

## Format for submissions

### Enabling market evolution: Market Operation Service Provider 10-year roadmap – consultation paper

| Submitter                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| Counties Energy                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Questions                                                                                                                                                      | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 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? | <p>The Authority should consider whether the future MOSP arrangements, either through one all-in-one service provider or a range of specialist providers, need a distinct, service-based Data Exchange Hub capability for DERs, smart-metering and customer-authorised data, rather than only incremental changes to existing registry and settlement functions. The increasing need is not just for data storage, but for trusted discovery, authorisation, addressing, auditability and standardised exchange between customers, EDBs, retailers, aggregators, flexibility service providers and market bodies. Counties Energy supports the Authority's focus on reducing bespoke peer-to-peer arrangements, cyber-security exposure and duplicated integration effort. We recommend the Authority explicitly test whether a Data Hub Manager service could provide common market infrastructure for: customer-authorised access to smart-metering and DER data; static and dynamic DER visibility; discovery of flexibility capability; consent and authorisation workflows; standard API-based exchange; and operational audit trails. A practical path would be to trial this with distribution network and customer data in a bounded environment before embedding detailed Code obligations.</p> |
| Q.2. What do you think of the Authority's view of the future of MOSP services? What else should the Authority consider?                                        | <p>We support the Authority's direction of travel toward fewer, service-based MOSP roles and a modernised data hub function. In our view, the Data Hub Manager should be treated as enabling market infrastructure, not simply an extension of the current registry hub. There are trials underway in market that could provide this capability as a Data Exchange Hub service for DER and smart-metering data, enabling authorised parties to access data through standardised, secure and auditable interfaces while avoiding unnecessary duplication of data stores. These platform services are consistent with the direction of travel in Australia, where AEMO's Project EDGE demonstrated scalable data exchange between multiple industry actors as part of coordinated DER market integration, and the subsequent CER Data Exchange co-design identified a secure digital exchange as a foundation for sharing CER-related information at scale. The service should support both market and operational use cases: customer-authorised sharing of metering and DER data; EDB visibility of low-voltage</p>                                                                                                                                                                                      |

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|                                                                                                            | <p>network conditions; retailer and aggregator access to consented data; and future flexibility markets where dynamic operating limits, availability and performance need to be exchanged reliably. We recommend the Authority to take the opportunity to use these trials to test the data hub model in practice, including the interaction between identity, authorisation, data access and participant roles.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>Q.3. What factors should the Authority consider when investigating the need and benefits of a CMDS?</p> | <p>The Authority should carefully distinguish between the need for improved data access and the need for a central meter data store. A CMDS may simplify some retention and access obligations, but it could also create cost, duplication, innovation and cyber-concentration risks if it becomes the default repository for all current and future meter-derived data. We recommend the Authority assess whether a federated Data Exchange Hub model can deliver most of the benefits of a CMDS without centralising all data. Key factors should include: the incremental value of central storage compared with standardised access to existing data holders; privacy and customer consent obligations; cyber-security and resilience; latency requirements for operational use cases; the ability to support new data types such as 5-minute data, power quality, DER register and telemetry and flexibility performance; governance of authorisation and audit trails; and whether the model can support Consumer Data Right implementation without duplicating or conflicting with it. In the near term, EIP4 data from retailers will be important for authorising access to customer data. Authentication can be handled within the data hub service, but authorisation must be clear, standardised and trusted by all participants.</p> |
| <p>Q4. What other examples of data sharing arrangements should the Authority consider?</p>                 | <p>The Authority should consider AEMO's Project EDGE DER Data Hub Lessons Learnt report and the broader Australian CER Data Exchange Industry Co-design work as relevant evidence for New Zealand. Project EDGE was an off-market field trial involving AEMO, AusNet Services, Mondo and aggregators to test DER integration, including identity, access control, dynamic operating envelopes, market coordination and scalable data exchange between multiple industry actors. The Project EDGE reports emphasise that clarity of roles and responsibilities, secure data exchange, consumer-centric design and scalable participant onboarding are critical to DER market integration. The 2025 CER Data Exchange co-design then moved this further toward an enduring national data-exchange concept, with priority use cases including broader access to CER standing data, efficient sharing of network limits, and network support and flexibility capability discovery. These are directly relevant to the Authority's proposed Data Hub Manager role. The Authority should also consider using a New Zealand proof-of-concept to complement these overseas examples. At Counties Energy, we have developed our</p>                                                                                                                        |

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|                                                                                                             | <p>Gridex DSO Engine, used in the Karaka Harbourside DSO Pilot on the same principles of the Project Edge Data Hub recommendations. The project is already providing a practical demonstration of a Data Exchange Hub for DER and smart-metering data, including customer-authorised access, EDB visibility, retailer/aggregator data access and a simple user interface for market participants. The Authority may wish to understand this further as part of the on-going PiP engagement. It can also help develop the detailed specifications for what a Data Hub for NZ may look like.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Q5. What else should the Authority consider in planning and scheduling changes to the MOSP services?</p> | <p>The Authority should plan the MOSP transition in stages, with early practical trials before locking in detailed enduring arrangements. We recommend that the 2027 contracting round include explicit requirements for modern API-based exchange, cyber-security uplift, scalability, interoperability and future integration with Consumer Data Right processes. The intermediate phase should include a live Data Hub Manager proof-of-concept using real but appropriately governed data, clear participant roles and measurable success criteria. The proof-of-concept should test customer authorisation using retailer-provided EIP4 data, data-holder participation, standardised APIs, audit logs, access revocation, role-based permissions and operational use cases such as DER visibility and flexibility discovery. This staged approach is consistent with the Australian CER Data Exchange pathway, which began with priority minimum viable use cases and then proposed progressive capability growth. Scheduling should also recognise that DER uptake, smart-meter capabilities, LV visibility needs and flexibility markets are moving faster than traditional MOSP procurement cycles. A staged approach would allow the Authority to learn quickly, avoid over-specifying the final model too early, and preserve optionality between a federated Data Exchange Hub, a CMDS, or a hybrid arrangement.</p> |

## Appendix A: Architecture diagrams

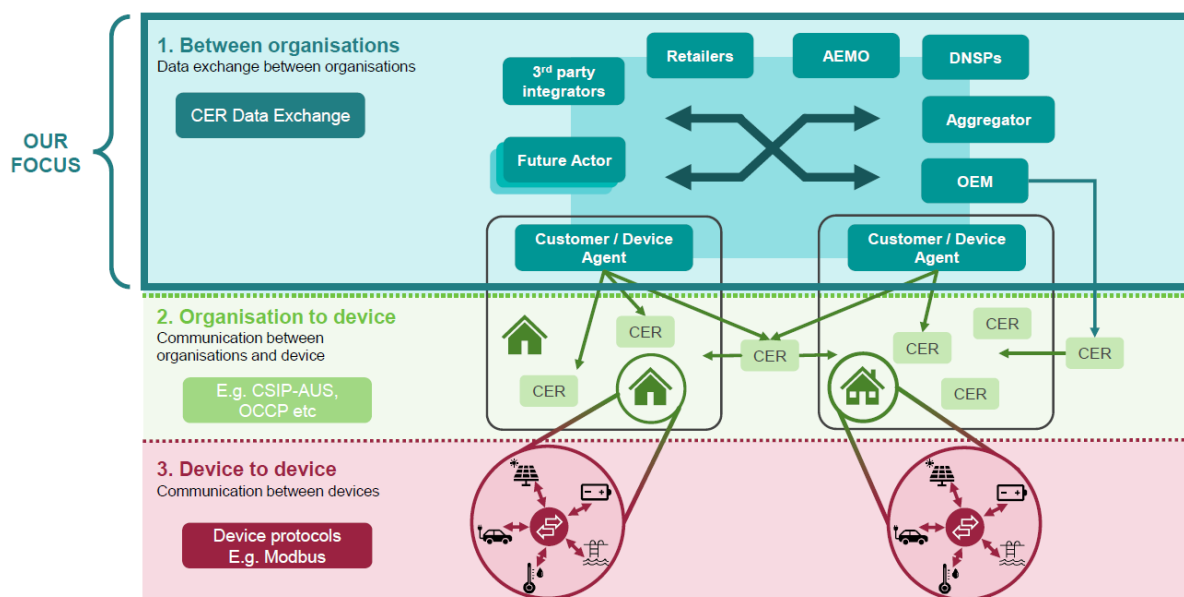
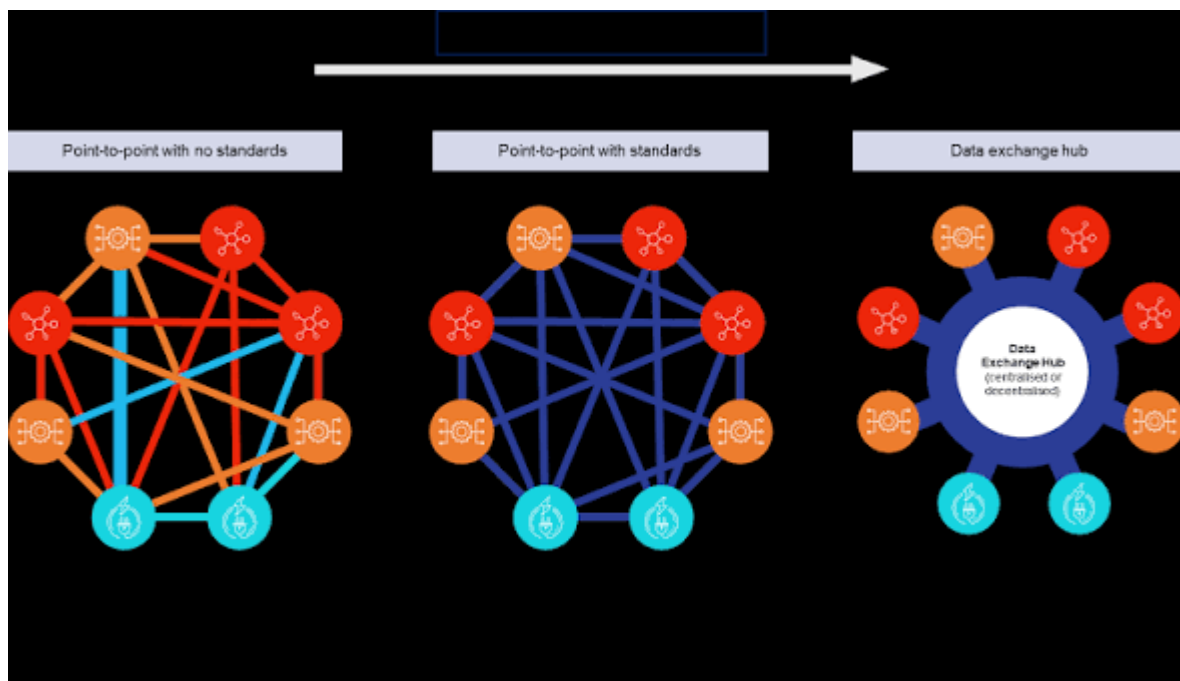


Figure.A7;Proposed.Gridex.Data.Exchange.Hub.operating.model;