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INDEPENDENT ELECTRICITY GENERATORS ASSOCIATION

6 November 2026

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

Dear team,

Re: TSO-DSO coordination – Operational requirements

The Independent Electricity Generators Association Inc. (IEGA) appreciates the opportunity to provide feedback to the System Operator on its proposed no-regrets foundational requirements for improved TSO and DSO coordination.[1]

The IEGA agrees with establishing a small working group to progress this no-regrets work and request that the group include owner/s of distribution network connected generation and storage.

Definitions of CER and DER

IEGA members own commercial-scale generation and storage assets connected to distribution networks. These assets are not 'Consumer energy resources' – CER. The System Operator has defined CER – which the IEGA supports given the scale, potentially large number, and dispersed nature of these assets. The IEGA's strong preference is to have a definition of Distributed energy resources (DER) that does not include CER. In our view the operational requirements for distributors and the System Operator are distinctly different between CER and commercial-scale generation and storage.[2]

Five Principles

The IEGA strongly supports the five principles the System Operator has identified that will guide what and how information is collected and used for TSO and DSO coordination.

The principle of 'Proportionate to operational consequence' is key. Assessing the operational consequence or risks from not requiring a new piece of information is important to manage costs imposed on asset owners and ensure efficient coordination.

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[1] The IEGA Steering Committee has signed off this submission on behalf of IEGA members.
[2] For example, MBIE defined DER as *"being business-owned assets, and their primary purpose can be … to provide energy system services …. They are generally larger in kW/kWh and can be connected at any voltage level on the distribution network. DER can be generation, storage and demand assets. Examples include medium-sized solar farms, wind farms, batteries, …* DER and CER together were called 'Distributed flexibility' MBIE discussion paper 'Measures for Transition to an Expanded and Highly Renewable Electricity System' October 2023

Requirement 2 and 3 – Minimum static and dynamic information

The Code already determines the information provided by, and operating requirements on, distributed generation asset owners for 'common quality' across the power system. EDBs may place conditions on distributed generation asset owners to reflect operating conditions within their networks. These two requirements cannot contradict each other and shouldn't duplicate each other. The information required should be relatively stable as changes impose costs on asset owners from coding or system changes to provide new or slightly different data.

It is not clear from the consultation paper whether sufficient information is already held by one party but not both the System Operator and EDB. That is, what new information is being sought and requires additional effort from participants to implement?

The IEGA seeks clarification that the System Operator's interest continues to be at the interface between the transmission and distribution networks.

Requirement 4 – Interoperable information exchange

An interoperable information exchange is critical if the benefits of sharing minimum static and dynamic information are to be realised.

Requirement 5 – Predictable technical performance

The consultation paper explains – "*The no-regret requirement is that material differences are known, technically justified and represented correctly in models, studies and operational assumptions where they can affect the wider system*". This description is relatively clear, but an alternative interpretation of this requirement could be that information and analysis would be used to assess individual asset owners' compliance with Code requirements.

The IEGA looks forward to further engagement on TSO and DSO coordination as this work is important to support continuing development of a least-cost power system.

Nothing in this submission is confidential.

Yours sincerely



Ben Gibson
Chair