



Genesis Energy Limited  
Level 6  
155 Fanshawe Street  
PO Box 90477  
Victoria St West  
Auckland 1142  
New Zealand

T. 09 580 2094

4 March 2026

To: Transpower

Email: [grid.investments@transpower.co.nz](mailto:grid.investments@transpower.co.nz)

### Genesis Energy's submission on WUNI2 short-list consultation

Genesis Energy Limited (**Genesis**) welcomes the opportunity to comment on **Transpower's** Waikato and upper North Island (WUNI) stage 2 project short-list consultation. Please find below our comments in relation to relevant assumptions or comments in the consultation documents. We support Transpower undertaking this project to ensure it maintains N-1 transmission limits. Genesis has submitted in previous consultations on previous stages of the overarching WUNI project. Please find below our feedback on

- technical implications for Huntly Power Station;
- future generation and BESS development pipeline within the WUNI region.

We provide this information to inform Transpower's assumptions.

We have also appended to this submission copies of our FY26 H1 Investor Presentation and Interim Report which includes an up-to-date summary of our generation development pipeline including in the WUNI region. Note we would be happy to discuss any of these matters further with Transpower or to provide further specific information as needed.

### Technical implications for Huntly Power Station

We have the following comments on Transpower's proposed shortlisted options (4A and 4B):

Both proposed options (4A and 4B) include series compensation devices (series capacitors) implemented on the WKM–BHL line. As Transpower is aware, the addition of series compensation devices can create a risk of sub-synchronous resonance (SSR) and sub-synchronous control interaction (SSCI) establishing between connected synchronous generating plant and the compensation devices. SSR and SSCI can have damaging effects on connected generating plant.

Transpower first notified Genesis Energy in 2019 that it was considering the use of series compensation and requested parameter information for the Huntly generators so that potential interactions could be studied. Further requests were made throughout

2024, which ultimately led to the determination that Genesis Energy did not have the required data available and therefore either site testing or OEM modelling of the Generators would be required to provide this data.

Transpower agreed to engage Siemens Energy directly and pay the costs required for a modelling study on the HLY Rankine generating units (1, 2 and 4) and to share the results with Genesis Energy. To Genesis Energy's current understanding, this study is still underway, and Siemens Energy has not yet provided the information required to allow Transpower to fully assess series compensation as a safe option for the Huntly generators.

It is essential that the design of the series compensation devices is completed in a manner that avoids SSR and SSCI, which may potentially damage Genesis Energy's equipment. Genesis Energy requests a review of the final compensation design before implementation to provide assurance of safe operation.

Pending finalisation of the modelling, Genesis Energy is unable to provide a detailed or definitive position on the potential risk to the Huntly Power Station generators from the proposed introduction of series compensation devices. We will continue engaging with Transpower on this issue.

## **Genesis's future generation development pipeline in WUNI region**

### **Generation**

For Genesis's most up-to-date future generation development pipeline see slide 27 of our FY26 H1 results presentation. Genesis aims to achieve ~1,370 MW in flexible capacity at Huntly by 2032 (also see slide 29). This will be achieved through a combination of our existing thermal generation capacity and additional BESS capacity situated in the WUNI region. The first 100 MW / 200 MWh BESS is under construction with commercial operations on target for Q4 FY26. We are actively considering a second 100 MW / 200 MWh BESS with FID expected in Q4 of the current FY26. In addition to flexible capacity, Genesis is also actively considering a new 271 MWp solar farm at Rangiriri, just north of Huntly Power Station. FID is expected in H2 FY27, with commissioning planned for 2029.

Transpower refers to the potential retirement of the remaining Huntly Rankine units and notes this further increases voltage stability risk, combined with demand growth and generation capacity decommissioning in the Waikato and upper North Island regions since 2012. The long-term Huntly Firming Options agreed in 2025 support the ongoing operation of Huntly Power Station including keeping the three Rankine units operational and available to the market for ten years (effective from January 2026).<sup>1</sup>

We will reserve comment on Genesis's indicative starting allocation under WUNI Stage 2 until Transpower undertakes formal consultation following any approval by the Commerce Commission. We note Transpower has initiated an operational review of the Transmission Pricing Methodology. It would be useful to clarify the extent to which any changes resulting from the TPM review could impact WUNI2.

---

<sup>1</sup> See page 13 of our H1 FY26 Interim Report: [https://media.genesisenergy.co.nz/genesis/investor/2026/h1\\_fy26\\_interim\\_report.pdf](https://media.genesisenergy.co.nz/genesis/investor/2026/h1_fy26_interim_report.pdf)

We note comment by Transpower on non-transmission solutions (page 10 of the consultation document). Where non-transmission solutions could help defer or optimise transmission investment and assist in managing risks from potential delays in constructing transmission assets, we support Transpower utilising such solutions, particularly to the extent such non-transmission options can 'smooth' grid investment and help alleviate cost impacts on customers.

Yours sincerely,

*Mitchell Trezona-Lecomte*

Mitchell Trezona-Lecomte  
**Senior Advisor, Government Relations and Regulatory Affairs**

## **Appendix: Genesis Energy H1 FY26 Results**

Investor Presentation: [h1 fy26 results presentation.pdf](#)

Interim Report 2026: [h1 fy26 interim report.pdf](#)