

Sent: Wednesday, March 6, 2024 11:54 AM

To: System Operator <System.Operator@transpower.co.nz>

Subject: Consultation – System Operator Rolling Outage Plan Review

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Ata mārie,

Following a discussion with our Operations Manager, please see Alpine Energy Limited's submission below:

1. Alpine Energy Limited (**we, our**) would like to thank Transpower for the opportunity to submit on the consultation paper regarding the System Operator Rolling Outage Plan Review, dated 7 February 2024.
2. Our submission does not include any confidential information and we do not require any redaction before publication.
3. We support the intent of the consultation and the proposed changes.
4. We are seeking clarity from the system operator on what they consider an "extended period" to be, given the multiple uses of the term across the proposed changes. It is used in the glossary concerning a developing event "An example of a developing event is an **extended period** of low hydro inflows", a supply shortage "to ensure supply demand for **extended periods** of time" and then the thresholds for supply shortage declarations uses the term for three different situations. We are concerned about the subjective nature of this term and believe it creates uncertainty about when declarations may be used. We accept that some description is necessary for the system operator regarding the duration of outages given the complexity of different events. Equally, we must have a level of confidence in the mechanism within the plan.
5. We hope our submission is helpful and we are happy for any further discussion.

Ngā mihi nui,

Oscar Horstmann / Regulatory & Corporate Advisor

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