

17 December 2024

John Clark
Acting Chief Executive
Transpower New Zealand Limited
PO Box 1021
WELLINGTON

Sent via email: system.operator@transpower.co.nz

Dear John

Low residual review

1. This is a brief cross-submission from the Major Electricity Users' Group (MEUG) on Transpower's consultation paper *System Operator co-ordination of low residual situations*¹ published on 20 November 2024.
2. MEUG members have been consulted on the approach to this cross-submission. This cross-submission does not contain any confidential information and can be published on the Transpower's website unaltered. Members may lodge separate cross-submissions.

Summary of points

3. Following our review of the consultation paper and the six submissions, MEUG has the following comments:
 - We support maintaining the current Low Residual threshold of 200 MW.
 - We support a regular two-yearly review cycle of the threshold, to ensure it reflects any material changes in the electricity market.
 - We do not believe that it is necessary to rename the CANs to an Industry Advice Notice but appreciate how including the term "industry" within any new name could help clarify who the notices are primarily targeted at.
 - We do not support a 24-hour delay in publishing the CANs on the website, and agree with the points set out in Powerco and Contact's submissions for this question.
 - Given the volume of CANs issued within a year, we consider that it can be hard for large consumers to ascertain what actions may be required from them. We would support more direct information where it is directed at large consumers.

¹ https://static.transpower.co.nz/public/bulk-upload/documents/Low_Residual_Situation_Review_Consultation.pdf?VersionId=xVQSXi3SncWHSzHzeDASiI014O1DjkSMi

- We support the System Operator maintaining the ability to call for a public response to any necessary CANS. We support Genesis Energy's recommendations around including the trigger point or threshold for calling for a public response within a formalised and transparent process.

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.

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