

Evolving market resource co-ordination: Tie-breaker provisions

Consultation Questions

Submission Date:	13 August 2025
Organisation:	Helios Energy Limited (Helios)

Question 1: Do you support our proposed tie-breaker solution: dispatch in proportion to offers?
Do you have any feedback on any aspect of it or our consideration of it?

Helios supports the tie-breaker solution proposed to revise offers in proportion to the generation offered, as this is equitable, predictable, and objectively manageable.

However, Helios notes that the proposed tie-breaker is equitable only within the context of the Electricity Authority's (EA) 21 Feb 2025 decision¹ to separate intermittent generation and Battery Energy Storage System (BESS) offers.

Helios notes that if the EA's BESS roadmap workstream on hybrid plants results in consolidating hybrid plant offers to improve BESS efficiency and market enhancement (as observed in Australia), the tie-breaker should be reviewed to ensure fairness is maintained between hybrid and non-hybrid intermittent plants.

¹ "Electricity from intermittent generation assets should be offered separately from electricity from a BESS (ie, a generator with intermittent generating assets and a BESS should submit two separate offers). This applies regardless of whether the intermittent generating asset is located at the same or a different location as the BESS."

Question 2: If you do not support our proposed tie-breaker solution, which alternative option would you prefer? If so, please describe the alternative and why you prefer it.

n/a

Question 3: Are there alternative options we have not identified which we should consider?
n/a
Question 4: Do you agree with our qualitative assessment that the benefits of the proposal can reasonably be expected to outweigh the costs?
<p>Helios agrees that the benefits are difficult to quantify, particularly those related to reducing operational challenges caused by random outcomes and addressing inequities between generators.</p> <p>Helios agrees that the main benefit to the proposed change is to provide investor confidence by implementing a solution that is fair, predictable and equitable.</p>
Question 5: Do you agree it is appropriate to rely on qualitative evaluation of the costs and benefits of the proposed amendments? If not, what information, evidence etc can you provide and/or what methods would you recommend to quantify the costs and benefits?
Yes
Question 6: Do you think we should progress a proposal to incorporate information about any tie-breaker solution we decide to adopt into the Policy Statement, to enhance certainty and transparency?
Yes
Any other comments:
n/a

