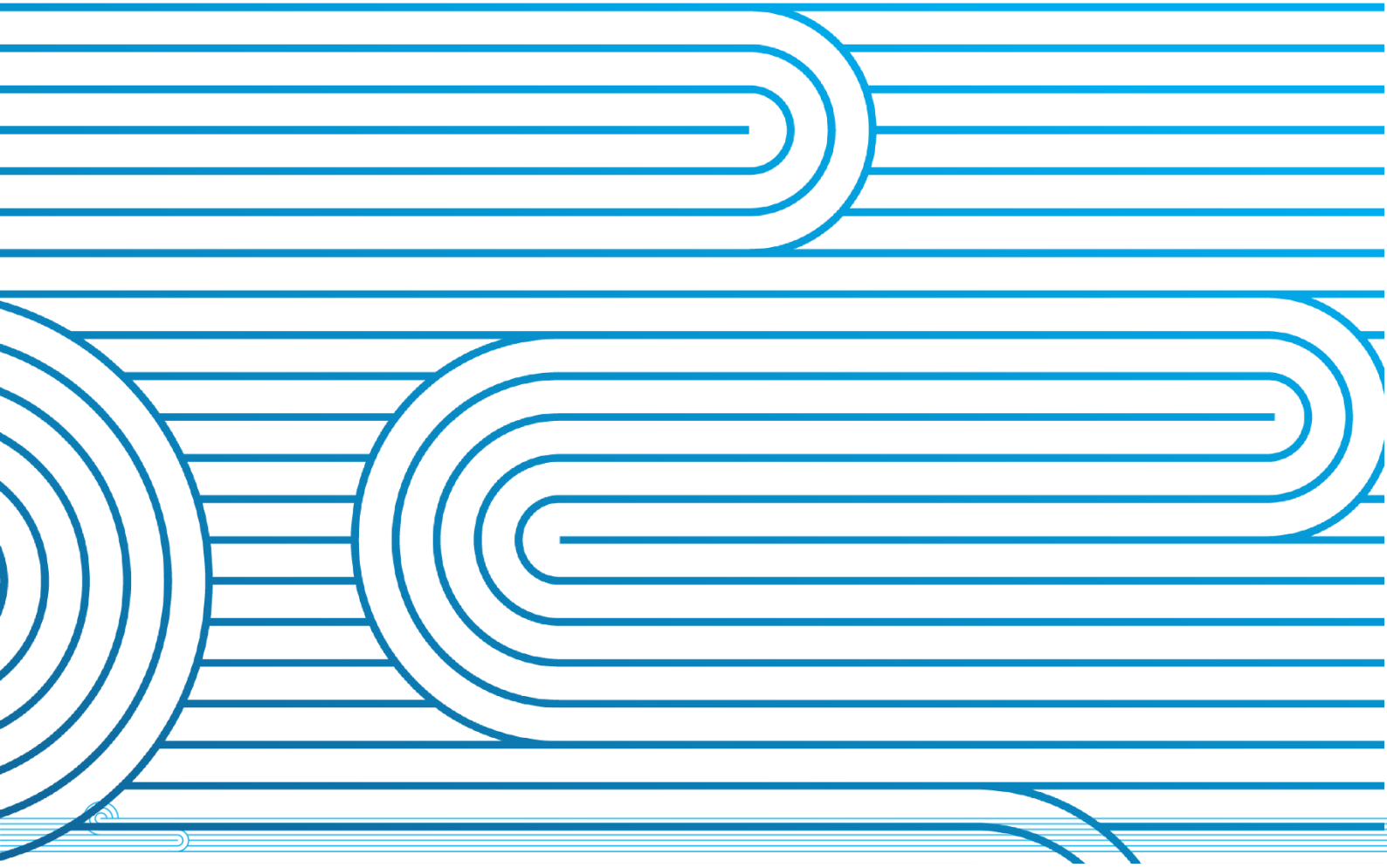


Monthly System Operator performance report

For the Electricity Authority

July 2024



Report Purpose

This report is Transpower's review of its performance as system operator in accordance with clauses 3.13 and 3.14 of the Electricity Industry Participation Code 2010 (the Code):

3.13 Self-review must be carried out by market operation service providers

- (1) Each **market operation service provider** must conduct, on a monthly basis, a self-review of its performance.
- (2) The review must concentrate on the **market operation service provider's** compliance with—
 - (a) its obligations under this Code and Part 2 and Subpart 1 of Part 4 of the **Act**; and
 - (b) the operation of this Code and Part 2 and Subpart 1 of Part 4 of the **Act**; and
 - (c) any performance standards agreed between the **market operation service provider** and the **Authority**; and
 - (d) the provisions of the **market operation service provider agreement**.

3.14 Market operation service providers must report to Authority

- (1) Each **market operation service provider** must prepare a written report for the **Authority** on the results of the review carried out under clause 3.13.
- (1A) A **market operation service provider** must provide the report prepared under subclause (1) to the **Authority**—
 - (a) within 10 **business days** after the end of each calendar month except after the month of December;
 - (b) within 20 **business days** after the end of the month of December.
- (2) The report must contain details of—
 - (a) any circumstances identified by the **market operation service provider** in which it has failed, or may have failed, to comply with its obligations under this Code and Part 2 and Subpart 1 of Part 4 of the **Act**; and
 - (b) any event or series of events that, in the **market operation service provider's** view, highlight an area where a change to this Code may need to be considered; and
 - (c) any other matters that the **Authority**, in its reasonable discretion, considers appropriate and asks the **market operation service provider**, in writing within a reasonable time before the report is provided, to report on.

System Operator performance reports are published on the [Electricity Authority](#) website in accordance with clause 7.12 of the Electricity Industry Participation Code 2010 (the Code):

7.12 Authority must publish system operator reports

- (1) The **Authority** must publish all self-review reports that are received from the **system operator** and that are required to be provided by the system operator to the **Authority** under this Code.
- (2) The **Authority** must **publish** each report within 5 **business days** after receiving the report.

Following the end of each Quarter, a system performance report is published on the [Transpower website](#).



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Commentary



Key points this month

System events this month

- *5 July 2024 – Real-time reserve deficit:* Prices spiked to ~\$4,800/MWh for the 08:10 and 08:15 5-minute dispatch periods when SPD determined it a lower overall cost solution to dispatch a reserve deficit rather than dispatch higher-priced generation. However, because we saw the situation improving (demand reducing) we did not apply discretion to constrain on additional reserves.
- *12 July 2024 - Dispatch Tools Issue:* There was a technical issue with the connection to WITS that impacted the system operator ability to receive new bids and offers and the publishing for some schedules. This lasted between 13:14 and 14:00 and we are continuing to investigate the reason for this issue
- *26 July 2024 - South Island Under-frequency event:* Generation at Clyde tripped at 07:21 resulting in the frequency in the South Island dropping to 49.14 Hz. We are carrying out an investigation is to provide the Authority with a causer recommendation for their consideration.

Security of Supply

- The July ERCs were published and presented to the SO Industry Forum on 30 July.
- The aggregate hydro storage position declined rapidly through July due to a combination of gas production constraints, very low wind, high demand (especially in May) and low inflows. Given the rate of decline at individual hydro storages, there is a risk of one or more lakes reaching the boundary of its contingent storage before the aggregate position triggers Alert Status. The SOSFIP includes a system operator discretion that could be used to increase the Alert trigger, which would bring forward Alert Status if necessary. We are planning to release a consultation to adjust Emergency Risk Curve alert level in August. We are engaging with the EA Authority and MBIE as we progress work.

Outages

- The tight market conditions and high average prices have incentivised high levels of unit commitment and hence health capacity margins. This has enabled us to accommodate two short notice outages without material capacity risk: one on the HVDC on 20 June, the other on 2 August at the Huntly substation impacting Huntly 5 generation. Both outages were successfully completed, reducing the risk of unplanned asset failure.
- On 15 July, the grid owner became aware of a fault placing Huntly unit 5 on N security and represented risk of an unplanned outage that would have disconnected Huntly unit 5, and/or wider grid owner asset damage. Given the materiality of Huntly unit 5, the system operator took the lead to ensure communications were clear, mitigations to risks understood, and timelines for key decisions points clear. The outage was successful and enabled Huntly unit 5 to run for the Monday morning peak demand.

Under-frequency event investigations

- *11 April 2024 North Island:* We have provided our causation report to the Authority
- *27 June 2024 - North Island, and 26 July 2024 - South Island:* Requests for data have been sent out to all providers in the relevant islands who were dispatched for reserves during the event.

Significant incident investigations

- *20 June 2024 - Northland Loss of Supply*: The preliminary fact-based report for the incident was published on the [Transpower website](#) on 5 July. We have commissioned a review by an external investigator which is making good progress. We have also responded to the Authority's information requests on the event.

Commissioning

- There continues to be a large volume of commissioning work including Meridian BESS at Ruakaka, Meridian's Harapaki Wind Farm (173 MW), Contact's Te Huka Unit 3 (59 MW)
- New generation in the pipeline includes Genesis' Lauriston solar farm (52 MW at Ashburton) and Lodestone's Te Herenga o Te Ra (38 MW at Waioatahe)

Risk & Assurance

- We presented the system operator-specific Risk Appetite Statement and Matrix to the Authority MOC in July.
- The first on four audits in the Business Assurance Audit Plan for 2024/25, Audit 53: Manage Security Constraints, is underway. The fieldwork is expected to be completed by the end of in mid-August.

SOSPA deliverables

- We have successfully completed the first report for 2024 SSF, the N-1 thermal and voltage study. The report covers the comprehensive studies conducted on N-1 contingencies to assess the robustness of the New Zealand power system over the next three years and is now available in Transpower's website.
- On 31 May, we submitted our proposal (including our response to feedback received from stakeholders) to the Authority for its consideration.

Commitment to evolving industry needs

- This month we have been engaging with the Electricity Networks Aotearoa (ENA) Future Networks Forum (FNF), Electrical Industry Space Weather Working Group (EISWWG) and have nominate Rebecca Osborne, Head of Market Services, for the FlexForum steering group.
- We are collaboratively working with PowerCo to gain real-time indications of their available controllable load via ICCP into our control rooms and are supporting an AraAke-led initiative to bring additional demand side flexible capacity to market. We are also working with SolarZero to get their distributed battery systems back into the reserves market.
- On 3 July, we published a consultation paper seeking industry feedback on resource co-ordination challenges we see arising now and in the future.
- On 8 July, we co-presented the Authority's webinar "Addressing frequency and voltage issues – as Part 8 Common Quality".
- Ancillary Services Cost Allocation System (ASCAS): The business case for this modernisation project was signed in mid-July and project initiation activities are underway.

1 Operating the power system

System events

5 July 2024 – Real-time reserve deficit: For the 08:10 and 08:15 5-minute dispatch periods, SPD determined it a lower overall cost solution to dispatch a reserve deficit rather than dispatch higher-priced generation to either reduce the risk setter (HLY5) or increase reserves in the market to cover the largest risk. There was ~370 MW of residual at the time with an average reference price of ~\$814/MWh. Prices spiked to ~\$4,800/MWh for energy and \$3,000/MWh for reserves in real-time. Dispatching insufficient reserves increases system security risk (pushes the system closer to reliance on an AUFLS response to manage security). Because we saw the situation improving (demand reducing) we did not apply discretion to constrain on additional reserves.

12 July 2024 - Dispatch Tools Issue: At 13:14, the system operator experienced a technical issue with the connection to WITS, impacting our ability to receive new bids and offers and the publishing of some schedules. A CAN was published to inform industry of the issue. This issue was as a result of planned work in the Southern Data Centre to replace a network switch. Service was restored by 14:10. IST continue to investigate the reason for this issue.

26 July 2024 - South Island Under-frequency event: Generation at Clyde tripped at 07:21 resulting in the frequency in the South Island dropping to 49.14 Hz. A CAN was published on 30 July 2024 confirming the under-frequency event, and that the system operator is investigating the cause of the event in accordance with the Code. The aim of the investigation is to provide the Authority with a causer recommendation for their consideration.

2 Power systems investigations and reporting

Under-frequency event investigations

11 April 2024 North Island: We have provided our causation report to the Authority and await its determination of the causer of the event.

27 June 2024 - North Island: Requests for data have been sent out to all providers in the North Island who were dispatched for reserves during the event. Once the data is received, the system operator will assess compliance during the event.

26 July 2024 - South Island: Requests for data have been sent out to all providers in the South Island who were dispatched for reserves during the event. Once the data is received, the system operator will assess compliance during the event.

Significant incident investigations

20 June 2024 - Northland Loss of Supply: The preliminary fact-based report for the incident which was published on the [Transpower website](#) on 5 July. We have commissioned a review by an independent investigator which has made good progress, with interviews of internal and external parties completed and draft findings under review. In addition, we have responded to the Authority's information requests on the event.

Commissioning

Meridian BESS at Ruakaka: We are working with Meridian on the commissioning plan for its 100 MW battery energy storage system (BESS). Expected first liveness is expected in August

Meridian's Harapaki Wind Farm (173 MW) has finished its testing and ended the commissioning period this month.

Contact's Te Huka Unit 3 (59 MW) geothermal unit is due to begin testing/commissioning in September 2024.

Other generation: We expect Genesis' Lauriston solar farm (52 MW at Ashburton) to begin commissioning activities late October/November, and Lodestone's Te Herenga o Te Ra (38 MW at Waioatahe) to begin later this year.

System Security Forecast (SSF)

We have successfully completed the first report for 2024 SSF, the N-1 thermal and voltage study. The report covers the comprehensive studies conducted on N-1 contingencies to assess the robustness of the New Zealand power system over the next three years and is now available in [Transpower's website](#). This year we are publishing the SSF in stages, and work has started for the next deliverable, which is the transient rotor angle stability studies.

3 Outage planning and coordination

New Zealand Generation Balance (NZGB) potential shortfalls and outage planning

NZGB analysis identified negative margins across 14 days in July. This was driven by a number of generation outages, most notably, multiple units at Manapouri, and one Rankine unit. However, the tight market conditions and high average prices have incentivised high levels of thermal unit commitment. This has resulted in healthy capacity margins during high peak demand periods.

These healthy capacity margins have enabled us to accommodate two short notice outages without material capacity risk: one on the HVDC on 20 June, the other on 2 August at the Huntly substation impacting Huntly 5 generation. Both outages were successfully completed, reducing the risk of unplanned asset failure.

The NZGB tool is now running with the Tesla load forecast. The tool has also been updated to include simplified supply scenarios.

Huntly substation planned outage

On 15 July, the grid owner became aware of a fault with the Current Transformer on circuit breaker 668 at the Huntly substation. This issue was placing Huntly unit 5 on N security, and the cause of the fault was unknown. This represented risk of an unplanned outage that would have disconnected Huntly unit 5, and/or wider grid owner asset damage, which could have slowed restoration should an event happen. To minimise risk the grid owner took a short notice outage at the Huntly Substation on the Friday 26 July to investigate the cause and to fix it. This outage also disconnected Huntly unit 5 generation from the system. Given the materiality of Huntly unit 5 in maintaining security of supply, and its slow stop and start lead times, the system operator took the lead to ensure both the grid owner and Genesis Energy communications during the outage were clear, mitigations to risks understood, and timelines for key decisions points clear. Ultimately the outage was successful and completed faster than planned. This allowed for minimal down time on

Huntly unit 5 and for it to be successfully back up and running for the Monday morning peak demand.

4 Commitment to evolving industry needs

Electricity Networks Aotearoa (ENA) Future Networks Forum (FNF): The FNF hosted an Innovation Forum on 2 and 3 July. We attended online and contributed to relevant discussions. We also attended FNF workstream team lead meetings in July discussing current initiatives and the transition in structure the FNF is implementing for the 24/25 FY.

FlexForum: We nominated Rebecca Osborne, Head of Market Services, for a steering group vacancy. Her appointment is expected to be confirmed at the AGM on 22 August.

Electrical Industry Space Weather Working Group (EISWWG): Last month we finalised the first industry response plan for an extreme geomagnetic storm. We also continued to engage with GNS to refine a proposal for the provision of space weather monitoring and advice service, similar to what is available for other natural hazards such as Tsunami and Earthquake. Guidance has been sought from the CE Forum on how to proceed with funding for this type of service. The Analysis on impacts to transformers based on modelling from Hitachi Energy and Otago University is continuing, this analysis will inform the power system modelling i.e. how can the system operate with 'at risk' transformers removed. We also took the opportunity to meet with our peers in the UK to discuss their observations and response to the Gannon storm in May 2024. They noted no noticeable impact, but interestingly the UK has less transformer monitoring in place than NZ to confirm these observations.

PowerCo controllable load indications: We are working collaboratively with PowerCo to gain real-time indications of their available controllable load via ICCP into our control rooms. This will include building the ability to send an alarm to PowerCo's control room should we need them to remove controllable load to maintain security. A similar alarm could be used to signal when controllable load can be restored, speeding up the restoration process. Based on the learnings from this collaborative work, we will look to identify and work with other distributors with ICCP capability to implement real-time indications.

AraAke North Island Flexible DER Pilot (NIFDP): Alongside Transpower's Innovation and Strategic Change team we, as system operator, are supporting an AraAke-led initiative to bring additional demand side flexible capacity to market. The group is considering the achievability and potential to integrate the DER as dispatch notified load (DNL) for winter 2025. Transpower's FlexPoint is being used to provide visibility to system operator control rooms of multi-provider aggregated flex made available in response to a tight situation notified by the system operator via a CAN, WRN or GEN. Transpower has also worked with the Authority towards the ability to extend visibility to participants via WITS difference bids functionality. Meanwhile AraAke continues to engage with potential providers.

SOROP review: On 31 May we submitted our proposal (including our response to feedback received from stakeholders) to the Authority for its consideration. We are progressing work to implement a new SOROP which includes modelling, working with distributors and direct connects to update their participant rolling outage plans (PROPs), and procedure updates.

SolarZero DER: Work continues with SolarZero to get their distributed battery systems back into the reserves market. Modelling of the batteries' proportional response to frequency drop will shortly be

implemented in the system operator's Reserves Management Tool (RMT) and testing is nearing completion.

Security of supply

July ERCs and Security of Supply: The July ERCs were published and presented to the SO Industry Forum on 30 July. The aggregate hydro storage position declined rapidly through July due to a combination of gas production constraints, very low wind, high demand (especially in May) and low inflows. Given the rate of decline at individual hydro storages, there is a risk of one or more lakes reaching the boundary of its contingent storage before the aggregate position triggers Alert Status. The SOSFIP includes a system operator discretion that could be used to increase the Alert trigger, which would bring forward Alert Status if necessary. We are planning to release a consultation to adjust Emergency Risk Curve alert level in August. We are engaging with the Authority and MBIE as we progress work.

Connecting with the industry

System Operator Industry Forums: Our fortnightly discussion of current operational and market issues were held on the 2, 16 and 3 July. Recent slide packs and recordings for forums within the last month are available on our website: [System operator industry forum | Transpower](#)

Evolving market resource co-ordination consultation: On 3 July, we published a [consultation paper](#) seeking industry feedback on resource co-ordination challenges we see arising now and in the future. Our paper grouped these challenges in to three categories: temporal challenges, geographic challenges, and security challenges. The paper was reviewed by the Authority prior to publication and the published version incorporated feedback we received. Twelve submissions were received and are available on our website: [Evolving market resource co-ordination \(Closed\) | Transpower](#)

Weekly Market Movements: Every Tuesday we publish a Market Operations weekly report on our website (or via email to subscribers) containing the latest information about the electricity market, including security of supply, wholesale price trends and system capacity. The report also contains an insight on a topical item for that week. The following insights were provided this quarter (the report date refers to the week ending date):

- [7 July:](#) Transpower as system operator published a paper titled Evolving market resource co-ordination in Aotearoa New Zealand, this paper addresses the key issues of coordinating resources in New Zealand's constantly evolving wholesale electricity market
- [14 July:](#) The insight looked at Thermal generation, hydro storage and spot prices.
- [21 July:](#) The insight covered wind generation in the previous week, and how it compared to wind generation over the past year.
- [28 July:](#) The insight took a look at the declining rate of national controlled hydro storage over July 2024 and compared it to previous years.

Supporting the Authority

Pricing Error Claim process: We engaged with the Authority and NZX regarding the pricing error claim (PEC) process. The improvements we suggested be made to the PEC form have been made and the associated discussions have clarified the process for the Authority and NZX. This will improve efficiency when PEC are lodged in the future.

Part 8 Common Quality consultation presentation: On 8 July, we co-presented the Authority's webinar "Addressing frequency and voltage issues – as Part 8 Common Quality". The webinar is part of the Authority's consultation on the common quality requirements in the Code, which is part of the Authority's FSR work programme.

Draft guidance for distributor involvement in flexibility the services market feedback: Our feedback to the Authority’s draft guidance highlighted the interactions between the draft guidance and the permanent Code change “controllable load 2024” and, as system operator, we asked the Authority to “carefully consider potential implications for near-term security of supply”. Our submission is available on our website: [TP Sub EDB involvement Flex draft guidance 10Jul2024.pdf](https://transpower.co.nz/TP_Sub_EDB_involvement_Flex_draft_guidance_10Jul2024.pdf) (transpower.co.nz)

Code change proposal – PROPS self-review: We have been speaking with the Authority about our prior Code change proposal for inclusion in an Omnibus to lengthen the mandatory self-review of each participants rolling outage plan from 2 years to 3 years.

Media interactions

There were three media enquiries related to the system operator, as shown below. None of these resulted in media stories being published.

Date	Outlet/type of engagement	Details	Coverage
15 July	NZ Herald	A series of questions regarding the Maungaturoto outage on 15 July.	No story published
22 July	Stuff	Asked about tight NZGB balances through July and August. NZGB system explained and that we would advise if any risk to electricity supply is seen in the market schedules.	No story published
22 July	NBR	Asked for an explanation of hydrology charts on our website . Chart explained, including that numbers are provided by NZX.	No story published

5 Project updates

Progress against high value, in-flight market design, service enhancement and service maintenance projects are included below along with details of any variances from the current capex plan.

5.1 Market design and service enhancement project updates

There are no market design or service enhancement projects in-flight.

5.2 Other projects and initiatives

Future Security and Resilience (FSR) Programme

The Authority published the frequency and voltage management options papers at the end of June with its Part 8 consultation paper. During July, our FSR team helped the Authority to respond to stakeholder queries regarding the papers. The team is also working on consultation papers for code amendment proposals related to Issues 6 and 7 which include information sharing and updating code terminologies in preparation for the Authority Board meeting in September.

Extended Reserves – Automatic Under-Frequency Load Shedding (AUFLS) project

During the July transition period, we received change requests from four North Island AUFLS providers for the August period and future months. The studies undertaken during July for the August period showed no security issues and the change requests for August 2024 were approved. During July, one non-adherence came to our attention and was reported to the Authority for further consideration.

Ancillary Services Cost Allocation System (ASCAS)

The business case for this modernisation project was signed in mid-July and project initiation activities are underway. Remaining roles required to complete the initial team have been recruited with two new starts joining week beginning 7 July. The delivery team kick-off meeting is scheduled for 14 August and will focus the team attention on the first milestone, platform establishment, which is due to be completed at the end of September.

6 Technical advisory hours and services

The following table provides the technical advisory hours for the month and a summary of technical advisory services to which those hours related (SOSPA 12.3 (d) refers).

TAS Statement of Work (SOW)	Status	Hours worked during July
TAS 108 – Extended Implementation (Phase III)	In progress	90
TAS 109 – Instantaneous Reserves Cost Allocation	Closed	45
TAS 112 - FSR Workstream - Part 8 of the Code - Common Quality Requirements	In progress	99

Progress:

TAS108 North Island AUFLS transition: We have continued to manage the AUFLS transition process for North Island distributors moving them from the 2-block to 4-block AUFLS scheme by end June 2025.

TAS112 FSR Workstream: The scope of work for the system operator to support the Authority’s FSR programme – Part 8 of the Code – Common Quality Requirements during the new financial year was agreed.

7 Risk & Assurance

Risk Management

We presented the system operator-specific Risk Appetite Statement and Matrix to the Authority MOC in July. Feedback at the meeting focused on the context and use of the matrix, which we will clarify. Other feedback received from the Authority will be discussed in person with staff in early August.

Business assurance audits

The Business Assurance Audit Plan for 2024/25 is underway, containing four audits. The scope for first one, Audit 53: Manage Security Constraints, has been drafted with input from staff and auditors, and will be confirmed in early August. The fieldwork is expected to be completed by the end of August.

8 Compliance

We reported no system operator self-breaches in this reporting period.

There are currently three events raised by the system operator awaiting Authority response:

Event number	Event date	Event title	Description	Date sent to EA
4275	11/04/22	VSAT node breaker modelling for TWI - Southland voltage stability constraint impact	TWI potlines are subject to a 5% safety margin increase in growth when a node breaker data is turned on – this is not necessary at TWI and 5% growth on the TWI potline load is quite a lot	24/01/24
4380	04/05/23	RTD Topology error after planned market system outage	16:55 RTD dispatched RPO generation to 25 MW, when both RPO TNG and RPO WRK were modelled out.	05/12/23
4446	11/04/24	UFE 11 April 2024	HLY U2 tripped at 00.25AM causing an under-frequency event.	17/06/24

9 Impartiality of Transpower roles

We have two open items in the Conflict of Interest Register (below). These are being actively managed in accordance with our Conflict of Interest procedure.

System Operator Open Conflict of Interest Issues		
40	General system operator/grid owner dual roles: This is a general item that will remain permanently open to cover all employees with a dual system operator/grid owner role. The item documents the actions necessary to ensure impartiality in these circumstances; these items will be monitored to ensure their continued effectiveness.	Corporate Counsel, Compliance and Impartiality
41	General relationship situation: This is a general item that will remain permanently open to cover all potential conflicts of interest arising under a relationship situation. This item documents the actions necessary to prevent an actual conflict arising and will be monitored by the SO Compliance & Impartiality Manager to ensure their continued effectiveness.	Corporate Counsel, Compliance and Impartiality

10 Performance metric and monitoring

Our system operator performance against the performance metrics for the financial year as required by SOSPA 12.3 (a) are reported following the end of each quarter.

11 Cost of services reporting

The cost of services reporting for 2023/24 will be delivered to the Authority by the end of the financial year.

12 Actions taken

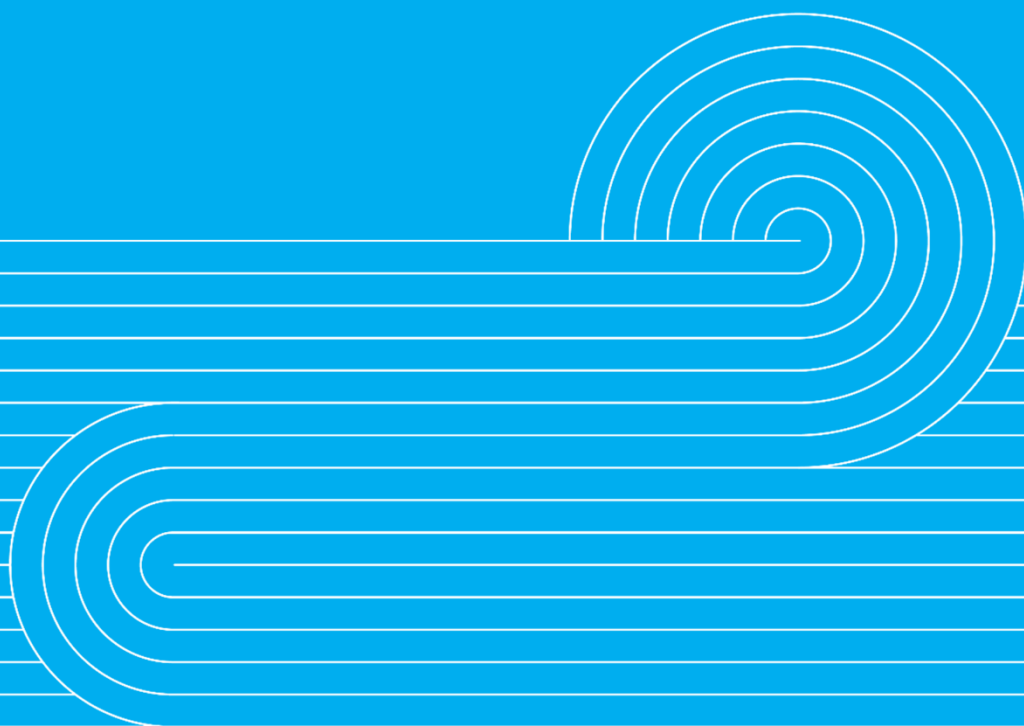
The following table contains a full list of actions taken this month regarding the System Operator business plan, statutory objective work plan, participant survey responses and any remedial plan, as required by SOSPA 12.3 (b).

We note that re-prioritisation of our resources to support the system operator and Authority Northland loss of supply investigations, the emerging 2024 security of supply situation and the SOSPA3 process has constrained our capacity to progress our work on these activities to planned timelines.

Item of interest	Actions taken
<p>(i) To give effect to the System Operator business plan strategic initiatives:</p>	<p>Support future-focused market developments through white papers, consultation processes and cross-industry forums</p> <ul style="list-style-type: none"> - Published and received feedback on the evolving market resource co-ordination consultation paper - Contributed to FNF Innovation Forum and attended Workstream team lead meetings - FlexForum: submitted a successful nomination for a Steering Group vacancy. - Progressed work with the EISWWG - Provided feedback on Authority's draft EDB flex guidance - Co-presented Part 8 Common Quality consultation webinar <p>Develop a view of the information, market and standards required to operate the future electricity system to support the FSR work program</p> <ul style="list-style-type: none"> • Provided feedback on the EA's work on information provision (issue 6 of the common quality issues.) <p>Enhance quality assurance through delivery of the Modelling Quality Assurance Framework</p> <ul style="list-style-type: none"> - Discovery phase work is progressing to plan <p>Implement stage 1 of new enterprise business process management (BPM) capability for system operations</p> <ul style="list-style-type: none"> - Tooling has been chosen and deployed, the structure and scoping work is progressing <p>Leverage data and analytics developments to improve our data modelling and reporting</p> <ul style="list-style-type: none"> - Supported Data & Analytics foundational investment to transfer market system data to new data warehouse <p>Deliver improvements to our generator commissioning management and assessment process</p> <ul style="list-style-type: none"> - Developed an internal workflow tool which is being rolled out internally - Progressing work on an Asset Owner Forum to discuss generation commission process with stakeholders - Recruiting a commissioning programme manager

Item of interest	Actions taken
(ii) To comply with the statutory objective work plan :	<p>Policy statement review (review due 1 November 2024)</p> <ul style="list-style-type: none"> - Progressing towards consultation planned for September. <p>AS procurement plan review (review due 8 June 2025)</p> <ul style="list-style-type: none"> - Internal review process has commenced. <p>Identify low residual / informational CANs (due 28 March 2025)</p> <ul style="list-style-type: none"> - Planned for Q1 System Performance Report <p>Low residual notices, threshold and process review (due April 2025)</p> <ul style="list-style-type: none"> - Planned to commence following winter 2024
(iii) In response to participant responses to any participant survey :	<p>Feedback from the 2023-24 survey</p> <ul style="list-style-type: none"> - No progress to report.
(iv) To comply with any remedial plan agreed by the parties under SOSPA 14.1	<p>N/A – No remedial plan in place.</p>

Appendix



Appendix A: Discretion

There have been no instances of discretion applied for the month of July.