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5 August 2009

Darryl Renner  
Director of System Operations and Common Quality  
Electricity Commission  
P O Box 10041  
WELLINGTON

Dear Darryl

**Draft Procurement Plan 2009/10 – System Operator submission**

This letter and the attached table constitute the System Operator's submission on the draft 2009/10 Procurement Plan and the submissions received by the Electricity Commission under the Electricity Governance Regulations and Rules Part C, Section IV, Rule 5.3.2.

We reviewed the seven submissions sent to us by the Commission (from Meridian Energy, Vector, Energy Intellect, Energy Response, TrustPower, Northpower and Contact).

In preparing our submission, the System Operator considered the comments made by these participants and made several changes to the draft plan as a result. To assist the Commission with the consideration of these proposed changes, we have collated the submission into a table and commented on each submission.

One key issue that we identified from the submissions as requiring further consideration outside of the procurement plan relates to paragraph 129A (no offering of AUFLS). On balance, the System Operator considers that this clause should be retained in its proposed form for the reasons outlined in the table. However, the System Operator believes that the wider issue of load aggregator's access to interruptible load on AUFLS circuits needs to be addressed by the Commission in light of recent technological innovations in this area.

Please let me know if you require any further information or explanation of the enclosed documentation.

Yours sincerely



John Campbell  
System Operations – Risk and Performance Manager (Acting)