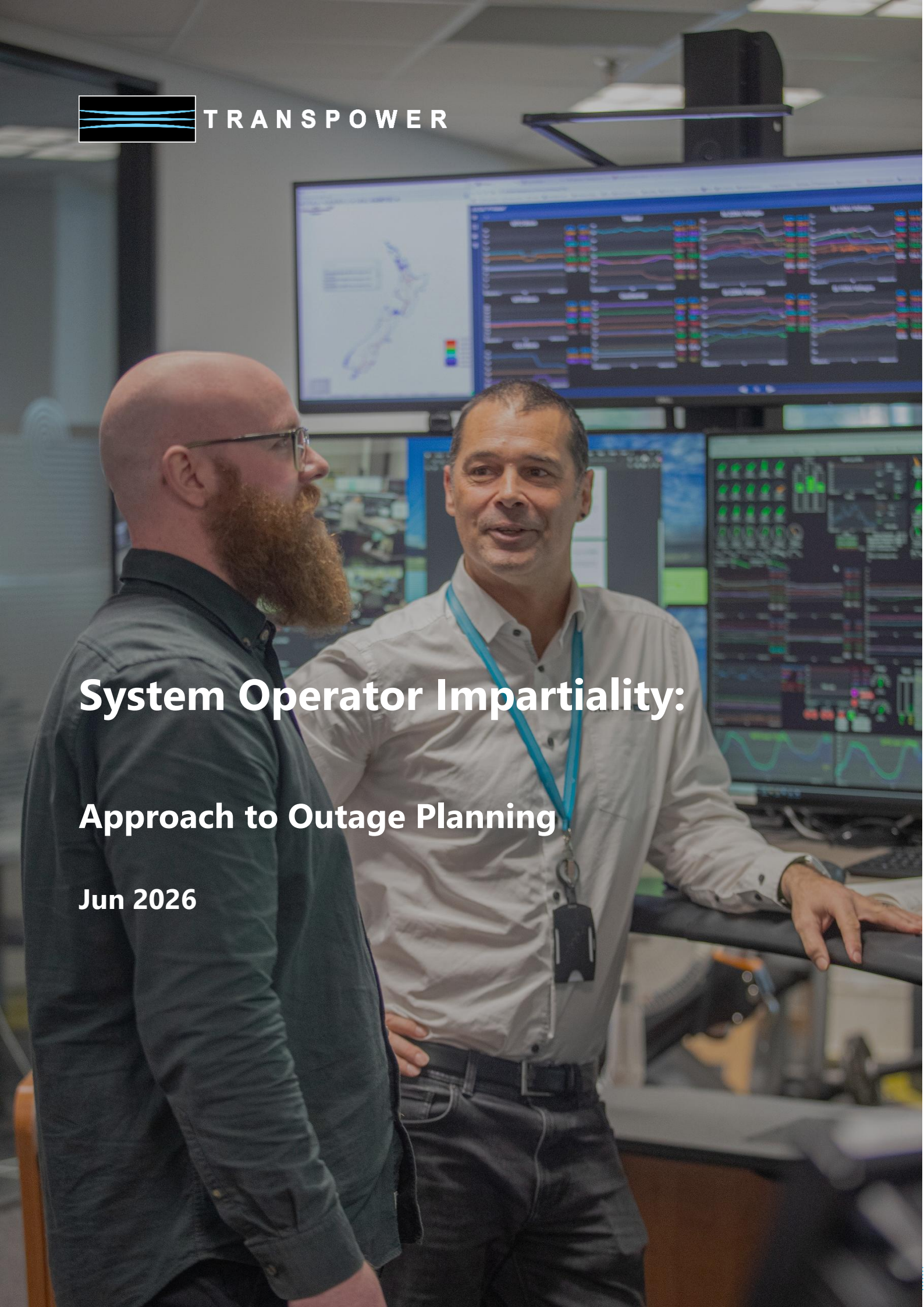


TRANSPOWER

System Operator Impartiality:

Approach to Outage Planning

Jun 2026

1 Purpose

This document outlines how the System Operator's outage planning policy is put into practice and how impartiality risks are managed throughout the process. It sets out:

- The process from planning through to real-time operation.
- The risk controls in place at each stage.
- How the process controls support consistency, transparency, and repeatability.
- How oversight and assurance mechanisms support ongoing confidence in the process.

1.1 Overview

The outage co-ordination role performed by Transpower as the System Operator is a critical function, as the timing, interaction, and management of outages can have an impact on system security and the System Operator's ability to meet its Principal Performance Objectives (PPOs). These PPOs ensure the power system remains secure. Each outage can have an operational and financial impact, with competing interests at play. It is imperative that the System Operator's processes, recommendations and actions are transparent, impartial, and based on technical evidence that supports its PPOs to avoid favouring any party when coordinating outages and maintaining system security.

An inherent impartiality risk arises from Transpower's dual roles:

- The System Operator co-ordinates outages to keep the power system secure.
- Transpower's transmission business (Grid Owner) plans and schedules outages along with other asset owners.

This may result in the perception that the System Operator favours the Grid Owner when it assesses outages initiated by transmission grid needs over other industry participants' needs[1].

1.2 Roles, Responsibilities and Accountabilities

It is important to note that asset owners[2] ultimately retain discretion around their outages.

The System Operator:

- assesses all asset owner outages to identify security concerns;
- identifies different ways the outages may be better planned to avoid security concerns;
- identifies ways to mitigate remaining security concerns; and
- identifies the potential impacts should the identified security concerns be present in real-time.

The actions the System Operator takes to co-ordinate outages involve:

- providing system security information to industry participants on outages;
- sharing power system information to industry; and
- recommending changes to outages that avoid security concerns.

1 In the 2025 financial year, there were approximately 7000 Transpower transmission outages and 6800 generation, direct connect and distribution outages from other industry participants.

2 Asset owners include generation and distribution businesses as well as Transpower's transmission business.

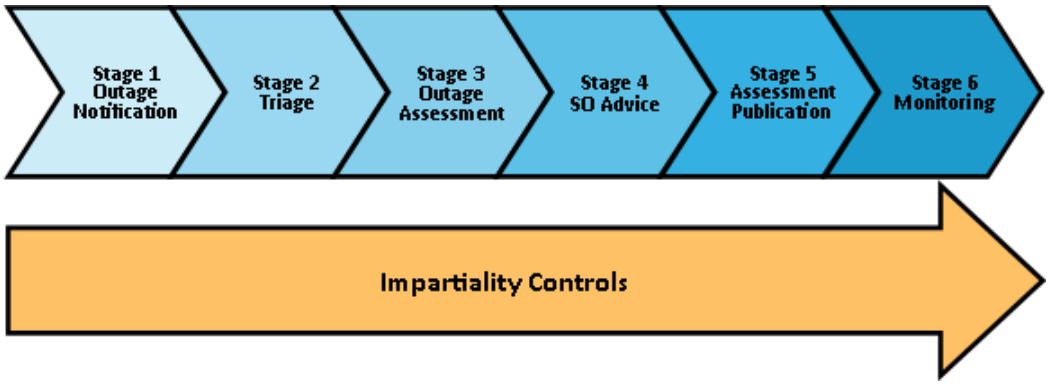
2 Outage Co-ordination Process and Impartiality Controls

The outage co-ordination process contains the impartiality controls described in the table below that span the entire process lifecycle:

Control	Description
Outage planning policy and principles	The outage planning policy is published on the Transpower website and defines the 5 principles that guide the System Operator's actions, decisions, and recommendations when co-ordinating outages. The principles relate back to the System Operator's PPOs, being the centre of its regulated function. The 5 outage planning principles are: consider the concurrency of outages that may give rise to a security concern; consider the timing of outages that may give rise to a security concern; consider the costs and benefits of the outages as planned and the different mitigation options available, using the net benefit test when asset owners cannot decide amongst themselves; identify the potential impacts of the planned outages proceeding if security concerns have been identified but are not mitigated; and adopt a proportionate approach for short notice outages.
Standardised engineering assessments	The use of standardised and repeatable engineering assessment procedures using standardised tooling, calculations, and security margins creates consistency in approach for assessing security risk across all industry participants.
Policy and engineering-based recommendations	Recommendations are based on the outage planning policy and engineering assessments. This ensures outcomes are driven by system security requirements rather than participant interests.
Standardised communication	Standard communication channels accessible to all industry participants are used to reduce information asymmetry. All outage information provided through the Planned Outage Co-ordination Process tool (POCP) is made available to all participants.
Publication of assessments and assumptions to POCP	Where an assessment identifies a situation that affects the System Operator's ability to meet its PPOs, the System Operator will publish the assessment (including details and supporting assumptions) on POCP and monitor responses to the notifications. The publication procedure is available on Transpower's website, and includes a process for industry participants to request assessments. Publication of the assessments and assumptions: reduces asymmetric access to information and increases visibility across industry participants; and allows the industry participants to see the technical basis for the assessment.
Regular review cycles	Outage risk assessment procedures, the outage planning policy and calculation methodologies are all controlled documents that must go through multiple review cycles before changes can be made.
Formal Training	Formal training on impartiality, handling of confidential information, and our procedures is required for all employees in Operations.

Control	Description
Escalation process	Impartiality oversight and conflict escalations are managed via a senior impartiality manager.

At each stage of the outage co-ordination process, the controls described above are in place to identify and mitigate any impartiality risks.



As needs, technology, and capabilities grow, this area will continue to evolve. One enhancement enabled by a recent tooling upgrade will be the ability to share greater detail on outage assessments provided to the Grid Owner with the Electricity Authority to further strengthen transparency.

The table in Appendix 1 outlines each high-level process stage involved in planning an outage, the inherent impartiality risks at each stage, and the controls applied to manage or mitigate the risks.

Overall, the outage co-ordination process is designed to ensure that all recommendations, advice, and actions taken by the System Operator are grounded in consistent application of policy, engineering judgement, and power system security requirements. The controls outlined in this document work collectively to mitigate impartiality risks. As the power system and industry evolve, these processes and controls will continue to be reviewed to ensure they continue to work as intended and remain aligned with the changing needs of the power system.

Appendix 1: Outage Process and Applied Impartiality Risk Controls

Stage	Description	Principal Impartiality Risk	How Impartiality Controls are Applied
Stage 1 Outage notification into POCP	Once an outage has been planned, outage information is published to POCP where all industry participants can access it. In the case of the Grid Owner, outages go through the Outage Handling and Management System tool (OHMS), the Grid Owner's outage planning tool, first and then it is automatically published onto POCP. All asset owners may engage with the System Operator prior to publication to discuss outage impacts and system security. This is typically for outages that are security risks themselves, i.e. key transmission assets like the HVDC or a full generation station shut down.	Information asymmetry and inconsistent engagement with asset owners that can lead to a potential market advantage	POCP functions as the common structured channel for outage information. Business rules define expectations for timeliness and quality of information to promote consistency. POCP has roles-based access to manage information sensitivity.
Stage 2 Outage triage	A System Operator engineer screens for outages with timing and outage concurrencies that may create a risk to the System Operator's ability to meet its PPOs. Engineering judgement is applied to determine whether detailed studies are required or presents a potential security risk. With over 7,000 outages taking place on the power system every year, not every	There is a risk of inconsistent escalation or scrutiny applied during the triage process.	The preliminary assessment is framed against impact on PPOs rather than who the asset owner is or commercial preference. The triage step is limited to be a screening mechanism. It is not used to provide formal outage advice. The outage planning principles are applied when triaging outages and determining whether a matter should move beyond preliminary review.

Stage	Description	Principal Impartiality Risk	How Impartiality Controls are Applied
	outage can or needs to be resourced for detailed study.		
Stage 3 Detailed outage assessment and security studies	Where a preliminary assessment indicates further assessment is required, the System Operator undertakes detailed analysis to determine whether a single outage or a combination of outages would create security violations and what mitigation strategies are available.	Different assumptions or different levels of conservatism could be perceived as being applied to different asset owners. Concurrent outages that do not work together may require some outages to proceed while others are deferred, creating sensitivity around which outages are preferred.	The System Operator stress-tests outages against defined load and generation assumptions and fixed security margins. This is applied consistently and embedded in procedures and engineering tools. The outage planning principles are applied when considering mitigation options. Where multiple mitigation options exist and participants are unable to co-ordinate amongst themselves, an economic analysis may be used to identify the most efficient option. The economic analysis test is designed to compare the costs of constraining on significant generation or utilising significant load management with the cost of a loss of supply (due to N-security) or any net benefit received by an asset owner. To promote consistency, previously published outage assessments and mitigation measures are used as guidance for similar situations.
Stage 4 Advice to asset owner(s)	Where the System Operator reasonably believes an outage would adversely affect its ability to meet or plan to meet its PPOs, it may request a delay, propose an alternative time, or request other changes to the outage plan. All outage advice is formally documented and recorded in an Outage Recommendations and Implications (ORI) document or via emails. From July 2026 onwards, these will be made available to the Electricity Authority via the System Operator's monthly reporting obligations.	Perception of unequal treatment in the advice given. Similar cases can be viewed as unfair if one participant experiences stronger pressure than another or if timing recommendations appear inconsistent.	Assessment outcomes are grounded in the System Operator's ability to meet its PPOs, using defined security margins embedded in its tools and procedures. This ensures advice is anchored to technical system security requirements. The outage planning principles are applied when providing advice to participants. The System Operator only provides advice and recommendations to all asset owners. The decision to accept the recommendation remains with the asset owner.

Stage	Description	Principal Impartiality Risk	How Impartiality Controls are Applied
Stage 5 Publication of outage risk assessment (as required)	Certain outages or combinations of outages can create system security situations, and asset owners may indicate they cannot reschedule. This can risk the System Operator's ability to meet its PPOs. This may include energy and reserve shortfalls, voltage stability violations, or thermal violations. Where triggers for publication to industry are met, the System Operator completes an assessment, publishes it on POCP, and prepares the associated communication including a CAN where relevant. At this point, the process moves from internal assessment to industry communication and transparency.	Some participants could receive information earlier or in more detail than others. There is a risk of biased or inappropriate communication, including disclosure of confidential information or use of emotive language that could imply prejudgment.	Assessments are published on POCP to reduce asymmetric access to information and increase visibility across industry participants. Since late 2025, POCP assessments have been publicly accessible without requiring user authentication. Outage assessments are published prior to any discussions with individual participants to ensure all participants have access to the same information, at the same time. Prior to the start of high-risk outages, the System Operator may hold an industry conference to provide all participants with access to the same information and notice period. Drafting guidance exists to guide formal, non-emotive, and impartial drafting, and prohibit the publication of confidential information. Drafting is subject to internal review for technical and impartiality considerations. The System Operator may receive commercially and operationally sensitive information from asset owners. This information is held confidentially by the System Operator until the outages are published on POCP.
Stage 6 Monitoring	Following publication, the System Operator continues to monitor outages and surrounding conditions up to real time. If circumstances materially change, stages 3, 4 and 5 will be repeated as required.		