

## Appendix E Format for submissions

Submitter

Ngāwhā Generation Limited (NGL)

### Minimum offer price exclusions for tie-breaker solutions

Questions	Comments
<p>Q2.1. Do you support the Authority's proposal to amend the Code to exclude intermittent generators from offering at \$0/MWh?</p> <p>Please explain your answer.</p>	<p>Yes, we support the proposal as it addresses the issue now. However, we believe that one of the alternative options should be implemented in future as it will provide a more durable and efficient outcome. Our reasons to support this option now are:</p> <ul style="list-style-type: none"> <li>• Agree with System Operators' arguments in their Code Amendment request (CAR) and outlined in the consultation.</li> <li>• The issue needs to be addressed now, and a more durable solution can be developed later</li> <li>• Our explanation of why a change was needed is outlined in our submission to the System Operator in August 2025</li> </ul> <p>We also agree that it should apply to all intermittent generation that are dispatched. (Grid-connected and Embedded).</p>
<p>Q2.2. Do you agree the proposed amendment is preferable to the alternative options?</p> <p>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 solution is fit-for-purpose to address the immediate issue.</p> <p>However, in the longer term, the optimal solution is an alternative outlined - Changing the market design by introducing a tie-breaker solution prioritising different types of generation e.g. Geothermal and slow-start thermal.</p> <p>As stated in the consultation by the Authority, this will provide a more durable solution, which we agree with.</p>
<p>Q2.3. Do you agree with the analysis presented in this Regulatory Statement?</p> <p>If not, why not?</p>	<p>Yes, agree with the main benefits being</p> <ol style="list-style-type: none"> <li>1. Enhanced reliability of supply</li> <li>2. Greater operational efficiency</li> </ol> <p>And that the costs to implement are minimal.</p>

## Materially large contracts

Questions	Comments
<p>Q3.1. Do you agree there is an issue with how the current Code recognises the benefits of new generation, most notably for wind and solar, for the purposes of determining whether an arrangement constitutes a MLC?</p> <p>If not, why not?</p>	No Comment
<p>Q3.2. Do you favour Option 1, Option 2, or an alternative option?</p> <p>Please explain your answer.</p>	No Comment
<p>Q3.3. Do you agree that offsets claimed for new generation should be calculated using prevailing industry standards and methodologies specific to each generation type (eg, wind, solar and geothermal)?</p> <p>If not, please explain your reasons and suggest any alternative approaches.</p>	No Comment
<p>Q3.4. Do you agree with allowing generators to choose between median generation and each point in time offsets?</p> <p>If not, please explain your reasons and suggest any alternative approaches.</p>	No Comment
<p>Q3.5. Do you agree the proposed amendments are preferable to the alternative options?</p> <p>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>	No Comment
<p>Q3.6. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?</p>	No Comment

## Refining hedge disclosure obligations to increase transparency

Questions	Comments
<p>Q4.1. Do you support the Authority's proposal to require disclosure of the generating station?</p> <p>Please explain your answer.</p>	<p>Yes, as it will improve the accuracy of the information published. We agree that the individual station codes should not be published.</p>
<p>Q4.2. Can you identify any other way to more easily identify PPAs and differentiate between these and firming contracts without defining PPAs in the Code?</p>	<p>No</p>
<p>Q4.3. Do you agree a 10 business day timeframe for submission of information, and the same process requirements as those applying to risk management contracts, should be introduced for novel or other types of contracts?</p> <p>Please explain your answer.</p>	<p>Yes, a similar process is appropriate.</p>
<p>Q4.4. Do you agree with the proposal to include demand response contracts in the definition of risk management contracts and require disclosure of their key terms (including price and price structure) through the hedge disclosure system?</p> <p>Please explain your reasons and any impacts you foresee.</p>	<p>Yes</p>
<p>Q4.5. Do you agree this proposal would increase confidence in published price information?</p> <p>If not, why not?</p>	<p>Yes</p>
<p>Q4.6. Do you agree the proposed amendment is preferable to the alternative options?</p> <p>If you disagree, please explain your preferred option in terms consistent with</p>	<p>No comment</p>

the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	
Q4.7. Do you agree with the analysis presented in this Regulatory Statement?  If not, why not?	No comment

## Technical and non-controversial amendments

Only complete this section if you have feedback on any of the technical and non-controversial proposed amendments. Please insert the row number at the top of each submission form.

Appendix D row number:	
Questions	Comments
Q5.1. Do you agree the issue identified by the Authority is technical and non-controversial?	
Q5.2. Do you have any feedback on the issue identified?	