6 November 2026

System Operator
Transpower New Zealand

By email: system.operator@transpower.co.nz

Submission on TSO-DSO coordination: Operational requirements

Discussion document, 14 October 2026

Dear System Operator team,

Thank you for the chance to comment. Cortexo supports the five requirements and the no-regret, use-case-led approach. We would remove nothing. Our comments are about controllable demand and flexibility, where we have practical experience, and we have not commented on other areas.

Cortexo is a Christchurch software company. We are not a network, retailer or aggregator, and we do not own or control customer resources. We were technical lead for the EEA and EECA FlexTalk project, which tested OpenADR between distributors, flexibility providers and homes. We also operate the Flexviz platform, which passes available flexibility by GXP to the System Operator's FlexPoint. We are also building a baselining tool, based on the University of Otago's global review of baseline methods, which Transpower and Ara Ake supported. The paper asks for evidence from current operating experience, so we draw on this work, and we say where it gives us an interest.

Our main points

1. **Split "confirmation of action" into three facts** (requirement 3): declared, acknowledged and delivered. Delivered response is the gap.
2. **Extend the primacy process** (requirement 1) to resources contracted in local flexibility markets, and name platform operators as a role.
3. **Let the "small, governed set" of platforms** (requirement 4) include flexibility platforms, so a resource is registered once and used by many parties.
4. **Reuse what is already in use in New Zealand.** Create nothing new where an existing standard or arrangement fits.
5. **Trial controllable load during an event first**, from available quantity through to delivered response.

Question 1: What should be changed, added or removed from the five operational requirements?

Nothing should be removed. We suggest the following additions, most of them clarifications.

Requirement 1: Clear operational accountabilities

The paper already asks for a process to establish primacy where transmission and distribution actions could conflict. We support this. We suggest it also covers a resource that a distributor has

contracted through a local flexibility market and the System Operator needs in an emergency. This is no longer theoretical, as Localflex began live competitions in August 2026. The parties should agree before an event who has primacy, what notice is given and how the provider is treated commercially. Reservations should not be so rigid that a resource cannot respond to a real system need. Great Britain's flexibility market rules include a primacy rule and are a useful reference.

We also suggest naming platform operators as a role, alongside distributors, retailers and aggregators. These are parties that register, signal or report on resources for others, including local flexibility markets. Their duties in normal and emergency conditions should be clear.

Requirement 2: Minimum static information

For controllable demand, the party that controls the resource should be the authoritative source. The main gap is common identifiers. There is no common way to link an ICP, a device, a provider's portfolio and a GXP, and to our knowledge the Registry does not hold information on batteries, EV chargers or controllable appliances. The call for common identifiers in requirement 4 is the right fix, and controllable demand is a good place to start.

Requirement 3: Minimum dynamic information

The item "available and activated controllable demand or flexibility, including confirmation of action" covers three different facts. Each answers a different operational question.

Fact	Question it answers	Source	Timing
Declared	How much could respond?	Provider	Before the event, day-ahead and intraday
Acknowledged	Did the signal arrive, and will they respond?	Provider, through the signalling standard	Within minutes of the signal
Delivered	How much did respond?	Metered data against an agreed baseline, independent of the provider	Within an agreed window after the event, for example the next business day

The first two exist in early form today. The third is the gap. It matters most for emergency demand management, AUFLS and restoration planning, because reserves and load-shedding plans otherwise rest on declared numbers that have not been checked against what was delivered. We suggest adding delivered response to the requirement.

Independent data should come from revenue meters where practical. EIEP13A, which retailers must support, gives a route to meter data with the consumer's authority. Where meter data is not practical, another measurement point may be proportionate, provided the quality flag says so. We also suggest recording which market or programme a resource is committed to for the period, so conflicts are visible before an event.

Requirement 4: Interoperable information exchange

We support a small, governed set of exchange platforms. We suggest the set can include flexibility platforms, so many small providers do not each need their own link to the System Operator. The provider stays accountable for the data and the platform is the channel. The set should stay open to more than one platform, provided each uses the same information objects.

We suggest two additions to the list of what each exchange defines: the baseline or estimation method behind any delivered-response data, and the single registration of a resource with one set of identifiers. A datahub manager, if established, may be a natural home for identifier and routing services. ICCP is beyond most flexibility providers. An authenticated API route through a governed platform keeps them in the system without weakening security.

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Requirement 5: Predictable technical performance

For "controllability, ramping and response confirmation", we suggest evidence from real or test events, and not only declared capability. A periodic test signal, checked against metered data, is a low-cost way to build that evidence over time.

Question 2: For each information item listed, is the proposed source best placed to create and maintain an authoritative value?

For the controllable demand items, yes, if the source is read as the party that controls the resource: the aggregator, retailer or distributor. We would expect the Grid Owner, where listed, to hold a copy. For delivered response, the provider should not be the only source, as set out under requirement 3.

Question 3: Is the proposed level of aggregation and timing proportionate to the operational use?

Yes for aggregation. GXP and operator is the right default for controllable demand. It is enough for forecasting and emergency demand management, and it avoids the cost and privacy risk of asset-level data.

The paper's day-ahead, intraday and event-triggered timing fits most uses. Five-minute availability reporting has worked for providers connected today. We agree that not every item needs real-time data, so we would keep it for larger resources and for periods when an event is likely. We suggest adding a fixed window after each event for delivered response.

Question 4: Which requirements can already be met through existing information, systems or processes?

Parts of requirements 1, 3 and 4 can be met in early form today.

- Available flexibility by GXP is reported every five minutes by connected providers through Flexviz to FlexPoint, at about 39 MW today and growing.
- A 2026 test passed a simulated emergency signal from a Transpower connection point through Flexviz to an Evnex EV charger fleet, which responded together droping 3 MW.
- OpenADR already carries event acknowledgement and opt-in or opt-out.
- Our Energy's Localflex market will shortly be coordinating with Flexviz, so flexibility contracted locally can be dispatched dynamically.
- FlexPoint measures performance after Transpower's own flexibility events.
- Distributors and traders are developing load management protocols for system emergency events, led by the ENA Future Networks Forum. These cover part of requirement 1 for hot water and other controllable load.

Question 5: Where are the material information, quality, access or capability gaps?

- **Coverage.** Only providers that have chosen to connect are visible. EECA's January 2026 study found up to 1,800 MW of demand could be shifted away from peak. That is potential for peak shifting, not emergency capacity, so it is not like for like, but it shows how little is visible today. Where information is incomplete, the limitation should be visible, as the paper says, so that visible flexibility is not treated as all flexibility.
- **Common identifiers** linking ICP, device, portfolio and GXP.
- **A common baseline.** FlexPoint measures its own events, Localflex distributors will need to measure theirs, and retailers measure their own programmes. If each uses a different baseline, the same resource shows different delivered values in different places. We suggest the working group agree a small set of standard methods. The University of Otago's global review

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of baselining methods is a New Zealand starting point, and Great Britain's Flexibility Market Rules include standard baselining methodologies.

- **A secure route for small providers** and **an agreed primacy rule**, as described under requirements 4 and 1.

Question 6: Which initial information exchange(s) should be prioritised for early definition or trial?

Controllable load during an event, end to end: from available quantity, through the signal and its acknowledgement, to delivered response. Then GXP forecast, which uses the same controllable demand data.

Question 7: Are there relevant initiatives or standards we should align with to avoid duplication?

Standards and arrangements in use here: OpenADR (IEC 62746-10-1), used in FlexTalk, FlexPoint and Flexviz; IEEE 2030.5 (CSIP-AUS) for device-level limits where distributors use them; EIEP13A, 13B and 13C for consumption data; Localflex market product definitions; and the ENA load management protocol work.

Policy work: the Electricity Authority's DSO roadmap of 30 June 2026, including its planned assessment from mid-2027 of whether to mandate standards and protocols; the Authority's standardised demand flexibility product co-design group; EECA's work on demand flexibility in end-use products; and FlexForum's work on communication, measurement and validation.

International references: Elexon's standard baselining rule and Ofgem's March 2025 decision on registering flexibility assets once. In May 2026 the UK's ENA, with Elexon, NESO and the OpenADR Alliance, agreed a common flexibility dispatch standard aligned with OpenADR 3.1, which Elexon is taking forward.

Question 8: Do you agree with the priority use cases that we have identified?

Yes. Our order is: controllable load during an event; GXP forecast; relevant System Operator information for distributors; material distribution event; and DER behaviour during disturbances. We rank the last by readiness, not importance, as it depends on longer standards work.

Suggested first trial and working group

We suggest the first trial tests controllable load during an event, using existing arrangements.

1. Providers report available controllable demand by GXP and operator, with quantity, response time and duration.
2. The System Operator issues a test event for one or more GXPs.
3. Each provider acknowledges the event and states its intended response.
4. After the event, delivered response is calculated at GXP and operator level against an agreed baseline, using metered data independent of the provider.
5. The group compares declared, acknowledged and delivered response and records what each information object must contain: units, identifiers, timing, quality flags and fallback.

Participation should be voluntary, and the trial tests information exchange only. It does not change the paper's position on dispatching small distribution-connected resources. A few connected providers, across EV charging, batteries and controllable load, at a few GXPs where a Localflex distributor also operates, would be enough. That also lets the trial test the primacy rule.

Any provider using a conforming OpenADR system should be able to take part, and the information objects should be platform neutral. The group should agree who calculates the baseline. Because we are building a baselining tool, we think it should not be Cortexo, or any other party whose own product is being trialled.

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We support the proposed working group with the Electricity Authority and would like to take part. We can offer operating experience from FlexTalk and Flexviz, and help define the information objects for controllable demand.

This submission contains no confidential information and may be published.

Yours sincerely



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[redacted]

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