3 November 2026

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

Haast Energy Trading

Submission on TSO-DSO coordination: Operational requirements

Dear System Operator team,

Haast Energy Trading supports better coordination between the System Operator and distribution networks. Better visibility of embedded generation, batteries, controllable demand and network constraints should improve forecasting and reduce reliance on unnecessarily conservative assumptions. Our concern is ensuring that improved operational information also supports an informed and competitive wholesale market.

The paper recognises two-way information exchange and accessible, standardised interfaces. These are useful foundations, but the arrangements should expressly address information neutrality. Haast and other physical and financial participants monitor system conditions to price hedges and manage risk. Information about material outages, constraints or demand-management actions can affect those decisions even where a participant does not own or control a physical asset.

Operational coordination should not create a privileged commercial view for distributors, affiliated businesses or selected asset owners. For each proposed exchange, the parties should identify the market-relevant information that can be published alongside the operational exchange. This should include aggregate forecasts, material constraints, affected locations and the quantity, timing and expected duration of significant actions. Changes and cancellations matter as much as initial notices. Common definitions, timestamps and machine-readable publication would make the information usable without bespoke bilateral access.

This does not require public access to household data, control systems or confidential asset-level instructions. Separate those inputs from the aggregate operational facts and assessments that participants need. Any restriction or publication delay should be justified and limited to what is necessary. Where public release of market-relevant outputs is not practicable, an industry opt-in channel on published, equal terms should be considered, including access for financial participants.

Clear accountabilities should also distinguish network-security requirements from commercial decisions. Coordination should preserve efficient dispatch and wholesale price signals, with material operational restrictions and interventions visible to the market. Better coordination should not depend on private understandings that leave other participants unable to interpret market outcomes.

We ask that information neutrality and publication of market-relevant outputs be built into the initial requirements and trials, rather than left for later implementation.

Yours sincerely,

Phillip Anderson
Haast Energy Trading