



Electricity Authority
Wellington

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By email: OperationConsult@ea.govt.nz

Market Operation Service Provision - 10-year roadmap

Transpower welcomes the opportunity to respond to the Authority's consultation on its 10-year roadmap for Market Operation Service Provision (MOSP), published 2 June 2026. This submission is from Transpower in all its roles: System Operator, Grid Owner and FTR manager.

The future market services model will shape how data is collected, governed, accessed and used across the electricity sector, with implications for market integrity, operational visibility, innovation, consumer services, cyber resilience and new entry. In that context, we consider it important to distinguish between centralising data infrastructure to improve access, interoperability and innovation, and consolidating operational market functions or accountabilities.

While consolidating several services may achieve productive efficiencies, it could also create high barriers to entry that reduce dynamic efficiency. The Authority should work through these trade-offs with industry before committing to structural consolidation or embedding particular service models through contracting decisions.

Summary of our views

We support:

- a future role for a centralised market data store (CMDs) as trusted shared infrastructure for ICP-level data and innovation in consumer and network services, including Consumer Data Rights.¹ We consider reconciliation (and registry) functions should be supported by, and closely interoperable with, the future data warehouse.
- modern, consistent data interfaces across MOSPs and market participants to improve visibility of distributed and consumer energy resources. The Authority should prioritise foundational data visibility and sharing arrangements, as these are essential to a smarter, more digitalised energy system now and into the future

¹ A Consumer Data Right (CDR) is a legal framework that allows a consumer to access, share, and manage certain data, like transaction history, with trusted third parties through secure digital systems. The goal is to provide greater choice, convenience, and innovation.

- clearer service-based obligations, outcomes and performance requirements in MOSP contracts. However, rationalising contracts does not require redefining MOSP roles into fewer service-based contracts. We are cautious that doing so may have the unintended consequence of losing intentional checks and balances between roles.²
- In the near term, contract retendering could focus on resolving current issues such as inconsistent terms and conditions, while preserving flexibility to transition to any future-state model.

We respond to the Authority's questions in the remainder of this submission.

Yours sincerely

Joel Cook

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² [Market Operation Service Provider 10- year roadmap](#) Executive summary

Q1. What else should the Authority consider when reviewing our MOSP arrangements? Are there other aspects of the services we should consider changing and why?

We encourage the Authority to consider whether some of the challenges identified in the consultation are best addressed through improvements to procurement design, service obligations and interoperability requirements, rather than through structural changes to MOSP functions. Common data standards, API-enabled interfaces, stronger cyber-security expectations, clearer change and funding arrangements, and improved transition obligations are likely to deliver many of the desired benefits while preserving flexibility for future market evolution.

The Authority should also consider the impact of any changes on market participants, such as implementation costs and transition complexity. Procurement settings that promote transparency, portability of information and orderly transitions are likely to improve long-term contestability more effectively than consolidation of functions alone. The Code is also designed around the current MOSP structure. Any cost-benefit analysis should therefore account for the consequential Code changes that may be needed to support a different structure, including the risk of unintended consequences.

The consultation paper describes the WITS (wholesale information system) function³ as managing *"trading information transfers, such as generation offers and market schedule results, between wholesale market participants and the system operator. The WITS portal also publishes market schedule results for public consumption."* We consider there may be targeted operational synergies between the WITS manager and the System Operator that warrant further investigation. However, any rationalisation should be assessed case by case and should not be treated as support for broader consolidation of MOSP functions.

Q2. What do you think of the Authority's view of the future of MOSP services? What else should the Authority consider?

We support the Authority signalling a future role for a CMDS at the centre of its future market services vision. A CMDS could provide trusted shared infrastructure for market-facing consumer meter data, accessed by authorised parties through standardised interfaces to support reconciliation, settlement, operational visibility and new consumer services.

This would move the market away from fragmented, participant-to-participant data transfers and toward a more transparent, interoperable and innovation-ready data environment. The Authority's recent decision to require traders to submit aggregated half-hourly volume information for ICPs with half-hour capable meters is an important step in that direction.⁴

Any consolidation of reconciliation, clearing and settlement would require careful consideration because it may weaken checks and balances. If the Authority explores consolidation, it should identify the controls needed to preserve market integrity, including separation of decision rights, auditable hand-offs between quantity-setting and financial

³ [Market Operation Service Provider 10- year roadmap](#) para. 8.5(d).

⁴ Authority decision [Requiring the use of half-hourly data for reconciliation](#) March 2026.

settlement processes, validation of inputs and outputs, error correction and dispute resolution processes, reporting, and independent assurance.

The Authority should first assess whether improved interoperability and common data standards can achieve the transactional efficiency benefits without altering the functional boundaries between market services. While the market has changed over the last 30 years, there were good reasons for the separation of services to encourage competition and reduce barriers to entry.

We do not support using this current round of contracts to embed a future-state operating model before that model has been fully developed. In the interim, the emphasis should be on improving systems, data flows and interoperability in ways that preserve future optionality and enable future parties to bring new ideas, techniques and innovations to market.

Q3. What factors should the Authority consider when investigating the need and benefits of a CMDS?

A CMDS should improve data accessibility, consistency and integration across market datasets, but its design, governance and implementation should follow from a clear view of its primary purpose, including what meter data it would hold and at what level of granularity. We understand the consultation paper is focused on ICP-level data. However, if designed as a trusted shared data source, the CMDS could also support wider market data exchange, beyond data provided to the clearing manager.

We consider a modular approach would be preferable. A shared data platform with standardised interfaces would reduce long-term technology and transition risk, while preserving flexibility as data volumes, data sources and market uses evolve.

A CMDS would also need clear governance over data ownership, quality and accountability. We agree that there may be a new role for a data hub manager with responsibility for verification and addressing services for data transfers across the market. Because a central service would become systemically important, its design should also address resilience, cyber-security, failover and recovery from the outset. Centralisation may reduce integration complexity, but it also creates a dependency that needs to be managed explicitly.

Q4. What other examples of data sharing arrangements should the Authority consider?

The Authority has identified and discussed a range of overseas data-sharing arrangements, and we have not extended that analysis. In our view, the Authority's examples demonstrate that there are design principles that would be applicable here.

Q5. What else should the Authority consider in planning and scheduling changes to the MOSP services?

We support signalling that contracts in the future state will need to address software platforms, protocols and cyber security. Current contracts should also include future-compatible requirements, such as interoperability, portability, resilience, transition support and clear change processes.

However, contract changes intended to *"incentivise future scalability of platforms to allow for more efficient expansion of services should the need arise"* could lock in current technologies and providers; and would risk narrowing future options before the Authority and industry have properly tested the preferred future-state architecture.