8 September 2026

System Operator
Transpower New Zealand
By email: system.operator@transpower.co.nz

Haast
Energy Trading

Submission on Emergency Reserve procurement arrangements

Dear System Operator team,

Haast Energy Trading seeks a change to the notification approach in paragraph 164 of the consultation paper, in response to Question 14. Pre-activation, activation and restoration of Emergency Reserve should be notified to the market when the relevant notices are issued to providers.

We disagree that these notifications would add no value for market participants. Haast and other physical and financial participants monitor real-time system performance as an important part of trading and risk management. Residual forecasts and general market notices do not tell participants whether Emergency Reserve has actually been activated, how much has been called or when its response is expected to cease. That information helps participants interpret system conditions, dispatch and prices. Post-event reporting cannot meet that real-time need.

The proposed approach would give contracted providers information unavailable to others at the same time. Providers need operational instructions, but their role should not confer an exclusive view of material system interventions. Equal access supports informed trading, efficient price discovery and competitive risk management. Creating subsets of participants with better operational information should be avoided by design.

If the System Operator remains opposed to public notification because of concerns about media attention or informal conservation responses, it should establish an industry opt-in notification service. Physical and financial participants should be able to enrol nominated staff on simple, published and equal terms. Access should not depend on owning generation or load, providing Emergency Reserve, or receiving a discretionary invitation.

Subscribers should receive the same material operational facts at the same time, alongside the relevant provider notices. These should include status, effective time, relevant island, activated quantity, material changes and restoration, distinguishing instructions from measured delivery. This need not disclose individual contract terms or confidential provider-specific instructions. An automated distribution channel would avoid adding a manual step to emergency operations.

Market-wide publication remains our preference. An open industry channel is a workable fallback, but selective notification is not. We ask that this requirement be incorporated into the final procurement and operational arrangements before the scheme begins.

Yours sincerely,

Phillip Anderson
Haast Energy Trading