



MAJOR ELECTRICITY USERS' GROUP

30 July 2010

Mike Collis
Electricity Commission

By email to submissions@electricitycommission.govt.nz

Dear Mike

Submission on Normal Frequency – Generator Asset Owner Performance Obligations

1. This is a submission by the Major Electricity Users' Group (MEUG) on the Electricity Commission consultation paper titled "Normal Frequency – Generator Asset Owner Performance Obligations" (AOPO) published 17th July 2010¹.
2. MEUG comments on the proposals in the paper follow:

	EC question	MEUG comments
Q1	With respect to normal frequency management, are there features of other grid codes you think the Commission should consider?	No.
Q2	Do you agree with the proposal to clarify rule 2.1 so that generators must ensure their generating units operate under unrestricted governor control?	Agree with the proposal.
Q3	Do you agree with the proposals for speed governor requirements?	Agree with the proposal including setting droop between zero and 6 percent (was 7%).
Q4	Do you agree with the proposal that initial and all subsequent changes to the speed governor settings be agreed by the System Operator?	Agree.
Q5	Do you agree with the Commission's analysis regarding the "catch-all" rules?	Agree.
Q6	Do you have any comments on the proposed rules?	No comments.

¹ <http://www.electricitycommission.govt.nz/consultation/normal-freq-obligations>

	EC question	MEUG comments
Q7	Do you think there are other reasonably practicable options the Commission should consider?	None at this stage.
Q8	Do you have any comments on the Commission's assessment of the options?	The list of benefits and costs of the proposal compared to the alternative and the status quo are reasonable and on a non-quantitative basis the proposal is the best option.

Yours sincerely



Ralph Matthes
Executive Director