



MAJOR ELECTRICITY USERS' GROUP

22 September 2006

Jenny Walton
Electricity Commission
By email to info@electricitycommission.govt.nz

Dear Jenny

Submission on proposed rules relating to Intermittent Generators

1. This is a submission by the Major Electricity Users' Group (MEUG) on the Electricity Commission (the "Commission") consultation paper, *Consideration of Rules relating to Intermittent Generators*, 25 August 2006.
2. The appendix contains MEUG answers to the 15 questions in the consultation paper.
3. In summary MEUG agree with the proposed three rule changes:
 - a) To clarify rules applying to synchronised machines also apply to asynchronous machines such as wind generators;
 - b) To remove any ambiguity regarding requirement of Intermittent Generators to obtain must-run auction rights to offer at \$0.00/MWh; and
 - c) To amend the refresh rate for indications and measurements from Intermittent Generators.
4. MEUG also support the Commission proposal to refer consideration of identifying the extent of problems and possible solutions on wind forecast errors and ability to comply with Asset Owner Performance Obligations (AOPOs) and technical requirements to the Wind Generation Investigation Project (WGIP).

Yours sincerely

Ralph Matthes
Executive Director

Appendix

	Question	MEUG comment
Q1	Do you agree with the Commission's proposed rule amendment for addressing issues relating to synchronism?	Yes.
Q2	Do you agree with the Commission's assessment of the costs and benefits for its proposal to address issues relating to synchronism? If not, what alternative assessment would you make and why?	Yes.
Q3	Is there a reasonably practicable alternative that you consider is more appropriate for addressing issues relating to synchronism than the Commission's proposal? If so, please describe the alternative and why you consider it more appropriate.	No.
Q4	Do you agree with the Commission's proposed rule amendment for addressing issues relating to must-run auction rights?	Yes.
Q5	Do you agree with the Commission's assessment of the costs and benefits for its proposal to address issues relating to must-run auction rights? If not, what alternative assessment would you make and why?	Yes.
Q6	Is there a reasonably practicable alternative that you consider is more appropriate for addressing issues relating to must-run auction rights than the Commission's proposal? If so, please describe the alternative and why you consider it more appropriate.	No.
Q7	Do you agree with the Commission's proposed rule amendment for addressing issues relating to the refresh rate for indications and measurements?	Yes.
Q8	Do you agree with the Commission's assessment of the costs and benefits for its proposal to address issues relating to the refresh rate for indications and measurements? If not, what alternative assessment would you make and why?	Yes.
Q9	Is there a reasonably practicable alternative that you consider is more appropriate for addressing relating to the refresh rate for indications and measurements than the Commission's proposal? If so, please describe the alternative and why you consider it more appropriate.	No.
Q10	Are there any further rule changes you consider are necessary as part of the interim set of changes to be progressed now pending completion of the WGIP? If so, please describe the changes required and why you consider they must be progressed at this time.	None.
Q11	Do you agree with the Commission's proposal to defer consideration of issues relating to the effect of wind forecast errors on the generation schedule at this time? If not, what is your rationale for these issues needing to be addressed now?	Yes.
Q12	Do you agree with the Commission's proposal to refer consideration of issues relating to the effect of wind forecast errors on the generation schedule to the WGIP? If not, what alternative forum would you propose for addressing these issues and why?	Yes.
Q13	Do you agree with the Commission's proposal to defer consideration of issues relating to AOPOs and technical codes at this time? If not, what is your rationale for these issues needing to be addressed now?	Yes.
Q14	Do you agree with the Commission's proposal to refer consideration of issues relating to AOPOs and technical codes to the WGIP? If not, what alternative forum would you propose for addressing these issues and why?	Yes.
Q15	Do you agree with the Commission's assessment of the proposed rule changes against the objectives set out in 172X of the Act? If not, what alternative assessment would you make?	Agree.