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Submitted via email to system.operator@transpower.co.nz

Discussion Document – TSO – DSO Coordination: Operational Requirements

Introduction

1. Thank you for the opportunity to submit on the discussion document '*TSO – DSO Coordination: Operational Requirements*'. This submission is not confidential and can be publicly disclosed.
2. Orion owns and operates the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch city and Selwyn District. Our network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. We deliver electricity to more than 230,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB).

Orion summary points

3. We have reviewed the consultation paper, and our general views are summarised in this section. Orion's specific responses to the eight questions posed by Transpower (System Operator) as well as other feedback we consider appropriate to the consultation are set out in Appendix A.
4. Our responses address several key areas, in which we welcome further discussion, including the framing of the role the Electricity Authority should take in information control, the current and future capability expected of EDBs, and the interaction between Electricity Industry Participation Code expectations on participants and the System Operator's version of information supply.
5. We encourage the System Operator to consider how this information can be efficiently gathered and exchanged using existing channels to minimise the need for additional investment.
6. We look forward to further discussions on the development of TSO and DSO coordination, while considering the role of other participants. We remain committed to working collaboratively towards solutions that enhance the resilience and security of supply of Aotearoa New Zealand's power system.

Concluding remarks

7. Thank you for the opportunity to provide feedback on this consultation.
8. If you have any questions or queries on aspects of this submission which you would like to discuss, please contact us on 03 363 9898.

Yours sincerely,

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Appendix A

Submitter	Orion New Zealand Limited ("Orion")

Questions	Comments
Q1. What should be changed, added, or removed from the five operational requirements?	**General Commentary** The document consistently uses the term "material" but does not define it. For clarity, provide a definition of "material" when it is used. **Clear Operational Accountabilities** We support maintaining the existing division of operating responsibilities while this work is undertaken, but clearer timing and a clearer split of responsibility would help support operational capability uplift for EDBs, as this can take time. **Minimum Static Information** ICPs regularly shift supply GXPs due to distribution operational requirements. While Orion updates an ICP's GXP tag overnight, we note that this is not an expectation on EDBs.The Electricity Industry Participation Code (the Code) requires this only every five days (Schedule 11.1 clauses 7 and 8). We recommend considering how and whether this requirement, and other related Code clauses, may need to be updated in future to support accurate, more real-time information. The document provides no indication as to how often the static information is expected to be updated. This impacts the relevance of sources and aggregations. When discussing the required information, it should also be clear that the System Operator (SO) is responsible for integrating the information provided, especially where multiple participants must provide overlapping information. Minimum static information should also include controllable generation (export) where appropriate, and not be limited to demand.

	Minimum Dynamic Information We seek to further understand what is meant by the Operational Use "Emergency Demand Management". It appears this Operational Use should be included in all items listed in the table. This is particularly true for "Material DER Availability" and in the event of "loss of control capability". Additionally, where the document notes the SO will provide "relevant demand and dispatch schedules or forecasts by GXP where these support distribution decisions", we would like to add "in an agreed format". We suggest the SO considers this for all transfer of information to assist the receiver of that information with digesting it. **Interoperable Information Exchange** We encourage the SO to consider which information channels may be reused and which small set of information is relevant across all participants before we continue making decisions impacting how information moves between participants. We support a small governed set of interfaces as outlined in the document. **Predictable Technical Performance** There appears to be a reasonable amount of crossover with this requirement and general technical sign off for connections. It should be considered whether this is the right forum for those conversations or if work like the ENA's Streamlining Connections workstream is a better place to manage connection expectations and workflows.
Q2. For each information item listed, is the proposed source best placed to create and maintain an authoritative value?	**Minimum Static Information**

	The sources listed for this type of information are generally incorrect in our view. We believe the Electricity registry should play a larger role in ensuring accurate information is available to all participants who require it, and that this would avoid unnecessary duplication. For embedded generation and battery capability specifically, the flow of information should be from those who collect it through mandated Code processes to the registry, where the System Operator (SO) can access it. If the current registry isn't suitable for the needs of the SO, the EA should take the opportunity, given it's recent RFP for this service, to ensure the fields and structure are updated appropriately to support SO needs. Information relating to Controllable Demand appears to not be static in nature and we question why it is in this section, acknowledging the timing requirements around making this available. The SO should also be aware that the resources measured to find this number may be controlled by multiple parties (for example, EDB and retailer) and double counting becomes a risk. We agree that the proposed source is accurate for network equivalents and technical performance, and that the level of aggregation is suitable for all items. **Minimum Dynamic Information** The request for week-ahead up to real time MW and MVAr is unclear. We would struggle to provide this at a consistently accurate MW level and query the capability of other participants to do the same. Additionally, the scope of this requirement appears unclear and we seek further clarification on what is meant by "at the agreed boundary where material". For the controllable demand request, we seek clarification that "confirmation of action" means confirming the outcome or impact and not confirming that each individual device has responded as expected. We seek the same for "Material DER Availability". Concerning "loss of control capability", we suggest retailers and aggregators should be added to the list of likely sources, or extending obligations under the Code to allow EDBs or the SO to collect the required information from other participants in a consistent manner.

Q3. Is the proposed level of aggregation and timing proportionate to the operational use?	The level of aggregation and timing is generally acceptable. It would be useful to supply some example use cases where they may change the timing or level of aggregation to assist EDBs with understanding the specific requirements.
Q4. Which requirements can already be met through existing information, systems, and processes?	The accuracy of existing systems and processes should not be taken for granted. As this is emerging capability to achieve some of the listed requirements, EDBs including Orion, will need to understand how best to collect and provide the information, in what format and from what source.
Q5. Where are the material information, quality, access, or capability gaps?	We believe the SO may have overlooked the amount of investment required to meet the expectations set out in this discussion document. The information Orion currently provides, as a reasonably advanced network in this space, would not meet these requirements. While we support the direction, we welcome further engagement to establish how this investment can be managed effectively and efficiently, and under what timeframes. Additionally, while this document discusses how the TSO and DSO will interact, and the information exchange that is to occur, the same exercise will be required with the inclusion of aggregators and retailers to ensure a comprehensive understanding of information exchange. The document appears to indicate that the DSO is responsible for coordinating all information that the SO expects to receive and that this is the given future model. Orion disagrees that this is the simplest method of information exchange given the existence of tools like the registry.
Q6. Which initial information exchanges should be prioritised for early definition or trial?	Load forecasting and controllable flexibility (demand and export) should be priorities for the SO.
Q7. Are there relevant initiatives or standards we should align with to avoid duplication?	We consider the following would be useful to the SO in avoiding duplication: • The Load Management Protocol work • The USI Load Manager functionality

	• Transpower's Non-Traditional Solutions work with EDBs • ENA's work on dynamic capacity management for export through the Future Networks Forum
Q8. Do you agree with the priority use cases that we have identified? If not, which would you consider are higher priority?	Yes, we agree that these should be the priorities. We also think the SO should consider black start as a priority.