



4 November 2025

James Kilty
Chief Executive
Transpower
PO Box 1021
WELLINGTON

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

Dear James

SOSFIP– Draft amendment proposal

1. This is a brief submission from the Major Electricity Users' Group (MEUG) on Transpower's consultation paper "*Security of Supply Forecasting and Information Policy Review: Consultation – Draft amendment proposal*"¹ and supporting documents published on 7 October 2025.
2. This submission does not contain any confidential information and can be published on Transpower's website unaltered. Members may lodge separate submissions.

Support for amendments to SOSFIP

3. MEUG supports Transpower undertaking a review of the Security of Supply Forecasting and Information Policy (SOSFIP). Changes are necessary to this Policy to reflect the considerable changes in market conditions in recent years and this work will support the Government's decisions following the 2025 review of the electricity system ("response to the Frontier report" as at 1 October 2025).
4. We consider that Transpower has set out a list of well-justified amendments relating to:
 - Its review of key Electricity Risk Curves (ERC) and Simulated Storage Trajectories (SSTs) assumptions
 - The linkage between energy and capacity risks
 - Consideration of geopolitical and assets risks
 - Contingent storage buffer access arrangements.
5. MEUG particularly supports the proposal to introduce a second ERC and SST scenario based on contracted thermal fuel quantities, noting that the Electricity Authority has now approved a permanent Code change to enable monthly gathering of this data.²

¹ <https://static.transpower.co.nz/public/bulk-upload/documents/System%20Operator%20-%20SOSFIP%20review%20consultation%20-%20October%202025.pdf?VersionId=6d0vgfTDneNQfW5OJWd0ApJ.k69hjvmC>

² <https://www.ea.govt.nz/news/general-news/updating-the-code-to-strengthen-the-system-operators-information-gathering-powers/>

6. We also support Transpower maintaining discretion around when access to contingent hydro storage can be triggered. We consider that publishing the CSRB buffer discretion process will provide greater certainty for industry participants, addressing previous concerns raised by some submitters.

Next steps

7. We look forward to reviewing comments made by other submitters. If you have any questions regarding our submission, please contact MEUG on 027 472 7798 or via email at karen@meug.co.nz.

Yours sincerely



Karen Boyes
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