

21 May 2026

James Kilty
Chief Executive
Transpower
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WELLINGTON 6011

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

Dear James

Draft Security of Supply Assessment 2026

1. The Major Electricity Users' Group (MEUG) welcomes the opportunity to provide a brief cross submission to Transpower on its consultation paper "*Draft Security of Supply Assessment 2026*"¹ and supporting appendices published on 23 April 2026.
2. This cross submission does not contain any confidential information and can be published on Transpower's website unaltered. Members may lodge separate responses.

Need to continually evolve SoSA to reflect changing market conditions

3. Submitters on the draft 2026 Security of Supply Assessment (SoSA) have all re-emphasised the importance of this annual document, which provides the market with key information on the supply / demand balance for the short, medium and long-term and can influence both investment and operational decisions. We agree with the views put forward by Genesis Energy,² Mercury³ and Meridian⁴ that Transpower must ensure that the SoSA remains fit for purpose and continues to evolve to reflect changing market conditions. The three gentailers have also detailed several areas where improvements could be made. For example:
 - Mercury recommends that "*deterministic energy and capacity margins should be supplemented by probabilistic reliability metrics*" and that the NI-WCM should be "*supplemented by probabilistic reliability metrics that better capture residual demand risk during peak periods, rather than relying solely on deterministic capacity margins*" (alongside a list of other recommendations).
 - Meridian considers that "*the SOSA process would benefit from a policy review to confirm that the process settings and underlying assumptions remain fit for purpose in the context of the energy transition. In particular, the fact that participants can hold materially different views on supply and demand outlooks highlights the importance of ensuring the SOSA is supported by high-quality, consistent information and robust assumptions*".

¹ <https://static.transpower.co.nz/public/bulk-upload/documents/2026%20SOSA%20-%20Draft%20Report.pdf?VersionId=6B3u7WHL68taxBVinzvR7t3I50Nun9uC>

² Genesis Energy [submission](#), 14 May 2026.

³ Mercury [submission](#), 14 May 2026

⁴ Meridian [submission](#), 14 May 2026.

- Genesis Energy outlines how *“the energy and capacity security of supply standards have not been updated since 2012”* and therefore the importance of *“the Authority’s [upcoming] review of the security standards and assumptions”*. Genesis also suggests the SoSA would *“benefit from more granular delineation of assumptions behind new generation project delivery”*.
4. MEUG encourages Transpower, in coordination with the Electricity Authority, to confirm that it has robust processes to capture all these suggestions and refinements, to ensure they are duly considered, consulted upon and factored into future SoSAs, where appropriate.

Next steps

5. If you have any questions regarding our submission, please contact MEUG on [REDACTED] or via email at [REDACTED].

Yours sincerely



Karen Boyes
Major Electricity Users' Group