

14 July 2026

Electricity Authority
PO Box 10041
Wellington 6143By email: operationsconsult@ea.govt.nz**Submission on Enabling market evolution: Market Operation Service Provider 10-year roadmap consultation (Consultation Paper)**

1. This is Vector's ("our", "we") response to the Electricity Authority's Consultation Paper dated 2 June 2026 and appreciates the opportunity to submit on this. This submission is not confidential and can be published on the Authority's website.
2. Vector supports the Authority's direction to modernise MOSP services and improve data interoperability. However, we consider this reform should be treated as a foundational market architecture and data governance exercise, not simply a procurement simplification exercise. The decisions taken here will shape how efficiently and securely the sector can support electrification, consumer participation, DER visibility, flexibility services, network operations and future digital market development.
3. Vector is broadly aligned with the Electricity Networks Aotearoa (ENA) submission. We support the Authority's move toward more modern, service-based arrangements and stronger data-sharing capability. Our comments focus on issues of particular importance to Vector as a large urban electricity distribution business, including price-led flexibility, operating envelopes, future DSO capability, distribution operational visibility and rapidly growing data volumes.
4. Vector considers that the roadmap should be guided by clearly defined future use cases and technical outcomes, not assumptions about the appropriate level of centralisation. Future arrangements should enable secure, scalable and machine-readable exchange of the data and signals needed for DER visibility, network limits publication including operating envelopes, flexibility capability and emergency coordination, while managing implementation complexity, latency and resilience risks.

Executive Summary

5. Vector agrees that current MOSP arrangements were developed for a simpler market, characterised by fewer participants, lower data volumes, limited consumer participation and largely predictable batch data flows. The next phase of market development will require data-sharing arrangements that are more timely, secure, interoperable and scalable across

retailers, distributors, metering providers, aggregators, the Authority and other authorised parties.

6. Vector considers this reform to be primarily about data governance and market architecture. It will shape who can access consumption and DER data, how distributors gain operational visibility of their networks, how flexibility services and non-wires solutions develop, and how retailers and customer agents can efficiently create consumer-facing propositions over time.
7. Vector supports further investigation of a data hub manager model in which the hub operates primarily as a trust, standards, addressing, authorisation and auditability layer. This approach could improve interoperability, reduce friction in data discovery and access, and avoid requiring the market to centralise the underlying data itself.
8. Vector does not support any implicit shift toward a central meter data store (CMDS). Any CMDS proposal should be assessed against a clear problem definition, explicit use cases and robust evidence that it would deliver net benefits over federated or hybrid alternatives. In particular, the Authority should test whether centralised storage would create unnecessary constraints on innovation, resilience, competition or future DER-related use cases.
9. The roadmap should be more explicit that distribution operational needs are core design requirements. Timely access to interval consumption and export data, CER standing data, inverter and controllability information, power quality and event data, network limits and operating envelope information will increasingly be essential for LV visibility, planning, outages response, dynamic export management, future price-led flexibility and safe network operation.
10. The 2027 MOSP contracting round should be used to implement no-regrets foundations now: stronger cyber and information management requirements, API-capable and machine-readable interfaces, common schemas, version governance, better identify and access management, improved auditability, conformance testing and technical capability to support future network-facing use cases.
11. For Vector, the key issue is that the roadmap creates practical foundations for future distribution system operation or rather than simply modernising existing market services without enabling the data, visibility and flexibility functions the energy transition will require.

Distribution and flexibility implications for Vector

12. For Vector, the most important issue is that future data arrangements must explicitly support distribution operational and flexibility-related use cases. The roadmap should not be designed primarily around switching, consumer comparison and settlement pathways and then assume distribution needs can be added later. If it does, the market may end up with better retail data but still lack the foundations needed for LV visibility, operating envelopes, network-aware flexibility and efficient DER integration.

13. The Authority should therefore articulate and test network-facing use cases, including access to CER standing data at ICP level, device type and capacity, inverter capability, controllability, interval import and export data, power quality and event data where available, network limit publication, operating envelope communication, flexibility capability discovery and exceptional emergency instructions. The design should also specify the granularity, latency, update cadence and access rights required for those use cases.
14. Vector also considers that MOSP reform should be explicitly aligned with future price-led flexibility. The market should be moving toward architectures in which:
- distributors publish network-related prices, headroom and envelopes;
 - retailers and customer agents respond by optimising customer devices and load; and
 - contracts and market arrangements provide targeted assurance where needed.

CMDS assessment criteria

15. If the Authority continues to investigate a CMDS, it should compare it properly with federated and hybrid options. That assessment should consider whether each option meets the required use cases, how quickly and reliably data can be accessed, cyber and privacy risks, impacts on competition and innovation, the cost and complexity of implementation and migration, business continuity, and whether the model can adapt as future DER data needs change without requiring major system redesign.
16. The Authority should also define what problem a CMDS is intended to solve that cannot be solved by common standards, centralised authorisation and distributed storage. In Vector's view, many of the benefits sought by the Authority may be attainable without centralising meter data storage. That alternative should be fully tested before the sector is asked to bear the cost and risk of a central repository.
17. Vector supports the Authority's intent to modernise MOSP arrangements and sees the roadmap as an important step toward a more flexible, data-enabled market. To maximise its value, the roadmap should clearly identify future market and network needs, support practical digital foundations, preserve options for how data is managed, and only move toward centralised meter data storage if there is clear evidence that it is needed and will deliver benefits. Our response to the consultation paper questions follows.

Yours sincerely



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Appendix A: Submission Form

Question	Comments
1. What else should the Authority consider when reviewing our MOSP arrangements? Are there other aspects of the services we should consider changing and why?	The Authority should ensure the review is driven by clearly defined future market and operational use cases rather than by the historical boundaries between existing MOSP contracts. In particular, future arrangements should be designed for a market with materially higher data volumes, more diverse data objects, more frequent updates, more automated machine-to-machine interactions and a significantly wider set of authorised users than the current arrangements were built to support. The review should explicitly recognise that this is not only a settlement and consumer-data issue. It is also about future operational visibility of distributed resources, network-limit communication, flexibility capability discovery, operating envelopes and future DSO-related functions. If those use cases are not built into the design from the outset, there is a material risk that the resulting architecture will remain retailer- and settlement-centric and will not support the next phase of market development. The Authority should also focus on data governance settings, including information models, standards, semantics, identity and access management, auditability, data quality obligations, consent and permissioning, and change prioritisation. In Vector's view, these governance settings are likely to do more to determine the success of reform than contract consolidation alone. Finally, the review should consider resilience and concentration risk. Greater central coordination may improve consistency, but it can also create operational, cyber and vendor concentration risk. Future arrangements should be designed to preserve portability, reduce single points of failure and avoid locking the market into static data structures that may not keep pace with evolving DER use cases.
2. What do you think the Authority's view of the future of MOSP services? What else should the Authority consider?	Vector supports the Authority's broad direction toward service-based MOSP arrangements and more modern data interfaces. We agree that the current structure can make change slower, more fragmented and more expensive than it needs to be. However, service-based contracts should be judged by whether they enable faster, lower-cost and more adaptable delivery of future market capabilities - including flexibility-related and network-facing capabilities - not simply by whether they reduce the number of existing contracts. The key test is whether the future model supports a more digital, decentralised and consumer-active electricity system in practice.

	Vector supports investigation of a data hub manager role in which the hub operates primarily as a trust and coordination layer, covering identity authorisation, addressing standards, protocol governance, permission verification and auditability. This approach could significantly improve interoperability while maintaining distributed source-of-truth data and avoiding unnecessary centralisation. The Authority should also make governance more explicit. Decisions about data standards, interface requirements, change sequencing, access rules and technical priorities should be made through transparent industry processes with meaningful participation by affected parties, including EDBs. EDBs should be treated as core stakeholders in the governance of future data arrangements, not simply as end users.
3.What factors should the Authority consider when investigating the need and benefits of a CMDS?	Vector accepts that the potential role of a CMDS warrants investigation but does not support any default shift toward centralised meter data storage. A CMDS should only proceed if the Authority can establish a clear problem definition, explicit use cases, quantified benefits and demonstrable net value relative to federated and hybrid alternatives. In particular, the Authority should test whether the intended benefits of a CMDS - such as interoperability, easier authorised access, data quality, retention efficiency or DER visibility - can instead be achieved through common standards, centralised trust and authorisation, and distributed storage. If those outcomes can be achieved without central data storage, that may better preserve flexibility, innovation and cyber resilience. Assessment criteria should include the impact on innovation in data types and metering services; latency and performance requirements; cyber-security resilience and concentration risk; privacy and data minimisation; implementation and migration costs; competition and entry; business continuity; data lineage and correction processes; and the ability to support future DER-related data without repeated whole-of-system reconfiguration. Vector is concerned that a central repository could slow innovation by requiring system-wide upgrades whenever new data objects or use cases emerge. That risk appears especially material in a transition where DER capabilities, visibility requirements and market use cases are still evolving and at pace.
4.What other examples of data sharing arrangements should the Authority consider?	Vector does not have any additional examples beyond those identified in the consultation paper. We consider the Australian CER data exchange model to be a useful reference point. It is particularly relevant because it focuses on practical use cases such as access to CER standing data, efficient

	sharing of network limits and flexibility capability discovery, while avoiding premature centralisation of storage and operational control. In our view, the key lesson from international examples is one of approach: successful data reforms are use-case-led, standards-based, well governed and implemented incrementally. Ultimately ensuring the model design clearly distinguishes trust, standards and interoperability functions is important. From a New Zealand perspective, the Authority should also continue to consider domestic visibility and flexibility initiatives that reflects New Zealand's circumstances and show the growing importance of secure, machine-readable data exchange between networks, retailers, aggregators and other market participants. Those examples reinforce the need to design current reforms with future distribution and flexibility use cases in mind.
5.What else should the Authority consider in planning and scheduling changes to the MOSP services?	Vector supports a staged approach. MOSP reform should be explicitly aligned with the Authority's broader work on flexibility, distribution pricing, DSO development, consumer data right implementation, EIEPs, switching arrangements and DER participation. Implementing changes in isolation risks duplication, rework and inconsistent system design choices. The 2027 contracting round should be used to implement no-regrets foundations now. These include stronger cyber-security and information management requirements, API-capable and machine-readable interfaces, common schemas and version governance, identity and access management, auditability, conformance testing, scalability requirements and technical hooks for future support of network limits, CER standing data and other emerging use cases. The roadmap should preserve optionality. Early decisions should be reversible wherever practicable and should avoid locking the market into a specific architecture (particularly a centralised storage model) before the relevant future use cases are sufficiently mature. The Authority should also test the proposition that larger service-based contracts will necessarily improve contestability or lower costs. Future arrangements should therefore include strong accountability settings, transparent performance measures, benchmarking and disciplined change-governance arrangements so that any benefits of consolidation are demonstrable and flow through to consumers.