

11 May 2021

Submissions
Electricity Authority
PO Box 10041
Wellington 6143
Via email: WholesaleConsultation@ea.govt.nz

Powerco Limited

35 Junction Street
Private Bag 2065
New Plymouth 4340

📞 0800 769 372

🌐 powerco.co.nz

Feedback on Extended Reserves Code Amendment

Our focus for consultation is on the practicalities of being capable to deliver the AUFLS service.

June 2025 is feasible for Powerco

Powerco is planning to be 4-block-capable in 2025, which aligns with the Authority's preferred as written in the Code.

10 year testing frequency for self-monitoring relays

We support the inclusion of clauses 6 and 7 in the Code and recommend the Code be amended to allow a 10 year for relays with a self-monitoring capability.

The testing frequency for AUFLS trip settings is drafted as 4 years in Appendix B and applies to all AUFLS relays¹. We recommend this be increased to 10 years for relays with a self-monitoring capability to align with manufacturer recommendations. This change would:

- **Reduce outages** Outages for customers will be reduced as they are proportionate to the testing frequency. A typical planned outage for a relay test is 30-40 minutes - we're excited about the possibility of these outages having a reduced frequency.
- **Reduce testing costs** Costs will be lower because fewer tests are required over each relay's life. Technical resource is scarce, so could be directed to more meaningful activities. An estimate of the direct benefit of this change is over \$2m for our portfolio of relays with a 20 year life. There is an indirect benefit too, as we can now re-optimize the maintenance for *all* relay testing and related maintenance.
- **Align with rest of the Code** Our proposed approach is not unique – it would align with the approach taken in the rest of Appendix B for routine testing of assets. The same Code drafting approach could be applied to clauses 6 and 7.

If you have any questions on this submission, please contact me at Andrew.Kerr@powerco.co.nz.

Yours sincerely



Andrew Kerr
Head of Policy, Regulation, and Markets

¹ Schedule 8.3, Technical Code A, Appendix B (clauses 6b and 7b of page 42 of the consultation paper).