



31 October 2022

Consultation paper — Amendments to correct issues in the new TPM

Electra Limited (Electra) welcomes the opportunity to submit to the Electricity Authority's (the Authority) *Amendments to correct issues in the new TPM, Consultation paper*, 18 October 2022 (the Consultation Paper). Nothing in this submission is confidential.

We support the Authority's proposal to correct two technical issues with Appendix A of the TPM:

- a. correctly identify a generator, that was treated as grid-connected for the purpose of calculating the allocations in Schedule 1 of the TPM guidelines (which in turn are reflected in Appendix A of the TPM), as embedded
- b. a minor edit to Appendix A to correct an administrative error made when transposing summary values into Appendix A.

As outlined by the Authority in its Consultation Paper at Issue 9: Correction of Appendix A BBI allocations, in August 2022, we notified the Authority of a potential error in the treatment of the Mangahao power station (Mangahao) in the new TPM.

In 2010 Mangahao became an embedded generator in the Electra electricity distribution network. Before 2010 Mangahao had been grid-connected. When analysing the impact of the new TPM on consumers, it was discovered that Mangahao had been treated interchangeably as a grid-connected and embedded generator in the workings of the new TPM.

The Authority has completed its assessment and concurs that Mangahao should have been treated only as embedded. The Authority proposes to correct the error by amending Appendix A of the TPM. The Authority's proposal has our full support.

This correction is estimated to reduce Electra's BBI allocation markedly. We therefore welcome this decision and the resulting reduction in transmission charges to our consumers.

Yours sincerely

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