



16 May 2022

Submissions
Electricity Authority
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Wellington

By email: policyconsult@ea.govt.nz

Consultation Paper—proposed amendments to the policy statement

Contact welcomes the Authority's consultation on proposed amendments to the policy statement as has the following feedback.

114. Assessing generating plant reactive capability with respect to the AOPOs set out in clause 8.23 of the Code

1. Clause 114.1 states "The generating plant's outputs are net active power and reactive power after accounting for local supply or auxiliary load and are measured at the generating plant terminal **entering the generating plant transformer**". This statement is in contradiction in itself and to clauses 8.23(a) and (b) of the code which states "when the voltage at its grid injection point is within the applicable range of nominal voltage, are capable of exporting (over excited) when synchronised and made available for dispatch by the system operator, a minimum net reactive power which is 50% of the maximum continuous MW output power as measured at the **following generating unit terminals**". This has in the past caused confusion on the technical requirements for new generation to meet the code and more so with unconventional plant where the point of reference to be compliant differs significantly. We see that 114.1 needs to be amended to reflect the code and/or that the statement above is removed and included in GL EA 953 Connection Study Guidelines document.
2. Clause 114.2 has the new statement added, "Generating plant voltage stability when small voltage perturbations are applied to exciters". Verifying compliance with clause 8.23 of the code is assessed using a static analysis and therefore Contact's view is that this statement should not be included as it is more applicable to Schedule 8.2 Technical Code A clause 5 of the code. Once again it is our view that the above is removed and included in GL EA 953 Connection Study Guidelines document.

Should you have any questions on the above, please let me know.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Gerard Demler".

Gerard Demler

Transmission Manager, Contact Energy