13 July 2026

System Operator
Transpower
By email: system.operator@transpower.co.nz

Haast
Energy Trading

Submission on the refreshed System Operator Strategy

Dear System Operator team,

Haast Energy Trading broadly supports the refreshed System Operator Strategy. The five priorities are sensible, but the priorities most important to Haast are Priority 2, efficient market operations and information provision, and Priority 4, technology and data.

The final strategy should treat participant-facing operational data, transparent operational decisions and information neutrality as core market infrastructure. It should also convert these objectives into measurable commitments that can guide and test the System Operator's 2028-2031 funding proposal.

Market-facing data is core infrastructure

As system operation becomes more complex, participants need timely, machine-readable and well-documented information to understand dispatch, manage risk and support competitive energy, reserve, hedge and FTR markets. Operational data is therefore not only an internal System Operator capability. It is part of the infrastructure through which the market operates.

Haast supports the proposed standard operational dataset. It should be designed around external participant use cases as well as System Operator and distributor needs. At minimum, the strategy should provide a pathway for:

- timely publication of active constraints and material security actions, including their cause, relevant assumptions and effects on dispatch or prices;
- participant-usable production SPD formulations, material change notices, inputs and outputs;
- machine-readable material security forecasts, outage-related assessments, credible-event changes and information used to alter operational limits; and
- transparent methodologies, procurement or activation information and performance reporting for ancillary services and new operational tools that affect dispatch or pricing.

These products should use stable identifiers and documented machine-readable formats or APIs, retain adequate history and have stated publication timeframes.

Information neutrality must be an explicit outcome

The System Operator necessarily receives market-sensitive operational information and engages closely with generators and other asset owners through outage planning, security management and operational coordination. Those interactions must not give any participant earlier or better access to information that could affect prices or trading decisions.

The final strategy should commit to publication-first processes wherever practicable, equivalent timing and quality of access, documented controls and audit trails where selective disclosure is operationally necessary, and a clear channel for independent and non-asset-owning participants to raise concerns. Participants should not have to infer price-relevant operational decisions from market outcomes or depend on bilateral relationships to understand them. Where selective disclosure is operationally necessary, the market-relevant content should be released to all participants as soon as practicable, with the reason and timing recorded.

Preserve efficient and reproducible market outcomes

Security interventions and new operational tools should preserve efficient price signals wherever practicable. Where constraints, security actions, ancillary-service requirements or flexibility arrangements materially affect dispatch or prices, participants should be able to understand what happened, why it happened and how it may recur. This requires timely publication of the relevant constraint or methodology, its principal inputs and assumptions, the period for which it applied, and a clear explanation of its effect on dispatch or prices. If advance disclosure would compromise secure operation, the System Operator should publish the material information as soon as practicable afterwards.

Make delivery and funding measurable

The strategy's outcomes should be capable of supporting and testing the 2028-2031 funding proposal. Haast recommends a public performance framework covering:

- timeliness, availability and completeness of market-facing datasets;
- compliance with stated publication timeframes;
- notice and documentation of material SPD or operational-methodology changes;
- material data outages, corrections and incidents involving unequal or delayed information access;
- resolution of participant-raised data and transparency issues; and
- annual progress against funded strategy initiatives.

Each material funding initiative should identify its participant-facing outcome, delivery date, accountable function, performance indicator and public reporting method. This would give the strategy practical value without requiring arbitrary numerical targets to be fixed now.

Requested changes

1. Give greater weight to participant-facing operational data and information neutrality under Priority 2 and Priority 4.
2. Commit to the focused operational-data package described above, with machine-readable access, documentation, history and publication timeframes.
3. Include publication-first and equivalent-access controls for market-sensitive operational information.
4. Adopt a public performance framework and link funded initiatives to measurable participant-facing outcomes.

Haast supports investment in the capability needed to operate a more complex electricity system. That investment should also improve market transparency, participant access to operational information and confidence in dispatch and pricing outcomes.

Yours sincerely,

Phillip Anderson
Haast Energy Trading