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Submissions  
Electricity Authority  
PO Box 10041  
Wellington 6143  
Via email: [battery@ea.govt.nz](mailto:battery@ea.govt.nz)

**Submission on Consultation paper – Battery Energy Storage Systems offering instantaneous reserve**

Powerco supports technology-neutral policy and market settings. Amending the Code to allow BESSs to deliver services in the wholesale market is a sensible thing to do. Clarity of the Code and procurement plan will be an essential input to commercial and technical assessments of BESS owners considering participation in the reserves market. We support the April '2022 timeframe and proposed Code amendment for this reason.

If you have any questions on this submission, please contact me at [Andrew.Kerr@powerco.co.nz](mailto:Andrew.Kerr@powerco.co.nz).

Yours sincerely



**Andrew Kerr**  
Head of Policy, Regulation, and Markets