## **System Operator Rolling Outage Plan Review**

Questions in the SOROP consultation document

**Transpower New Zealand Limited** 

Keeping the energy flowing









TRANSPOWER



Question 1	Do you agree with our assessment of the problems with the SOROP?
Agree	
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Overtion 2	De view supposit and grant and to accord the CODOD?
Question 2	Do you support our proposal to amend the SOROP?
es, better clarif	ication is required
	Are there any other amendment options we should consider? Please explain option in terms consistent with the Authority's statutory objective in the stry Act 2010 and consideration of practicality of the solution to implement.
differ between E	rioritisation of Demand to be disconnected by Distributors. This Priority order will EDBs, for example Northpower would prefer to maintain the supply to the CBD as ry Farms (reverse the order of 4 and 5)
Question 4	Do you agree with splitting the declaration of a supply shortage into a shortage
of electricity su	upply and a shortage of transmission capacity. Is this split clear?
es we agree.	
<b>Question 5</b> supply shortag	Do you agree with the proposed change to this method of when to declare a le?
Yes	
Question 6	Do you agree with our proposal to use the surrent inflow foresect assurates 10/
<b>Question 6</b> daily inflows be shortage?	Do you agree with our proposal to use the current inflow forecast, assuming 1% eyond 7 days, as one of the inputs in determining when to declare a supply
Agree	

**Question 7** Do you agree with using a demand forecast as described above over the next 35 days in determining whether to declare a supply shortage?

This seems appropriate

**Question 8** Do you agree with the proposal to lower the notification period for declaration of a supply shortage from 14 days to 7 days? If not, what timeframe would you suggest as appropriate?

This is acceptable

**Question 9** Do you agree with the proposal for the calculation of savings targets?

Agree

**Question 10** Do you agree with using a forecast of specified participants consumption over the next 35 days in setting savings targets rather than last year's demand?

We would agree, with 35 days, however this would always need a seasonable adjustment.

**Question 11** Do you agree with the proposal to provide for participant feedback on the demand forecast within 48 hours if a participant believes it is wrong?

Yes we agree, we need to be able to provide near real time loading

**Question 12** Do you agree with lowering the notification of savings targets from 9 days to 7 days?

Yes, however we need the ability to provide information to our consumers, who may opt to reduce load

**Question 13** Do you agree with the proposal to add the requirement for Participant Rolling Outage Plans to provide a seven-day planned outage list with daily outage and restoration times and half hourly GXP level demand upon notification of savings targets?

No, we can only provide suggested PROPs as each event will act differently to another. The half hourly GXP demand would need to be modelled using specific dates and times

**Question 14** Do you agree the priority order in the Table in 6.8 of the SOROP for disconnection of demand should remain unchanged?

## As per question 3.

7.12 Section 5 Prioritisation of Demand to be disconnected by Distributors. This Priority order will differ between EDBs, for example Northpower would prefer to maintain the supply to the CBD as opposed to Dairy Farms (reverse the order of 4 and 5)

**Question 15** Do you agree with the proposal to not change the requirement to provide information on the arrangements in place between the distributor and retailers?

Agree

**Question 16** Do you agree with this clarification in clause 6.12(b)? If not, would you suggest anything different or would you prefer what's in the current SOROP which does not specify any time of year or month?

Agree

**Question 17** Do you agree with the proposal to remove the provision for directly connected consumers to provide a full information plan given participants (which includes directly connected consumers) can provide feedback on their demand forecast and on their savings targets?

Agree

**Question 18** Do you support our proposed transitional arrangements under which specified participants would not have to bring forward their proposed amendments/update of their Participant Rolling Outage Plans?

Agree

**Question 19** Do you agree with the objectives of the proposed amendment?

Agree

**Question 20** 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?

I would need to better understand the options, to make an informed decision.

**Question 21** Do you agree the benefits of the proposed amendments to the SOROP can reasonably be expected to outweigh its costs?

I would need to better understand the options, to make an informed decision.

**Question 22** Do you agree that the proposed amendment complies with section 32(1) of the Act?

Agree

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