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Electricity Authority
By email: OperationsConsult@ea.govt.nz

Submission on Enabling market evolution: Market Operation Service Provider 10-year roadmap

Dear Operations team,

Haast supports changing the MOSP contracting approach and considers change overdue. Repeated re-tendering has entrenched the same providers, constrained innovation and allowed complacent service behaviours to develop. The 2027 process should restore contestability and service discipline, not merely rebundle existing functions. It should also set a clear participant objective: an independent participant must be able to obtain, process and audit the same public market information as a vertically integrated participant, at the same time and through production-ready interfaces.

Haast uses WITS offers, bids, schedules and prices, SPD and vSPD information, clearing and reconciliation outputs, and FTR auction and payout data to price risk, value hedges and reconcile market outcomes. Weak data access does not present as an abstract IT problem. It creates manual work, uncertainty and risk premia, and it advantages firms able to reconstruct missing context from larger asset portfolios and internal systems.

Our priorities are therefore practical: the 2027 contracts should embed participant-usable data standards; consolidation should not turn longstanding provider concentration into an opaque bundled dependency; and the Authority should implement the data hub and interface work before deciding whether a central meter data store is justified.

Q1. Matters the Authority should add to its review

Participant access should be a contracted service outcome, not a by-product of systems built mainly for the Authority and the service providers. For wholesale and FTR data, the roadmap should commit to:

- a published, machine-readable data catalogue covering inputs, outputs, definitions, lineage and finality states;
- documented APIs and bulk historical files, with publication-time service levels and correction notices;
- versioned schemas, change logs, meaningful backward-compatibility periods and clear deprecation dates;
- production-like sandboxes and representative test data before material interface changes;
- the inputs, assumptions, intermediate outputs and audit trails needed to reproduce and explain material dispatch, price, settlement, reconciliation and FTR outcomes, with no MOSP process operating as a black box to participants; and
- equivalent access timing and interface quality for all participants, supported by published performance and incident reporting.

The paper treats the FTR Manager as comparatively self-contained. That may justify keeping the service operationally separate, but not excluding it from common data, interface, audit and change-management standards. FTR auction inputs and results, prudential information, payouts and loss and constraint excess information collectively form part of the market's risk-transfer infrastructure.

Q2. Future MOSP services

A wholesale settlement manager and a data hub manager are sensible organising concepts. Combining closely related reconciliation and clearing work could make change cheaper and faster. A data hub that provides authentication, addressing and common protocols while data continues to move peer-to-peer could also reduce entry and integration costs.

The competition case for larger contracts needs testing rather than assuming. The paper records that the MOSP contracts have remained with incumbent providers through several re-tendering rounds and suggests that a larger contract may attract new bidders. It may, but bundling can also increase the minimum scale, integration capability

and balance-sheet commitment needed to tender. A single larger contract could therefore deepen incumbent dependence if its architecture and exit arrangements are not designed carefully.

Tender evaluation should accordingly test modularity, data portability, documented interfaces, subcontracting options, step-in and transition rights, independent assurance, service-level transparency and the ability to change a component without replacing the whole service. The contracts should give the Authority enduring rights to the data definitions, schemas, interface documentation and migration materials needed to transfer the service to a replacement provider without recreating the data layer.

The proposed division of WITS functions should be judged from the participant's perspective. Whether a function sits with the settlement manager or the data hub manager matters less than having one coherent catalogue, consistent authentication, reliable history and a clear owner for resolving data defects. A cleaner contractual diagram would not be an improvement if traders and risk managers face more interfaces or less usable data.

Q3. Central meter data store

The Authority should investigate a central meter data store, but it has not yet established that central storage adds enough value beyond common protocols, authorisation and retention standards. The data hub and standards layer should come first. That sequencing will reveal how much duplication and friction remain once transfers are standardised.

Any later CMDS proposal should quantify the incremental benefit and address source-of-truth and correction rules, privacy and consent, cyber concentration, disaster recovery, data latency and granularity, support for new meter services, cost allocation, and an exit path if centralisation impedes innovation. The comparison should be against a credible standardised peer-to-peer model, not against today's fragmented arrangements.

Q4. Other data-sharing examples

The Authority should examine the broader NEM approach to public market data as well as the consumer-energy-resource examples in the paper. Standardised files, published data models, historical archives and predictable update channels allow participants to build repeatable operational and analytical processes. New Zealand need not copy the Australian architecture, but it should adopt the discipline of treating market data as a maintained infrastructure product rather than a collection of portal outputs.

International examples should be assessed using a participant test: who receives the information, when, in what format, with what history and audit trail, and whether a participant can reproduce the relevant market outcome. This also guards against data-sharing arrangements that improve visibility for the operator or an asset owner while leaving the wider market with only the resulting price effect.

Q5. Planning and sequencing

The 2027 contracting round should secure the low-regret capabilities now, even if the final service structure is introduced later. At minimum, the contracts should include modern interface obligations, measurable publication and availability standards, cyber and information-management requirements, participant test environments, and enforceable change-notice and deprecation periods.

Each material migration should have a published participant-impact assessment, realistic testing window, parallel run where failure would affect dispatch or settlement, rollback plan, and accountable service owner. The Authority should also avoid clustering MOSP migrations with major changes to dispatch, settlement, prudential or FTR arrangements unless the dependencies make joint implementation unavoidable.

Finally, the roadmap should identify participant-facing releases rather than only organisational milestones. The market should be able to see when it will receive better WITS, settlement, reconciliation, registry and FTR datasets, what service standard will apply, and how success will be measured.

Yours sincerely,

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