESS, particularly where these measures improve investment certainty and enable greater system value from hybrid and standalone storage projects. In particular, we welcome the following elements:

- Helios acknowledges the constructive work to date with Transpower on Transmission Pricing Methodology (**TPM**) as it relates to BESS, particularly in supporting TPM transparency and the development of business cases where TPM outcomes have a material impact.
- The EA's focus on enabling hybrid systems of solar plus BESS, which aligns with Helios' development pipeline and reflects the growing importance of integrated renewable-plus-storage solutions.

Opportunities to Strengthen the Roadmap

While we support the overall direction, we see opportunities to improve the roadmap in ways that better support investor confidence and near-term project viability:

- **Timeliness of Regulatory Certainty:** The current roadmap may not align with the pace at which investment decisions are being made. Several Helios projects - and likely others in Transpower's connection pipeline - will be facing key financial milestones before the roadmap's anticipated work programme outcomes or Code changes are scheduled to be delivered. We encourage the EA to consider the urgency of these timelines when prioritising actions, particularly for enabling hybrid plant (PV + BESS) deployment.

- Pipeline Data Transparency: Helios supports the ongoing disclosure of the generation pipeline but notes a gap in current reporting, including the omission of battery sizing details for standalone and hybrid BESS. This limits developers' ability to benchmark projects, identify co-location opportunities, and understand grid impacts. Including BESS capacity and configuration would improve market transparency and support more informed system planning. While we acknowledge the EA's intention to review this data over the next two years, we recommend prioritising this update sooner, given the volume of storage projects already in development.

Conclusion

Helios appreciates the opportunity to contribute feedback to the EA regulatory roadmap for BESS. We are encouraged by the EA's proactive approach and its recognition of BESS as a critical enabler of a flexible, resilient, and decarbonised electricity system.

We strongly support the roadmap's overarching direction and the steps already taken to reduce barriers to BESS deployment. We encourage the EA to prioritise actions that deliver timely regulatory certainty and improved data transparency, to ensure the roadmap keeps pace with real-world investment timelines and project development.

We look forward to continued engagement with the EA as this work progresses and would welcome the opportunity to provide further input as specific initiatives are advanced.

Nāku iti noa, nā



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