

APPENDIX 1: Proposed Code amendment

Proposed amendments to the Code are displayed as follows:

- (a) text or formatting is red underlined if it is to be added to the existing Code as part of the **interim** amendment
- (b) text or formatting is shown in ~~red strikethrough~~ if it is to be deleted from the existing Code as part of the interim amendment.
- (c) text or formatting is blue underlined if it is to be added to the amended Code as part of the **final** amendment.
- (d) text or formatting is shown in ~~blue strikethrough~~ if it is to be deleted from the amended Code as part of the final amendment.

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>Part 1 Preliminary provisions</p> <p>1.1 Interpretation</p> <p>(1) In this Code, unless the context otherwise requires,—</p> <p>...</p> <p><u>adjusted consumption capability means the maximum electricity a battery energy storage system station is capable of consuming, in MWh, at the point of connection to the grid for which a bid is submitted in respect of that battery energy storage system station, adjusted to ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer</u></p> <p style="text-align: center;">no change</p>	<p>Part 1 Preliminary provisions</p> <p>1.1 Interpretation</p> <p>(1) In this Code, unless the context otherwise requires,—</p> <p>...</p> <p>adjusted consumption capability means the maximum electricity a battery energy storage system station is capable of consuming, in MWh, at the point of connection to the grid for which a bid is submitted in respect of that battery energy storage system station, adjusted to ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer</p> <p><u>adjusted consumption capacity means the maximum power a battery energy storage system station can consume, in MW, at the point of connection to the grid for which a bid is submitted in respect of that battery energy storage system station, adjusted to:</u></p> <p>(a) <u>account for any outages; and</u></p>

Commented [S01]: We query whether the word “consume” is appropriate for BESS as they don’t consume energy other than in respect of losses and parasitic load.

Commented [S02]: In relation to both the “interim” and “final” drafts, we consider that the definitions of “adjusted generation/consumption capacity” should specify that the maximum power may need to be adjusted when the system operator issues a formal notice (which is the circumstance in clause 13.19AAA(1)(b)).

Commented [S03]: In relation to the “final” draft, it is unclear whether “outages” here refers to BESS and/or also network outages.

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<p><u>adjusted generation capability means the maximum electricity a battery energy storage system station is capable of generating, in MWh, at the point of connection to the grid for which an offer is submitted in respect of that battery energy storage system station, adjusted to ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer</u></p>	<p>(b) <u>account for any distribution network constraints; and</u> (c) <u>ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer</u></p> <p>adjusted generation capability means the maximum electricity a battery energy storage system station is capable of generating, in MWh, at the point of connection to the grid for which an offer is submitted in respect of that battery energy storage system station, adjusted to ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer</p>
<p>no change</p>	<p><u>adjusted generation capacity means the maximum power a battery energy storage system station can generate, in MW, at the point of connection to the grid for which an offer is submitted in respect of that battery energy storage system station adjusted to:</u></p> <p>(a) <u>account for any outages; and</u> (b) <u>account for any distribution network constraints; and</u> (c) <u>ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer</u></p>
<p>no change</p>	<p><u>adjusted maximum storage limit means the maximum amount of energy a battery energy storage system station can physically and practically store, in MWh, adjusted to:</u></p> <p>(a) <u>account for any outages; and</u></p>

Commented [S04]: BESS do not generate electricity. The wording in other proposed Code clauses further down uses “output” for BESS. We consider that this is a better description and suggest replacing generation/generating with “output” in relation to BESS, for consistency.

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<p style="text-align: center;">no change</p> <p><u>battery energy storage system</u> means an energy storage system in which the energy is stored exclusively in electro-chemical form</p> <p><u>battery energy storage system owner</u> means a person who owns battery energy storage systems, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such battery energy storage systems, to the extent that person is acting in respect of that battery energy storage system</p>	<p>(b) <u>ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer.</u></p> <p><u>adjusted minimum storage limit</u> means the minimum amount of energy a battery energy storage system station can physically and practically store, in MWh, adjusted to:</p> <p>(a) <u>account for any outages; and</u></p> <p>(b) <u>ensure that, under any reasonably foreseeable circumstances, the battery energy storage system owner is able to meet any conditions it intends to comply with for the purposes of maintaining any warranty provided by the original equipment manufacturer</u></p> <p><u>battery energy storage system</u> means an energy storage system in which the energy is stored exclusively in electro-chemical form</p> <p><u>battery energy storage system owner</u> means a person who owns battery energy storage systems, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such battery energy storage systems, to the extent that person is acting in respect of that battery energy storage system</p>
<p><u>battery energy storage system station</u> means 1 or more battery energy storage systems that are directly connected to a network and that inject into the network at a single point of connection</p> <p style="text-align: center;">no change</p>	<p><u>battery energy storage system station</u> means 1 or more battery energy storage systems that are directly connected to a network and that inject into the network at a single point of connection</p> <p><u>BESS loss factor</u> means a fixed or variable factor reflecting energy losses in respect of a battery energy storage system station</p>

Commented [S05]: In relation to the “final” draft, we query whether both “physically” and “practically” is required here and what the difference would be.

Commented [S06]: “Battery energy storage system owner” is used with reference to both individual BESS and a station of BESS. As such we suggest amending the definition to refer to “a battery energy storage system or battery energy storage system station”. This will also remove the reference to plurals in the drafting.

Commented [S07]: We query whether the words “on behalf of any person who owns such battery energy storage systems” adequately captures aggregators of BESS systems, noting that aggregation of domestic systems is a real likelihood/ already takes place.

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<p>bid,—</p> <p>(a) means—</p> <p>(i) a nominated bid;</p> <p>(ii) a difference bid; and</p> <p>(b) includes a bid revised in accordance with clause 13.19AB, 13.19A or 13.19B</p> <p>(c) <i>[Revoked]</i></p> <p>bona fide physical reason includes,—</p> <p>(a) in relation to a generator, or a purchaser, or an ancillary service agent or a grid owner, a situation where personnel or plant safety is at risk; and</p> <p>(b) in relation to a generator or an ancillary service agent providing generation reserve or frequency keeping,—</p> <p>(i) a reasonably unforeseeable change in generating capability, reserve capability, or frequency keeping capability (as the case may be) from an item of generating plant that is the subject of an existing offer, reserve offer, or offer to provide frequency keeping by that generator or ancillary service agent; or</p> <p>(ii) a reasonably unforeseeable change in the level of expected uncontrollable water inflows into the head pond of a hydro station that is the subject of an existing offer, reserve offer, or offer to provide frequency keeping by that generator or ancillary service agent; or</p> <p>(iii) a reasonably unforeseeable change in circumstances such that the generator or ancillary service agent will breach any consent held by it under the Resource Management Act 1991; or</p> <p>(iv) a reasonably unforeseeable physical infeasibility that arises</p>	<p>bid,—</p> <p>(a) means—</p> <p>(i) a nominated bid;</p> <p>(ii) a difference bid; and</p> <p>(b) includes a bid revised in accordance with clause 13.19AB, 13.19A or 13.19B</p> <p>(c) <i>[Revoked]</i></p> <p>bona fide physical reason includes,—</p> <p>(a) in relation to a generator, or a purchaser, or an ancillary service agent or a grid owner, a situation where personnel or plant safety is at risk; and</p> <p>(b) in relation to a generator or an ancillary service agent providing generation reserve or frequency keeping,—</p> <p>(i) a reasonably unforeseeable change in generating capability, reserve capability, or frequency keeping capability (as the case may be) from an item of generating plant that is the subject of an existing offer, reserve offer, or offer to provide frequency keeping by that generator or ancillary service agent, <u>but, in the case of an offer by a battery energy storage system owner, does not include a reasonably unforeseeable change in generation capability arising solely due to the effect of dispatch instructions on the battery energy storage system's state of charge</u>; or</p> <p>(ii) a reasonably unforeseeable change in the level of expected uncontrollable water inflows into the head pond of a hydro station that is the subject of an existing offer, reserve offer, or offer to provide frequency keeping by that generator or ancillary service agent; or</p> <p>(iii) a reasonably unforeseeable change in circumstances such that</p>

Commented [S08]: We consider that the definition of “bona fide physical reason” should be exhaustive. We consider that will help strengthen, clarify and limit the circumstances which permit revisions during gate closure, limit the extent to which BESS owners could revise their trades, ensure bids and offers do not get revised during gate closure due to “lazy trading”.

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<p>from a price-responsive schedule, a non-response schedule, or a dispatch schedule; and</p> <p><u>(baa) in relation to a battery energy storage system owner. —</u></p> <p>(i) <u>a reasonably unforeseeable change in consumption capability from a battery energy storage system station; or</u></p> <p>(ii) <u>a reasonably unforeseeable change in circumstances which the battery energy storage system owner reasonably expects to result in a breach of one or more conditions with which the battery energy storage system owner reasonably considers it must comply for the purposes of maintaining any warranty provided by the original equipment manufacturer; and</u></p> <p>(bb) in relation to an ancillary service agent providing emergency reserve,—</p> <p>(i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) that is the subject of an alternative ancillary service arrangement to provide emergency reserve; or</p> <p>(ii) a reasonably unforeseeable full or partial loss of generating capability from an item of generating plant that is the subject of an ancillary service arrangement to provide emergency reserve; or</p> <p>(iii) a reasonably unforeseeable change in circumstances such that the ancillary service agent will breach any consent held by it under the Resource Management Act 1991; and</p> <p>(c) in relation to a purchaser, or an ancillary service agent providing interruptible load,—</p> <p>(i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) at a grid exit point that is the subject of an existing bid or reserve offer by the purchaser or the ancillary service agent; or</p>	<p>the generator or ancillary service agent will breach any consent held by it under the Resource Management Act 1991; or</p> <p>(iv) a reasonably unforeseeable physical infeasibility that arises from a price-responsive schedule, a non-response schedule, or a dispatch schedule; and</p> <p><u>(baa) in relation to a battery energy storage system owner. —</u></p> <p>(i) <u>a reasonably unforeseeable change in consumption capability from a battery energy storage system station, excluding a reasonably unforeseeable change in consumption capability arising solely due to the effect of dispatch instructions on the battery energy storage system's state of charge; or</u></p> <p>(ii) <u>a reasonably unforeseeable change in circumstances which the battery energy storage system owner reasonably expects to result in a breach of one or more conditions with which the battery energy storage system owner reasonably considers it must comply for the purposes of maintaining any warranty provided by the original equipment manufacturer; and</u></p> <p>(bb) in relation to an ancillary service agent providing emergency reserve,—</p> <p>(i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) that is the subject of an alternative ancillary service arrangement to provide emergency reserve; or</p> <p>(ii) a reasonably unforeseeable full or partial loss of generating capability from an item of generating plant that is the subject of an ancillary service arrangement to provide emergency reserve; or</p> <p>(iii) a reasonably unforeseeable change in circumstances such that the ancillary service agent will breach any consent held by it</p>

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<ul style="list-style-type: none"> (ii) a reasonably unforeseeable change in circumstances such that the purchaser or ancillary service agent will breach any consent held by it under the Resource Management Act 1991; or (iii) a reasonably unforeseeable full or partial loss of generating capability from an item of generating plant owned by, or the subject of a supply contract with, that purchaser during the relevant trading periods; and (d) in relation to a grid owner, a reasonably unforeseeable loss of full or partial capacity on transmission plant forming part of the grid <p>...</p>	<p>under the Resource Management Act 1991; and</p> <ul style="list-style-type: none"> (c) in relation to a purchaser, or an ancillary service agent providing interruptible load,— <ul style="list-style-type: none"> (i) a reasonably unforeseeable full or partial loss of demand or reserve capability (as the case may be) at a grid exit point that is the subject of an existing bid or reserve offer by the purchaser or the ancillary service agent; or (ii) a reasonably unforeseeable change in circumstances such that the purchaser or ancillary service agent will breach any consent held by it under the Resource Management Act 1991; or (iii) a reasonably unforeseeable full or partial loss of generating capability from an item of generating plant owned by, or the subject of a supply contract with, that purchaser during the relevant trading periods; and (d) in relation to a grid owner, a reasonably unforeseeable loss of full or partial capacity on transmission plant forming part of the grid <p>...</p>
<p>dispatchable load information means the volume information—</p> <ul style="list-style-type: none"> (a) of each dispatch-capable load station <u>or battery energy storage system station</u> for each trading period in a consumption period; and (b) that is— <ul style="list-style-type: none"> (i) prepared under clause 15.5A or 15.5B; and (ii) aggregated and rounded in accordance with clause 15.5C <p>...</p>	<p>dispatchable load information means the volume information—</p> <ul style="list-style-type: none"> (a) of each dispatch-capable load station <u>or battery energy storage system station</u> for each trading period in a consumption period; and (b) that is— <ul style="list-style-type: none"> (i) prepared under clause 15.5A or 15.5B; and (ii) aggregated and rounded in accordance with clause 15.5C <p>...</p>
<p>gate closure period, in relation to a trading period for which a generator or ancillary service agent has submitted an offer or reserve offer, or for which a dispatchable load purchaser <u>or battery energy storage system owner</u> has submitted a nominated dispatch bid means—</p> <ul style="list-style-type: none"> (a) the trading period to which the offer or reserve offer relates, and 	<p>gate closure period, in relation to a trading period for which a generator or ancillary service agent has submitted an offer or reserve offer, or for which a dispatchable load purchaser <u>or battery energy storage system owner</u> has submitted a nominated dispatch bid means—</p> <ul style="list-style-type: none"> (a) the trading period to which the offer or reserve offer relates, and

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<p>the trading period immediately preceding that trading period for—</p> <ul style="list-style-type: none"> (i) an embedded generator <u>(except for a battery energy storage system owner)</u>; (ii) an ancillary service agent that is also an embedded generator <u>(except for a battery energy storage system owner)</u>; (iii) a dispatch notification purchaser; (iv) a dispatch notification generator; and <p>(b) the trading period to which the offer, reserve offer, or nominated dispatch bid relates, and the 2 trading periods immediately preceding that trading period, for—</p> <ul style="list-style-type: none"> <u>(ia) a battery energy storage system owner</u>; (i) any other generator; (ii) any other ancillary service agent; (iii) a dispatchable load purchaser (other than a dispatch notification purchaser) <p>generating station means 1 or more generating units that are directly connected to the grid or to a local network and that inject into the grid or a local network (as the case may be) at a single point of injection, <u>and includes a battery energy storage system station</u></p> <p>generating unit means all equipment functioning together as a single entity to produce electricity, <u>and includes a battery energy storage system</u></p> <p>generator means, except in Part 6A, a person who owns generating units connected to a network, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such generating units, and includes <u>battery energy storage system owners, embedded generators,</u></p>	<p>the trading period immediately preceding that trading period for—</p> <ul style="list-style-type: none"> (i) an embedded generator <u>(except for a battery energy storage system owner)</u>; (ii) an ancillary service agent that is also an embedded generator <u>(except for a battery energy storage system owner)</u>; (iii) a dispatch notification purchaser; (iv) a dispatch notification generator; and <p>(b) the trading period to which the offer, reserve offer, or nominated dispatch bid relates, and the 2 trading periods immediately preceding that trading period, for—</p> <ul style="list-style-type: none"> <u>(ia) a battery energy storage system owner</u>; (i) any other generator; (ii) any other ancillary service agent; (iii) a dispatchable load purchaser (other than a dispatch notification purchaser) <p>generating station means 1 or more generating units that are directly connected to the grid or to a local network and that inject into the grid or a local network (as the case may be) at a single point of injection, <u>and includes a battery energy storage system station</u></p> <p>generating unit means all equipment functioning together as a single entity to produce electricity, <u>and includes a battery energy storage system</u></p> <p>generator means, except in Part 6A, a person who owns generating units connected to a network, or any person who acts, in respect of Parts 13, 14 and 15, on behalf of any person who owns such generating units, and includes <u>battery energy storage system owners, embedded generators,</u></p>

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<p>intermittent generators, type A co-generators, and type B co-generators</p> <p>nominated bid—</p> <p>(a) <i>[Revoked]</i></p> <p>(b) <i>[Revoked]</i></p> <p>(c) <i>[Revoked]</i></p> <p>(d) means the information that a purchaser submits to the system operator under clauses 13.6A or 13.7 to indicate a reasonable estimate of the—</p> <p>(i) electricity that the purchaser will purchase for a dispatch-capable load station or battery energy storage system at a GXP; or</p> <p>(ii) non-dispatch-capable load that the purchaser will purchase at a nonconforming GXP; and</p> <p>(e) includes a deemed nominated bid under clause 13.8A</p> <p>nominated dispatch bid means a nominated bid that a purchaser submits to the system operator in relation to a battery energy storage system or a dispatch-capable load station that the purchaser is making available to be dispatched</p> <p>offer means the information that a generator submits to the system operator under clause 13.6(1) or 13.6A, and clause 13.9B(1), includes any revised offer that a generator submits under clauses 13.17 to 13.19AAA</p> <p>purchaser means a person who buys electricity from the clearing manager and, for the purposes of Parts 8, 13, 14, and 14A, has the</p>	<p>intermittent generators, type A co-generators, and type B co-generators</p> <p>nominated bid—</p> <p>(a) <i>[Revoked]</i></p> <p>(b) <i>[Revoked]</i></p> <p>(c) <i>[Revoked]</i></p> <p>(d) means the information that a purchaser submits to the system operator under clauses 13.6A or 13.7 to indicate a reasonable estimate of the—</p> <p>(i) electricity that the purchaser will purchase for a dispatch-capable load station or battery energy storage system at a GXP; or</p> <p>(ii) non-dispatch-capable load that the purchaser will purchase at a nonconforming GXP; and</p> <p>(e) includes a deemed nominated bid under clause 13.8A</p> <p>nominated dispatch bid means a nominated bid that a purchaser submits to the system operator in relation to a battery energy storage system or a dispatch-capable load station that the purchaser is making available to be dispatched</p> <p>offer means the information that a generator submits to the system operator under clause 13.6(1) or 13.6A, and clause 13.9B(1), includes any revised offer that a generator submits under clauses 13.17 to 13.19AAA</p> <p>purchaser means a person who buys electricity from the clearing manager and, for the purposes of Parts 8, 13, 14, and 14A, has the</p>

Commented [S09]: In relation to the “Final” draft, there may be additional changes required to the definition of “generator” and “generating station” stemming from the BESS Common Quality Consultation Paper (which is still undergoing the initial consultation process as at the date of this submission).

We consider that there may be potential unintended consequences stemming from the inclusion of BESS and BESS owners in the definitions of **generation station**, **generating unit**, and **generator**, in particular, in relation to CACTIS and the Transmission Pricing Methodology.

A related issue is whether the definition of “generating plant” should then also be changed to include BESS (it does not currently).

Commented [S010]: This should refer to “battery energy storage system *station*”.

Commented [S011]: There is proposed wording in the “final” draft that refers to demand-side information appearing in an offer rather than a bid (e.g. clause 13.9(e)(ii), which refers to “consumption”, and clause 10(b) of schedule 13.3, which is about demand).

The potential confusion this creates could be avoided by, in the longer-term, defining and using a more generic term for combined BESS offers/bids, e.g. “BESS trade”.

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<p>additional meaning set out in clause 1.5, <u>and includes a battery energy storage system owner</u></p>	<p>additional meaning set out in clause 1.5, <u>and includes a battery energy storage system owner</u></p>
<p>reconciliation participant means a participant that—</p> <p>(a) is one of the following:</p> <ul style="list-style-type: none"> (i) a retailer when purchasing electricity from, or selling electricity to, the clearing manager; (ii) a generator; (iii) a network owner; (iv) a distributor; (v) a person who purchases electricity from or sells electricity to the clearing manager, including a dispatchable load purchaser <u>and a battery energy storage system owner</u>; and <p>(b) provides information to the reconciliation manager in accordance with clauses 15.4 to 15.11</p>	<p>reconciliation participant means a participant that—</p> <p>(a) is one of the following:</p> <ul style="list-style-type: none"> (i) a retailer when purchasing electricity from, or selling electricity to, the clearing manager; (ii) a generator; (iii) a network owner; (iv) a distributor; (v) a person who purchases electricity from or sells electricity to the clearing manager, including a dispatchable load purchaser <u>and a battery energy storage system owner</u>; and <p>(b) provides information to the reconciliation manager in accordance with clauses 15.4 to 15.11</p>
<p>no change</p>	<p><u>state of charge means the energy stored in a battery energy storage system at a specific point in time, measured in MWh</u></p>
<p style="text-align: center;">Part 8 Common quality</p> <p>...</p>	<p style="text-align: center;">Part 8 Common quality</p> <p>...</p>
<p>8.25 Other asset owner performance obligations and technical standards</p> <p>...</p> <p>(5) If the system operator reasonably considers it necessary to assist the system operator in planning to comply, and complying, with the principal performance obligations and achieving the dispatch objective, the system operator—</p>	<p>8.25 Other asset owner performance obligations and technical standards</p> <p>...</p> <p>(5) If the system operator reasonably considers it necessary to assist the system operator in planning to comply, and complying, with the principal performance obligations and achieving the dispatch objective, the system operator—</p>

Commented [SO12]: As currently drafted, every BESS owner is a purchaser, including at the micro/household level. We think this should be limited to BESS owners required to submit bids under clause 13.6A.

Commented [SO13]: We consider that clause 8.25(6) also needs to be updated to reflect the proposed changes to clause 8.25(5) to the effect that the SO may require a group of embedded stations and/or battery energy storage systems that add up to 10MW behind a single GXP to offer, subject to a directive from the EA.

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<p>(a) may require that an embedded generator <u>(except an embedded generator that is a battery energy storage system owner)</u> provide information regarding the intended output of each embedded generating station greater than 10 MW in capacity, that must be either—</p> <p>(i) submitted as an offer in accordance with subpart 1 of Part 13; or</p> <p>(ii) provided in a form and manner agreed between the system operator and the embedded generator; and</p> <p><u>(aa) may require that a battery energy storage system owner that is an embedded generator provide information regarding the intended output and consumption of each battery energy storage system station greater than 10MW in capacity, that must be either—</u></p> <p><u>(i) submitted as an offer and a bid in accordance with subpart 1 of Part 13; or</u></p> <p><u>(ii) provided in a form and manner agreed between the system operator and the battery energy storage system owner; and</u></p> <p>(b) must advise the embedded generator or battery energy storage system of its requirement at least 20 business days in advance of the requirement coming into effect.</p>	<p>(a) may require that an embedded generator <u>(except an embedded generator that is a battery energy storage system owner)</u> provide information regarding the intended output of each embedded generating station greater than 10 MW in capacity, that must be either—</p> <p>(i) submitted as an offer in accordance with subpart 1 of Part 13; or</p> <p>(ii) provided in a form and manner agreed between the system operator and the embedded generator; and</p> <p><u>(aa) may require that a battery energy storage system owner that is an embedded generator provide information regarding the intended output and consumption of each battery energy storage system station greater than 10MW in capacity, that must be either—</u></p> <p><u>(i) submitted as an offer and a bid in accordance with subpart 1 of Part 13; or</u></p> <p><u>(ii) provided in a form and manner agreed between the system operator and the battery energy storage system owner; and</u></p> <p>(b) must advise the embedded generator or battery energy storage system of its requirement at least 20 business days in advance of the requirement coming into effect.</p>
<p style="text-align: center;">Part 13 Trading arrangements</p> <p>...</p> <p>13.3A Approval process for dispatch-capable load stations</p> <p>(1) A purchaser at a GXP, <u>other than a battery energy storage system owner</u>, may apply to the system operator for approval for a device or a group of devices at the GXP to be a dispatch-capable load</p>	<p style="text-align: center;">Part 13 Trading arrangements</p> <p>...</p> <p>13.3A Approval process for dispatch-capable load stations</p> <p>(1) A purchaser at a GXP, <u>other than a battery energy storage system owner</u>, may apply to the system operator for approval for a device or a group of devices at the GXP to be a dispatch-capable load</p>

Commented [SO14]: This should be bolded as it is a defined term

Commented [SO15]: This should refer to "battery energy storage system owner"

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>station under Schedule 13.8.</p> <p>(1A) In addition to subclause (1), a purchaser who intends to operate devices or a group of devices as a dispatch notification purchaser may apply to the system operator for approval for devices or a group of devices located at more than one GXP to be a dispatch-capable load station under Schedule 13.8.</p> <p>(2) The system operator must consider an application under subclause (1) or (1A) in accordance with Schedule 13.8.</p> <p>(3) If the system operator approves a device or a group of devices as a dispatch-capable load station following an application by a purchaser under subclause (1) or (1A)—</p> <p>(a) the approval is valid until the date the approval is revoked under clause 10 of Schedule 13.8; but</p> <p>(b) a device or group of devices in respect of which the approval is granted is not a dispatch-capable load station while its approval is suspended under clause 10 of Schedule 13.8.</p> <p>(4) The system operator must suspend or revoke an approval for devices or a group of devices located at more than one GXP to be a dispatch-capable load station in accordance with clause 10 of Schedule 13.8 if the purchaser is not, will not in the future or states that it no longer intends to operate as, a dispatch notification purchaser in respect of the relevant dispatch-capable load station.</p> <p>(5) Where the system operator suspends such an approval under subclause (4), the system operator must continue such suspension until—</p> <p>(a) the purchaser re-commences operating as a dispatch notification purchaser in respect of the relevant dispatch capable load station; or</p> <p>(b) the system operator revokes the approval for devices or a group of devices located at more than one GXP to be a</p>	<p>station under Schedule 13.8.</p> <p>(1A) In addition to subclause (1), a purchaser who intends to operate devices or a group of devices as a dispatch notification purchaser may apply to the system operator for approval for devices or a group of devices located at more than one GXP to be a dispatch-capable load station under Schedule 13.8.</p> <p>(2) The system operator must consider an application under subclause (1) or (1A) in accordance with Schedule 13.8.</p> <p>(3) If the system operator approves a device or a group of devices as a dispatch-capable load station following an application by a purchaser under subclause (1) or (1A)—</p> <p>(a) the approval is valid until the date the approval is revoked under clause 10 of Schedule 13.8; but</p> <p>(b) a device or group of devices in respect of which the approval is granted is not a dispatch-capable load station while its approval is suspended under clause 10 of Schedule 13.8.</p> <p>(4) The system operator must suspend or revoke an approval for devices or a group of devices located at more than one GXP to be a dispatch-capable load station in accordance with clause 10 of Schedule 13.8 if the purchaser is not, will not in the future or states that it no longer intends to operate as, a dispatch notification purchaser in respect of the relevant dispatch-capable load station.</p> <p>(5) Where the system operator suspends such an approval under subclause (4), the system operator must continue such suspension until—</p> <p>(a) the purchaser re-commences operating as a dispatch notification purchaser in respect of the relevant dispatch capable load station; or</p> <p>(b) the system operator revokes the approval for devices or a group of devices located at more than one GXP to be a</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>dispatch-capable load station in accordance with clause 10 of Schedule 13.8.</p> <p>(6) The approval for any battery energy storage system station as a dispatch-capable load station prior to [DATE of Code amendment] is revoked with immediate effect from [DATE of Code amendment].</p> <p>13.3E Approval process for dispatch notification purchasers</p> <p>(1) A purchaser, other than a battery energy storage system owner, may apply to become a dispatch notification purchaser by applying to the system operator for approval of the relevant device or group of devices as a dispatch-capable load station under Schedule 13.8.</p> <p>(2) If the system operator receives an application under subclause (1), the system operator must consider the application in accordance with Schedule 13.8.</p> <p>(2A) The system operator may only approve an application if the Authority has confirmed to the system operator that the applicant will be able to comply with clause 13.82B.</p> <p>(3) If the system operator approves a purchaser's application to become a dispatch notification purchaser,—</p> <p>(a) the purchaser is a dispatch notification purchaser in relation to the dispatch-capable load station to which the application relates; and</p> <p>(b) the approval is valid until the date on which the approval is revoked under clause 10 of Schedule 13.8; but</p> <p>(c) the purchaser in respect of which approval is granted is not a dispatch notification purchaser while approval for the relevant dispatch-capable load station is suspended under clause 10 of Schedule 13.8.</p> <p>(4) The system operator may suspend or revoke an approval for a dispatch notification purchaser in accordance with clause 10 of Schedule 13.8 if the purchaser has repeatedly submitted revised bids</p>	<p>dispatch-capable load station in accordance with clause 10 of Schedule 13.8.</p> <p>(6) The approval for any battery energy storage system station as a dispatch-capable load station prior to [DATE of Code amendment] is revoked with immediate effect from [DATE of Code amendment].</p> <p>13.3E Approval process for dispatch notification purchasers</p> <p>(1) A purchaser, other than a battery energy storage system owner, may apply to become a dispatch notification purchaser by applying to the system operator for approval of the relevant device or group of devices as a dispatch-capable load station under Schedule 13.8.</p> <p>(2) If the system operator receives an application under subclause (1), the system operator must consider the application in accordance with Schedule 13.8.</p> <p>(2A) The system operator may only approve an application if the Authority has confirmed to the system operator that the applicant will be able to comply with clause 13.82B.</p> <p>(3) If the system operator approves a purchaser's application to become a dispatch notification purchaser,—</p> <p>(a) the purchaser is a dispatch notification purchaser in relation to the dispatch-capable load station to which the application relates; and</p> <p>(b) the approval is valid until the date on which the approval is revoked under clause 10 of Schedule 13.8; but</p> <p>(c) the purchaser in respect of which approval is granted is not a dispatch notification purchaser while approval for the relevant dispatch-capable load station is suspended under clause 10 of Schedule 13.8.</p> <p>(4) The system operator may suspend or revoke an approval for a dispatch notification purchaser in accordance with clause 10 of Schedule 13.8 if the purchaser has repeatedly submitted revised bids</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>under clause 13.19C(1) such that it is no longer appropriate for the purchaser to remain a dispatch notification purchaser, taking into account any criteria set out in the policy statement.</p>	<p>under clause 13.19C(1) such that it is no longer appropriate for the purchaser to remain a dispatch notification purchaser, taking into account any criteria set out in the policy statement.</p>
<p>13.3F Approval process for dispatch notification generators</p>	<p>13.3F Approval process for dispatch notification generators</p>
<p>(1) A generator, <u>other than a battery energy storage system owner</u>, may, by notice in writing to the system operator, apply to become a dispatch notification generator in respect of a generating station that exports less than 30 MW to the grid or a local network.</p> <p>(2) The notice must specify the generating station in respect of which the generator wishes to be a dispatch notification generator.</p> <p>(3) The system operator must approve an application received under subclause (1) if the application—</p> <p>(a) relates to a generating station that exports less than 30 MW to the grid or a local network; and</p> <p>(b) meets any criteria for approval set out in the policy statement.</p> <p>(3A) Notwithstanding subclause (3), the system operator may only approve an application received under subclause (1) if the Authority has confirmed to the system operator that the applicant will be able to comply with clause 13.82B.</p> <p>(4) The system operator may revoke an approval for a dispatch notification generator if—</p> <p>(a) the generator no longer meets the approval requirements; or</p> <p>(b) the generator has repeatedly submitted revised offers under clause 13.19C(2) such that it is no longer appropriate for the generator to remain a dispatch notification generator, taking into account any criteria set out in the policy statement.</p> <p>...</p>	<p>(1) A generator, <u>other than a battery energy storage system owner</u>, may, by notice in writing to the system operator, apply to become a dispatch notification generator in respect of a generating station that exports less than 30 MW to the grid or a local network.</p> <p>(2) The notice must specify the generating station in respect of which the generator wishes to be a dispatch notification generator.</p> <p>(3) The system operator must approve an application received under subclause (1) if the application—</p> <p>(a) relates to a generating station that exports less than 30 MW to the grid or a local network; and</p> <p>(b) meets any criteria for approval set out in the policy statement.</p> <p>(3A) Notwithstanding subclause (3), the system operator may only approve an application received under subclause (1) if the Authority has confirmed to the system operator that the applicant will be able to comply with clause 13.82B.</p> <p>(4) The system operator may revoke an approval for a dispatch notification generator if—</p> <p>(a) the generator no longer meets the approval requirements; or</p> <p>(b) the generator has repeatedly submitted revised offers under clause 13.19C(2) such that it is no longer appropriate for the generator to remain a dispatch notification generator, taking into account any criteria set out in the policy statement.</p> <p>...</p>

Bids and offer preparation

13.6 Requirements for generators when submitting offers

- (1) Each **generator** with a **point of connection** to the **grid** and each **embedded generator** required by the **system operator** to submit an **offer** under clause 8.25(5), must—
 - (a) for a **generator** other than an **intermittent generator**;
 - (i) submit to the **system operator** an **offer** for each **trading period** in the **schedule period**, under which the **generator** is prepared to sell **electricity** to the **clearing manager**; and
 - (ii) ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period** to which the **offer** relates.; and
 - (b) subject to subclause (2), for an **intermittent generator**;
 - (i) submit to the **system operator** an offer for each **trading period** and **intermittent generating station** in respect of which the **intermittent generator** is prepared to sell **electricity** to the **clearing manager**; and
 - (ii) ensure that the **system operator** receives an **offer** within 25 minutes of the first **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates; or
 - (iii) if there is no **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates 72 **trading periods** before the beginning of the **trading period**, ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period**.
- (2) Subclauses (1)(b)(ii) and (iii) do not apply to **intermittent generators** using an alternative forecast in accordance with clause 13.9B(4).

Bids and offer preparation

13.6 Requirements for generators when submitting offers

- (1) Each **generator** with a **point of connection** to the **grid** and each **embedded generator** required by the **system operator** to submit an **offer** under clause 8.25(5), must—
 - (a) for a **generator** other than an **intermittent generator**;
 - (i) submit to the **system operator** an **offer** for each **trading period** in the **schedule period**, under which the **generator** is prepared to sell **electricity** to the **clearing manager**; and
 - (ii) ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period** to which the **offer** relates.; and
 - (b) subject to subclause (2), for an **intermittent generator**;
 - (i) submit to the **system operator** an offer for each **trading period** and **intermittent generating station** in respect of which the **intermittent generator** is prepared to sell **electricity** to the **clearing manager**; and
 - (ii) ensure that the **system operator** receives an **offer** within 25 minutes of the first **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates; or
 - (iii) if there is no **approved forecast** for a **trading period** and **intermittent generating station** to which the **offer** relates 72 **trading periods** before the beginning of the **trading period**, ensure that the **system operator** receives an **offer** at least 71 **trading periods** before the beginning of the **trading period**.
- (2) Subclauses (1)(b)(ii) and (iii) do not apply to **intermittent generators** using an alternative forecast in accordance with clause 13.9B(4).

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>(3) Despite subclauses (1) and (2), a generator must give at least 5 business days' notice in writing to the system operator and the clearing manager before the generator makes an offer for the 1st time in respect of the generating plant that is the subject of the offer.</p> <p>(4) The notice must state—</p> <p>(a) the point of connection to the grid at which electricity generated by the generator is sold to the clearing manager under clause 14.3 or 14.4; and</p> <p>(b) whether the generating plant is an intermittent generating station.</p> <p>(5) A generator must comply with any request from the system operator for information concerning generating plant that is the subject of a notice under subclause (3) if the system operator requires the information for the purposes of scheduling and dispatch in accordance with this Code.</p> <p>(6) Despite subclauses (1) and (2), if a generator intends to permanently cease to submit offers to the system operator in respect of any generating plant, the generator must give at least 5 business days' notice in writing to the system operator and the clearing manager.</p> <p><u>(7) Nothing in this clause applies to battery energy storage system owners.</u></p>	<p>(3) Despite subclauses (1) and (2), a generator must give at least 5 business days' notice in writing to the system operator and the clearing manager before the generator makes an offer for the 1st time in respect of the generating plant that is the subject of the offer.</p> <p>(4) The notice must state—</p> <p>(a) the point of connection to the grid at which electricity generated by the generator is sold to the clearing manager under clause 14.3 or 14.4; and</p> <p>(b) whether the generating plant is an intermittent generating station.</p> <p>(5) A generator must comply with any request from the system operator for information concerning generating plant that is the subject of a notice under subclause (3) if the system operator requires the information for the purposes of scheduling and dispatch in accordance with this Code.</p> <p>(6) Despite subclauses (1) and (2), if a generator intends to permanently cease to submit offers to the system operator in respect of any generating plant, the generator must give at least 5 business days' notice in writing to the system operator and the clearing manager.</p> <p><u>(7) Nothing in this clause applies to battery energy storage system owners.</u></p>
<p><u>13.6A Requirements for battery energy storage system owners when submitting bids and offers</u></p> <p><u>(1) Each battery energy storage system owner with a point of connection to the grid, and each battery energy storage system owner which is an embedded generator and is required by the system operator to submit an offer under clause 8.25(5), must—</u></p>	<p><u>13.6A Requirements for battery energy storage system owners when submitting bids and offers</u></p> <p><u>(1) Each battery energy storage system owner with a point of connection to the grid, and each battery energy storage system owner which is an embedded generator and is required by the system operator to submit an offer under clause 8.25(5), must—</u></p>

Commented [SO16]: To aid Code navigation, we suggest clause 13.6A(1) be made expressly “subject to clause 13.25A”.

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>(a) <u>submit to the system operator an offer and a nominated bid for each trading period in the schedule period, under which the battery energy storage system owner is prepared to sell electricity to, or buy electricity from, the clearing manager; and</u></p> <p>(b) <u>ensure that the system operator receives an offer and nominated bid at least 71 trading periods before the beginning of the trading period to which the offer and nominated bid relates.</u></p> <p>(2) <u>Despite subclause (1) a battery energy storage system owner must give at least 5 business days' notice in writing to the system operator and the clearing manager before the battery energy storage system owner makes an offer and a nominated bid for the 1st time in respect of the battery energy storage system station that is the subject of the offer and nominated bid.</u></p> <p>(3) <u>The notice must state —</u></p> <p>(a) <u>the point of connection to the grid at which electricity generated by the battery energy storage system station is sold to the clearing manager under clause 14.3 or 14.4; and</u></p> <p>(b) <u>the point of connection to the grid at which electricity stored by the battery energy storage system station is bought from the clearing manager under clause 14.3 or 14.4.</u></p> <p>(4) <u>A battery energy storage system owner must comply with any request from the system operator for information concerning the battery energy storage system station that is the subject of a notice under subclause (2) if the system operator requires the information for the purposes of scheduling and dispatch in accordance with this Code.</u></p> <p>(5) <u>Despite subclause (1), if a battery energy storage system owner intends to permanently cease to submit offers and nominated bids</u></p>	<p>(a) <u>submit to the system operator an offer and a nominated bid for each trading period in the schedule period, under which the battery energy storage system owner is prepared to sell electricity to, or buy electricity from, the clearing manager; and</u></p> <p>(b) <u>ensure that the system operator receives an offer and nominated bid at least 71 trading periods before the beginning of the trading period to which the offer and nominated bid relates.</u></p> <p>(2) <u>Despite subclause (1) a battery energy storage system owner must give at least 5 business days' notice in writing to the system operator and the clearing manager before the battery energy storage system owner makes an offer and a nominated bid for the 1st time in respect of the battery energy storage system station that is the subject of the offer and nominated bid.</u></p> <p>(3) <u>The notice must state —</u></p> <p>(a) <u>the point of connection to the grid at which electricity generated by the battery energy storage system station is sold to the clearing manager under clause 14.3 or 14.4; and</u></p> <p>(b) <u>the point of connection to the grid at which electricity stored by the battery energy storage system station is bought from the clearing manager under clause 14.3 or 14.4.</u></p> <p>(4) <u>A battery energy storage system owner must comply with any request from the system operator for information concerning the battery energy storage system station that is the subject of a notice under subclause (2) if the system operator requires the information for the purposes of scheduling and dispatch in accordance with this Code.</u></p> <p>(5) <u>Despite subclause (1), if a battery energy storage system owner intends to permanently cease to submit offers and nominated bids</u></p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p><u>to the system operator in respect of any battery energy storage system station, the battery energy storage system owner must give at least 5 business days' notice in writing to the system operator and the clearing manager.</u></p> <p>...</p> <p>13.7AA Purchaser to submit bids for non-dispatch-capable load</p> <p>(1) This clause applies to each purchaser that—</p> <p>(a) purchases non-dispatch-capable load; and</p> <p>(b) in relation to a nominated bid, does not rely on clause 13.8A; <u>and</u></p> <p><u>(c) is not a battery energy storage system owner.</u></p> <p>(2) The purchaser—</p> <p>(a) must, if it purchases non-dispatch-capable load at a non-conforming GXP, submit to the system operator for each trading period in the schedule period a nominated non-dispatch bid that represents a reasonable estimate of the total non-dispatch-capable load that the purchaser will purchase—</p> <p>(i) at the GXP; and</p> <p>(ii) for the trading period; and</p> <p>(iii) at the prices specified in the nominated non-dispatch bid; and</p> <p>(b) may, if it purchases non-dispatch-capable load at a conforming GXP, submit to the system operator for a trading period a difference bid that represents a reasonable estimate of an increase or decrease in the purchaser's usual non-dispatch-capable load purchased—</p> <p>(i) at the GXP; and</p> <p>(ii) for the trading period; and</p> <p>(iii) at the prices specified in the difference bid.</p>	<p><u>to the system operator in respect of any battery energy storage system station, the battery energy storage system owner must give at least 5 business days' notice in writing to the system operator and the clearing manager.</u></p> <p>...</p> <p>13.7AA Purchaser to submit bids for non-dispatch-capable load</p> <p>(1) This clause applies to each purchaser that—</p> <p>(a) purchases non-dispatch-capable load; and</p> <p>(b) in relation to a nominated bid, does not rely on clause 13.8A; <u>and</u></p> <p><u>(c) is not a battery energy storage system owner.</u></p> <p>(2) The purchaser—</p> <p>(a) must, if it purchases non-dispatch-capable load at a non-conforming GXP, submit to the system operator for each trading period in the schedule period a nominated non-dispatch bid that represents a reasonable estimate of the total non-dispatch-capable load that the purchaser will purchase—</p> <p>(i) at the GXP; and</p> <p>(ii) for the trading period; and</p> <p>(iii) at the prices specified in the nominated non-dispatch bid; and</p> <p>(b) may, if it purchases non-dispatch-capable load at a conforming GXP, submit to the system operator for a trading period a difference bid that represents a reasonable estimate of an increase or decrease in the purchaser's usual non-dispatch-capable load purchased—</p> <p>(i) at the GXP; and</p> <p>(ii) for the trading period; and</p> <p>(iii) at the prices specified in the difference bid.</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>13.7AB Timeframe for submitting bids to system operator</p> <p>(1) Each purchaser, <u>other than a battery energy storage system owner</u>, that submits a nominated bid to the system operator must submit the nominated bid at least 71 trading periods before the beginning of the trading period to which the nominated bid applies.</p> <p>(2) Each purchaser, <u>other than a battery energy storage system owner</u>, that submits a difference bid to the system operator must submit the difference bid at least 4 trading periods before the beginning of the trading period to which the difference bid applies.</p> <p>...</p> <p>13.8 Deemed offers</p> <p>(1) This clause applies if, on any trading day ("the current trading day"), a generator has not submitted an offer for a trading period in the trading day following the next trading day.</p> <p>(2) A generator is deemed to have submitted, for that trading period, an offer that is the same as the offer the generator made for the corresponding trading period on the current trading day, and clauses 13.9A <u>and 13.9AA apply applies</u> accordingly.</p> <p>(3) A deemed offer under subclause (2) applies until the generator revises the offer in accordance with clauses 13.17 to 13.19<u>AAA</u>.</p> <p>13.8A Deemed nominated bids</p> <p>(1) This clause applies if, on any trading day ("the current trading day"), a purchaser has not submitted a nominated bid for a trading period in the trading day following the next trading day.</p> <p>(2) A purchaser is deemed to have submitted, for that trading period, a nominated bid that is the same as the nominated bid the purchaser made for the corresponding trading period on the current trading day.</p>	<p>13.7AB Timeframe for submitting bids to system operator</p> <p>(1) Each purchaser, <u>other than a battery energy storage system owner</u>, that submits a nominated bid to the system operator must submit the nominated bid at least 71 trading periods before the beginning of the trading period to which the nominated bid applies.</p> <p>(2) Each purchaser, <u>other than a battery energy storage system owner</u>, that submits a difference bid to the system operator must submit the difference bid at least 4 trading periods before the beginning of the trading period to which the difference bid applies.</p> <p>...</p> <p>13.8 Deemed offers</p> <p>(1) This clause applies if, on any trading day ("the current trading day"), a generator has not submitted an offer for a trading period in the trading day following the next trading day.</p> <p>(2) A generator is deemed to have submitted, for that trading period, an offer that is the same as the offer the generator made for the corresponding trading period on the current trading day, and clauses 13.9A <u>and 13.9AA apply applies</u> accordingly.</p> <p>(3) A deemed offer under subclause (2) applies until the generator revises the offer in accordance with clauses 13.17 to 13.19<u>AAA</u>.</p> <p>13.8A Deemed nominated bids</p> <p>(1) This clause applies if, on any trading day ("the current trading day"), a purchaser has not submitted a nominated bid for a trading period in the trading day following the next trading day.</p> <p>(2) A purchaser is deemed to have submitted, for that trading period, a nominated bid that is the same as the nominated bid the purchaser made for the corresponding trading period on the current trading day.</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>(3) A deemed nominated bid under subclause (2) applies until the purchaser revises the nominated bid in accordance with clause 13.19AAA or 13.19A.</p> <p>(4) A purchaser must ensure that each of its deemed nominated bids under this clause—</p> <p>(a) if it is a nominated bid for a dispatch-capable load station, represents a reasonable estimate of the total quantity of electricity that the purchaser will purchase for the dispatch-capable load station at the specified prices for the trading period; or</p> <p>(b) if it is a nominated bid for non-dispatch-capable load, represents a reasonable estimate of the non-dispatch-capable load that the purchaser will purchase at the GXP at the specified prices for the trading period.</p> <p>...</p>	<p>(3) A deemed nominated bid under subclause (2) applies until the purchaser revises the nominated bid in accordance with clause 13.19AAA or 13.19A.</p> <p>(4) A purchaser must ensure that each of its deemed nominated bids under this clause—</p> <p>(a) if it is a nominated bid for a dispatch-capable load station, represents a reasonable estimate of the total quantity of electricity that the purchaser will purchase for the dispatch-capable load station at the specified prices for the trading period; or</p> <p>(b) if it is a nominated bid for non-dispatch-capable load, represents a reasonable estimate of the non-dispatch-capable load that the purchaser will purchase at the GXP at the specified prices for the trading period.</p>
<p>no change</p>	<p>13.9 Information that offers must contain Each offer submitted by a generator must—</p> <p>(a) other than for battery energy storage system owners, intermittent generators, type A co-generators, and type B co-generators, contain all information required by Form 1 in Schedule 13.1; and</p> <p>(b) <i>[Revoked]</i></p> <p>(c) if the offer is submitted by an intermittent generator for an intermittent generating station,—</p> <p>(i) contain the information required by Form 2 in Schedule 13.1; and</p> <p>(ii) <i>[Revoked]</i></p> <p>(iii) <i>[Revoked]</i></p> <p>(d) if the offer is submitted by a type A co-generator for a type A industrial co-generating station or by a type B co-generator for a type B industrial co-generating station,—</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>13.9A Offer not to exceed capability</p> <p>(1) The total MW specified in each offer submitted by a generator must, in relation to the generating plant that is the subject of the offer, not exceed the total MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period.</p> <p>(2) Subclause (1) does not apply to an intermittent generator <u>or a battery energy storage system owner</u>.</p> <p><u>13.9AA Battery energy storage systems offers and bids not to exceed adjusted capability</u> <u>The total MW specified in each offer and bid submitted by a battery energy storage system owner must, in relation to the battery energy</u></p>	<p>(i) contain the information required by Form 3 in Schedule 13.1; and</p> <p>(ii) have a maximum of 2 price bands for each trading period; and</p> <p>(iii) specify a price of either \$0.00 (in accordance with clause 13.116) or \$0.01 for the price band.</p> <p><u>(e) if the offer is submitted by a battery energy storage system owner,</u></p> <p><u>—</u></p> <p><u>(i) contain all information required by Form 10 in Schedule 13.1; and</u></p> <p><u>(ii) contain a variable BESS loss factor for a given MWh of consumption or generation, and a fixed BESS loss factor, for the trading period to which the offer relates which, taken together, constitute a reasonable estimate of the losses the battery energy storage system owner expects to incur in that trading period; and</u></p> <p><u>(iii) have a maximum of 10 price bands for each trading period.</u></p> <p>13.9A Offer not to exceed capability</p> <p>(1) The total MW specified in each offer submitted by a generator must, in relation to the generating plant that is the subject of the offer, not exceed the total MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period.</p> <p>(2) Subclause (1) does not apply to an intermittent generator <u>or a battery energy storage system owner</u>.</p> <p><u>13.9AA Battery energy storage systems offers and bids not to exceed adjusted capability capacity</u> <u>(1) The total MW specified in each offer and bid submitted by a battery energy storage system owner must, in relation to the</u></p>

Commented [SO17]: The proposed definition of “adjusted consumption capability” is measured in MWh, so the offer and bids should also be specified in MWh. There are similar inconsistencies throughout the proposed drafting.

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p><u>storage system station that is the subject of the offer and bid, not exceed the adjusted generation capability or adjusted consumption capability, whichever is applicable, for that battery energy storage system station for the relevant trading period.</u></p> <p>...</p> <p>13.10 Generators must specify units in offers Each offer submitted by a generator must—</p> <p>(a) be specific to individual generating units for generating plant in respect of which electricity is offered by that generator that cannot synchronise and come up to minimum load within the duration of a trading period; or</p> <p><u>(ab) be specific to individual battery energy storage system stations; or</u></p> <p>(b) be specific to individual generating stations for other generating plant in respect of which electricity is offered by that generator.</p>	<p><u>battery energy storage system station that is the subject of the offer and bid, not exceed the adjusted generation capability or adjusted consumption capability, whichever is applicable, for that battery energy storage system station for the relevant trading period.</u></p> <p>(2) <u>The maximum storage limit specified in each offer and bid submitted by a battery energy storage system owner must, in relation to the battery energy storage system station that is the subject of that offer and bid, not exceed the adjusted maximum storage limit for that battery energy storage system station for the relevant trading period.</u></p> <p>(3) <u>The minimum storage limit specified in each offer and bid submitted by a battery energy storage system owner must, in relation to the battery energy storage system station that is the subject of that offer and bid, not be less than the adjusted minimum storage limit for that battery energy storage system station for the relevant trading period.</u></p> <p>...</p> <p>13.10 Generators must specify units in offers Each offer submitted by a generator must—</p> <p>(a) be specific to individual generating units for generating plant in respect of which electricity is offered by that generator that cannot synchronise and come up to minimum load within the duration of a trading period; or</p> <p><u>(ab) be specific to individual battery energy storage system stations; or</u></p> <p>(b) be specific to individual generating stations for other generating plant in respect of which electricity is offered by that generator.</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>13.11 Offers may be made by unit or plant</p> <p>(1) Despite clause 13.10, a generator, other than an intermittent generator <u>or a battery energy storage system owner</u>, may offer electricity in respect of any generating plant on a unit basis. A generator may exercise this option by giving the system operator at least 5 business days’ notice in writing of the exercise of the option. The system operator must, during the 5 business day period, make any necessary changes to the scheduling software.</p> <p>(2) If a generator has offered electricity in respect of any generating plant on a unit basis in accordance with subclause (1), it may change to submitting offers in accordance with clause 13.10. Such a change may be effected by giving the system operator at least 5 business days’ notice in writing of the change. The system operator must, during the 5 business day period, make any necessary changes to the scheduling software.</p> <p>13.12 Offers may contain up to 5 price bands</p> <p><u>(1) Subject to clause 13.9(d), an offer submitted by a generator, other than a battery energy storage system owner, may have a maximum of 5 price bands for each trading period, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.</u></p> <p><u>(2) An offer submitted by a battery energy storage system owner may have a maximum of 10 price bands for each trading period, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.</u></p> <p style="text-align: center;">no change</p>	<p>13.11 Offers may be made by unit or plant</p> <p>(1) Despite clause 13.10, a generator, other than an intermittent generator <u>or a battery energy storage system owner</u>, may offer electricity in respect of any generating plant on a unit basis. A generator may exercise this option by giving the system operator at least 5 business days’ notice in writing of the exercise of the option. The system operator must, during the 5 business day period, make any necessary changes to the scheduling software.</p> <p>(2) If a generator has offered electricity in respect of any generating plant on a unit basis in accordance with subclause (1), it may change to submitting offers in accordance with clause 13.10. Such a change may be effected by giving the system operator at least 5 business days’ notice in writing of the change. The system operator must, during the 5 business day period, make any necessary changes to the scheduling software.</p> <p>13.12 Offers may contain up to 5 price bands</p> <p><u>(1) Subject to clause 13.9(d), an offer submitted by a generator, other than a battery energy storage system owner, may have a maximum of 5 price bands for each trading period, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.</u></p> <p><u>(2) An offer submitted by a battery energy storage system owner may have a maximum of 10 price bands for each trading period, with the 1st price band containing the lowest price offered, and each subsequent band having a higher price than the band preceding it.</u></p> <p>13.13 Information to be contained in bids</p> <p>(1) A purchaser, <u>other than a battery energy storage system owner</u>, must ensure that each of its nominated bids—</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>13.17 Offers may be revised</p> <p>(1) Subject to subclauses (2) to (4) and clause 13.18A, a generator may revise an offer at any time before the end of the trading period to which the offer relates by submitting a new offer to the system operator.</p> <p>(2) A generator must not revise any of its offer prices during a gate closure period.</p> <p>(3) A generator must not revise the MW specified in any price band in an offer during a gate closure period, unless clause 13.18(1), 13.18(1A), <u>13.18B</u> 13.19, <u>13.19AAA</u> or 13.19C applies.</p> <p>(4) A generator must not revise any of the following offer parameters during a gate closure period, unless clause 13.19 <u>or 13.19AAA</u> applies:</p> <p>(a) ramp rates:</p> <p>(b) maximum output (including overload).</p>	<p>(a) contains all information required by Form 4 in Schedule 13.1; and</p> <p>(aa) if it is a nominated bid for a dispatch-capable load station, specifies whether it is—</p> <p>(i) a nominated dispatch bid; or</p> <p>(ii) a nominated non-dispatch bid.</p> <p>(b) <i>[Revoked]</i></p> <p>(c) <i>[Revoked]</i></p> <p>(1A) <i>[Revoked]</i></p> <p>(2) A purchaser must ensure that each of its difference bids contains all information required by Form 4A in Schedule 13.1.</p> <p><u>(3) A battery energy storage system owner must ensure that each of its nominated bids contains all information required by Form 10 in Schedule 13.1.</u></p> <p>...</p> <p>13.17 Offers may be revised</p> <p>(1) Subject to subclauses (2) to (4) and clause 13.18A, a generator may revise an offer at any time before the end of the trading period to which the offer relates by submitting a new offer to the system operator.</p> <p>(2) A generator must not revise any of its offer prices during a gate closure period.</p> <p>(3) A generator must not revise the MW specified in any price band in an offer during a gate closure period, unless clause 13.18(1), 13.18(1A), <u>13.18B</u> 13.19, <u>13.19AAA</u> or 13.19C applies.</p> <p>(4) A generator must not revise any of the following offer parameters during a gate closure period, unless clause 13.19 <u>or 13.19AAA</u> applies:</p> <p>(a) ramp rates:</p> <p>(b) maximum output (including overload).</p>

Commented [SO18]: For the “final” draft, we submit that ramp rates will not be required for BESS and BESS owners.

Commented [SO19]: For the “final” draft, the maximum output here needs to take into consideration the MWh limits to align with the proposed “adjusted maximum storage limit”, and BESS loss calculations.

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>13.18 When revised offer to be submitted</p> <p>(1) A generator, other than an intermittent generator <u>or battery energy storage system owner</u>, must immediately submit a revised offer to the system operator if the total MW specified in an offer exceeds, by more than 5 MW, the total MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period.</p> <p>(1A) A generator, other than an intermittent generator <u>or battery energy storage system owner</u>, may submit a revised offer to the system operator if the total MW specified in an offer exceeds, by 5 MW or less, the total MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period.</p> <p>(1B) The submission of a revised offer under subclause (1) or subclause (1A) does not relieve the generator of liability for breach of any other provision of this Code.</p> <p>(2) <i>[Revoked]</i></p> <p>(3) <i>[Revoked]</i></p> <p>...</p> <p><u>13.18B When battery energy storage system owners must revise offer and bid</u></p> <p>(1) <u>A battery energy storage system owner must submit a revised offer, or bid, to the system operator if necessary to ensure that, as at the start of the gate closure period for the relevant trading period, the total MW specified in the offer, or bid, does not exceed the adjusted generation capability, or adjusted consumption capability, whichever is applicable, for that battery energy storage system station for the relevant trading period.</u></p>	<p>13.18 When revised offer to be submitted</p> <p>(1) A generator, other than an intermittent generator <u>or battery energy storage system owner</u>, must immediately submit a revised offer to the system operator if the total MW specified in an offer exceeds, by more than 5 MW, the total MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period.</p> <p>(1A) A generator, other than an intermittent generator <u>or battery energy storage system owner</u>, may submit a revised offer to the system operator if the total MW specified in an offer exceeds, by 5 MW or less, the total MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period.</p> <p>(1B) The submission of a revised offer under subclause (1) or subclause (1A) does not relieve the generator of liability for breach of any other provision of this Code.</p> <p>(2) <i>[Revoked]</i></p> <p>(3) <i>[Revoked]</i></p> <p>...</p> <p><u>13.18B When battery energy storage system owners must revise offer and bid</u></p> <p>(1) <u>A battery energy storage system owner must submit a revised offer, or bid, to the system operator if necessary to ensure that, as at the start of the gate closure period for the trading period:</u></p> <p>(a) <u>the total MW specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, does not exceed the adjusted generation capability capacity, or adjusted consumption eapability capacity, whichever is applicable, for that battery energy</u></p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>(2) <u>A battery energy storage system owner must immediately submit a revised offer, or bid, to the system operator if:</u></p> <p>(a) <u>the total MW specified in that offer, or bid, exceeds, by more than 5 MW, the adjusted generation capability, or adjusted consumption capability, whichever is applicable, for that battery energy storage system station, for the relevant trading period; and</u></p> <p>(b) <u>one or more of the conditions in clause 13.9AAA(1)(a) to (c) applies.</u></p> <p>(3) <u>The submission of a revised offer or bid under this clause does not relieve the battery energy storage system owner of liability for breach of any other provision of this Code.</u></p>	<p><u>storage system station for the relevant trading period;</u></p> <p>(b) <u>the maximum storage limit specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, does not exceed the adjusted maximum storage limit for that battery energy storage system station for the relevant trading period;</u></p> <p>(c) <u>the minimum storage limit specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, is not lower than the adjusted minimum storage limit for that battery energy storage system station for the relevant trading period.</u></p> <p>(2) <u>A battery energy storage system owner must immediately submit a revised offer, or bid, to the system operator, whether or not the gate closure period for the trading period to which that offer or bid relates has commenced, if one or more of the conditions in clause 13.9AAA(1)(a) to (f) applies and:</u></p> <p>(a) <u>the total MW specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, exceeds the adjusted generation capability, or adjusted consumption capability, whichever is applicable, for that battery energy storage system station for the relevant trading period by more than 5 MW; or</u></p> <p>(b) <u>the maximum storage limit specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, exceeds the adjusted maximum storage limit for that battery energy storage system station for the relevant trading period by more than 2.5 MWh; or</u></p> <p>(c) <u>the minimum storage limit specified in the offer, or bid, in</u></p>

- Commented [SO20]:** This should state 13.19AAA
- Commented [SO21]:** As currently drafted, clause 13.18B(2) only applies if the total bid or offer quantities exceeds by more than 5 MW, the adjusted generation capability or adjusted consumption capability AND 1 or more conditions relating to revised offers during gate closure in clause 13.19AAA(1)(a)-(e) applies.

This does not reflect the purpose of this proposed clause articulated in pg 61 of the Consultation paper. We consider that clause 13.18B(2) must apply at all times, including to offers before gate closure as well.
- Commented [SO22]:** Again, we consider that the 5MW and 2.5MWh thresholds should apply to all offers before and during gate closure. The current drafting does not provide for this.

As clause 13.19AAA is only in relation to revisions during gate closure specifically, the proposed "final" clause 13.18B(2) can only apply to offers during gate closure if any of the conditions under clause 13.19AAA(1)(a)-(f) applies.

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>13.19 When revised offers may be submitted during gate closure period</p> <p>(1) A generator, other than an intermittent generator or battery energy storage system owner, may submit a revised offer to the system operator during a gate closure period if—</p> <ul style="list-style-type: none"> (a) the revision is necessary due to a bona fide physical reason; or (b) the system operator issues a formal notice under clause 5 of Technical Code B of Schedule 8.3; or (c) a bona fide physical reason that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and— <ul style="list-style-type: none"> (i) the 1st trading period after the original bona fide physical reason ceases to exist is within 24 hours after the circumstances that constituted the original bona fide physical reason arose; and (ii) the total change in MW specified in the offer that is revised as a result of the bona fide physical reason ceasing to exist is the same or less than the total change in MW specified in the offer that was made as a result of the original bona fide physical reason. 	<p><u>relation to the battery energy storage system station that is the subject of the offer or bid, is less than the adjusted minimum storage limit for that battery energy storage system station for the relevant trading period by more than 2.5 MWh.</u></p> <p>(3) The submission of a revised offer or bid under this clause does not relieve the battery energy storage system owner of liability for breach of any other provision of this Code.</p> <p>13.19 When revised offers may be submitted during gate closure period</p> <p>(1) A generator, other than an intermittent generator or battery energy storage system owner, may submit a revised offer to the system operator during a gate closure period if—</p> <ul style="list-style-type: none"> (a) the revision is necessary due to a bona fide physical reason; or (b) the system operator issues a formal notice under clause 5 of Technical Code B of Schedule 8.3; or (c) a bona fide physical reason that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and— <ul style="list-style-type: none"> (i) the 1st trading period after the original bona fide physical reason ceases to exist is within 24 hours after the circumstances that constituted the original bona fide physical reason arose; and (ii) the total change in MW specified in the offer that is revised as a result of the bona fide physical reason ceasing to exist is the same or less than the total change in MW specified in the offer that was made as a result of the original bona fide physical reason.

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>(2) A generator that submits a revised offer under subclause (1)(c) must do so as soon as possible after the relevant bona fide physical reason ceases to exist.</p> <p>13.19AAA When a battery energy storage system owner may submit revised offers or bids during gate closure</p> <p>(1) Subject to clause 13.19AB, a battery energy storage system owner may submit a revised offer or bid to the system operator during a gate closure period only if—</p> <p>(a) <u>the revision is necessary due to a bona fide physical reason;</u> or</p> <p>(b) <u>the system operator issues a formal notice under clause 5 of Technical Code B of Schedule 8.3; or</u></p> <p>(c) <u>a bona fide physical reason that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and the 1st trading period after the original bona fide physical reason ceases to exist is within 24 hours after the circumstances that constituted the original bona fide physical reason arose; or</u></p> <p>(d) <u>the total MW specified in the offer or bid exceeds the adjusted generation capability or adjusted consumption capability, whichever is applicable, that a reasonable battery energy storage system owner, assessing the matter immediately before the start of the gate closure period for the relevant trading period, would have expected for that trading period; or</u></p> <p>(e) <u>the state of charge the battery energy storage system station is expected to have at the beginning of the trading period to which the offer or bid relates differs from the state of charge a reasonable battery energy storage system owner assessing the matter immediately before the start of the gate closure</u></p>	<p>(2) A generator that submits a revised offer under subclause (1)(c) must do so as soon as possible after the relevant bona fide physical reason ceases to exist.</p> <p>13.19AAA When a battery energy storage system owner may submit revised offers or bids during gate closure</p> <p>(1) Subject to clause 13.19AB, a battery energy storage system owner may submit a revised offer or bid to the system operator during a gate closure period only if—</p> <p>(a) <u>the revision is necessary due to a bona fide physical reason;</u> or</p> <p>(b) <u>the system operator issues a formal notice under clause 5 of Technical Code B of Schedule 8.3; or</u></p> <p>(c) <u>a bona fide physical reason that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and the 1st trading period after the original bona fide physical reason ceases to exist is within 24 hours after the circumstances that constituted the original bona fide physical reason arose; or</u></p> <p>(d) <u>the total MW specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, exceeds the adjusted generation capability, or adjusted consumption capability, whichever is applicable and as determined at the start of the gate closure period for the relevant trading period, for that battery energy storage system station for the relevant trading period; or</u></p> <p>(e) <u>the maximum storage limit specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, exceeds the adjusted</u></p>

Commented [SO24]: This wording should also be included in the “interim” draft, as it gives the rest of the paragraph context.

Commented [SO23]: The definition of “state of charge” is only proposed to be added as a defined term in the “final” draft of the Code, so the use of the term in the “Interim” draft does not work

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<p><u>period would have expected the battery energy storage system station to have at the beginning of that trading period.</u></p> <p><u>(2) A battery energy storage system owner that submits a revised offer or bid under subclause (1)(c) must do so as soon as possible after the relevant bona fide physical reason ceases to exist.</u></p> <p><u>(3) The submission of a revised offer or bid under this clause does not relieve the battery energy storage system owner of liability for breach of any other provision of this Code.</u></p> <p>13.19AA Limitations on revised offers A generator, <u>other than a battery energy storage system owner</u>, that submits a revised offer under clauses 13.18(1), 13.18(1A), or 13.19(1) during a gate closure period must ensure that—</p> <p>(a) the revised offer only differs from the original offer to the extent necessary to ensure that the MW specified in the revised offer is the MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period; and</p> <p>(b) the revised offer complies with the following:</p> <p>(i) the reduction in MW specified in the revised offer must be first deducted from the MW offered in the highest price band:</p>	<p><u>maximum storage limit, as determined at the start of the gate closure period for the relevant trading period, for that battery energy storage system station for the relevant trading period; or</u></p> <p><u>(f) the minimum storage limit specified in the offer, or bid, in relation to the battery energy storage system station that is the subject of the offer or bid, is less than the adjusted minimum storage limit, as determined at the start of the gate closure period for the relevant trading period, for that battery energy storage system station for the relevant trading period.</u></p> <p><u>(2) A battery energy storage system owner that submits a revised offer or bid under subclause (1)(c) must do so as soon as possible after the relevant bona fide physical reason ceases to exist.</u></p> <p><u>(3) The submission of a revised offer or bid under this clause does not relieve the battery energy storage system owner of liability for breach of any other provision of this Code.</u></p> <p>13.19AA Limitations on revised offers A generator, <u>other than a battery energy storage system owner</u>, that submits a revised offer under clauses 13.18(1), 13.18(1A), or 13.19(1) during a gate closure period must ensure that—</p> <p>(a) the revised offer only differs from the original offer to the extent necessary to ensure that the MW specified in the revised offer is the MW that the generator expects to be capable of generating at the relevant point of connection to the grid for the relevant trading period; and</p> <p>(b) the revised offer complies with the following:</p> <p>(i) the reduction in MW specified in the revised offer must be first deducted from the MW offered in the highest price band:</p>

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<p>(ii) if the reduction in MW exceeds the MW in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the MW in each price band is reduced to zero, until all of the reduction is reflected in the revised offer.</p>	<p>(ii) if the reduction in MW exceeds the MW in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the MW in each price band is reduced to zero, until all of the reduction is reflected in the revised offer.</p>
<p><u>13.19AB Limitations on revised offers and bids for battery energy storage system owners</u></p>	<p><u>13.19AB Limitations on revised offers and bids for battery energy storage system owners</u></p>
<p>(1) A battery energy storage system owner that submits a revised offer or bid in reliance on clause 13.19AAA(1)(a), (b) or (d) during a gate closure period must ensure that the MW specified in the revised offer or bid only differs from the original offer or bid to the extent necessary to ensure that the MW specified in the revised offer or bid is the adjusted generation capability or adjusted consumption capability, whichever is applicable.</p>	<p>(1) A battery energy storage system owner that submits a revised offer or bid under clause <u>13.19AAA(a), (b), or (d), (e) or (f)</u> during a gate closure period must ensure that:</p>
<p>(2) A battery energy storage system owner that submits a further revised offer or bid under clause 13.19AAA(1)(c) during a gate closure period must ensure the total change in MW as between that further revised offer or bid and the offer or bid as revised to account for the bona fide physical reason is the same or less than the total change in MW made to the original offer or bid as a result of the bona fide physical reason.</p>	<p>(a) <u>the MW specified in the revised offer or bid only differs from the original offer or bid to the extent necessary to ensure that the MW specified in the revised offer or bid is the adjusted generation capability capacity or adjusted consumption capability, whichever is applicable; and</u></p> <p>(b) <u>the maximum and minimum storage limits specified in the revised offer or bid only differ from the original offer or bid to the extent necessary to ensure that the maximum and minimum storage limits specified in the revised offer or bid are the adjusted maximum storage limit and adjusted minimum storage limit.</u></p>
<p>(3) A battery energy storage system owner that submits a revised offer or bid under clause 13.19AAA(1)(e) during a gate closure period must ensure the MW in the revised offer or bid does not—</p> <p>(a) <u>exceed the adjusted generation capability or adjusted consumption capability, whichever is applicable; and</u></p> <p>(b) <u>exceed the MW specified in the original offer or bid, if there was a decrease in expected generation or consumption capability relative to that expected at the time the original offer</u></p>	<p>(2) A battery energy storage system owner that submits a further revised offer or bid under clause 13.19AAA(1)(c) during a gate closure period must ensure the total change in MW as between that further revised offer or bid and the offer or bid as revised to account for the bona fide physical reason is the same or less than the total change in MW made to the original offer or bid as a result of the bona fide physical reason.</p> <p>(3) A battery energy storage system owner that submits a revised</p>

Commented [SO25]: This should reference 13.19(1)(a)

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<p><u>or bid was submitted; and</u></p> <p><u>(c) reduce the MW specified in the original offer or bid, if there was an increase in expected generation or consumption capability relative to that expected at the time the original offer or bid was submitted; and</u></p> <p><u>(d) differ from the MW in the original offer or bid by more than the change in expected capability from the original offer and bid.</u></p> <p><u>(4) A revised offer under this clause must comply with the following:</u></p> <p><u>(a) the reduction in MW specified in the revised offer must be first deducted from the MW offered in the highest price band;</u></p> <p><u>(b) if the reduction in MW exceeds the MW in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the MW in each price band is reduced to zero, until all of the reduction is reflected in the revised offer.</u></p> <p><u>(5) A revised bid under this clause must comply with the following:</u></p> <p><u>(a) the reduction in MW specified in the revised bid must be first deducted from the MW bid for in the lowest price band;</u></p> <p><u>(b) if the reduction in MW exceeds the MW in the lowest price band, the remainder must be deducted from the price bands above the lowest, in ascending order as the MW in each price band is reduced to zero, until all of the reduction is reflected in the revised bid.</u></p>	<p>offer or bid under clause 13.19AAA(1)(e) during a gate closure period must ensure the MW in the revised offer or bid does not—</p> <p>(a) exceed the adjusted generation capability or adjusted consumption capability, whichever is applicable; and</p> <p>(b) exceed the MW specified in the original offer or bid, if there was a decrease in expected generation or consumption capability relative to that expected at the time the original offer or bid was submitted; and</p> <p>(c) reduce the MW specified in the original offer or bid, if there was an increase in expected generation or consumption capability relative to that expected at the time the original offer or bid was submitted; and</p> <p>(d) differ from the MW in the original offer or bid by more than the change in expected capability from the original offer and bid.</p> <p><i>[Revoked]</i></p> <p><u>(4) A revised offer under this clause must comply with the following:</u></p> <p><u>(a) the reduction in MW specified in the revised offer must be first deducted from the MW offered in the highest price band;</u></p> <p><u>(b) if the reduction in MW exceeds the MW in the highest price band, the remainder must be deducted from the price bands below the highest, in descending order as the MW in each price band is reduced to zero, until all of the reduction is reflected in the revised offer.</u></p> <p><u>(5) A revised bid under this clause must comply with the following:</u></p> <p><u>(a) the reduction in MW specified in the revised bid must be first deducted from the MW bid for in the lowest price band;</u></p> <p><u>(b) if the reduction in MW exceeds the MW in the lowest price band, the remainder must be deducted from the price bands above the lowest, in ascending order as the MW in each price</u></p>

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<p>13.19A Bids may be revised</p> <p>(1) Each purchaser <u>other than a battery energy storage system owner</u> may, at any time before the end of a trading period in respect of which a bid is made,—</p> <p>(a) revise any of its bid prices or the MW specified in any price band in a bid for any trading period by submitting a new bid to the system operator; or</p> <p>(aa) revise a nominated bid—</p> <p>(i) from being a nominated dispatch bid to being a nominated non-dispatch bid; or</p> <p>(ii) from being a nominated non-dispatch bid to being a nominated dispatch bid.</p> <p>(b) <i>[Revoked]</i></p> <p>(1A) Despite subclause (1), a dispatchable load purchaser must not do any of the following during a gate closure period:</p> <p>(a) revise the price of a nominated dispatch bid;</p> <p>(b) revise the MW specified in any price band in a nominated dispatch bid, unless subclause (1B) or clause 13.19B applies.</p> <p>(c) revise a nominated non-dispatch bid to being a nominated dispatch bid, unless the system operator declares a grid emergency in accordance with Technical Code B of Schedule 8.3.</p> <p>(1B) A dispatchable load purchaser may revise the MW specified in any price band in a nominated dispatch bid during a gate closure period if—</p> <p>(a) the revision is necessary due to a bona fide physical reason;</p> <p>or</p>	<p style="text-align: center;"><u>band is reduced to zero, until all of the reduction is reflected in the revised bid.</u></p> <p>13.19A Bids may be revised</p> <p>(1) Each purchaser <u>other than a battery energy storage system owner</u> may, at any time before the end of a trading period in respect of which a bid is made,—</p> <p>(a) revise any of its bid prices or the MW specified in any price band in a bid for any trading period by submitting a new bid to the system operator; or</p> <p>(aa) revise a nominated bid—</p> <p>(i) from being a nominated dispatch bid to being a nominated non-dispatch bid; or</p> <p>(ii) from being a nominated non-dispatch bid to being a nominated dispatch bid.</p> <p>(b) <i>[Revoked]</i></p> <p>(1A) Despite subclause (1), a dispatchable load purchaser must not do any of the following during a gate closure period:</p> <p>(a) revise the price of a nominated dispatch bid;</p> <p>(b) revise the MW specified in any price band in a nominated dispatch bid, unless subclause (1B) or clause 13.19B applies.</p> <p>(c) revise a nominated non-dispatch bid to being a nominated dispatch bid, unless the system operator declares a grid emergency in accordance with Technical Code B of Schedule 8.3.</p> <p>(1B) A dispatchable load purchaser may revise the MW specified in any price band in a nominated dispatch bid during a gate closure period if—</p> <p>(a) the revision is necessary due to a bona fide physical reason;</p> <p>or</p>

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<p>(b) the system operator has declared a grid emergency; or</p> <p>(c) a bona fide physical reason that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and—</p> <p>(i) the 1st trading period after the original bona fide physical reason ceases to exist is within 24 hours after the circumstances that constituted the original bona fide physical reason arose; and</p> <p>(ii) the total change in MW specified in the nominated dispatch bid that is revised as a result of the bona fide physical reason ceasing to exist is the same or less than the total change in MW specified in the nominated dispatch bid that was made as a result of the original bona fide physical reason.</p> <p><u>(1C) Subject to subclauses (1D) to (1F) and clause 13.18B, a battery energy storage system owner may revise a bid at any time before the end of the trading period to which the bid relates by submitting a new bid to the system operator.</u></p> <p><u>(1D) A battery energy storage system owner must not revise any of its bid prices during a gate closure period.</u></p> <p><u>(1E) A battery energy storage system owner must not revise the MW specified in any price band in a bid during a gate closure period, unless clause 13.18B or 13.19AAA applies.</u></p> <p><u>(1F) A battery energy storage system owner must not revise any of the following bid parameters during a gate closure period, unless clause 13.19AAA applies:</u></p> <p><u>(a) ramp rates;</u></p> <p><u>(b) maximum output (including overload).</u></p> <p>(2) <i>[Revoked]</i></p> <p>(3) <i>[Revoked]</i></p>	<p>(b) the system operator has declared a grid emergency; or</p> <p>(c) a bona fide physical reason that made a revision necessary under paragraph (a) ceases to exist sooner than was expected at the time it arose, and—</p> <p>(i) the 1st trading period after the original bona fide physical reason ceases to exist is within 24 hours after the circumstances that constituted the original bona fide physical reason arose; and</p> <p>(ii) the total change in MW specified in the nominated dispatch bid that is revised as a result of the bona fide physical reason ceasing to exist is the same or less than the total change in MW specified in the nominated dispatch bid that was made as a result of the original bona fide physical reason.</p> <p><u>(1C) Subject to subclauses (1D) to (1F) and clause 13.18B, a battery energy storage system owner may revise a bid at any time before the end of the trading period to which the bid relates by submitting a new bid to the system operator.</u></p> <p><u>(1D) A battery energy storage system owner must not revise any of its bid prices during a gate closure period.</u></p> <p><u>(1E) A battery energy storage system owner must not revise the MW specified in any price band in a bid during a gate closure period, unless clause 13.18B or 13.19AAA applies.</u></p> <p><u>(1F) A battery energy storage system owner must not revise any of the following bid parameters during a gate closure period, unless clause 13.19AAA applies:</u></p> <p><u>(a) ramp rates;</u></p> <p><u>(b) maximum output (including overload).</u></p> <p>(2) <i>[Revoked]</i></p> <p>(3) <i>[Revoked]</i></p>

Commented [SO26]: For the “final” draft, we consider that ramp rates will not be relevant for BESS and BESS owners.

Commented [SO27]: For the “final” draft, the maximum output here needs to take into consideration the MWh limits to align with the proposed “adjusted maximum storage limit”, and BESS loss calculations.

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<p>(3A) <i>[Revoked]</i> (3B) <i>[Revoked]</i> (4) <i>[Revoked]</i> (5) <i>[Revoked]</i> (6) <i>[Revoked]</i>.</p>	<p>(3A) <i>[Revoked]</i> (3B) <i>[Revoked]</i> (4) <i>[Revoked]</i> (5) <i>[Revoked]</i> (6) <i>[Revoked]</i>.</p>
<p>13.19B Bids must be revised</p> <p>(1) Before the end of the trading period to which a nominated bid relates, the a purchaser, other than a battery energy storage system owner, that submitted the nominated bid must immediately submit a revised nominated bid in respect of MW to the system operator if the purchaser expects, or ought reasonably to expect, that the MW it is likely to purchase at the prices indicated in the nominated bid will,—</p> <p>(a) if the nominated bid is a nominated non-dispatch bid, differ from the MW specified in the nominated bid by more than the lesser of—</p> <p>(i) 20 MW; and</p> <p>(ii) 20% of the nominated bid MW; or</p> <p>(b) if the nominated bid is a nominated dispatch bid, differ from the MW specified in the nominated bid by more than the lesser of—</p> <p>(i) 10 MW; and</p> <p>(ii) 10% of the nominated bid MW.</p> <p>(2) Despite subclause (1), a purchaser is not required to submit a revised nominated bid in respect of MW if the expected change in MW is less than 5 MW.</p> <p>...</p>	<p>13.19B Bids must be revised</p> <p>(1) Before the end of the trading period to which a nominated bid relates, the a purchaser, other than a battery energy storage system owner, that submitted the nominated bid must immediately submit a revised nominated bid in respect of MW to the system operator if the purchaser expects, or ought reasonably to expect, that the MW it is likely to purchase at the prices indicated in the nominated bid will,—</p> <p>(a) if the nominated bid is a nominated non-dispatch bid, differ from the MW specified in the nominated bid by more than the lesser of—</p> <p>(i) 20 MW; and</p> <p>(ii) 20% of the nominated bid MW; or</p> <p>(b) if the nominated bid is a nominated dispatch bid, differ from the MW specified in the nominated bid by more than the lesser of—</p> <p>(i) 10 MW; and</p> <p>(ii) 10% of the nominated bid MW.</p> <p>(2) Despite subclause (1), a purchaser is not required to submit a revised nominated bid in respect of MW if the expected change in MW is less than 5 MW.</p> <p>...</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>13.21 Authority informed of revised nominated dispatch bid or offer during gate closure period</p> <p>(1) A dispatchable load purchaser, <u>battery energy storage system owner</u>, or generator that submits a revised nominated dispatch bid or a revised offer to the system operator during a gate closure period must report each revision to the Authority in writing together with an explanation of the reasons for the revision.</p> <p>(1A) The dispatchable load purchaser, <u>battery energy storage system owner</u>, or generator must report the revision to the Authority no later than 1700 hours on the 1st business day following the trading day on which the revision was made.</p> <p>(1B) Subclauses (1) and (1A) do not apply to an intermittent generator submitting a revised forecast of generation potential under clause 13.18A.</p> <p>(2) <i>[Revoked]</i></p> <p>...</p> <p><u>13.25A Exception for small battery energy storage systems</u></p> <p>(1) <u>Despite clause 13.6A(1), a battery energy storage system owner is not required to submit offers and bids for a battery energy storage system station that has a maximum continuous MW output power of 10 MW or smaller.</u></p> <p>(2) <u>Any electricity discharged by a battery energy storage system station to which subclause (1) applies and which is sold to the clearing manager is regarded as unoffered generation for the purpose of this Code.</u></p> <p>(3) <u>The system operator may require the relevant battery energy storage system owner to provide information in a form reasonably determined by the system operator on the expected generation output for any unoffered generation from a battery energy storage system owner with a point of connection to the grid.</u></p>	<p>13.21 Authority informed of revised nominated dispatch bid or offer during gate closure period</p> <p>(1) A dispatchable load purchaser, <u>battery energy storage system owner</u>, or generator that submits a revised nominated dispatch bid or a revised offer to the system operator during a gate closure period must report each revision to the Authority in writing together with an explanation of the reasons for the revision.</p> <p>(1A) The dispatchable load purchaser, <u>battery energy storage system owner</u>, or generator must report the revision to the Authority no later than 1700 hours on the 1st business day following the trading day on which the revision was made.</p> <p>(1B) Subclauses (1) and (1A) do not apply to an intermittent generator submitting a revised forecast of generation potential under clause 13.18A.</p> <p>(2) <i>[Revoked]</i></p> <p>...</p> <p><u>13.25A Exception for small battery energy storage systems</u></p> <p>(1) <u>Despite clause 13.6A(1), a battery energy storage system owner is not required to submit offers and bids for a battery energy storage system station that has a maximum continuous MW output power of 10 MW or smaller.</u></p> <p>(2) <u>Any electricity discharged by a battery energy storage system station to which subclause (1) applies and which is sold to the clearing manager is regarded as unoffered generation for the purpose of this Code.</u></p> <p>(3) <u>The system operator may require the relevant battery energy storage system owner to provide information in a form reasonably determined by the system operator on the expected generation output for any unoffered generation from a battery energy storage system owner with a point of connection to the grid.</u></p>

Commented [S028]: This should state “offers or bids”, otherwise there could be an interpretation that the exception only applies to submissions with both an offer and a bid (but not individually).

Commented [S029]: We query why the term “discharged” is used here instead of “output”. We consider that the term “output” should be used throughout the Code drafting for consistency.

Commented [S030]: In the consultation paper (paragraph 4.27) the intention behind this proposed clause was to require small BESS owners to submit information about their consumption and generation, if required by the system operator. However, subclause (3) only applies to BESS output.

We also consider that “generation” should be deleted, as “output” is a better term in relation to BESS.

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<p>...</p> <p style="text-align: center;">no change</p>	<p>...</p> <p>13.38 Ancillary service agents to submit reserve offers to system operator</p> <p>(1) Each ancillary service agent who has a contract described in clause 13.37 may submit reserve offers to the system operator.</p> <p>(1A) An ancillary service agent who submits a reserve offer must ensure that the system operator receives the reserve offer at least 71 trading periods before the beginning of the trading period to which the reserve offer applies.</p> <p>(2) Each reserve offer submitted by an ancillary service agent, other than a battery energy storage system owner, under subclause (1) may be for fast instantaneous reserve, sustained instantaneous reserve or both and must—</p> <ul style="list-style-type: none"> (a) contain all the information required by Form 5(1) in Schedule 13.1 for partly loaded spinning reserve or Form 5(2) in Schedule 13.1 for all other categories of generation reserve; and (b) contain all the information required by Form 6 in Schedule 13.1 for interruptible load; and (c) be a reasonable estimate of the quantity of instantaneous reserve available from the ancillary service agent at that grid injection point, grid exit point or interruptible load group GXP. <p><u>(2A) Each reserve offer submitted by an ancillary service agent that is a battery energy storage system owner under subclause (1) may be for fast instantaneous reserve, sustained instantaneous reserve or both and must—</u></p> <ul style="list-style-type: none"> <u>(a) contain all the information required by Form 11; and</u> <u>(b) in respect of interruptible load, not exceed a reasonable estimate of the adjusted consumption capacity for the</u>

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<p>13.39 Inter-relationship between reserve and energy offers Reserve offers and offers made under clauses 13.38(1) and 13.6(1) to (3) or 13.6A(1) or (2) respectively, if they are in respect of the same individual generating unit or individual generating station (as required under clauses 13.10 and 13.11), are inter-related in that the greater the energy dispatched the lower the instantaneous reserve may be and vice versa. Accordingly, an ancillary service agent that is a generator does not breach clause 13.38(2)(c) if the offer quantity under clauses 13.6 to 13.27 and quantity of instantaneous reserve offered under clauses 13.37 to 13.54 are duplicated, and the ancillary service agent must not be scheduled by the system operator and a dispatch instruction from the system operator must not be given the effect of which is that the combined dispatch quantity and instantaneous reserve exceeds the capacity of the individual generating unit or individual generating station, as the case may be.</p> <p>13.40A Inter-relationship between reserve offers and nominated dispatch bids Reserve offers and nominated dispatch bids made under clauses 13.38(1) and 13.7(1) to (3) (or clause 13.6A(1) in respect of a nominated</p>	<p>ancillary service agent's battery energy storage system station; and (c) in respect of generation reserve, not exceed a reasonable estimate of the adjusted generation capacity for the ancillary service agent's battery energy storage system station.</p> <p>(3) Each reserve offer submitted under subclause (1), by an ancillary service agent that is a generator, must be made by reference to the same generating unit or generating station that is the subject of an offer under clauses 13.10 or 13.11.</p> <p>13.39 Inter-relationship between reserve and energy offers Reserve offers and offers made under clauses 13.38(1) and 13.6(1) to (3) or 13.6A(1) or (2) respectively, if they are in respect of the same individual generating unit or individual generating station (as required under clauses 13.10 and 13.11), are inter-related in that the greater the energy dispatched the lower the instantaneous reserve may be and vice versa. Accordingly, an ancillary service agent that is a generator does not breach clause 13.38(2)(c) if the offer quantity under clauses 13.6 to 13.27 and quantity of instantaneous reserve offered under clauses 13.37 to 13.54 are duplicated, and the ancillary service agent must not be scheduled by the system operator and a dispatch instruction from the system operator must not be given the effect of which is that the combined dispatch quantity and instantaneous reserve exceeds the capacity of the individual generating unit or individual generating station, as the case may be.</p> <p>13.40A Inter-relationship between reserve offers and nominated dispatch bids Reserve offers and nominated dispatch bids made under clauses 13.38(1) and 13.7(1) to (3) (or clause 13.6A(1) in respect of a nominated</p>

Commented [S031]: As noted in our submission, we do not support a strict separation between interruptible load and generation reserve for BESS reserve offers.

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<p><u>dispatch bid made by a battery energy storage system owner</u> respectively, if they are in respect of the same plant, are inter-related in that the lower the demand dispatched or scheduled the lower the instantaneous reserve may be. The ancillary service agent must not be scheduled by the system operator and a dispatch instruction from the system operator must not be given the effect of which is that the instantaneous reserve exceeds the scheduled or dispatched demand quantity of the dispatch-capable load station, as the case may be.</p> <p>...</p> <p style="text-align: center;">no change</p>	<p><u>dispatch bid made by a battery energy storage system owner</u> respectively, if they are in respect of the same plant, are inter-related in that the lower the demand dispatched or scheduled the lower the instantaneous reserve may be. The ancillary service agent must not be scheduled by the system operator and a dispatch instruction from the system operator must not be given the effect of which is that the instantaneous reserve exceeds the scheduled or dispatched demand quantity of the dispatch-capable load station, as the case may be.</p> <p>...</p> <p>13.44 How quantity is to be specified in reserve offers</p> <p>(1) For each price band, a reserve offer <u>submitted by an ancillary service agent that is not a battery energy storage owner</u> must specify the quantity of instantaneous reserve offered to respond as fast instantaneous reserve and/or sustained instantaneous reserve—</p> <ul style="list-style-type: none"> (a) as the generation available to be injected as a proportion of electricity output up to a specified maximum quantity for partly loaded spinning reserve; or (b) as the generation available to be injected for all other categories of generation reserve; or (c) as the demand available to be reduced for interruptible load. <p><u>(1A) For each price band, a reserve offer submitted by an ancillary service agent that is a battery energy storage owner must specify the quantity of instantaneous reserve offered to respond as fast instantaneous reserve and/or sustained instantaneous reserve—</u></p> <ul style="list-style-type: none"> <u>(a) as the generation available to be injected for generation reserve if unconstrained by state of charge; or</u> <u>(b) as the demand available to be reduced for interruptible load if unconstrained by state of charge.</u> <p>(2) The quantity that may be offered in a price band for a trading period</p>

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no change	<p>must be expressed in MW to not more than 3 decimal places and must not be less than 0.000 MW.</p> <p>13.46 Reserve offer may be revised</p> <p>(1) Subject to subclauses (1A) and (1B), an ancillary service agent may revise a reserve offer at any time before the end of the trading period in respect of which the reserve offer is made by submitting a new reserve offer to the system operator.</p> <p>(1A) An ancillary service agent must not revise its reserve offer prices during a gate closure period.</p> <p>(1B) An ancillary service agent must not revise the MW specified in any price band in a reserve offer during a gate closure period unless subclause (3) or clause 13.47 applies.</p> <p>(2) An ancillary service agent that revises a reserve offer for an embedded generating station must use reasonable endeavours to submit the reserve offer at least 1 hour before the beginning of the trading period in respect of which the reserve offer is made.</p> <p>(3) Before the end of the trading period to which the reserve offer applies, and despite clauses 13.97 to 13.101, an ancillary service agent <u>that is not a battery energy storage system owner</u> must immediately submit a revised reserve offer in respect of MW offered to the system operator if—</p> <p>(a) the MW specified in any price band in the reserve offer no longer represents a reasonable estimate of the instantaneous reserve available from the ancillary service agent at the grid injection point, grid exit point or interruptible load group GXP</p> <p>(b) <i>[Revoked]</i></p> <p><u>(3A) Before the end of the trading period to which the reserve offer applies, and despite clauses 13.97 to 13.101, an ancillary service</u></p>

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<p>13.57 The dispatch objective The system operator’s dispatch objective is to maximise for each half hour the gross economic benefits to all purchasers of electricity at the grid exit points, less the cost of supplying the electricity at the grid injection points and the costs of ancillary services purchased by the system operator under subpart 3 of Part 8, in accordance with the methodology set out in Schedule 13.3, subject to—</p> <p>(a) the capability of generation, dispatch-capable load stations <u>or</u> battery energy storage system stations for which a nominated dispatch bid was submitted, and ancillary services and the configuration and capacity of the grid and information made available by asset owners; and</p> <p>(b) achieving the principal performance obligations and any arrangements of the type described in clause 8.6; and</p> <p>(c) meeting the requirements of clause 8.5 in relation to restoration of the power system—</p> <p>provided that in the case of any conflict between paragraphs (b) and (c), paragraph (c) takes priority.</p> <p>...</p>	<p><u>agent that is a battery energy storage system owner must immediately submit a revised reserve offer in respect of MW offered to the system operator if the MW specified in any price band in the reserve offer exceeds—</u></p> <p>(a) <u>in respect of interruptible load, a reasonable estimate of the adjusted consumption capacity for the ancillary service agent’s battery energy storage system station; or</u></p> <p>(b) <u>in respect of generation reserve, a reasonable estimate of the adjusted generation capacity for the ancillary service agent’s battery energy storage system station.</u></p> <p>13.57 The dispatch objective The system operator’s dispatch objective is to maximise for each half hour the gross economic benefits to all purchasers of electricity at the grid exit points, less the cost of supplying the electricity at the grid injection points and the costs of ancillary services purchased by the system operator under subpart 3 of Part 8, in accordance with the methodology set out in Schedule 13.3, subject to—</p> <p>(a) the capability of generation, dispatch-capable load stations <u>or</u> battery energy storage system stations for which a nominated dispatch bid was submitted, and ancillary services and the configuration and capacity of the grid and information made available by asset owners; and</p> <p>(b) achieving the principal performance obligations and any arrangements of the type described in clause 8.6; and</p> <p>(c) meeting the requirements of clause 8.5 in relation to restoration of the power system—</p> <p>provided that in the case of any conflict between paragraphs (b) and (c), paragraph (c) takes priority.</p> <p>...</p>

Commented [S032]: In relation to the “final” draft, “adjusted consumption capacity” should be bolded as it will be a defined term.

Commented [S033]: Likewise.

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no change	<p>13.58A Inputs for price-responsive schedule and non-response schedule</p> <p>(1) The system operator must prepare a price-responsive schedule using the following inputs:</p> <ul style="list-style-type: none"> (a) offers and reserve offers; and (aa) the potential output of all intermittent generating stations, determined using the most recent forecast of generation potential for each intermittent generating station submitted under clause 13.18A; and <u>(ab) for all battery energy storage system stations:</u> <ul style="list-style-type: none"> <u>(i) the current telemetered reading of the state of charge for that battery energy storage system station; and</u> <u>(ii) any additional operational parameter agreed between the battery energy storage system owner and the system operator; and</u> (b) nominated bids; and (c) the forecast prepared by the system operator under clause 13.7A(1); and (d) difference bids; and (e) information provided to the system operator by a grid owner under clauses 13.29 to 13.34 about— <ul style="list-style-type: none"> (i) the AC transmission system configuration, capacity, and losses; and (ii) the capability of the HVDC link including the HVDC link configuration, the capacity of the HVDC link, the losses in the HVDC link, the direction of any transfer limit on the HVDC link, and any minimum or maximum transfer limits on the HVDC link; and (iii) transformer configuration, capacity, and losses; and

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	<ul style="list-style-type: none"> (f) the adjustments specified in subclause (2)(e), subject to any exceptions specified in the policy statement; and (g) information about voltage support from contracts held by the system operator under the procurement plan; and (h) information from ancillary service agents about instantaneous reserves procured under the procurement plan; and (i) any price and quantity values assigned by the system operator under clause 13.58AA(1)(a). <p>(2) The system operator must prepare a non-response schedule using the following inputs:</p> <ul style="list-style-type: none"> (a) offers, nominated dispatch bids, and reserve offers; and (aa) the potential output of all intermittent generating stations, determined using the most recent forecast of generation potential for each intermittent generating station submitted under clause 13.18A; and <u>(ab) for all battery energy storage system stations:</u> <ul style="list-style-type: none"> <u>(i) the current telemetered reading of the state of charge for that battery energy storage system station; and</u> <u>(ii) any additional operational parameter agreed between the battery energy storage system owner and the system operator; and</u> (b) nominated non-dispatch bid quantities (where, in the case of a nominated non-dispatch bid submitted by a dispatch notification purchaser, the relevant quantity is 0 MW); and (c) the forecast prepared by the system operator under clause 13.7A(1); and (d) information provided to the system operator by a grid owner under clauses 13.29 to 13.34 referring to—

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<p>13.69B Inputs for dispatch schedule</p> <p>(1) The system operator must use the following inputs to prepare a dispatch schedule:</p> <p>(a) offers and reserve offers, excluding the following:</p> <ul style="list-style-type: none"> (i) offers submitted by an intermittent generator under clause 13.6: (ii) revised offers submitted by an intermittent generator under clause 13.18A: (iii) offers submitted by a type B co-generator under clause 13.6: (iv) revised offers submitted by a type B co-generator under clause 13.17; and 	<ul style="list-style-type: none"> (i) the AC transmission system configuration, capacity, and losses; and (ii) the capability of the HVDC link including the HVDC link configuration, the capacity of the HVDC link, the losses in the HVDC link, the direction of any transfer limit on the HVDC link, and any minimum or maximum transfer limits on the HVDC link; and (iii) transformer configuration, capacity, and losses; and (e) adjustments made by the system operator under clause 13(1) of Schedule 13.3, in order to meet the dispatch objective; and (f) information about voltage support from contracts held by the system operator under the procurement plan; and (g) information from ancillary service agents about instantaneous reserves procured under the procurement plan; and (h) any price and quantity values assigned by the system operator under clause 13.58AA(1)(b). <p>...</p> <p>13.69B Inputs for dispatch schedule</p> <p>(1) The system operator must use the following inputs to prepare a dispatch schedule:</p> <p>(a) offers and reserve offers, excluding the following:</p> <ul style="list-style-type: none"> (i) offers submitted by an intermittent generator under clause 13.6: (ii) revised offers submitted by an intermittent generator under clause 13.18A: (iii) offers submitted by a type B co-generator under clause 13.6: (iv) revised offers submitted by a type B co-generator under clause 13.17; and

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<ul style="list-style-type: none"> (b) the quantities and prices specified in nominated dispatch bids (clause 13.7) and the quantities and prices specified in revised nominated dispatch bids (clauses 13.19AAA, 13.19A and 13.19B): (c) any price and quantity values assigned by the system operator under clause 13.69AA: (d) the expected profile of demand until the next dispatch schedule is produced by the system operator, where in an unsupplied demand situation— <ul style="list-style-type: none"> (i) the expected profile of demand used to calculate dispatch instructions and dispatch notifications must reflect the demand expected to be supplied by the available offers; and (ii) the expected profile of demand used to calculate dispatch price must be adjusted for the demand that was unable to be supplied by the available offers that was assigned a value by the system operator under clause 13.69AA(a), in accordance with the processes set out in Schedule 13.3AA: (e) the potential output of all intermittent generating stations, determined in accordance with subclause (4): (f) the current output levels of each generator or, if no such data is available, a reasonable estimate of the current output levels of each generator: (g) information from the grid owner (clauses 13.29 to 13.34) and revised information from the grid owner (clause 13.33) about— <ul style="list-style-type: none"> (i) the AC transmission system configuration, capacity and losses; and 	<ul style="list-style-type: none"> (b) the quantities and prices specified in nominated dispatch bids (clause 13.7) and the quantities and prices specified in revised nominated dispatch bids (clauses 13.19AAA, 13.19A and 13.19B): (c) any price and quantity values assigned by the system operator under clause 13.69AA: (d) the expected profile of demand until the next dispatch schedule is produced by the system operator, where in an unsupplied demand situation— <ul style="list-style-type: none"> (i) the expected profile of demand used to calculate dispatch instructions and dispatch notifications must reflect the demand expected to be supplied by the available offers; and (ii) the expected profile of demand used to calculate dispatch price must be adjusted for the demand that was unable to be supplied by the available offers that was assigned a value by the system operator under clause 13.69AA(a), in accordance with the processes set out in Schedule 13.3AA: (e) the potential output of all intermittent generating stations, determined in accordance with subclause (4): (f) the current output levels of each generator or, if no such data is available, a reasonable estimate of the current output levels of each generator: (g) information from the grid owner (clauses 13.29 to 13.34) and revised information from the grid owner (clause 13.33) about— <ul style="list-style-type: none"> (i) the AC transmission system configuration, capacity and losses; and

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<p>(ii) the capability of the HVDC link including the HVDC link configuration, the capacity of the HVDC link, the losses in the HVDC link, the direction of any transfer limit on the HVDC link, and any minimum or maximum transfer limits on the HVDC link; and</p> <p>(iii) transformer configuration, capacity and losses:</p> <p>(h) information about voltage support:</p> <p>(i) the price order in the current dispatch schedule:</p> <p>(j) in relation to intermittent generators, any ramp rates agreed between the intermittent generator and the system operator</p> <p>(2) The system operator must incorporate, in each schedule prepared, any adjustments to the inputs described in subclause (1) that may be required to meet the dispatch objective.</p> <p>(3) The system operator must use the information provided under clause 13.69AAA as part of its calculation of the expected profile of demand.</p> <p>(4) The system operator must, in determining the potential output of an intermittent generating station for the purposes of subclause (1)(e), use the following information:</p> <p>(a) if the most recent dispatch instruction to the relevant intermittent generator for the intermittent generating station was not flagged, the actual output in MW of the intermittent generating station:</p> <p>(b) if the most recent dispatch instruction to the relevant intermittent generator for the intermittent generating station was flagged, the greater of—</p> <p>(i) the forecast of generation potential specified in the intermittent generator's final offer for the relevant intermittent generating station submitted under clause 13.18A; and</p>	<p>(ii) the capability of the HVDC link including the HVDC link configuration, the capacity of the HVDC link, the losses in the HVDC link, the direction of any transfer limit on the HVDC link, and any minimum or maximum transfer limits on the HVDC link; and</p> <p>(iii) transformer configuration, capacity and losses:</p> <p>(h) information about voltage support:</p> <p>(i) the price order in the current dispatch schedule:</p> <p>(j) in relation to intermittent generators, any ramp rates agreed between the intermittent generator and the system operator:</p> <p><u>(k) in relation to each battery energy storage system station:</u></p> <p><u>(i) the current telemetered reading of the state of charge for that battery energy storage system station or, if no such data is available for any reason, a reasonable estimate of that battery energy storage system station; and</u></p> <p><u>(ii) any additional operational parameter agreed between the battery energy storage system owner and the system operator.</u></p> <p>(2) The system operator must incorporate, in each schedule prepared, any adjustments to the inputs described in subclause (1) that may be required to meet the dispatch objective.</p> <p>(3) The system operator must use the information provided under clause 13.69AAA as part of its calculation of the expected profile of demand.</p> <p>(4) The system operator must, in determining the potential output of an intermittent generating station for the purposes of subclause (1)(e), use the following information:</p> <p>(a) if the most recent dispatch instruction to the relevant intermittent generator for the intermittent generating</p>

Commented [S034]: In relation to the “final” draft, this should be replaced with “state of charge”.

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<p>(ii) the actual output in MW of the intermittent generating station:</p> <p>(c) if the intermittent generator and the system operator have agreed in writing that an alternative estimate may be provided, the alternative estimate of the potential output of the intermittent generating station provided by the relevant intermittent generator.</p> <p>...</p> <p>13.72 System operator to issue dispatch instructions and dispatch notifications</p> <p>(1) The system operator must implement each dispatch schedule, and any departure from a dispatch schedule under clause 13.70 by—</p> <p>(a) issuing dispatch instructions to,—</p> <p>(i) generators; and</p> <p>(ii) ancillary service agents; and</p> <p>(iii) dispatchable load purchasers (other than dispatch notification purchasers) and battery energy storage system owners that have submitted nominated dispatch bids; and</p> <p>(b) issuing dispatch notifications to dispatch notification purchasers and dispatch notification generators.</p>	<p>station was not flagged, the actual output in MW of the intermittent generating station:</p> <p>(b) if the most recent dispatch instruction to the relevant intermittent generator for the intermittent generating station was flagged, the greater of—</p> <p>(i) the forecast of generation potential specified in the intermittent generator's final offer for the relevant intermittent generating station submitted under clause 13.18A; and</p> <p>(ii) the actual output in MW of the intermittent generating station:</p> <p>(c) if the intermittent generator and the system operator have agreed in writing that an alternative estimate may be provided, the alternative estimate of the potential output of the intermittent generating station provided by the relevant intermittent generator.</p> <p>...</p> <p>13.72 System operator to issue dispatch instructions and dispatch notifications</p> <p>(1) The system operator must implement each dispatch schedule, and any departure from a dispatch schedule under clause 13.70 by—</p> <p>(a) issuing dispatch instructions to,—</p> <p>(i) generators; and</p> <p>(ii) ancillary service agents; and</p> <p>(iii) dispatchable load purchasers (other than dispatch notification purchasers) and battery energy storage system owners that have submitted nominated dispatch bids; and</p> <p>(b) issuing dispatch notifications to dispatch notification purchasers and dispatch notification generators.</p>

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<p>(2) The system operator must issue each dispatch instruction and each dispatch notification in a reasonable and timely manner to enable the participant to which the dispatch instruction or dispatch notification is issued to comply with the dispatch instruction or dispatch notification.</p> <p>(3) Despite subclause (1), the system operator is not required to issue a dispatch instruction to a participant if—</p> <ul style="list-style-type: none"> (a) the dispatch instruction is— <ul style="list-style-type: none"> (i) to provide a quantity of active power under clause 13.73(1)(a); or (ii) to provide a quantity of instantaneous reserve under clause 13.73(1)(b); and (b) the dispatch instruction would differ from the most recent dispatch instruction issued to the participant by 1 MW or less. <p>...</p>	<p>(2) The system operator must issue each dispatch instruction and each dispatch notification in a reasonable and timely manner to enable the participant to which the dispatch instruction or dispatch notification is issued to comply with the dispatch instruction or dispatch notification.</p> <p>(3) Despite subclause (1), the system operator is not required to issue a dispatch instruction to a participant if—</p> <ul style="list-style-type: none"> (a) the dispatch instruction is— <ul style="list-style-type: none"> (i) to provide a quantity of active power under clause 13.73(1)(a); or (ii) to provide a quantity of instantaneous reserve under clause 13.73(1)(b); and (b) the dispatch instruction would differ from the most recent dispatch instruction issued to the participant by 1 MW or less. <p>...</p>
<p>13.73 Content of dispatch instructions and dispatch notifications</p> <p>(1) The system operator must ensure that each dispatch instruction and dispatch notification it issues under clause 13.72(1) instructs the generator, ancillary service agent, or dispatchable load purchaser or battery energy storage system owner to carry out 1 of the following:</p> <ul style="list-style-type: none"> (a) provide a quantity of active power; (b) provide a quantity of instantaneous reserve; (c) provide a quantity and quality of reserve power or alternative to regulate frequency continuously; (d) provide a quantity of reactive power; (e) adjust transformer tap positions to maintain voltage levels; (f) provide a level of voltage; 	<p>13.73 Content of dispatch instructions and dispatch notifications</p> <p>(1) The system operator must ensure that each dispatch instruction and dispatch notification it issues under clause 13.72(1) instructs the generator, ancillary service agent, or dispatchable load purchaser or battery energy storage system owner to carry out 1 of the following:</p> <ul style="list-style-type: none"> (a) provide a quantity of active power; (b) provide a quantity of instantaneous reserve; (c) provide a quantity and quality of reserve power or alternative to regulate frequency continuously; (d) provide a quantity of reactive power; (e) adjust transformer tap positions to maintain voltage levels; (f) provide a level of voltage;

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<p>(g) synchronise or de-synchronise generating plant within the current trading period or the next trading period either directly or in accordance with any process that may be agreed with the generator:</p> <p>(h) switch on or switch off schemes for over frequency tripping where such capability exists in generating plant that a generator has offered to provide to the system operator:</p> <p>(i) manage the generating plant within a block dispatch group or station dispatch group so as to ensure the largest single reserve risk within that block dispatch group or station dispatch group does not exceed the relevant maximum reserve risk advised by the system operator for the North Island or the South Island for each trading period:</p> <p>(j) manage the total aggregate generation for each sub-block dispatch group or sub-station dispatch group for that generator so as not to exceed the total sum of the dispatched quantities for each generating plant or generating unit comprising that sub-block dispatch group or sub-station dispatch group for the duration of the notice received under clauses 13.60, 13.61, or 13.64 to 13.66:</p> <p>(k) manage the total aggregate generation for each block dispatch group or station dispatch group for that generator so as to meet the total sum of the dispatched quantities for each generating station or generating unit comprising that block dispatch group or station dispatch group:</p> <p>(l) use a specified quantity of electricity.</p> <p>(1A) The system operator must include an indication (flag) in each dispatch instruction it issues to an intermittent generator under clause 13.72(1)(a) if the intermittent generator is dispatched for a</p>	<p>(g) synchronise or de-synchronise generating plant within the current trading period or the next trading period either directly or in accordance with any process that may be agreed with the generator:</p> <p>(h) switch on or switch off schemes for over frequency tripping where such capability exists in generating plant that a generator has offered to provide to the system operator:</p> <p>(i) manage the generating plant within a block dispatch group or station dispatch group so as to ensure the largest single reserve risk within that block dispatch group or station dispatch group does not exceed the relevant maximum reserve risk advised by the system operator for the North Island or the South Island for each trading period:</p> <p>(j) manage the total aggregate generation for each sub-block dispatch group or sub-station dispatch group for that generator so as not to exceed the total sum of the dispatched quantities for each generating plant or generating unit comprising that sub-block dispatch group or sub-station dispatch group for the duration of the notice received under clauses 13.60, 13.61, or 13.64 to 13.66:</p> <p>(k) manage the total aggregate generation for each block dispatch group or station dispatch group for that generator so as to meet the total sum of the dispatched quantities for each generating station or generating unit comprising that block dispatch group or station dispatch group:</p> <p>(l) use a specified quantity of electricity.</p> <p>(1A) The system operator must include an indication (flag) in each dispatch instruction it issues to an intermittent generator under clause 13.72(1)(a) if the intermittent generator is dispatched for a</p>

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<p>trading period at a quantity less than the potential output of the relevant intermittent generating station.</p> <p>(1B) For the purposes of subclause (1A), the potential output of an intermittent generating station is the potential output for the relevant intermittent generating station determined by the system operator under clause 13.69B(4).</p> <p>(2) <i>[Revoked]</i></p> <p>...</p> <p>13.75 Form of dispatch instruction and dispatch notification</p> <p>(1) When issuing a dispatch instruction or dispatch notification under clause 13.72(1), the system operator must specify—</p> <ul style="list-style-type: none"> (a) the generating plant, generating unit, block dispatch group, station dispatch group, interruptible load, dispatch-capable load station, battery energy storage system station or frequency keeping units to which the dispatch instruction or dispatch notification applies; and (b) the desired outcome of the dispatch instruction or dispatch notification; and (c) if the start time for the dispatch instruction or dispatch notification differs from the issue time, the start time within the current trading period or the next trading period; and (d) if specific ramp rates are concerned, a specific target time to reach the desired outcome; and (e) the time at which the dispatch instruction or dispatch notification was issued; and (f) any block security constraint that occurs within a block dispatch group and how the block security constraint divides the generating stations or generating units of a block dispatch group into sub-block dispatch groups as part of such a dispatch instruction or dispatch notification; and 	<p>trading period at a quantity less than the potential output of the relevant intermittent generating station.</p> <p>(1B) For the purposes of subclause (1A), the potential output of an intermittent generating station is the potential output for the relevant intermittent generating station determined by the system operator under clause 13.69B(4).</p> <p>(2) <i>[Revoked]</i></p> <p>...</p> <p>13.75 Form of dispatch instruction and dispatch notification</p> <p>(1) When issuing a dispatch instruction or dispatch notification under clause 13.72(1), the system operator must specify—</p> <ul style="list-style-type: none"> (i) the generating plant, generating unit, block dispatch group, station dispatch group, interruptible load, dispatch-capable load station, battery energy storage system station or frequency keeping units to which the dispatch instruction or dispatch notification applies; and (j) the desired outcome of the dispatch instruction or dispatch notification; and (k) if the start time for the dispatch instruction or dispatch notification differs from the issue time, the start time within the current trading period or the next trading period; and (l) if specific ramp rates are concerned, a specific target time to reach the desired outcome; and (m) the time at which the dispatch instruction or dispatch notification was issued; and (n) any block security constraint that occurs within a block dispatch group and how the block security constraint divides the generating stations or generating units of a block dispatch group into sub-block dispatch groups as part of such a dispatch instruction or dispatch notification; and

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<p>(g) any station security constraint that occurs within a station dispatch group and how the station security constraint divides the generating stations or generating units of a station dispatch group into sub-station dispatch groups; and</p> <p>(h) if it is a dispatch instruction or dispatch notification specified in clause 13.73(1)(i), the maximum reserve risk for the relevant island; and</p> <p>(i) when issuing a dispatch instruction or dispatch notification to a dispatchable load purchaser, the trading period for which the dispatch instruction or dispatch notification is issued.</p>	<p>(o) any station security constraint that occurs within a station dispatch group and how the station security constraint divides the generating stations or generating units of a station dispatch group into sub-station dispatch groups; and</p> <p>(p) if it is a dispatch instruction or dispatch notification specified in clause 13.73(1)(i), the maximum reserve risk for the relevant island; and</p> <p>(i) when issuing a dispatch instruction or dispatch notification to a dispatchable load purchaser, the trading period for which the dispatch instruction or dispatch notification is issued.</p>
<p>13.76 System operator to issue and log dispatch instructions and dispatch notifications</p> <p>(1) The system operator must issue dispatch instructions and dispatch notifications—</p> <p>(a) to each generator <u>and each battery energy storage system owner</u> (other than a generator <u>or battery energy storage system owner</u> receiving dispatch instructions in its capacity as an ancillary service agent) and each dispatchable load purchaser, using an approved system; and</p> <p>...</p>	<p>13.76 System operator to issue and log dispatch instructions and dispatch notifications</p> <p>(1) The system operator must issue dispatch instructions and dispatch notifications—</p> <p>(a) to each generator <u>and each battery energy storage system owner</u> (other than a generator <u>or battery energy storage system owner</u> receiving dispatch instructions in its capacity as an ancillary service agent) and each dispatchable load purchaser, using an approved system; and</p> <p>...</p>
<p>13.82 Dispatch instructions to be complied with</p> <p>(1) This clause applies to—</p> <p>(a) a generator; and</p> <p>(b) an ancillary service agent; and</p> <p>(c) a dispatched purchaser; and</p> <p><u>(d) a battery energy storage system owner.</u></p> <p>(2) Each participant to which this clause applies must comply with a dispatch instruction properly issued by the system operator under</p>	<p>13.82 Dispatch instructions to be complied with</p> <p>(1) This clause applies to—</p> <p>(a) a generator; and</p> <p>(b) an ancillary service agent; and</p> <p>(c) a dispatched purchaser; and</p> <p><u>(d) a battery energy storage system owner.</u></p> <p>(2) Each participant to which this clause applies must comply with a dispatch instruction properly issued by the system operator under</p>

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<p>clause 13.72(1)(a) unless,—</p> <p>(a) in the participant's reasonable opinion,—</p> <p>(i) personnel or plant safety is at risk; or</p> <p>(ii) following the dispatch instruction will contravene a law;</p> <p>or</p> <p>(b) the generating plant, <u>battery energy storage system</u> or dispatch-capable load station is already responding to an automated signal to activate—</p> <p>(i) capacity reserve; or</p> <p>(ii) instantaneous reserve; or</p> <p>(iii) automatic under-frequency load shedding; or</p> <p>(iv) over frequency reserve; or</p> <p>(c) the participant is a generator or ancillary service agent acting in accordance with clause 13.86; or</p> <p>(d) the participant is an intermittent generator and—</p> <p>(i) is generating electricity during a trading period at a rate that is not more than 30MW below the forecast of generation potential specified in the intermittent generator's final offer; and</p> <p>(ii) the system operator has not flagged the dispatch instruction in accordance with clause 13.73(1A); or</p> <p>(e) the participant—</p> <p>(i) is a generator; and</p> <p>(ii) deviates from a dispatch instruction for active power to comply with clause 8.17; or</p> <p>(f) the participant—</p> <p>(i) is a dispatched purchaser <u>or battery energy storage system owner</u>; and</p> <p>(ii) deviates from the dispatch instruction—</p> <p>(A) to comply with a request issued by the system</p>	<p>clause 13.72(1)(a) unless,—</p> <p>(a) in the participant's reasonable opinion,—</p> <p>(i) personnel or plant safety is at risk; or</p> <p>(ii) following the dispatch instruction will contravene a law;</p> <p>or</p> <p>(b) the generating plant, <u>battery energy storage system</u> or dispatch-capable load station is already responding to an automated signal to activate—</p> <p>(i) capacity reserve; or</p> <p>(ii) instantaneous reserve; or</p> <p>(iii) automatic under-frequency load shedding; or</p> <p>(iv) over frequency reserve; or</p> <p>(c) the participant is a generator or ancillary service agent acting in accordance with clause 13.86; or</p> <p>(d) the participant is an intermittent generator and—</p> <p>(i) is generating electricity during a trading period at a rate that is not more than 30MW below the forecast of generation potential specified in the intermittent generator's final offer; and</p> <p>(ii) the system operator has not flagged the dispatch instruction in accordance with clause 13.73(1A); or</p> <p>(e) the participant—</p> <p>(i) is a generator; and</p> <p>(ii) deviates from a dispatch instruction for active power to comply with clause 8.17; or</p> <p>(f) the participant—</p> <p>(i) is a dispatched purchaser <u>or battery energy storage system owner</u>; and</p> <p>(ii) deviates from the dispatch instruction—</p> <p>(A) to comply with a request issued by the system</p>

Commented [S035]: Does this mean that compliance is at the individual BESS level or station level?

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<p>operator under clause 5(4) of Technical Code B of Schedule 8.3; or</p> <p>(B) to comply with clause 8.18; or</p> <p>(g) the participant—</p> <p>(i) is a dispatched purchaser <u>or battery energy storage system owner</u>; and</p> <p>(ii) cannot comply with the dispatch instruction because demand has been electrically disconnected under clause 7(20) of Technical Code B of Schedule 8.3; or</p> <p>(ga) the participant—</p> <p>(i) is a dispatched purchaser; and</p> <p>(ii) the dispatch instruction is issued for a trading period for which the latest nominated bid for the relevant dispatch-capable load station is a nominated non-dispatch bid; or</p> <p>(h) the participant—</p> <p>(i) is a generator or an ancillary service agent; and</p> <p>(ii) deviates from a dispatch instruction to comply with clause 9 of Technical Code B of Schedule 8.3; or</p> <p>(i) the participant—</p> <p>(i) is a generator or an ancillary service agent; and</p> <p>(ii) is acting in accordance with a commissioning plan or test plan that—</p> <p>(A) is required under clause 2(6) of Technical Code A of Schedule 8.3; and</p> <p>(B) expressly allows the generator or ancillary service agent to depart from the dispatch instruction for the purpose of the commissioning plan or test plan; and</p> <p>(iii) has no reasonable means of complying with the dispatch</p>	<p>operator under clause 5(4) of Technical Code B of Schedule 8.3; or</p> <p>(B) to comply with clause 8.18; or</p> <p>(g) the participant—</p> <p>(i) is a dispatched purchaser <u>or battery energy storage system owner</u>; and</p> <p>(ii) cannot comply with the dispatch instruction because demand has been electrically disconnected under clause 7(20) of Technical Code B of Schedule 8.3; or</p> <p>(ga) the participant—</p> <p>(i) is a dispatched purchaser; and</p> <p>(ii) the dispatch instruction is issued for a trading period for which the latest nominated bid for the relevant dispatch-capable load station is a nominated non-dispatch bid; or</p> <p>(h) the participant—</p> <p>(i) is a generator or an ancillary service agent; and</p> <p>(ii) deviates from a dispatch instruction to comply with clause 9 of Technical Code B of Schedule 8.3; or</p> <p>(i) the participant—</p> <p>(i) is a generator or an ancillary service agent; and</p> <p>(ii) is acting in accordance with a commissioning plan or test plan that—</p> <p>(A) is required under clause 2(6) of Technical Code A of Schedule 8.3; and</p> <p>(B) expressly allows the generator or ancillary service agent to depart from the dispatch instruction for the purpose of the commissioning plan or test plan; and</p> <p>(iii) has no reasonable means of complying with the dispatch</p>

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<p>instruction while acting in accordance with the commissioning plan or test plan; or</p> <p>(j) the participant is a type B co-generator and the system operator has not advised that there is—</p> <p>(i) a grid emergency; or</p> <p>(ii) a system constraint that directly affects the type B co-generator.</p> <p>(3) A participant to which the exception in subclause (2)(a) applies must immediately advise the system operator of the circumstance in which the exception arises.</p> <p>(4) If a dispatched purchaser is issued with more than 1 dispatch instruction for the same dispatch-capable load station for the same trading period, the dispatched purchaser must comply with the latest dispatch instruction.</p> <p>(5) To avoid doubt, a dispatch instruction listed in clause 13.73(1)(b) to 13.73(1)(f) or 13.73(1)(h) is properly issued only if—</p> <p>(a) the generator or ancillary service agent to which the dispatch instruction is given has an enforceable contract with the system operator for the provision of services relating to the dispatch instruction; or</p> <p>(b) the dispatch instruction is consistent with an enforceable contract between the system operator and the generator or ancillary service agent for the provision of services relating to the dispatch instruction; or</p> <p>(c) the dispatch instruction is given for the purposes of clause 8.5 or 13.70; or</p> <p>(d) the dispatch instruction is consistent with—</p> <p>(i) the asset owner performance obligations under clauses 8.22 to 8.24; or</p> <p>(ii) the technical codes concerning voltage; or</p>	<p>instruction while acting in accordance with the commissioning plan or test plan; or</p> <p>(j) the participant is a type B co-generator and the system operator has not advised that there is—</p> <p>(i) a grid emergency; or</p> <p>(ii) a system constraint that directly affects the type B co-generator.</p> <p>(3) A participant to which the exception in subclause (2)(a) applies must immediately advise the system operator of the circumstance in which the exception arises.</p> <p>(4) If a dispatched purchaser is issued with more than 1 dispatch instruction for the same dispatch-capable load station for the same trading period, the dispatched purchaser must comply with the latest dispatch instruction.</p> <p>(5) To avoid doubt, a dispatch instruction listed in clause 13.73(1)(b) to 13.73(1)(f) or 13.73(1)(h) is properly issued only if—</p> <p>(a) the generator or ancillary service agent to which the dispatch instruction is given has an enforceable contract with the system operator for the provision of services relating to the dispatch instruction; or</p> <p>(b) the dispatch instruction is consistent with an enforceable contract between the system operator and the generator or ancillary service agent for the provision of services relating to the dispatch instruction; or</p> <p>(c) the dispatch instruction is given for the purposes of clause 8.5 or 13.70; or</p> <p>(d) the dispatch instruction is consistent with—</p> <p>(i) the asset owner performance obligations under clauses 8.22 to 8.24; or</p> <p>(ii) the technical codes concerning voltage; or</p>

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<p>(iii) a dispensation.</p> <p>(6) A dispatched purchaser issued with a dispatch instruction for a dispatch-capable load station must not make changes to its other load at the same GXP with the intention of offsetting the dispatch instruction for the dispatch-capable load station.</p> <p>...</p> <p>13.83A Dispatchable load purchasers to make staff or facilities available to meet dispatch instructions and dispatch notifications</p> <p>(1) Each dispatchable load purchaser, or battery energy storage system owner, that has submitted a nominated dispatch bid must ensure that appropriate personnel or facilities are available to receive and comply with each dispatch instruction or dispatch notification issued to the dispatchable load purchaser or battery energy storage system owner.</p> <p>(2) Nothing in this clause limits the ability of a dispatchable load purchaser or battery energy storage system owner to have a control centre that operates 1 or more dispatch-capable load stations or battery energy storage system stations by remote control.</p> <p>...</p> <p>13.105A Information to be made available to purchasers, generators, and ancillary service agents</p> <p>(1) At the same time as the system operator is required to make information available in accordance with clause 13.104(1), the system operator must make available on WITS—</p> <p>(aa) for each dispatchable load purchaser that has submitted a nominated dispatch bid, information from the current non-response schedule relating to the scheduling of the dispatchable load purchaser’s nominated dispatch bids for the trading periods covered in the schedule length period; and</p>	<p>(iii) a dispensation.</p> <p>(6) A dispatched purchaser issued with a dispatch instruction for a dispatch-capable load station must not make changes to its other load at the same GXP with the intention of offsetting the dispatch instruction for the dispatch-capable load station.</p> <p>...</p> <p>13.83A Dispatchable load purchasers to make staff or facilities available to meet dispatch instructions and dispatch notifications</p> <p>(1) Each dispatchable load purchaser, or battery energy storage system owner, that has submitted a nominated dispatch bid must ensure that appropriate personnel or facilities are available to receive and comply with each dispatch instruction or dispatch notification issued to the dispatchable load purchaser or battery energy storage system owner.</p> <p>(2) Nothing in this clause limits the ability of a dispatchable load purchaser or battery energy storage system owner to have a control centre that operates 1 or more dispatch-capable load stations or battery energy storage system stations by remote control.</p> <p>...</p> <p>13.105A Information to be made available to purchasers, generators, and ancillary service agents</p> <p>(1) At the same time as the system operator is required to make information available in accordance with clause 13.104(1), the system operator must make available on WITS—</p> <p>(aa) for each dispatchable load purchaser that has submitted a nominated dispatch bid, information from the current non-response schedule relating to the scheduling of the dispatchable load purchaser’s nominated dispatch bids for the trading periods covered in the schedule length period; and</p>

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<p>(a) for each purchaser, information from the current price-responsive schedule relating to the scheduling of the purchaser’s bids for the trading periods covered in the schedule length period; and</p> <p>(b) for each generator, information from the current price-responsive schedule and non-response schedule relating to the scheduling of the generator’s offers for the trading periods covered in the schedule length period; and</p> <p>(c) for each ancillary service agent who has submitted a reserve offer for the scheduling period, information from the current price-responsive schedule and non-response schedule relating to the scheduling of the ancillary service agent’s reserve offers for the trading periods covered in the schedule length period; and</p> <p><u>(d) for each battery energy storage system owner that has submitted an offer or bid, information on the capped quantities scheduled for the battery energy storage system owner’s battery energy storage system stations from the current price-responsive schedule and non-response schedule relating to the scheduling of the battery energy storage system owner’s offers or bids for the trading periods covered in the schedule length period.</u></p> <p>...</p>	<p>(a) for each purchaser, information from the current price-responsive schedule relating to the scheduling of the purchaser’s bids for the trading periods covered in the schedule length period; and</p> <p>(b) for each generator, information from the current price-responsive schedule and non-response schedule relating to the scheduling of the generator’s offers for the trading periods covered in the schedule length period; and</p> <p>(c) for each ancillary service agent who has submitted a reserve offer for the scheduling period, information from the current price-responsive schedule and non-response schedule relating to the scheduling of the ancillary service agent’s reserve offers for the trading periods covered in the schedule length period; and</p> <p><u>(d) for each battery energy storage system owner that has submitted an offer or bid, information on the capped quantities scheduled for the battery energy storage system owner’s battery energy storage system stations from the current price-responsive schedule and non-response schedule relating to the scheduling of the battery energy storage system owner’s offers or bids for the trading periods covered in the schedule length period.</u></p> <p>...</p>

Commented [S036]: It is unclear what “capped quantities” refers to. We recommend “capped” being a defined term.

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<p style="text-align: center;"><i>Calculation of constrained off amounts</i></p> <p style="text-align: center;">...</p> <p>13.194 Clearing manager to calculate constrained off amounts</p> <p>...</p> <p>(2) If a constrained off situation occurs in relation to a dispatch-capable load station <u>or battery energy storage system station</u> during a trading period, the clearing manager must calculate the constrained off amounts for each dispatch-capable load station <u>or battery energy storage system station</u>, for each affected nominated dispatch bid price band, using the following formula:</p> <p>$ConOffAmdisp = ConOffQ * (Pb - Pf)$ where</p> <p>ConOffAmdisp is the constrained off amount for a dispatch-capable load station <u>or battery energy storage system station</u> for the nominated dispatch bid price band</p>	<p style="text-align: center;"><i>Calculation of constrained off amounts</i></p> <p style="text-align: center;">...</p> <p>13.194 Clearing manager to calculate constrained off amounts</p> <p>...</p> <p>(2) If a constrained off situation occurs in relation to a dispatch-capable load station <u>or battery energy storage system station</u> during a trading period, the clearing manager must calculate the constrained off amounts for each dispatch-capable load station <u>or battery energy storage system station</u>, for each affected nominated dispatch bid price band, using the following formula:</p> <p>$ConOffAmdisp = ConOffQ * (Pb - Pf)$ where</p> <p>ConOffAmdisp is the constrained off amount for a dispatch-capable load station <u>or battery energy storage system station</u> for the nominated dispatch bid price band</p>
<p>...</p> <p>13.199 Clearing manager to make details of constrained off amounts available</p> <p>The clearing manager must, at the time specified in clause 13.197, publish the details of constrained off amounts for each generator and each dispatched purchaser for the previous billing period as follows:</p> <p>(a) the constrained off amounts calculated in accordance with clauses 13.194 to 13.196:</p> <p>(b) the generator, <u>battery energy storage system owner</u> or dispatched purchaser (as the case may be) that was constrained off:</p> <p>(c) the applicable grid injection point, or grid exit point, or block dispatch group, or station dispatch group.</p>	<p>...</p> <p>13.199 Clearing manager to make details of constrained off amounts available</p> <p>The clearing manager must, at the time specified in clause 13.197, publish the details of constrained off amounts for each generator and each dispatched purchaser for the previous billing period as follows:</p> <p>(a) the constrained off amounts calculated in accordance with clauses 13.194 to 13.196:</p> <p>(b) the generator, <u>battery energy storage system owner</u> or dispatched purchaser (as the case may be) that was constrained off:</p> <p>(c) the applicable grid injection point, or grid exit point, or block dispatch group, or station dispatch group.</p>

Commented [S037]: The purpose of this amendment (page 51 of the Consultation paper) is to require the “clearing manager to use capped bids and offers when calculating constrained off amounts”. We don’t consider that this purpose is adequately reflected in this section without a change to the definition of “constrained off situation” in clause 13.192 (depending on what is meant by “capped bids and offers”).

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<p>...</p> <p>13.201A Dispatched purchasers entitled to constrained off compensation and purchasers to pay constrained off compensation</p> <p>(1) A dispatched purchaser <u>or battery energy storage system owner</u> in respect of whose <u>dispatch-capable load station or battery energy storage system station</u> there was a constrained off situation as described in clause 13.192(1)(c) is owed constrained off compensation for the constrained off amounts calculated under clause 13.194(2).</p> <p>(2) A purchaser that purchases electricity at a grid exit point incurs an amount owing to the clearing manager for constrained off compensation, calculated under subclause (6).</p> <p>(2A) The clearing manager must advise each purchaser of the amount owing by the purchaser for constrained off compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p> <p>(3) The clearing manager owes constrained off compensation received under subclause (2), for each <u>dispatch-capable load station or battery energy storage system station</u>, to the <u>dispatched purchaser or battery energy storage system owner</u> that purchased electricity for the <u>dispatch-capable load station or battery energy storage system station</u>.</p> <p>(4) The clearing manager must advise each <u>dispatched purchaser or battery energy storage system owner</u> of the amount owing to the <u>dispatched purchaser or battery energy storage system owner</u> for constrained off compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p> <p>(5) <i>[Revoked]</i></p>	<p>...</p> <p>13.201A Dispatched purchasers entitled to constrained off compensation and purchasers to pay constrained off compensation</p> <p>(1) A dispatched purchaser <u>or battery energy storage system owner</u> in respect of whose <u>dispatch-capable load station or battery energy storage system station</u> there was a constrained off situation as described in clause 13.192(1)(c) is owed constrained off compensation for the constrained off amounts calculated under clause 13.194(2).</p> <p>(2) A purchaser that purchases electricity at a grid exit point incurs an amount owing to the clearing manager for constrained off compensation, calculated under subclause (6).</p> <p>(2A) The clearing manager must advise each purchaser of the amount owing by the purchaser for constrained off compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p> <p>(3) The clearing manager owes constrained off compensation received under subclause (2), for each <u>dispatch-capable load station or battery energy storage system station</u>, to the <u>dispatched purchaser or battery energy storage system owner</u> that purchased electricity for the <u>dispatch-capable load station or battery energy storage system station</u>.</p> <p>(4) The clearing manager must advise each <u>dispatched purchaser or battery energy storage system owner</u> of the amount owing to the <u>dispatched purchaser or battery energy storage system owner</u> for constrained off compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p> <p>(5) <i>[Revoked]</i></p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>(6) The clearing manager must calculate constrained off compensation owing by a purchaser under subclause (2) for each trading period using the following formula: $\text{ConOffC}_p = \text{ConOffC}_{\text{DLPs}} * (\text{Pur}_i / \text{TotPur})$ where ConOffC_p is the constrained off compensation owing by a purchaser $\text{ConOffC}_{\text{DLPs}}$ is the sum of constrained off compensation owing to all dispatched purchasers <u>and battery energy storage system owners whose bids were dispatched</u> for the trading period Pur_i is the total quantity in MWh of all purchases by the purchaser from the clearing manager during the trading period, as shown by reconciliation information calculated by the reconciliation manager under Part 15 TotPur is the quantity in MWh of all purchases by all purchasers from the clearing manager during the trading period, as shown by reconciliation information calculated by the reconciliation manager under Part 15.</p>	<p>(6) The clearing manager must calculate constrained off compensation owing by a purchaser under subclause (2) for each trading period using the following formula: $\text{ConOffC}_p = \text{ConOffC}_{\text{DLPs}} * (\text{Pur}_i / \text{TotPur})$ where ConOffC_p is the constrained off compensation owing by a purchaser $\text{ConOffC}_{\text{DLPs}}$ is the sum of constrained off compensation owing to all dispatched purchasers <u>and battery energy storage system owners whose bids were dispatched</u> for the trading period Pur_i is the total quantity in MWh of all purchases by the purchaser from the clearing manager during the trading period, as shown by reconciliation information calculated by the reconciliation manager under Part 15 TotPur is the quantity in MWh of all purchases by all purchasers from the clearing manager during the trading period, as shown by reconciliation information calculated by the reconciliation manager under Part 15.</p>
<p>...</p> <p>13.204 Calculation of constrained on amounts</p> <p>(1) If a constrained on situation occurs during any trading period during a previous billing period,—</p> <p>(a) the clearing manager must calculate the constrained on amounts for a constrained on situation described in clause 13.202(1)(a) or (b) for each generator for each affected price band in accordance with the following formula:</p>	<p>...</p> <p>13.204 Calculation of constrained on amounts</p> <p>(1) If a constrained on situation occurs during any trading period during a previous billing period,—</p> <p>(a) the clearing manager must calculate the constrained on amounts for a constrained on situation described in clause 13.202(1)(a) or (b) for each generator for each affected price band in accordance with the following formula:</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>$COC = Q_{con} * (P_o - P_f)$</p> <p>where</p> <p>COC is the constrained on amount for a generator</p> <p>Q_{con} is the dispatched quantity in MWh (calculated under paragraph (b)) from that price band in the offer that was constrained on during a trading period, or the positive difference between the reconciliation information and the scheduled quantity, whichever is less</p> <p>P_o is the price offered for that price band by the generator for the quantity of electricity from the generating plant which was constrained on</p> <p>P_f is the final price for that trading period at the grid injection point; and</p> <p>(aa) the clearing manager must calculate the constrained on amounts for a constrained on situation described in clause 13.202(1)(d) for each dispatch-capable load station for each affected nominated dispatch bid price band, using the following formula:</p> $ConOnAmt = ConOnQ * (P_f - P_b)$ <p>where</p> <p>ConOnAmt is the constrained on amount for a dispatch-capable load station <u>or battery energy storage system station</u> for the nominated dispatch bid price band</p>	<p>$COC = Q_{con} * (P_o - P_f)$</p> <p>where</p> <p>COC is the constrained on amount for a generator</p> <p>Q_{con} is the dispatched quantity in MWh (calculated under paragraph (b)) from that price band in the offer that was constrained on during a trading period, or the positive difference between the reconciliation information and the scheduled quantity, whichever is less</p> <p>P_o is the price offered for that price band by the generator for the quantity of electricity from the generating plant which was constrained on</p> <p>P_f is the final price for that trading period at the grid injection point; and</p> <p>(aa) the clearing manager must calculate the constrained on amounts for a constrained on situation described in clause 13.202(1)(d) for each dispatch-capable load station for each affected nominated dispatch bid price band, using the following formula:</p> $ConOnAmt = ConOnQ * (P_f - P_b)$ <p>where</p> <p>ConOnAmt is the constrained on amount for a dispatch-capable load station <u>or battery energy storage system station</u> for the nominated dispatch bid price band</p>

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<p>ConOnQ is the amount in MWh by which the lowest of Q_{disp} and Q_{rec} exceeds Q_b</p> <p>where</p> <p>Q_b is the quantity, in MWh, in the nominated dispatch bid price band where the bid price is below the final price.</p> <p>Q_{disp} is the dispatched quantity in MWh in the trading period, calculated under paragraph (b), for the nominated dispatch bid price band in the trading period</p> <p>Q_{rec} is the reconciled quantity provided by the reconciliation manager under clause 15.20C allocated by the clearing manager to the nominated dispatch bid price band in the trading period</p> <p>P_f is the final price for the trading period at the grid exit point</p> <p>P_b is the price bid for the nominated dispatch bid price band for the dispatch-capable load station <u>or battery energy storage system station</u> that was constrained on; and</p> <p>(b) for the purposes of clauses 13.202 to 13.211 dispatched quantity must be calculated taking into account—</p> <p>(i) the quantity in MW recorded in the log kept by the system operator in accordance with clause 13.76; and if required, the clearing manager must aggregate such quantities for—</p> <p>(A) generating stations or generating units in the relevant station dispatch group; or</p>	<p>ConOnQ is the amount in MWh by which the lowest of Q_{disp} and Q_{rec} exceeds Q_b</p> <p>where</p> <p>Q_b is the quantity, in MWh, in the nominated dispatch bid price band where the bid price is below the final price.</p> <p>Q_{disp} is the dispatched quantity in MWh in the trading period, calculated under paragraph (b), for the nominated dispatch bid price band in the trading period</p> <p>Q_{rec} is the reconciled quantity provided by the reconciliation manager under clause 15.20C allocated by the clearing manager to the nominated dispatch bid price band in the trading period</p> <p>P_f is the final price for the trading period at the grid exit point</p> <p>P_b is the price bid for the nominated dispatch bid price band for the dispatch-capable load station <u>or battery energy storage system station</u> that was constrained on; and</p> <p>(b) for the purposes of clauses 13.202 to 13.211 dispatched quantity must be calculated taking into account—</p> <p>(i) the quantity in MW recorded in the log kept by the system operator in accordance with clause 13.76; and if required, the clearing manager must aggregate such quantities for—</p> <p>(A) generating stations or generating units in the relevant station dispatch group; or</p>

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<p>(B) generating units, if the clearing manager requires a dispatched quantity to be determined on a grid injection point basis; and</p> <p>(ii) for an offer, the ramp rate applying to that constrained on situation that is specified in the offer submitted by the generator, or—</p> <p>(A) for a block dispatch group or a station dispatch group; or</p> <p>(B) for generating units, if the clearing manager requires the dispatched quantity to be determined on a grid injection point basis—</p> <p>the fastest of the ramp rates applying to that constrained on situation that are specified in the offers submitted by the generator in that block dispatch group, that station dispatch group or those generating units electrically connected to the relevant grid injection point (as the case may be); and</p> <p>(iii) plus or minus the MW bandwidth applicable for each generator affected by a frequency keeping requirement as advised by the system operator to the clearing manager under clause 13.76 and, if required, the clearing manager must aggregate the MW bandwidth applicable to determine the MW bandwidth on a grid injection point basis; and</p> <p>(c) the clearing manager must calculate the constrained on amounts for a constrained on situation described in clause 13.202(1)(c) for each ancillary service agent for each affected price band in accordance with the following formula:</p> <p>$COC = Q_{con} * (P_o - P_f)$</p>	<p>(B) generating units, if the clearing manager requires a dispatched quantity to be determined on a grid injection point basis; and</p> <p>(ii) for an offer, the ramp rate applying to that constrained on situation that is specified in the offer submitted by the generator, or—</p> <p>(A) for a block dispatch group or a station dispatch group; or</p> <p>(B) for generating units, if the clearing manager requires the dispatched quantity to be determined on a grid injection point basis—</p> <p>the fastest of the ramp rates applying to that constrained on situation that are specified in the offers submitted by the generator in that block dispatch group, that station dispatch group or those generating units electrically connected to the relevant grid injection point (as the case may be); and</p> <p>(iii) plus or minus the MW bandwidth applicable for each generator affected by a frequency keeping requirement as advised by the system operator to the clearing manager under clause 13.76 and, if required, the clearing manager must aggregate the MW bandwidth applicable to determine the MW bandwidth on a grid injection point basis; and</p> <p>(c) the clearing manager must calculate the constrained on amounts for a constrained on situation described in clause 13.202(1)(c) for each ancillary service agent for each affected price band in accordance with the following formula:</p> <p>$COC = Q_{con} * (P_o - P_f)$</p>

Commented [S038]: In relation to the "final" draft, ramp rates will not be relevant for BESS and should be reflected in the drafting

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<p>where</p> <p>COC is the constrained on amount for an ancillary service agent</p> <p>Q_{con} is the dispatched quantity of instantaneous reserve in MW (calculated under paragraph (d)) from that price band in the reserve offer that was constrained on during a trading period</p> <p>P_o is the price offered for that price band by that ancillary service agent for the quantity Q_{con}</p> <p>P_f is the final reserve price for that trading period at the point of connection on the grid; and</p> <p>(d) for the purposes of paragraph (c), in determining the dispatched quantity, the clearing manager must take into account the quantity in MW of instantaneous reserve dispatched for the ancillary service agent recorded in the log kept by the system operator in accordance with clause 13.76; and</p> <p>(e) the constrained on amounts for a block dispatch group or station dispatch group equal the sum of the amounts calculated in accordance with paragraphs (a) and (b) for the generating plant in that block dispatch group or station dispatch group (as the case may be); and</p> <p>(f) in relation to any 2 adjacent trading periods, a generator is entitled to be paid for the 2nd trading period at the final price for the grid injection point if the generator—</p>	<p>where</p> <p>COC is the constrained on amount for an ancillary service agent</p> <p>Q_{con} is the dispatched quantity of instantaneous reserve in MW (calculated under paragraph (d)) from that price band in the reserve offer that was constrained on during a trading period</p> <p>P_o is the price offered for that price band by that ancillary service agent for the quantity Q_{con}</p> <p>P_f is the final reserve price for that trading period at the point of connection on the grid; and</p> <p>(d) for the purposes of paragraph (c), in determining the dispatched quantity, the clearing manager must take into account the quantity in MW of instantaneous reserve dispatched for the ancillary service agent recorded in the log kept by the system operator in accordance with clause 13.76; and</p> <p>(e) the constrained on amounts for a block dispatch group or station dispatch group equal the sum of the amounts calculated in accordance with paragraphs (a) and (b) for the generating plant in that block dispatch group or station dispatch group (as the case may be); and</p> <p>(f) in relation to any 2 adjacent trading periods, a generator is entitled to be paid for the 2nd trading period at the final price for the grid injection point if the generator—</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<ul style="list-style-type: none"> (i) was in a constrained on situation in the 1st trading period; and (ii) continues to generate in the 2nd trading period as a result of a dispatch instruction given for the 1st trading period; but (iii) has not made an offer in the 2nd trading period. <p>(2) To avoid doubt, nothing in this clause entitles the system operator to issue any instruction to a generator in relation to unoffered generation.</p> <p>(3) In this clause,—</p> <ul style="list-style-type: none"> (a) an offer made by a generator means the last offer made by the generator which applied during the relevant trading period; and (b) a bid made by a purchaser means the last bid made by the purchaser which applied during the relevant trading period. 	<ul style="list-style-type: none"> (i) was in a constrained on situation in the 1st trading period; and (ii) continues to generate in the 2nd trading period as a result of a dispatch instruction given for the 1st trading period; but (iii) has not made an offer in the 2nd trading period. <p>(2) To avoid doubt, nothing in this clause entitles the system operator to issue any instruction to a generator in relation to unoffered generation.</p> <p>(3) In this clause,—</p> <ul style="list-style-type: none"> (a) an offer made by a generator means the last offer made by the generator which applied during the relevant trading period; and (b) a bid made by a purchaser means the last bid made by the purchaser which applied during the relevant trading period.
<p>...</p> <p>13.212 Payment of constrained on compensation</p> <p>(1) For each trading period,—</p> <ul style="list-style-type: none"> (a) a generator or ancillary service agent is owed constrained on compensation for constrained on amounts determined under clauses 13.204 and 13.205; and (b) a dispatched purchaser <u>or battery energy storage system owner</u> is owed constrained on compensation for constrained on amounts determined under clause 13.204. <p>(1A) Constrained on compensation for each dispatch-capable load station <u>or battery energy storage system station</u> is an amount owing to the dispatched purchaser <u>or battery energy storage system owner</u> that purchased electricity for the dispatch-capable load station <u>or battery energy storage system station</u>.</p>	<p>...</p> <p>13.212 Payment of constrained on compensation</p> <p>(1) For each trading period,—</p> <ul style="list-style-type: none"> (a) a generator or ancillary service agent is owed constrained on compensation for constrained on amounts determined under clauses 13.204 and 13.205; and (b) a dispatched purchaser <u>or battery energy storage system owner</u> is owed constrained on compensation for constrained on amounts determined under clause 13.204. <p>(1A) Constrained on compensation for each dispatch-capable load station <u>or battery energy storage system station</u> is an amount owing to the dispatched purchaser <u>or battery energy storage system owner</u> that purchased electricity for the dispatch-capable load station <u>or battery energy storage system station</u>.</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>(2) The system operator must pay to a generator, or ancillary service agent any constrained on amount calculated under clause 13.205.</p> <p>(3) The clearing manager must advise each generator, ancillary service agent, and dispatched purchaser <u>or battery energy storage system station owner</u> of the amount owing to the generator, ancillary service agent, or dispatched purchaser <u>or battery energy storage system station owner</u> for constrained on compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p> <p>(4) <i>[Revoked]</i></p> <p>(5) Each purchaser that purchases electricity at a grid exit point incurs an amount owing to the clearing manager for constrained on compensation, calculated under subclause (7).</p> <p>(5A) <i>[Revoked]</i></p> <p>(6) Instantaneous reserve constrained on compensation is an instantaneous reserve cost that must be allocated in accordance with clauses 8.59 to 8.66.</p> <p>(7) The clearing manager must calculate constrained on compensation for each trading period using the following formula:</p> $COC_p = (COC_g - COC_{so}) * (P_q / TP_q)$ <p>where</p> <p>COC_p is the constrained on compensation owing by a purchaser</p> <p>COC_g is the sum of constrained on compensation owing to all generators and all dispatched purchasers for the trading period calculated in accordance with clause 13.204(1)(a) and 13.204(1)(aa)</p>	<p>(2) The system operator must pay to a generator, or ancillary service agent any constrained on amount calculated under clause 13.205.</p> <p>(3) The clearing manager must advise each generator, ancillary service agent, and dispatched purchaser <u>or battery energy storage system station owner</u> of the amount owing to the generator, ancillary service agent, or dispatched purchaser <u>or battery energy storage system station owner</u> for constrained on compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p> <p>(4) <i>[Revoked]</i></p> <p>(5) Each purchaser that purchases electricity at a grid exit point incurs an amount owing to the clearing manager for constrained on compensation, calculated under subclause (7).</p> <p>(5A) <i>[Revoked]</i></p> <p>(6) Instantaneous reserve constrained on compensation is an instantaneous reserve cost that must be allocated in accordance with clauses 8.59 to 8.66.</p> <p>(7) The clearing manager must calculate constrained on compensation for each trading period using the following formula:</p> $COC_p = (COC_g - COC_{so}) * (P_q / TP_q)$ <p>where</p> <p>COC_p is the constrained on compensation owing by a purchaser</p> <p>COC_g is the sum of constrained on compensation owing to all generators and all dispatched purchasers for the trading period calculated in accordance with clause 13.204(1)(a) and 13.204(1)(aa)</p>

Commented [S039]: "Station" should be deleted here

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p>COC_{so} is the sum of constrained on compensation for that trading period payable by the system operator to generators under subclause (2)</p>	<p>COC_{so} is the sum of constrained on compensation for that trading period payable by the system operator to generators under subclause (2)</p>
<p>P_q is the total electricity purchased by that purchaser from the clearing manager during the trading period as shown by the reconciliation information calculated by the reconciliation manager under Part 15</p>	<p>P_q is the total electricity purchased by that purchaser from the clearing manager during the trading period as shown by the reconciliation information calculated by the reconciliation manager under Part 15</p>
<p>TP_q is the total electricity purchased by all purchasers from the clearing manager during the trading period as shown by reconciliation information calculated by the reconciliation manager under Part 15.</p>	<p>TP_q is the total electricity purchased by all purchasers from the clearing manager during the trading period as shown by reconciliation information calculated by the reconciliation manager under Part 15.</p>
<p>(8) The clearing manager must advise each purchaser of the amount owing by the purchaser for constrained on compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p>	<p>(8) The clearing manager must advise each purchaser of the amount owing by the purchaser for constrained on compensation for a billing period when the clearing manager advises amounts owing under subpart 4 of Part 14.</p>
<p>...</p>	<p>...</p>
<p style="text-align: center;">Schedule 13.1 Forms 1 to 9</p>	<p style="text-align: center;">Schedule 13.1 Forms 1 to 9</p>
<p>...</p>	<p>...</p>
<p style="text-align: center;">no change</p>	<p style="text-align: center;">Form 10 – Battery energy storage system owner offer</p>
<p style="text-align: center;">no change</p>	<p style="text-align: center;">Form 11 – Battery energy storage system owner instantaneous reserve offer</p>
<p>...</p>	<p>...</p>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
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no change

Form 10: Battery energy storage system owner offer and bid

Date: _____

Battery Energy Storage System Owner Participant Identifier: _____

Battery Energy Storage System Owner Name: _____

Grid Injection Point : _____

Battery Energy Storage System Maximum Output _____ MW

Trading Period: _____ Starting at _____ : _____ 0 hours

Battery Energy Storage System Station Minimum Storage Limit: _____ MWh

Battery Energy Storage System Station Maximum Storage Limit: _____ MWh

Battery Energy Storage System Station Fixed BESS Loss Factor : _____ MWh

Battery Energy Storage System Station Variable BESS Loss Factor:
_____ MWh/MWh

Commented [S040]: The maximum output should be at station level (and to be consistent with the rest of the form).

Battery energy storage system offer to sell electricity:

- Band 1: From 0 MW to _____ MW @ \$ _____ per MWh
- Band 2: plus _____ MW @ \$ _____ per MWh
- Band 3: plus _____ MW @ \$ _____ per MWh
- Band 4: plus _____ MW @ \$ _____ per MWh
- Band 5: plus _____ MW @ \$ _____ per MWh
- Band 6: plus _____ MW @ \$ _____ per MWh
- Band 7: plus _____ MW @ \$ _____ per MWh
- Band 8: plus _____ MW @ \$ _____ per MWh

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
	Band 9: plus _____ MW @ \$ _____ per MWh Band 10: plus _____ MW @ \$ _____ per MWh
	<p>Battery energy storage system bid to purchase electricity</p> Band 1: From 0 MW to _____ MW @ \$ _____ per MWh Band 2: plus _____ MW @ \$ _____ per MWh Band 3: plus _____ MW @ \$ _____ per MWh Band 4: plus _____ MW @ \$ _____ per MWh Band 5: plus _____ MW @ \$ _____ per MWh Band 6: plus _____ MW @ \$ _____ per MWh Band 7: plus _____ MW @ \$ _____ per MWh Band 8: plus _____ MW @ \$ _____ per MWh Band 9: plus _____ MW @ \$ _____ per MWh Band 10: plus _____ MW @ \$ _____ per MWh
no change	<p>Form 11: Battery energy storage system owner instantaneous reserve offer</p> Date: _____ Ancillary Service Agent: _____ Battery Energy Storage System Station Name: _____ Grid Injection Point: _____ Trading Period: _____ Starting at _____ 0 hours

Proposed **INTERIM** Code amendment
(proposed to be in place for 17 months from approx. Sept 2026)

Proposed **FINAL** Code amendment
(proposed to replace the interim amendment after 17 months, approx. Dec 2027)

Instantaneous reserve capability

Holds a Reserve Contract with the System Operator " Yes
Fast Instantaneous Reserve Interruptible Load Available " Yes
Sustained Instantaneous Reserve Interruptible Load Available " Yes
Trading Period: _____ Starting at _____ : _____ 0 hours

Offer to provide reserve

1 Generation reserve

Band 1:

Up to a maximum of _____ MW @ \$ _____ per MW as Fast Instantaneous Reserve

Up to a maximum of _____ MW @ \$ _____ per MW as Sustained Instantaneous Reserve

Band 2:

Up to a maximum of _____ MW @ \$ _____ per MW as Fast Instantaneous Reserve

Up to a maximum of _____ MW @ \$ _____ per MW as Sustained Instantaneous Reserve

Band 3:

Up to a maximum of _____ MW @ \$ _____ per MW as Fast Instantaneous Reserve

Up to a maximum of _____ MW @ \$ _____ per MW as Sustained Instantaneous Reserve

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
<p style="text-align: center;">2 Interruptible load</p> <p>Band 1:</p> <p>Up to a maximum of ___ MW @ \$ ___ per MW as Fast Instantaneous Reserve</p> <p>Up to a maximum of ___ MW @ \$ ___ per MW as Sustained Instantaneous Reserve</p> <p>Band 2:</p> <p>Up to a maximum of ___ MW @ \$ ___ per MW as Fast Instantaneous Reserve</p> <p>Up to a maximum of ___ MW @ \$ ___ per MW as Sustained Instantaneous Reserve</p> <p>Band 3:</p> <p>Up to a maximum of ___ MW @ \$ ___ per MW as Fast Instantaneous Reserve</p> <p>Up to a maximum of ___ MW @ \$ ___ per MW as Sustained Instantaneous Reserve</p> <p>...</p>	<p style="text-align: center;">Schedule 13.3 The Modelling System</p> <p>1 Purpose of modelling system</p> <p>(1) The purpose of the modelling system is to provide schedules of quantities and prices that maximise the gross purchaser benefit from purchases of electricity from the clearing manager less the total cost of production of electricity and instantaneous reserves as specified in this Schedule.</p> <p>(2) <i>[Revoked]</i></p> <p>(2A) A price-responsive schedule and non-response schedule must use the scheduled generation at the end of the previous trading period as the expected output for the purpose of clause 9A(b).</p> <p><u>(2B) A price-responsive schedule and non-response schedule must use the predicted state of charge of each battery energy storage system</u></p>
<p style="text-align: center;">no change</p>	

Commented [S041]: As noted in our submission, we do not support a strict separation between interruptible load and generation reserve for BESS reserve offers.

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
no change	<p>station at the end of the previous trading period as the expected state of charge for the purpose of clause 9A(d).</p> <p>(3) The modelling system must provide prices for electricity and instantaneous reserve that are consistent with the above purpose and the scheduled quantities of electricity and instantaneous reserve.</p> <p>(4) The modelling system must be used, using different inputs, to produce—</p> <ul style="list-style-type: none"> (a) price-responsive schedules; and (b) non-response schedules; and (c) dispatch schedules (d) [Revoked] (e) [Revoked] (f) [Revoked] (g) [Revoked] <p>...</p> <p>9A Constraints relating to generation</p> <p>The constraints for the purpose of clause 9(b) are that—</p> <ul style="list-style-type: none"> (a) for each price band, the modelling system does not schedule electricity generation that would result in the scheduled quantity of electricity to be generated by a generator being greater than the quantity offered by the generator for the price band; and (b) the modelling system schedules electricity generation for each generating unit or generating station, including a battery energy storage system station, in a trading period within the offered maximum ramp up and ramp down rates of the generating unit or generating station, given the expected (or actual) output at the start of the trading period; and (c) the modelling system schedules electricity generation for each intermittent generating station in a trading period at a level that is

Commented [S042]: In relation to the “final” draft, BESS will not be required to offer ramp rates

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<p style="text-align: center;">no change</p>	<p>no higher than the potential output of the intermittent generating station, determined as follows:</p> <ul style="list-style-type: none"> (i) in relation to the price-responsive schedule, in accordance with clause 13.58A(1)(aa): (ii) in relation to the non-response schedule, in accordance with clause 13.58A(2)(aa): (iii) in relation to the dispatch schedule, in accordance with clause 13.71(3): (iv) in relation to the input information referred to in clause 13.141, in accordance with clause 13.141(1)(caa); <u>and</u> (v) <i>[Revoked]</i> <p><u>(d) the modelling system schedules electricity generation for each battery energy storage system station in a trading period such that:</u></p> <ul style="list-style-type: none"> <u>(i) the level of generation can be maintained for the trading period, or the level of sustained instantaneous reserves can be maintained for 15 minutes, whichever is applicable;</u> <u>(ii) the scheduled quantity of electricity to be generated by the battery energy storage system station does not exceed the difference between the state of charge at the beginning of the trading period, calculated in accordance with clause 10A, and the minimum storage limit specified in the offer submitted by the battery energy storage system owner for that trading period, adjusted for any BESS loss factors specified in the offer.</u> <p><u>9B State of charge for battery energy storage systems</u></p> <p><u>(1) For the purposes of clauses 9A and 10, the starting state of charge for a battery energy storage system station for each trading period is to be determined:</u></p> <ul style="list-style-type: none"> <u>(a) for the purposes of the dispatch schedule, using the current</u>

Proposed INTERIM Code amendment (proposed to be in place for 17 months from approx. Sept 2026)	Proposed FINAL Code amendment (proposed to replace the interim amendment after 17 months, approx. Dec 2027)
no change	<p>telemetered reading for the state of charge at that battery energy storage system station at the commencement of that dispatch schedule; or</p> <p>(b) for the purposes of the non-response schedule and price-responsive schedule, using the current telemetered reading for the state of charge at that battery energy storage system station at the start of the trading period in which the system operator commences preparing the schedule.</p> <p>(2) For the purposes of the non-response schedule and price-responsive schedule, the state of charge for a battery energy storage system station at the end of each trading period must be determined accounting for the scheduled generation or consumption during that trading period and the BESS loss factors provided in Form 10.</p> <p>...</p> <p>10 Constraint relating to demand</p> <p>The constraint relating to demand for the purpose of clause 9(c) is that, for each price band, the modelling system does not schedule electricity demand that would result in the scheduled quantity of demand being greater than:</p> <p>(a) the quantity bid by the purchaser for the price band; and</p> <p>(b) the difference between the state of charge at the beginning of the trading period, calculated in accordance with clause 10A, and the maximum storage limit specified in the offer submitted by the battery energy storage system owner for that trading period, adjusted for any BESS loss factors specified in the offer.</p> <p>12 Constraints relating to instantaneous reserve</p> <p>(1) The modelling system must simultaneously calculate the amount of fast instantaneous reserve and sustained instantaneous reserve to</p>

Commented [S043]: In relation to the "final" draft, while we recognise that there will only be one form, information about demand will be submitted in relation to the bid part of the form. On that basis, we think this clause should refer to the BESS bid, not offer

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	<p>be provided by each ancillary service agent in each island to meet the requirements of the dispatch objective in each island.</p> <p>(2) In making the calculation in subclause (1), the modelling system must identify the risk (in MW) associated with the largest “Contingent Event” as the largest of—</p> <ul style="list-style-type: none"> (a) the transfer on a single pole of the HVDC link; or (b) the generation from a single generating unit (whether or not this is a generator’s generating unit); or (c) any other risk specified in the dispatch objective. <p>(3) The modelling system must calculate the total amount of fast instantaneous reserve and sustained instantaneous reserve required to meet the requirements of the dispatch objective. The amount of fast instantaneous reserve and sustained instantaneous reserve to be provided by each ancillary service agent is this amount less any instantaneous reserve being provided by any other person who is not an ancillary service agent (as advised by the system operator).</p> <p>(4) The modelling system must not schedule instantaneous reserve at a generating unit or generating station that would result in the scheduled quantity of electricity to be generated plus the scheduled quantity of instantaneous reserve to be provided that is greater than the maximum generator effective reserve capacity of that generating unit or generating station as specified in the reserve offer for that generating unit or generating station.</p> <p><u>(4A) The modelling system must not schedule instantaneous reserve at a battery energy storage system station that would result in the scheduled quantity of electricity to be generated plus the scheduled quantity of sustained instantaneous reserve to be provided exceeding the maximum effective reserve capacity of that battery</u></p>

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no change	<p data-bbox="996 331 1720 389">energy storage system station as specified in the reserve offer for that battery energy storage system station.</p> <p data-bbox="936 395 1720 552">(5) The modelling system must use the price and quantity values set out in the table in clause 13.58AA(3) for the following model parameters: (a) fast instantaneous reserve contingent event risk violation: (b) sustained instantaneous reserve contingent event risk violation.</p> <p data-bbox="936 564 965 584">...</p> <p data-bbox="813 587 1635 651" style="text-align: center;">Schedule 13.3B Information for schedules prepared by system operator</p> <p data-bbox="728 689 1019 715">1 Purpose of this schedule</p> <p data-bbox="728 721 1720 976">(1) This Schedule sets out the information required to be contained in, and/or published by, the dispatch schedule, price-responsive schedule and non-response schedule. (2) Contents of schedules, columns 1, 2, and 3, are those values derived by the modelling system using the input information listed in clause 13.69B for the dispatch schedule and clause 13.58A for the price-responsive schedule and non-response schedule. (3) Published information, columns 4, 5, and 6, are those values that are required to be transmitted by the system operator to the WITS manager for public consumption at the time the schedules are published.</p> <table border="1" data-bbox="728 1011 1697 1270"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> <tr> <th>Information required</th> <th colspan="3">Contents of schedules</th> <th colspan="3">To be published</th> </tr> <tr> <th>Row</th> <th>Schedule</th> <th>PRS</th> <th>NRS</th> <th>Dispatch</th> <th>PRS</th> <th>NRS</th> <th>Dispatch</th> </tr> </thead> <tbody> <tr> <td></td> <td>...</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>Offers and bids quantities (in MW) for each battery energy storage system</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>48</td> <td>station limited by state of charge constraints</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> </tbody> </table> <p data-bbox="728 1283 757 1302">...</p>		1	2	3	4	5	6	Information required	Contents of schedules			To be published			Row	Schedule	PRS	NRS	Dispatch	PRS	NRS	Dispatch		...								Offers and bids quantities (in MW) for each battery energy storage system							48	station limited by state of charge constraints	X	X	X	X	X	X
	1	2	3	4	5	6																																									
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<p style="text-align: center;">Part 15 Reconciliation</p> <p>15.1 Contents of this Part This Part provides for the following:</p> <ul style="list-style-type: none"> (a) the improvement of information about electricity conveyed as more volume information becomes available over time: (b) the correction of information to remedy errors in information provided: (c) how reconciliation participants must gather, store and provide information about electricity conveyed: (d) how reconciliation participants must prepare and provide submission information: (da) how dispatchable load purchasers <u>and battery energy storage system owners</u> must collect volume information in accordance with Schedule 15.2: (e) how the reconciliation manager must calculate responsibility for electricity among reconciliation participants: (f) how the reconciliation manager must pass information to the clearing manager, for the calculation of amounts owing under Part 14: (g) obligations of the reconciliation manager to pass the information to reconciliation participants, the registry manager and the Authority: (h) requirements for the creation, approval and maintenance of profiles: (i) requirements for audits, approvals and certifications. ... <p>15.5A Dispatchable load purchaser <u>and battery energy storage system owner</u> must prepare dispatchable load information</p> <ul style="list-style-type: none"> (1) Each dispatchable load purchaser <u>and battery energy storage system owner</u> must prepare dispatchable load information using 	<p style="text-align: center;">Part 15 Reconciliation</p> <p>15.1 Contents of this Part This Part provides for the following:</p> <ul style="list-style-type: none"> (a) the improvement of information about electricity conveyed as more volume information becomes available over time: (b) the correction of information to remedy errors in information provided: (c) how reconciliation participants must gather, store and provide information about electricity conveyed: (d) how reconciliation participants must prepare and provide submission information: (da) how dispatchable load purchasers <u>and battery energy storage system owners</u> must collect volume information in accordance with Schedule 15.2: (e) how the reconciliation manager must calculate responsibility for electricity among reconciliation participants: (f) how the reconciliation manager must pass information to the clearing manager, for the calculation of amounts owing under Part 14: (g) obligations of the reconciliation manager to pass the information to reconciliation participants, the registry manager and the Authority: (h) requirements for the creation, approval and maintenance of profiles: (i) requirements for audits, approvals and certifications. <p>15.5A Dispatchable load purchaser <u>and battery energy storage system owner</u> must prepare dispatchable load information</p> <ul style="list-style-type: none"> (1) Each dispatchable load purchaser <u>and battery energy storage system owner</u> must prepare dispatchable load information using

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<p>volume information prepared in accordance with Schedule 15.2.</p> <p>(2) If clause 15.5B applies to a dispatch-capable load station's metering installation, the dispatchable load purchaser responsible for the dispatch-capable load station must comply with clause 15.5B in relation to the dispatch-capable load station.</p> <p>...</p> <p>15.5C Aggregating and rounding dispatchable load information</p> <p>(1) When preparing dispatchable load information, a each dispatchable load purchaser or battery energy storage system owner must—</p> <p>(a) aggregate volume information to the following level:</p> <p>(i) NSP code;</p> <p>(ii) battery energy storage system station identifier;</p> <p>(iii) loss category code;</p> <p>(iv) trading period; and</p> <p>(b) round the aggregated volume information—</p> <p>(i) to 2 decimal places; and</p> <p>(ii) so that if the digit to the right of the second decimal place is—</p> <p>(A) greater than or equal to 5, the second digit is rounded up; or</p> <p>(B) less than 5, the second digit is unchanged.</p> <p>(2) When aggregating volume information for a dispatch-capable load station or a battery energy storage system station to the NSP, the dispatchable load purchaser or battery energy storage system owner must use the NSP code as shown in the registry at the time the volume information is derived.</p> <p>15.5D Dispatchable load information to be delivered to reconciliation manager</p> <p>(1) Each dispatchable load purchaser or battery energy storage</p>	<p>volume information prepared in accordance with Schedule 15.2.</p> <p>(2) If clause 15.5B applies to a dispatch-capable load station's metering installation, the dispatchable load purchaser responsible for the dispatch-capable load station must comply with clause 15.5B in relation to the dispatch-capable load station.</p> <p>...</p> <p>15.5C Aggregating and rounding dispatchable load information</p> <p>(1) When preparing dispatchable load information, a each dispatchable load purchaser or battery energy storage system owner must—</p> <p>(a) aggregate volume information to the following level:</p> <p>(i) NSP code;</p> <p>(ii) battery energy storage system station identifier;</p> <p>(iii) loss category code;</p> <p>(iv) trading period; and</p> <p>(b) round the aggregated volume information—</p> <p>(i) to 2 decimal places; and</p> <p>(ii) so that if the digit to the right of the second decimal place is—</p> <p>(A) greater than or equal to 5, the second digit is rounded up; or</p> <p>(B) less than 5, the second digit is unchanged.</p> <p>(2) When aggregating volume information for a dispatch-capable load station or a battery energy storage system station to the NSP, the dispatchable load purchaser or battery energy storage system owner must use the NSP code as shown in the registry at the time the volume information is derived.</p> <p>15.5D Dispatchable load information to be delivered to reconciliation manager</p> <p>(1) Each dispatchable load purchaser or battery energy storage</p>

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<p>system owner must provide to the reconciliation manager—</p> <ul style="list-style-type: none"> (a) dispatchable load information for each GXP at which the dispatchable load purchaser or battery energy storage system owner has purchased electricity for a dispatch-capable load station or battery energy storage system station during the consumption period immediately before each reconciliation period; and (b) if the dispatchable load purchaser or battery energy storage system owner knows that dispatchable load information previously provided has changed, revised dispatchable load information for the consumption period for which the dispatchable load information was initially provided. <p>(2) Each dispatchable load purchaser or battery energy storage system owner must provide—</p> <ul style="list-style-type: none"> (a) the information described in subclause (1)(a) by 1600 hours on the 4th business day of each reconciliation period; and (b) the information described in subclause (1)(b) by 1600 hours on the 13th business day of each reconciliation period. <p>...</p> <p>15.20B Reconciliation manager loss adjusts and summarises dispatchable load information</p> <ul style="list-style-type: none"> (1) The reconciliation manager must apply loss factors to dispatchable load information received under clause 15.5D— <ul style="list-style-type: none"> (a) for each trading period; and (b) using the loss category codes advised by the dispatchable load purchaser or battery energy storage system owner when submitting dispatchable load information under clause 15.5D. (2) After applying loss factors under subclause (1), the reconciliation manager must summarise— 	<p>system owner must provide to the reconciliation manager—</p> <ul style="list-style-type: none"> (a) dispatchable load information for each GXP at which the dispatchable load purchaser or battery energy storage system owner has purchased electricity for a dispatch-capable load station or battery energy storage system station during the consumption period immediately before each reconciliation period; and (b) if the dispatchable load purchaser or battery energy storage system owner knows that dispatchable load information previously provided has changed, revised dispatchable load information for the consumption period for which the dispatchable load information was initially provided. <p>(2) Each dispatchable load purchaser or battery energy storage system owner must provide—</p> <ul style="list-style-type: none"> (a) the information described in subclause (1)(a) by 1600 hours on the 4th business day of each reconciliation period; and (b) the information described in subclause (1)(b) by 1600 hours on the 13th business day of each reconciliation period. <p>...</p> <p>15.20B Reconciliation manager loss adjusts and summarises dispatchable load information</p> <ul style="list-style-type: none"> (1) The reconciliation manager must apply loss factors to dispatchable load information received under clause 15.5D— <ul style="list-style-type: none"> (a) for each trading period; and (b) using the loss category codes advised by the dispatchable load purchaser or battery energy storage system owner when submitting dispatchable load information under clause 15.5D. (2) After applying loss factors under subclause (1), the reconciliation manager must summarise—

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<p>(a) into 1 file for each consumption period, dispatchable load information received under clause 15.5D(1)(a); and</p> <p>(b) into 1 file for each consumption period, dispatchable load information received under clause 15.5D(1)(b) and updated under clause 15.20A.</p> <p>(3) The Authority may direct the reconciliation manager to apply specified values for loss factors for each loss category for a reconciliation period for which the registry manager does not provide the reconciliation manager with the loss factors for each loss category in accordance with clause 11.26(b).</p> <p>(4) If the Authority makes a direction under subclause (3), the reconciliation manager must apply the values as loss factors to the relevant dispatchable load information for all reconciliation periods during which the direction applies.</p> <p>...</p> <p>15.20D Reconciliation manager to provide loss adjusted and summarised dispatchable load information to dispatchable load purchasers <u>and battery energy storage system owners</u></p> <p>At the same time the reconciliation manager provides the information described in clause 15.20C to the clearing manager, the reconciliation manager must provide each dispatchable load purchaser <u>and battery energy storage system owner</u> with the part of the information that relates to the dispatchable load purchaser <u>or battery energy storage system owner</u>.</p> <p>...</p> <p>15.38 Functions requiring certification</p> <p>(1) Subject to subclause (3), and to clauses 2A and 2B of Schedule 15.1, a reconciliation participant must obtain and maintain certification under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions</p>	<p>(a) into 1 file for each consumption period, dispatchable load information received under clause 15.5D(1)(a); and</p> <p>(b) into 1 file for each consumption period, dispatchable load information received under clause 15.5D(1)(b) and updated under clause 15.20A.</p> <p>(3) The Authority may direct the reconciliation manager to apply specified values for loss factors for each loss category for a reconciliation period for which the registry manager does not provide the reconciliation manager with the loss factors for each loss category in accordance with clause 11.26(b).</p> <p>(4) If the Authority makes a direction under subclause (3), the reconciliation manager must apply the values as loss factors to the relevant dispatchable load information for all reconciliation periods during which the direction applies.</p> <p>15.20D Reconciliation manager to provide loss adjusted and summarised dispatchable load information to dispatchable load purchasers <u>and battery energy storage system owners</u></p> <p>At the same time the reconciliation manager provides the information described in clause 15.20C to the clearing manager, the reconciliation manager must provide each dispatchable load purchaser <u>and battery energy storage system owner</u> with the part of the information that relates to the dispatchable load purchaser <u>or battery energy storage system owner</u>.</p> <p>...</p> <p>15.38 Functions requiring certification</p> <p>(1) Subject to subclause (3), and to clauses 2A and 2B of Schedule 15.1, a reconciliation participant must obtain and maintain certification under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions</p>

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<p>under this Code:</p> <ul style="list-style-type: none"> (a) maintaining registry information and performing ICP switching (except if the maintenance of registry information is carried out by a distributor under Part 11): (b) gathering and storing raw meter data: (c) creating and managing (including validating, estimating, storing, correcting and archiving)— <ul style="list-style-type: none"> (i) half hour volume information; or (ii) non half hour volume information; or (iii) half hour and non half hour volume information: (iv) <i>[Revoked]</i> (d) delivery of: <ul style="list-style-type: none"> (i) a report under clause 15.6 and the calculation of the number of ICP days detailed in the report: (ii) electricity supplied information under clause 15.7: (iii) information from retailer and direct purchaser half hourly metered ICPs under clause 15.8: (da) <i>[Revoked]</i> (db) <i>[Revoked]</i> (e) provision of submission information for reconciliation. (f) <i>[Revoked]</i> <p>(1A) In addition to the functions in subclause (1), a reconciliation participant that is a dispatchable load purchaser <u>or battery energy storage system owner</u> must obtain and maintain certification under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions under this Code:</p> <ul style="list-style-type: none"> (a) <i>[Revoked]</i> (b) creating and managing (including validating, estimating, storing, correcting, and archiving) dispatchable load information; and 	<p>under this Code:</p> <ul style="list-style-type: none"> (a) maintaining registry information and performing ICP switching (except if the maintenance of registry information is carried out by a distributor under Part 11): (b) gathering and storing raw meter data: (c) creating and managing (including validating, estimating, storing, correcting and archiving)— <ul style="list-style-type: none"> (i) half hour volume information; or (ii) non half hour volume information; or (iii) half hour and non half hour volume information: (iv) <i>[Revoked]</i> (d) delivery of: <ul style="list-style-type: none"> (i) a report under clause 15.6 and the calculation of the number of ICP days detailed in the report: (ii) electricity supplied information under clause 15.7: (iii) information from retailer and direct purchaser half hourly metered ICPs under clause 15.8: (da) <i>[Revoked]</i> (db) <i>[Revoked]</i> (e) provision of submission information for reconciliation. (f) <i>[Revoked]</i> <p>(1A) In addition to the functions in subclause (1), a reconciliation participant that is a dispatchable load purchaser <u>or battery energy storage system owner</u> must obtain and maintain certification under Schedule 15.1 to be permitted to perform, or to have performed by an agent or agents, any of the following functions under this Code:</p> <ul style="list-style-type: none"> (a) <i>[Revoked]</i> (b) creating and managing (including validating, estimating, storing, correcting, and archiving) dispatchable load information; and

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<p>(c) providing dispatchable load information.</p> <p>(1B) <i>[Revoked]</i></p> <p>(2) <i>[Revoked]</i></p> <p>(3) A distributor that is a reconciliation participant need not obtain or maintain certification in accordance with subclause (1) if it is a reconciliation participant only because it is responsible for an interconnection point.</p>	<p>(c) providing dispatchable load information.</p> <p>(1B) <i>[Revoked]</i></p> <p>(2) <i>[Revoked]</i></p> <p>(3) A distributor that is a reconciliation participant need not obtain or maintain certification in accordance with subclause (1) if it is a reconciliation participant only because it is responsible for an interconnection point.</p>