



Electricity Authority
Wellington

7 August 2026

By email: fsr@ea.govt.nz

Sharing Common Quality information between System Operator and Grid Owner

Transpower in its dual roles of System Operator (SO) and Grid Owner (GO) welcomes the opportunity to respond to the Authority's *Proposal for Transpower to share common quality information between System Operator and network owner functions*, published 30 June 2026.

We support the consultation focus to reduce fragmented and duplicative information-sharing arrangements under the status quo, with both SO and GO having rights to provision of asset capability information. Streamlining these arrangements will reduce compliance costs and administrative burden for all parties, supporting more efficient use of common quality information across Transpower's SO and GO functions.

The proposal would require the SO to provide the GO access to the following information held by the System Operator:

- asset capability statement (ACS) information
- encrypted asset modelling information, and
- equivalence arrangement and dispensation applications and supporting information.

The proposal also introduces strengthened confidentiality and information security obligations on the Grid Owner for encrypted and unencrypted modelling information.

Transpower supports the proposal.

Proposed clause 6, remove words "Despite anything in a transmission agreement"

We consider clause 6 should not have the words "*despite anything in a transmission agreement.*"

[Analysis] Proposed Clause 6 states "*Despite anything in a transmission agreement, an asset owner is not required to provide information to Transpower as a grid owner that Transpower as a grid owner can access under subclause (5).*"

Clause 5 provides that the information to the system operator is the asset capability statement, and encrypted modelling information provided pursuant to the CACTIS.¹ The transmission agreement clause being referred to, is clause 2.1 of Schedule 12.6 (the Connection Code). This clause provides that GO can receive the ACS provided to the SO, and additional information specified in clause 2.2 (b) (c) and (d). However, the information provided to the GO under clause 2.2 is in a format specified by the GO and not pursuant to the CACTIS.

Therefore, information that an asset owner may need to provide to the GO under the Connection Code for encrypted modelling, may not be the same as the encrypted modelling information provided under the CACTIS. For example: Real Time Digital Simulator (RTDS) models are not asked for under the CACTIS but could be asked for by the GO.

Removing the words means proposed clause 6 then reads *"an asset owner is not required to provide information to Transpower as a grid owner that Transpower as a grid owner can access under subclause (5)."* This sentence retains the policy intent to not duplicate information processes, but ensures the GO is still able to ask an asset owner for encrypted modelling information that is in a format specified by the GO, under the transmission agreement.

Confidentiality Obligations

We agree with the requirements under proposed clause 3(7)(b) of Technical Code A, where the GO must comply with the confidentiality obligations that apply to the SO under clause 3(2A) of Technical Code A of Schedule 8.3 in relation to encrypted modelling information the SO provides access to.

To provide further clarity to the industry regarding the GO's confidentiality obligations regarding asset owner information, we submit that the GO's obligations under proposed clause 3(7)(b) should also apply to ACS information and equivalence and dispensation information that the SO provides access to.

As part of the equivalence arrangement and dispensation application process, the SO receives information from asset owners that may be identified as confidential under clause 2(f) of Schedule 8.1. The SO has existing disclosure restrictions and obligations to keep asset owner information confidential as per clause 3(2A) of Technical Code A of Schedule 8.3. As such, the same obligations should also apply to the GO once it is provided access to this information. The same applies to ACS information the SO receives under chapter 3 of the CACTIS.

We have responded to the questions in the Appendix.

Yours sincerely

Joel Cook

Head of Strategy and Regulation

¹ Connected Asset Commissioning, testing and Information Standard

Appendix – Response to questions

Common quality information between System Operator and network owner functions

Please email your submission to fsr@ea.govt.nz by 5pm, 11 August 2026.

Submitter	Transpower as Grid Owner and System Operator
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Questions	Comments
Q1. Do you support the Authority's proposal to require the System Operator to provide Transpower, as a transmission network owner, with access to the System Operator's ACS database, subject to appropriate information use and confidentiality requirements? If not, why not?	Yes. Code settings already exist for which the System Operator (SO) and the Grid Owner (GO) have the same access rights to the same information under the Asset Capability Statements. The proposal will improve efficiency of information provision for connected customers and Transpower, by removing duplicative information provision processes.
Q2. Do you support the Authority's proposal to require the System Operator to share encrypted modelling information with Transpower as a transmission network owner, subject to appropriate information use and confidentiality requirements? If not, why not?	Yes, however the current drafting of the proposed code changes do not reflect confidentiality requirements of the GO for ACS information shared by the SO. To provide further clarity, we suggest that for any ACS information the GO is provided access to under proposed clause 3(5)(a) of Technical Code A, the GO must comply with the obligations that apply to the SO under clause 3(2A) of Technical Code A of Schedule 8.3 as if those obligations applied to the GO.
Q3. Do you support the Authority's proposal to require Transpower's transmission network owner function to meet the same access and storage requirements for encrypted and unencrypted modelling information as apply to the System Operator? If not, why not?	Yes. This approach should reassure providers of information that their concerns for confidentiality are being addressed.
Q4. Do you support requiring the System Operator to provide Transpower as a transmission	Yes, subject to the same SO confidentiality obligations under clause 3(2A) of Technical Code A of Schedule 8.3 applying to the GO upon

Questions	Comments
network owner with access to equivalence arrangement and dispensation applications and supporting information? If not, why not?	receiving access to the equivalence arrangement and dispensation information. As part of the equivalence arrangement and dispensation application process, the SO receives information from asset owners that may be identified as confidential under clause 2(f) of Schedule 8.1. The SO has existing obligations to keep asset owner information confidential as per clause 3(2A) of Technical Code A of Schedule 8.3. As such, the same obligations should also apply to the GO once it is provided access to this information To provide further clarity regarding the confidential information identified by asset owners, we suggest that for any equivalence arrangement and dispensation information the GO is provided access to under proposed clause 8.54AB(1), the GO must comply with the obligations that apply to the SO under clause 3(2A) of Technical Code A of Schedule 8.3 as if those obligations applied to the GO.
Q5. Do you agree with the Code amendment proposal's objective? If not, why not?	Yes.
Q6. Do you agree the Code amendment proposal's benefits outweigh its costs? Please provide evidence to support your view.	Yes.
Q7. Do you agree the Code amendment proposal is preferable to other options identified? If you disagree, please explain why and give your preferred option in terms consistent with the Authority's main statutory objective in section 15 of the Act.	Yes.
Q8. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?	Yes.

Questions	Comments
Q9. Do you agree the Code amendment proposal complies with section 32(1) of the Act?	Yes.
Q10. Do you have any comments on the drafting of the proposed Code amendment? Please explain your answer.	Yes. • Under clause 6 remove the words "Despite anything in a transmission agreement." Please refer to cover letter for the reasoning. • The proposed definition of "asset capability statement" should reference <i>Chapter 3 of the connected asset commissioning, testing and information standard</i> instead, as clause 2(5A), Tech Code A, Schedule 8.3 has since been revoked post incorporation of CACTIS. • Please see the comments above on Code amendments required to address the GO's confidentiality obligations in relation to ACS information and equivalence arrangement and dispensation information accessed through the SO.
Q11. Do you see any unintended consequences in making the proposed Code amendment? Please explain your answer.	No.