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To: Energy Efficiency and Conservation Authority (EECA)
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Genesis supports measures to enable demand side flexibility

Genesis Energy Limited **(Genesis)** welcomes the opportunity to comment on the Energy Efficiency and Conservation Authority's **(EECA)** *Unlocking the potential of demand flexibility − a residential product perspective paper*. We support EECA undertaking this work and agree that demand side flexibility has potential to unlock significant electricity system and consumer benefits. See below our responses to EECA's consultation questions.

For New Zealand to achieve its climate goals, we need electricity to provide 60 per cent of our energy, be 95 per cent renewable, and be 100 per cent reliable. Achieving this will require a more renewable, flexible electricity system, harnessing a range of energy resources and technologies. As part of our Gen35 strategy, Genesis aims to achieve 150 MW of demand-side flexibility in our customer book by the 2028 financial year. We would be more than happy to continue engaging with EECA and to discuss any of our comments in this submission.

Yours sincerely,

Mitchell Trezona-Lecomte

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Genesis Energy's response to consultation questions

Consultation Question	Genesis Response
Q1. The main use cases for demand flexibility presented in this paper are: managing peak demand (generation and line capacity) constraints, optimising renewable energy use, and optimising home energy use. Do you think these are the main use cases? What other use cases are there?	Yes, we generally agree, although it may be useful to breakdown the use cases based on different actors within the electricity system, as each will have different incentives and therefore different drivers for adopting demand flexibility. For example, the incentives for retailers are different to those of network owners, and different again from residential or commercial and industrial consumers. We would also note that "optimising home energy use" could be framed more broadly in terms of consumer empowerment (i.e. enabling "prosumers").
Q2. In the residential sector, the following products have been identified as key end-use products for demand flexibility: EV chargers, heat pumps, electric hot water systems which use a storage tank, fridges/freezer, clothes washers, dishwashers, clothes dryers, inverters for solar and battery systems, and HEMS. Do you think these are the key demand flexible end-use products in the residential sector? If not, what are the key products and why?	Yes.
Q3. Do you think a standardised end-use product/application-based approach is relevant for the commercial sector, or is a bespoke/customised approach needed?	No. The commercial sector is inherently bespoke, meaning standardisation is unlikely to be effective or efficient.
Q4. What do you think the key end-use products/applications are in the commercial sector?	Refrigeration, Heating, Energy Management Systems
Q5. Do you think a standardised end-use product/application-based approach is relevant for the industrial sector, or is a bespoke/customised approach needed?	No. As per the commercial sector.
Q6. What do you think the key end-use products/applications are in the industrial sector?	Process Heat, Energy Management Systems
Q7. What are the barriers to the uptake of demand flexible technology?	From an electricity retailer perspective, it is difficult to work flexibility into a business case without clear and obvious monetary benefits, and in many cases these monetary benefits are dependent on network owners (electricity distribution businesses), particularly in terms of realising benefits from avoided connection costs or deferred network investment and

	how this will impacts materialization of value for an end user.
Q9. Do you think to support the development and uptake of demand flexibility there is a need to create a minimum level of standardisation at an end-use product level (covering communication protocol, product response, and operational information)?	Yes, with regards to communications protocols we agree. However, it is important to keep in mind that New Zealand is a "technology taker". We therefore need to align ourselves with the prominent protocol(s) that are used widely across the world or at least in Australia. For that reason, we would not support regulatory (mandatory) standardization of product response and operational information at this stage, as we see a risk regulatory mis-alignment prevents New Zealand from accessing the best, state-of-the-art technologies. This risk is exacerbated by the fact demand side flexibility-enabling technologies are still nascent and therefore potential for innovation and technology change remains high. At this stage, New Zealand will be better positioned to innovate and benefit from demand-side flexibility if we have access to the widest range of technologies possible, and there is a risk premature regulation would undermine this.
Q10. Would you support EECA creating a voluntary approved list of residential demand flexible end-use products, similar to EV Smart Charger Approved List?	Yes, in principle but with the scope limited to communications protocol. As noted above, there is a risk that being too prescriptive too early will deter emerging tech players from coming to New Zealand when we don't yet have a good handle on what is required from this tech today and into the near future.
Q11. Would you participate in working groups on the key end-use products to develop voluntary demand flexibility requirements (covering communication protocol, product response, and operational information)? If so, what product-based working groups would you like to be part of?	Yes. EV, Solar & Battery, Hot water, Heat Pumps, commercial and industrial.