

11 August 2026

Electricity Authority | Te Mana Hiko

By email to: fsr@ea.govt.nz



Tēnā koutou,

RESPONSE TO SUBMISSION ON TRANSPOWER'S COMMON QUALITY INFORMATION SHARING PROPOSAL

Unison Networks Limited (Unison) and Centralines Limited (Centralines) are consumer-owned electricity distribution businesses serving communities in Hawke's Bay, Taupō, Rotorua, and Central Hawke's Bay. We appreciate the opportunity to comment on the Electricity Authority's proposal to enable Transpower to share common quality information between its System Operator and transmission network owner functions.

As consumer-owned entities, we operate in the best interests of the communities we serve. Guided by our vision, and values, we strive to deliver economic benefits to both our customers and community shareholders, while championing a sustainable energy future. We are committed to maintaining the right balance between keeping electricity affordable and making strategic investments that secure the long-term reliability and resilience of our network. In all aspects of our operations, we place strong emphasis on meeting industry compliance requirements, ensuring we uphold all relevant standards. This approach not only supports New Zealand's transition to new energy solutions but also enables our communities to access cleaner, smarter, and more flexible energy options, now and for generations to come.

Executive Summary and Overall Position

We support the Authority's proposal in principle. The amendment addresses a genuine inefficiency in the current framework by enabling Transpower's transmission network owner function to access relevant information already held by the System Operator. This should reduce duplication, improve data consistency, and support more efficient transmission planning and operational decision-making.

We support direct access to Asset Capability Statement (ACS) information, which will help ensure both functions work from the same validated dataset and reduce unnecessary information requests. We also support the sharing of encrypted modelling information. As inverter-based resources become more prevalent, access to detailed models will become increasingly important for maintaining system security, assessing network impacts, and supporting efficient investment decisions. Limiting access to encrypted models

appropriately balances these needs with the protection of OEM intellectual property and commercially sensitive information.

The proposal to share information associated with dispensation and equivalence applications should also improve the timeliness and quality of technical assessments while helping ensure decisions do not unintentionally compromise transmission network reliability.

On balance, the expected benefits appear likely to outweigh the implementation costs. Reducing duplication, improving information quality, and enabling more efficient network utilisation should support the reliable supply and efficient operation of the electricity industry for the long-term benefit of consumers.

We support the Authority's decision not to extend the proposed arrangements to distributors at this stage. The case for distributor access has not yet been clearly demonstrated, and the costs and implementation requirements remain uncertain. However, as distributed energy resources, flexibility services and distribution system operation evolve, access to more comprehensive system information may become increasingly important. Any future extension should be considered separately and supported by a clearly defined use case, demonstrated consumer benefits, and proportionate information and governance requirements.

Our support is subject to appropriate safeguards. Access and use should be limited to defined transmission network owner purposes, supported by robust security controls, and should not create additional obligations for distributors or asset owners. The amendment should remain narrowly focused on addressing the identified information-sharing inefficiency and should not create a broad information entitlement for the network owner function.

Key Considerations

Purpose and Scope

Access should be limited to information reasonably necessary for defined transmission network owner functions. This principle should also apply to dispensation and equivalence applications, with information sharing restricted to what is necessary to assess transmission network impacts and support informed decision-making.

Information Security and Governance

Information accessed by the transmission network owner should be subject to equivalent protections as information held by the System Operator. At a minimum, this should include role-based access controls, secure storage, audit logging, restrictions on onward disclosure, and appropriate breach-management processes.

Data Quality and Reliance

The framework should clearly identify data ownership, validation status, and information limitations. Transpower should remain responsible for determining whether additional verification is required before relying on information for planning or operational purposes.

Functional Separation

The proposal should preserve confidence in the practical separation between Transpower's System Operator and transmission network owner functions. Access should be limited, auditable and supported by clear accountability arrangements.

Distributor Impacts

We agree that extending the arrangements to distributors is not currently justified. While the value of information sharing may increase as distributed energy resources, aggregators and flexibility services evolve, any future expansion should be assessed separately through a clear cost-benefit framework.

Recommended Amendments

We recommend that the Authority:

- proceed with the proposed amendment;
- limit access and use to information reasonably necessary for defined network owner functions;
- replace access to "all information" with a necessity-based test;
- strengthen security, audit, and access-control requirements;
- clarify responsibilities for data quality and reliance;
- preserve effective separation between Transpower's functions; and
- confirm that no additional information obligations are created for distributors or asset owners.

Conclusion

Unison supports the Authority's targeted proposal. It addresses a clear inefficiency in the existing framework and should improve information consistency, reduce duplication, and support better-informed transmission planning and operational decision-making. With appropriate safeguards and a clear focus on the identified problem, the proposal should promote the reliable supply and efficient operation of the electricity industry for the long-term benefit of consumers.

We look forward to continuing to engage with the Authority and Transpower as this work progresses and would welcome the opportunity to discuss any aspect of this submission.

Ngā mihi nui,

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Format for submissions

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	Unison and Centralines
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, subject to appropriate confidentiality, security, and purpose limitations. Access to the ACS database should reduce duplication, improve consistency between Transpower's System Operator and network owner functions, and support more efficient transmission planning and technical assessments. Access should be role-based, auditable and limited to legitimate network-owner purposes. The Code should also clarify that access does not create additional information obligations for distributors or asset owners.
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, in principle. Access to encrypted modelling information should improve transmission planning and technical assessments while protecting intellectual property and commercially sensitive information. Use should be limited to defined transmission network purposes and supported by appropriate licensing, cybersecurity, and confidentiality protections.
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. Equivalent information should receive equivalent protection regardless of which Transpower function accesses it. Minimum requirements should include secure storage, access controls, audit logging, restrictions on onward disclosure and periodic assurance that controls remain effective.
Q4. Do you support requiring the System Operator to provide Transpower as a transmission network owner with access to equivalence arrangement and dispensation applications and	Yes, where the information is reasonably necessary to assess transmission network impacts. Providing access may reduce unnecessary delays and duplicate consent processes. However, access should be limited to relevant information rather than all information associated with an application.

supporting information? If not, why not?	Asset owners should be informed where information may be shared for this purpose.
Q5. Do you agree with the Code amendment proposal's objective? If not, why not?	We support the objective of improving Transpower's access to information needed to maintain the integrity, stability, and security of the transmission network. The objective could also recognise the benefits of more efficient transmission planning and utilisation while maintaining strong protections for confidential information.
Q6. Do you agree the Code amendment proposal's benefits outweigh its costs? Please provide evidence to support your view.	On balance, yes. The proposal should reduce duplicated information requests, administrative effort and delays in technical assessments while improving information consistency. Realisation of the benefits will depend on effective implementation, security controls, and ongoing monitoring.
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. A targeted Code amendment is preferable to relying on individual consents, contractual arrangements, or repeated information requests. It addresses the identified problem while providing a clearer and more durable information-sharing framework.
Q8. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?	Broadly, yes. The Regulatory Statement appropriately identifies likely efficiency and reliability benefits. However, it could place greater emphasis on cybersecurity risks, protection of confidential information, data quality, and the need to maintain confidence in the separation of Transpower's functions.
Q9. Do you agree the Code amendment proposal complies with section 32(1) of the Act?	Yes, subject to the safeguards outlined in this submission. The proposal is targeted at supporting reliable supply and efficient industry operation through improved access to relevant technical information. Appropriate limitations on access, use and disclosure will remain important.

Q10. Do you have any comments on the drafting of the proposed Code amendment? Please explain your answer.	We recommend: • limiting access and use to information reasonably necessary for defined network-owner functions; • replacing access to "all information" on applications with a necessity-based test; • clarifying that access does not alter ownership, intellectual property rights, or existing licence conditions; • strengthening confidentiality, audit, and access-control requirements; and • clarifying retention, breach-notification, and access-removal obligations.
Q11. Do you see any unintended consequences in making the proposed Code amendment? Please explain your answer.	Potential unintended consequences include: • expansion of information use beyond its original purpose; • erosion of the separation between Transpower's functions; • confidentiality, intellectual property, and cybersecurity risks; • reliance on incomplete or outdated information; and • the emergence of additional information requests to distributors. These risks can be mitigated through clear purpose limitations, access controls, and strong governance arrangements.