

System Operator Rolling Outage Plan Review

Questions in the SOROP consultation document

Transpower New Zealand Limited

Top Energy Submission

Keeping the energy flowing



TRANSPOWER



Question 1 Do you agree with our assessment of the problems with the SOROP?

Yes, we do and recognise the reasoning applied

Question 2 Do you support our proposal to amend the SOROP?

Yes, we believe the amendments help clarify the process.

Question 3 Are there any other amendment options we should consider? Please explain your preferred option in terms consistent with the Authority's statutory objective in the Electricity Industry Act 2010 and consideration of practicality of the solution to implement.

None at present

Question 4 Do you agree with splitting the declaration of a supply shortage into a shortage of electricity supply and a shortage of transmission capacity. Is this split clear?

Yes, as long as SO communications clearly state the applicable status.

Question 5 Do you agree with the proposed change to this method of when to declare a supply shortage?

Yes,

Question 6 Do you agree with our proposal to use the current inflow forecast, assuming 1% daily inflows beyond 7 days, as one of the inputs in determining when to declare a supply shortage?

Yes, makes sense .

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?

Yes can understand logic

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?

7 days should be sufficient.

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

Yes, they appear to be reasonable

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?

Yes. However, in our case we have geothermal generation on our network, and its availability at any given time should be taking in to account in forecasting, as that may affect the load data used to forecast.

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, makes sense

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

Yes

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?

Yes

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

Yes

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?

Yes

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?

Yes

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?

Yes

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?

Yes

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

Yes

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?

Do not have sufficient information on hand to comment.

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

Do not have sufficient information on hand to comment.

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

We agree

