

19 February 2025

Sarah Gillies  
Chief Executive  
Electricity Authority  
PO Box 10041  
WELLINGTON 6143

Sent via email: [operationsconsult@ea.govt.nz](mailto:operationsconsult@ea.govt.nz)

Dear Sarah

## Improving access to thermal fuel information

1. This is a submission from the Major Electricity Users' Group (MEUG) on the Electricity Authority's (Authority) consultation paper *Improving access to thermal fuel information: clause 2.16 information notice*<sup>1</sup> published on 28 January 2025.
2. MEUG members have been consulted on the approach to this submission. This submission does not contain any confidential information and can be published on the Authority's website unaltered. Members may lodge separate submissions.

## Support improvements to thermal fuel information

3. MEUG supports the Authority's proposal to increase the collection and publication of thermal fuel information. We consider that:
  - The paper covers the critical importance of thermal generation to provide longer-term firming for the foreseeable future and discusses the options New Zealand currently has available to meet this need.
  - The Authority has established a clear case for why the current information disclosures are insufficient, and do not meet the needs of the Authority, or broader stakeholders including MEUG and our members.
  - While it is a positive step to have information published monthly, we would recommend that all information be collected weekly and in time, published weekly. The experience over winter 2024 highlighted how quickly the fuel situation can change across a month and why more frequent information is beneficial in times of pressure on the system.<sup>2</sup> The more frequent publication of information also aligns with the intention of NZX disclosures, where any material information impacting the market must be disclosed. Thermal fuel information is also important information for consumers negotiations for electricity contracts, as information asymmetry can impact on views of the spot and futures market.

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<sup>1</sup>[https://www.ea.govt.nz/documents/6411/Consultation\\_Paper\\_Improving\\_access\\_to\\_thermal\\_fuel\\_information\\_clause\\_2.16\\_in\\_yyyF7Qg.pdf](https://www.ea.govt.nz/documents/6411/Consultation_Paper_Improving_access_to_thermal_fuel_information_clause_2.16_in_yyyF7Qg.pdf)

<sup>2</sup> The Authority also reference this is paragraph 6.7 of the consultation paper.

- We support the publication of volume information, while keeping commercial pricing information confidential within the Authority for its own monitoring functions.
- The Authority's proposal allows for the capture and disclosure of information on future fuels such as torrefied black pellets, as and when these options are used by thermal generators.

**Welcome opportunity to discuss our comments further**

4. If you have any questions regarding our submission, please contact MEUG on 027 472 7798 or via email at [karen@meug.co.nz](mailto:karen@meug.co.nz).

Yours sincerely

A handwritten signature in black ink, appearing to read "K Boyes", with a long horizontal flourish extending to the right.

**Karen Boyes**  
Major Electricity Users' Group