

Evolving market resource co-ordination: Tie-breaker provisions

Consultation Questions

Submission Date:	13 August 2025
Organisation:	Lodestone Energy Ltd

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?
<p>Lodestone Energy supports the proposed tie-breaker solution of dispatching generation in proportion to offered quantities. We consider it to be a practical, fair, and transparent method that aligns well with nodal pricing principles and reflects international best practice. The pro-rata allocation method offers clarity for market participants and reduces uncertainty, particularly for new and existing investors in renewable generation.</p> <p>We agree this approach appropriately limits the need for discretionary real-time decisions by the System Operator, which helps enhance operational predictability and confidence in the dispatch process. We also acknowledge that implementation appears feasible, given successful prototype testing in SPD.</p>
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.
Not applicable. We support the proposed solution.
Question 3: Are there alternative options we have not identified which we should consider?
We consider that the consultation paper has comprehensively assessed a range of viable options. At this stage, we do not have additional options to propose.
Question 4: Do you agree with our qualitative assessment that the benefits of the proposal can reasonably be expected to outweigh the costs?



Yes. Lodestone agrees that the qualitative benefits - greater investor confidence, operational certainty, reduced discretionary intervention, and equity among market participants - outweigh the relatively minor implementation costs.

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. We believe the qualitative evaluation is appropriate for this issue. Quantifying the benefits of improved certainty and investor confidence is inherently challenging and unlikely to produce materially different outcomes than a qualitative approach. Given the limited frequency and scope of tie-breaker situations, a qualitative approach seems appropriate.

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. Lodestone supports the inclusion of the tie-breaker methodology in the Policy Statement. Doing so will capture the process in a transparent manner, enhancing market understanding and confidence. Clear policy direction will also help prevent ad hoc or discretionary practices from being introduced over time.

Any other comments:

