

Appendix B 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	Tesla
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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, supportive – as long as the access is limited to encrypted EMT and RMS models only. The asset owner or OEM should have no requirements to share the unencrypted EMT and RMS models even with the System Operator or Network Operator.
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, supportive – as long as the access is limited to encrypted EMT and RMS models only. The asset owner or OEM should have no requirements to share the unencrypted EMT and RMS models even with the System Operator or Network Operator.
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?	No. We believe that encrypted models are sufficient for TP's TNO to conduct the necessary studies for IBRs connecting to their network.

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 supporting information? If not, why not?	Yes, supportive – as long as the access is limited to encrypted EMT and RMS models only. The asset owner or OEM should have no requirements to share the unencrypted EMT and RMS models even with the System Operator or Network Operator.
Q5. Do you agree with the Code amendment proposal's objective? If not, why not?	Yes, as it eliminated the need for separate NDAs to be in effect.
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.	We believe option 3 is the preferred option.
Q8. Do you agree with the analysis presented in this Regulatory Statement? If not, why not?	We do not agree that unencrypted EMT models are required for any study conducted by NSP or ISO. We do not agree that unencrypted RMS models are required for studies conducted by the NSP. We agree to ISO sharing ENCRYPTED models with NSP in both RMS and EMT formats.
Q9. Do you agree the Code amendment proposal complies with section 32(1) of the Act?	The amendment must specify that the models shared with the TNO by the TSO must be encrypted. We agree with the general concept of TSO sharing RMS and EMT ENCRYPTED models with TNO. We believe TSO must keep the unencrypted RMW models within the TSO network.
Q10. Do you have any comments on the drafting of the proposed Code amendment? Please explain your answer.	Mentioned above.

Q11. Do you see any unintended consequences in making the proposed Code amendment?
Please explain your answer.

N/A.