

Improving visibility of competition in the over-the- counter contract market: additional consultation on clause 2.16 information notice

Consultation paper

17 July 2025

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1. Purpose of this paper

- 1.1. The Electricity Authority Te Mana Hiko (Authority) is seeking additional feedback from interested parties on our proposed clause 2.16 information notice to improve visibility of competition in the over-the-counter (OTC) contract market.
- 1.2. Additional consultation is necessary because our proposal has expanded in scope. We want to ensure parties affected by the expanded scope have the opportunity to make a submission.

2. What you need to know to make a submission

May 2025 consultation

- 2.1. The Authority consulted on a proposal to improve the monitoring and transparency of the market for OTC hedges in May 2025: *Improving visibility of competition in the over-the-counter contract market: clause 2.16 information notice* (May consultation).
- 2.2. The proposal included an information gathering notice under the *Regular and Event-Driven Provision of Information to the Authority* sub-part of the Code (clauses 2.16 to 2.24) to collect information on OTC requests for contracts and responses to those requests (proposed notice).
- 2.3. The consultation closed on 28 May 2025, and 12 submissions were received. All submissions have been published on our [website](#).

Additional consultation

- 2.4. While non-integrated generators did not submit on our original consultation on the proposed notice, some submitted on the Energy Competition Task Force initiative 1A and 1D issues papers. Their responses to these consultations suggest that OTC pricing and accessibility issues are a concern for non-integrated generators as well, and that non-integrated generators may be supportive of increased monitoring of the OTC market.
- 2.5. After also considering the submissions received during the May consultation on the proposed notice, we now propose to expand the scope of the notice in two ways:
 - (a) to collect information from all generators (including non-integrated generators)
 - (b) to capture sell requests.
- 2.6. Given the Authority's role in monitoring competition, applying the proposed notice to non-integrated generators and having visibility of both buy and sell requests will provide a more comprehensive view of participant behaviour and hedge options available across the sector. It will allow a consistent and integrated approach to monitoring all OTC bids and offers (including power purchase agreements (PPAs)) and will support any options progressed through the Energy Competition Task Force 1D options.
- 2.7. We are carrying out additional consultation to allow parties who are potentially affected by the expanded scope to submit on the proposal. It will be beneficial in this additional consultation process to see, and submit on, other proposed changes

from the May consultation. These are detailed in section 4. The proposed clause 2.16 notice is set out in Appendix A with changes from the previous notice redlined in Appendix B (proposed amended notice). In addition to the two proposed changes above, it also includes proposed changes from the May consultation.

- 2.8. This paper should be read in conjunction with our initial consultation paper published on 6 May 2025: [Improving visibility of competition in the over-the-counter contract market: clause 2.16 information notice](#).
- 2.9. If you have already submitted on the initial consultation, you may wish to provide additional feedback on this consultation.

How to make a submission

- 2.10. The Authority's preference is to receive submissions in electronic format (through the Authority's information provision platform info.ea.govt.nz) using the questions in Appendix B. Submissions in electronic form should be uploaded to <https://info.ea.govt.nz/sl/6d9d52>.
- 2.11. If you cannot send your submission electronically or would prefer to send a Microsoft Word submission, please contact the Authority (info@ea.govt.nz or 04 460 8860) to discuss alternative arrangements.
- 2.12. Please note the Authority intends to publish all submissions it receives. If you consider that the Authority should not publish any part of your submission, please:
 - (a) indicate which part should not be published
 - (b) explain why you consider we should not publish that part
 - (c) provide a version of your submission the Authority can publish (if we agree not to publish your full submission).
- 2.13. If you indicate part of your submission should not be published, the Authority will discuss this with you before deciding whether to not publish that part of your submission.
- 2.14. However, please note all submissions received by the Authority, including any parts the Authority does not publish, can be requested under the Official Information Act 1982. This means the Authority would be required to release material not published unless good reason existed under the Official Information Act to withhold it. The Authority would normally consult with you before releasing any material you said should not be published.

When to make a submission

- 2.15. Please deliver your submission by 5pm on Thursday 24 July 2025. Authority staff will acknowledge receipt of all submissions electronically. Please contact the Authority info@ea.govt.nz or 04 460 8860 if you do not receive electronic acknowledgement of your submission within two business days.

3. We propose expanding the scope of the notice

- 3.1. We propose expanding the scope of the proposed notice in two ways:

- (a) to collect information from all generators (including non-integrated generators)
- (b) to capture sell requests.

Table 1: Expanded scope of the proposed notice

Original proposal	Expanded proposal
The proposed notice would be to all retailers (including gentailers and small, micro and community retailers) and large industrials.	The proposed amended notice would be to all retailers (including gentailers and small, micro and community retailers), all generators, and large industrials.
The proposed notice includes only requests for buying contracts.	The proposed amended notice includes requests for buying and selling contracts.

Collecting information from all generators

- 3.2. Our May 2025 consultation proposed to exclude non-integrated generators on the basis that:
- (a) the Energy Competition Task Force initiative 1A was considering increasing scrutiny of bids and offers in the OTC market for PPAs¹ and PPA firming²
 - (b) it would be premature to put forward specific proposals on information relating to non-integrated generator requests for firming/sleeving.
- 3.3. With that work now largely folded into initiative 1D on level playing field measures and any measures to address competitiveness of PPAs and the firming of PPAs likely being addressed alongside measures to increase competitiveness in the overall OTC market, a comprehensive, consistent and integrated approach to monitoring all OTC bids and offers (including PPAs) will be needed to support any options progressed through 1D.
- 3.4. While non-integrated generators did not submit on our original consultation on the proposed notice, some submitted on the 1A and 1D issues papers. Their responses to these consultations suggest that OTC pricing and accessibility issues are a concern for non-integrated generators as well, and that non-integrated generators may be supportive of increased monitoring of the OTC market.
- 3.5. We anticipate non-integrated generators will make a mixture of both buy and sell requests. We are proposing to include both buy and sell requests (as set out in the next section) to provide a complete picture of the bids and offers in the market. It would therefore be incomplete if it simply focused on the gentailers. Several submissions to our May consultation supported this view.
- 3.6. Given the Authority's aim is to monitor competition, applying the notice to non-integrated generators will provide a more comprehensive view of hedge options

¹ PPAs are long term contracts to sell power output from a specific generation source.

² In this context, firming refers to a PPA buyer accessing pricing for the balance of their demand – including when the PPA generation is not producing due to lulls in wind or sunshine.

available across the sector and allow the comparison of trends in hedging behaviour of, and offers received by, all participant types that transact in the OTC market.

- 3.7. Five submitters to our original consultation responded that we should include non-integrated generators and PPAs to capture all market dynamics and provide a comprehensive view of all hedge options available. Octopus pointed out that many non-integrated generators already participate in the OTC market, and we would avoid data gaps by including them. We also agree with another point in its submission³ that:

As the electricity market evolves with increased renewable generation, understanding the relationship between traditional OTC hedging and emerging PPA structures becomes increasingly important for effective market oversight

Q1. Do you agree with the Authority's proposal to expand the scope of the proposed notice to collect information from non-integrated generators?

Capturing sell requests

- 3.8. Following the arguments made in three submissions and further consideration, we consider that the proposed notice should also include sell requests. We agree with points made in submissions that inclusion will allow us to:

- (a) better monitor accessibility
- (b) better monitor participant behaviour, market power, and risk management strategies
- (c) monitor who is offering both buy and sell requests, and the difference in price between these requests.

- 3.9. As pointed out by Genesis in its submission⁴, optimising a hedge book requires participants to be able to buy or sell their portfolio as their hedge requirements change. Accessibility therefore includes the ability to both buy and sell when requested.

- 3.10. The Authority proposes collecting data from the sell side as well. This provides important information around potential arbitrage as well as measuring market power via the difference between the price parties are offering to buy and sell.

Q2. Do you agree with the Authority's proposal to capture sell requests in addition to buy requests?

³ [OENZ Submission on Improving visibility of competition in the over-the-counter contract market: clause 2.16 information notice.](#)

⁴ https://www.ea.govt.nz/documents/7474/Submission_-_Improving_visibility_of_competition_in_OTC_contract_-_Genesis.pdf.

4. We have also made some other changes to the notice after considering submissions

- 4.1. We think it's beneficial in this additional consultation process for participants to see the proposed amended notice, including other proposed changes from the May consultation. These are minor changes involving clarification and are set out in Table 2. A redlined version of the proposed amended notice is also available in Appendix B containing all of our current proposed changes.

Table 2: Other proposed changes to the proposed amended notice

Topic	Original proposal	Updated proposal
What constitutes a written request	The Authority proposed restricting the data collection to written requests and requests made through brokers but to exclude text messages and phone calls.	<p>We propose to include all requests where the initial request is made in writing but exclude text messages (or other messenger applications). This includes request for proposals (RFPs), expressions of interest (EOIs), and emails. There is an appropriate balance to strike between capturing the right data and creating an unnecessary compliance burden.</p> <p>For the avoidance of doubt, participants may make an initial request via a phone conversation or text message and later record the request in writing (via email or a written memo). These requests would not be captured by our proposed information notice. All RFPs and EOIs should be included, as we class these as the initial request regardless of whether this is the initial approach</p>
Initial bids and final offers	We proposed to collect information on the initial bids and final offers only, as these are the most relevant: what the requestor originally wanted, and what they ended up being offered. Including an additional field covering the number of negotiation steps taken by the parties was presented as an alternative	<p>We propose to remove the negotiation steps field as we consider it would increase the burden for the participants while not adding much value in terms of information.</p> <p>There is no change to our proposal to collect information on initial bids rather than final bids.</p> <p>We propose to define a final offer as the offer which the requestor either declines to transact or makes a trade.</p>

Requests made through brokers	The proposed notice applies to these requests, with the requirement to provide the information falling on the requestor	No change
Monitoring of the standardised flexibility product	Not discussed in the original consultation	We propose that requests for the standardised super-peak hedge contract made through auctions run by Aotearoa Energy are explicitly excluded from the proposed amended notice. The Authority already collects and publishes this information.
Decline reasons	The original consultation paper provided a simplified description of what the decline reasons should be.	We propose expanding the description and include a list of the most common reasons for declining an offer, based on the feedback we received.
Negotiations that straddle two quarters	Not specified	We propose that requests made in one quarter where final offers were received in the following quarter should be disclosed in the quarter in which the final offers were received.
Offer terms and conditions	Our proposed notice included fields for the offers made of the credit requested and how many days the proposal was valid for but did not capture demand response provisions.	The proposed amended notice captures demand response provisions.

Q3. Do you agree with the Authority's other changes to the proposed notice listed in table 2?

5. Our view that the expected benefits of the proposed amended notice outweigh the costs is unchanged

- 5.1. Our May consultation set out our preliminary view that the proposed notice benefits are expected to outweigh the costs. A common theme in submissions received was the importance of ensuring the data collection balances costs with benefits and the proposals are workable.
- 5.2. In this consultation, our proposal is expanded to collect information from all generators (including non-integrated generators) and to capture sell requests.

However, we have defined the scope of the proposed amended notice more tightly to help minimise implementation costs. Our view is that costs are relatively low for most participants and the proposed amended notice is preferred to other options.

Appendix A Proposed Clause 2.16 notice: OTC bids and offers data

This over-the-counter (OTC) bids and offers data notice is published under clause 2.16 of the Electricity Industry Participation Code 2010 (Code). The first data submission will be due no later than 31 August 2025.

Overview

Clause 2.16(1) of the Code enables the Electricity Authority Te Mana Hiko (Authority) to publish a notice specifying information a participant must, on a regular basis or because of an identified event, provide to the Authority.

The provision of the required information to the Authority as specified in this notice will enable the Authority to carry out its functions referred to in section 45(a) of the Electricity Industry Act 2010 (Act), including undertaking industry and market monitoring (s16(1)(g) and undertaking and monitoring market facilitation measures (s16(1)(f)).

To whom the notice applies

This notice applies to all retailers, all generators, and large industrials (industrials who are participants under section 7 of the Act) (applicable participants).

Scope of requests

The clause 2.16 notice applies to buy and sell requests. The clause 2.16 notice also applies to buy and sell requests made through energy brokers by applicable participants, but the requirement falls on applicable participants to provide the information on these requests.

This clause 2.16 notice encompasses initial bids and final offers (when the requestor either declines to transact or makes a trade).

All requests where the initial request is made in writing are included – but excluding text messages (or other messenger applications). This includes request for proposals (RFPs), expressions of interest (EOIs), and emails. For the avoidance of doubt, applicable participants may make an initial request via a phone conversation or text message and later record the request in writing (via email or a written memo). These requests are not captured by this information notice. All RFPs and EOIs should be included, as we class these as the initial request regardless of whether this is the initial approach.

Requests made in one quarter where final offers were received in the following quarter should be disclosed in the quarter in which the final offers were received.

Standardised super-peak hedge contract made through auctions run by Aotearoa Energy are explicitly excluded from this notice.

When the information needs to be provided

Regular provision

A response to this information notice should be provided quarterly. If no written requests were sent out during the relevant quarter, an empty requests master file must be submitted. If one or more written requests were sent out during the relevant quarter (that meet the

requirements as set out in the notice), the information as set out below must be submitted for that quarter.

Data (or a response specifying no requests were sent out) must be provided to the Authority 10 working days after the end of the quarter.

The Authority may extend the deadline outlined above for a participant but only in exceptional circumstances. If you wish to seek an extension of time under this notice, please apply for one in writing no later than 5pm five working days before the deadline outlined above and include your reasons for seeking the extension.

The way applicable participants must provide the information

Applicable participants must upload the required information using the Authority's secure file transfer facility. An SFTP account will be provisioned for each qualifying Participant unless such an account already exists. The information required for the Authority to provision an SFTP account and instructions on how to configure and use the SFTP facility will be supplied upon request by emailing data.products@ea.govt.nz.

Information that must be provided

We propose to divide the data collection into requests and responses. For each there will be three csv files; tables 3-5 detail the request files while tables 6-8 detail the response files. Fields marked with a (*) are the same or very similar to the ones captured in the HDO.⁵

When providing information to the Authority under this notice, applicable participants can identify information they consider confidential and the reasons why. Provisions relating to confidential information are set out in clause 2.21 of the Code.

The Authority will handle any confidential information in accordance with clause 2.22 of the Code.

Note: Please see consultation paper and decision paper for further information about confidentiality.

Table 3 – Requests: contract master file

Column name	Description	Data type	Example
RequestID	Party's own unique identifier for the requested contract. Used by the system to link the request and response tables. Can be a request for a single product or multiple products. See ContractID field in Tables 4-8. Case sensitive.	Char (30)	ABC00123

⁵ See: [NZX and Electricity Authority. Hedge Disclosure System User Guide for Bulk Upload File Formats \(2025\)](#).

Column name	Description	Data type	Example
RequestType	<p>The way in which the request was sent. Inputs:</p> <ul style="list-style-type: none"> • RFP – request for proposal • EOI – expression of interest • DREQ – direct request • BROKR – made via broker • OTHER – other types of requests 	Char (5)	RFP
RequestSentTo	<p>A list or description of participants who were sent the request</p> <p>Insert text between double quotes (").</p> <p>Use a pipe character () to separate items in a list.</p>	Text	"Contact Energy Ltd Genesis Energy Ltd"
RequestDate	The date the request was sent out	YYYY-MM-DD	2025-08-15
RequestCloseDate	Date (deadline) given to respond to the request (as specified in the request)	YYYY-MM-DD	2025-08-15

Table 4 – Requests: contract details file

Column name	Description	Data type	Example
RequestID	<p>Party's own unique identifier for the requested contract. Used by the system to link the request and response tables.</p> <p>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</p> <p>Case sensitive.</p>	Char (30)	ABC00123
ContractID	<p>Party's own unique identifier for each product requested under the same RequestID</p> <p>One product per row with respective ContractIDs.</p>	Char (30)	3

Column name	Description	Data type	Example
PartyRole*	<p>Whether the requestor is the buyer or seller of the contract. Inputs:</p> <ul style="list-style-type: none"> • Buyer • Seller <p>Not case sensitive</p>	Char (6)	Buyer
ContractType*	<p>The type of the requested contract. Inputs:</p> <ul style="list-style-type: none"> • CFD – contract for differences • FPFV – fixed-price fixed volume • FPVV – fixed-price variable volume • OPT – option • NOVEL – other contract types <p>Note that NOVEL should be used for other contract types</p> <p>Not case sensitive</p>	Char (5)	CFD
OptionVariation*	<p>Whether the Option is American or Asian style. Inputs:</p> <ul style="list-style-type: none"> • AM – American • AS – Asian • N/A – Not Applicable <p>Note: Mandatory for Options contracts, otherwise leave blank.</p> <p>Not case sensitive</p>	Char (3)	AM
OptionType*	<p>Whether the option is a Call or Put. Inputs:</p> <ul style="list-style-type: none"> • C – Call option • P – Put option • N/A – Not Applicable 	Char (3)	C

Column name	Description	Data type	Example
	Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive		
OptionSubtype*	Whether the option is a Cap or Floor. Inputs: <ul style="list-style-type: none"> • C – Cap • F – Floor • N/A – Not Applicable Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive	Char (3)	F
Premium*	Premium price (\$) <p>Mandatory for Options contracts. Blank otherwise.</p>	Decimal (5,2)	123.45
DemandResponse	Y or N to whether the request is for a demand responsive product	Char (1)	N
EffectiveDate*	The start date of the price schedule record	YYYY-MM-DD	2025-08-15
EndDate*	The end date of the price schedule record	YYYY-MM-DD	2025-08-15
ContractProfile	The shape of the requested contract: <ul style="list-style-type: none"> • BASE – for baseload • GENW – for generation following (wind) • GENG – for generation following (geothermal) • SHAPED – for other shaped products Not case sensitive	Char (6)	SHAPED
MinVolume	Where the requested contract has variable volume this represents the minimum requested quantity (MW).	Decimal (15,3)	123.456

Column name	Description	Data type	Example
	Where the contract requested has fixed volume this is a fixed amount (MW)		
MaxVolume	Where the contract requested has variable volume this represents the maximum requested quantity (MW) . Where the contract requested has fixed volume this represents the fixed amount (MW)	Decimal (15,3)	123.456
Quantity*	The total volume requested (MWh) .	Decimal (15,3)	1234.567
EnergyType*	<p>C – if the contract is tied to electricity consumption, and the volume of the contract is determined by the energy load or usage. For example, for a demand response agreement for a retail customer's load</p> <p>G – if the contract is associated with a specific plant or station, and the volume of the contract is determined by the electricity output of that plant. For example, for a PPA tied to a wind farm's output</p> <p>N/A – for financial contracts that are not tied to specific generation or consumption volumes. For example, for a standard hedge or swap contract not tied to specific assets or load</p> <p>Optional for Novel</p> <p>Not case sensitive</p>	Char (3)	G
IndexPrice*	<p>Y or N to indicate whether the requested contract is an index-based price contract</p> <p>Optional for Novel</p> <p>Not case sensitive</p>	Char (1)	Y

Column name	Description	Data type	Example
PriceEscalationFrequency	<p>The frequency at which the requested contract price is readjusted. Inputs:</p> <ul style="list-style-type: none"> • NONE • 1YEAR – requests readjusted annually • 2YEAR – for requests readjusted every 2 years • 3YEAR – for requests readjusted every 3 years • 4YEAR – for requests readjusted every 4 years • 5YEAR – for requests readjusted every 5 years or more <p>Not case sensitive</p>	Char (5)	1YEAR
SuspensionTriggers	<p>Suspension triggers for the requested contract, if any.</p> <p>Free-form field</p> <p>Insert text between double quotes (").</p>	Text	"Example text"
OtherInformation*	<p>Any other information the participant wishes to disclose.</p> <p>Free-form field</p> <p>Insert text between double quotes (").</p>	Text	"Example text"

Table 5 – Requests: contract price schedule file

Column name	Description	Data type	Example
RequestID	<p>Party's own unique identifier for the requested contract. Used by the system to link the request and response tables.</p>	Char (30)	ABC00123

Column name	Description	Data type	Example
	Can be a request for a single product or multiple products. See ContractID field in Tables 4-8. Case sensitive.		
ContractID	Party's own unique identifier for each product requested under the same RequestID One product per row with respective ContractIDs (see example below).	Char (30)	3
StartDate*	The start date of the price schedule record	YYYY-MM-DD	2025-08-15
EndDate*	The end date of the price schedule record	YYYY-MM-DD	2025-08-15
StartPeriod*	The start period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows under different ContractIDs. Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight savings start dates, 50 on daylight savings end dates, and 48 for all other dates)	Integer	48
EndPeriod*	The end period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows under different ContractIDs. Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight savings start dates, 50 on daylight savings end dates, and 48 for all other dates)	Integer	48
DayType*	Days on which the requested contract is effective. Inputs: <ul style="list-style-type: none"> ALL – the price schedule record applies to all days within the date range 	Char (3)	ALL

Column name	Description	Data type	Example
	<ul style="list-style-type: none"> BD – the price schedule record applies to business days only within the date range NBD – the price schedule record applies to non-business days only within the date range PH – the price schedule record applies to public holidays only within the date range NPH – the price schedule record applies to all days within the date range that are not public holidays WD – the price schedule record applies to all weekdays within the date range (including public holidays on a weekday) WE – the price schedule record applies to all weekend days within the date range (including public holidays on a weekend day) <p>Not case sensitive</p>		
Node*	<p>Specify the node(s) at which prices are requested. If volume is required at more than one node, these should be on separate rows under different ContractIDs.</p> <p>Not case sensitive</p>	Char (8)	HAY2201
Volume*	<p>Quantity requested per trading period (in MWh). One value per group of trading periods, each on separate rows under different ContractIDs.</p>	Decimal (15,3)	123.456

Table 6 – Responses: no offers received file (only applicable if the other party provided a response but not an offer)

Column name	Description	Data type	Example
RequestID	Party's own unique identifier for the requested contract. Used by	Char (30)	ABC00123

Column name	Description	Data type	Example
	<p>the system to link the request and response tables.</p> <p>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</p> <p>Case sensitive.</p>		
ContractID	<p>Party's own unique identifier for each product requested under the same RequestID</p> <p>One product per row with respective ContractIDs (see example below).</p>	Char (30)	3
OtherPartyLegalName*	<p>The other party legal name.</p> <p>Insert text between double quotes (").</p> <p>Not case sensitive</p>	Text	"Contact Energy Ltd"
DeclineReason	<p>The reason given by the other party for not providing an offer for the requested contract.</p> <p>Inputs:</p> <ul style="list-style-type: none"> • FMCA – requestor does not meet FMCA requirements (not an eligible wholesale investor) • CRED – insufficient credit • ISDA – no signed ISDA master agreement • LCOMP – Responses withheld due to legal or compliance constraints • TIME – not enough time between request date and request close date • TEST – When requestor was interested in understanding market conditions and did not have the intention to complete the trade 	Char (5)	FMCA

Column name	Description	Data type	Example
	<ul style="list-style-type: none"> OTHER - if no reason provided 		
ResponseDate	The date when the response was sent by the other party	YYYY-MM-DD	2025-08-15

Table 7 – Responses: contract details file

Column name	Description	Data type	Example
RequestID	<p>Party's own unique identifier for the requested contract. Used by the system to link the request and response tables.</p> <p>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</p> <p>Case sensitive.</p>	Char (30)	ABC00123
ContractID	<p>Party's own unique identifier for each product requested under the same RequestID</p> <p>One product per row with respective ContractIDs (see example below).</p>	Char (30)	3
OtherpartyLegalName*	<p>The other party legal name.</p> <p>Insert text between double quotes (").</p> <p>Not case sensitive</p>	Text	"Contact Energy Ltd"
ResponseDate	The date when the response was sent by the other party	YYYY-MM-DD	2025-08-15
CreditRequested	The amount (in \$) requested by the respondent	Decimal (15,2)	1000.50
ProposalValidFor	The number of days the proposal is valid for	Integer	20
ConformingFlag	Y or N to indicate whether the response was conforming	Char (1)	Y

Column name	Description	Data type	Example
ContractTypeOffered*	<p>The type of the offered contract. Inputs:</p> <ul style="list-style-type: none"> • CFD – contract for differences • FPFV – fixed-price fixed volume • FPVV – fixed-price variable volume • OPT – option • NOVEL – other contract types <p>Note that NOVEL should be used for other contract types</p> <p>Not case sensitive</p>	Char (5)	CFD
DemandResponseOffered	Y or N to whether the offer is for a demand responsive product	Char (1)	N
PremiumOffered*	Premium price for the offer (\$) Mandatory for Options contracts. Blank otherwise.	Decimal (15,2)	123.45
OptionVariationOffered*	<p>Whether the Option is American or Asian style. Inputs:</p> <ul style="list-style-type: none"> • AM – American • AS – Asian • N/A – Not Applicable <p>Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive</p>	Char (3)	AM
OptionTypeOffered*	<p>Whether the option is a Call or Put. Inputs:</p> <ul style="list-style-type: none"> • C – Call option • P – Put option • N/A – Not Applicable <p>Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive</p>	Char (3)	C

Column name	Description	Data type	Example
OptionBuyless*	Y or N Mandatory for a call options contract. Used when disclosing a swaption ⁶	Char (1)	Y
OptionSubtypeOffered*	Whether the option is a Cap or Floor. Inputs: <ul style="list-style-type: none"> • C – Cap • F – Floor • N/A – Not Applicable Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive	Char (3)	F
EffectiveDateOffered*	The date when the offer was sent by the other party	YYYY-MM-DD	2025-08-15
EndDateOffered*	The date when the offer was sent by the other party	YYYY-MM-DD	2025-08-15
ContractProfileOffered	The shape of the offer. Inputs: <ul style="list-style-type: none"> • BASE – for baseload • GENW – for generation following (wind) • GENG – for generation following (geothermal) • SHAPED – for other shaped products Not case sensitive	Char (6)	SHAPED
MinVolumeOffered	Where the offered contract has variable volume this represents the minimum offered quantity (MW). Where the offered contract has fixed volume this is a fixed amount (MW)	Decimal (15,3)	123.456
MaxVolumeOffered	Where the offered contract has variable volume this	Decimal (15,3)	123.456

⁶ This fulfils the Code under clause 13.219 (1) (h) (ii), which specifies that for call options, one must indicate if the buyer has the right to buy less than the quantity.

Column name	Description	Data type	Example
	represents the maximum offered quantity (MW). Where the offered contract has fixed volume this represents the fixed amount (MW)		
QuantityOffered*	The total volume offered (MWh).	Decimal (15,3)	123.456
ExchangeForPhysicalOffered	Y or N Whether the offer is an exchange for physical supply	Char (1)	N
EnergyTypeOffered*	<p>C – if the contract is tied to electricity consumption, and the volume of the contract is determined by the energy load or usage. For example, for a demand response agreement for a retail customer's load</p> <p>G – if the contract is associated with a specific plant or station, and the volume of the contract is determined by the electricity output of that plant. For example, for a PPA tied to a wind farm's output</p> <p>N/A – for financial contracts that are not tied to specific generation or consumption volumes. For example, for a standard hedge or swap contract not tied to specific assets or load</p> <p>Optional for Novel</p> <p>Not case sensitive</p>	Char (3)	G
ReferencePriceOffered	<p>What the offered contract price is indexed to, if applicable. Inputs:</p> <ul style="list-style-type: none"> • SPOT – for spot price • ASX – for ASX price, • MODEL – for modelled price 	Char (4)	SPOT

Column name	Description	Data type	Example
	<ul style="list-style-type: none"> CPI – for prices referenced to Consumer Price Index (CPI) PPI – for prices referenced to Producer Price Index (PPI) OTHER N/A 		
IndexPriceOffered*	<p>Y or N to indicate whether the offered contract is an index-based price contract</p> <p>Optional for novel</p> <p>Not case sensitive</p>	Char (1)	Y
PriceEscalationFrequencyOffered	<p>The frequency at which the contract offered price is readjusted. Inputs:</p> <ul style="list-style-type: none"> NONE 1YEAR – requests readjusted annually 2YEAR – for requests readjusted every 2 years 3YEAR – for requests readjusted every 3 years 4YEAR – for requests readjusted every 4 years 5YEAR – for requests readjusted every 5 years or more <p>Not case sensitive</p>	Char (5)	1YEAR
IndexPriceFormulaOffered*	<p>Formula of index price.</p> <p>Insert text between double quotes (“”).</p> <p>Optional free-text field</p>	Text	“Example text”
ASXReferenceNodeOffered	<p>Specifies which ASX node the offer price is referenced to, if applicable. Blank otherwise.</p> <p>Not case sensitive</p>	Char (8)	BEN2201

Column name	Description	Data type	Example
ASXLastDateOffered	Specifies the last ASX date specified for the referencing, if applicable. Blank otherwise	YYYY-MM-DD	2025-08-15
ASXLastPriceOffered	Specifies the last ASX price (\$/MWh) specified for the referencing, if applicable. Blank otherwise	Decimal (15,2)	123.45
SuspensionTriggersOffered	Suspension triggers for the offered contract, if any. Insert text between double quotes ("). Free-form field	Text	"Example text"
OtherInformationOffer*	Any other information the participant wishes to disclose on the offer or negotiation steps. Insert text between double quotes ("). Free-form field	Text	"Example text"

Table 8 - Responses: contract price schedule file

Column name	Description	Data type	Example
RequestID	Party's own unique identifier for the requested contract. Used by the system to link the request and response tables. Can be a request for a single product or multiple products. See ContractID field in Tables 4-8. Case sensitive.	Char (30)	ABC00123
ContractID	Party's own unique identifier for each product requested under the same RequestID	Char (30)	3

Column name	Description	Data type	Example
	One product per row with respective ContractIDs (see example below).		
StartDateOffered*	The start date of the price schedule record	YYYY-MM-DD	2025-08-15
EndDateOffered*	The end date of the price schedule record	YYYY-MM-DD	2025-08-15
StartPeriodOffered*	<p>The start period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows under different ContractIDs.</p> <p>Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight savings start dates, 50 on daylight savings end dates, and 48 for all other dates)</p>	Integer	48
EndPeriodOffered*	<p>The end period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows under different ContractIDs.</p> <p>Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight savings start dates, 50 on daylight savings end dates, and 48 for all other dates)</p>	Integer	48
DayTypeOffered*	<p>Days on which the offered contract is effective. Inputs:</p> <ul style="list-style-type: none"> ALL – the price schedule record 	Char (3)	ALL

Column name	Description	Data type	Example
	<p>applies to all days within the date range</p> <ul style="list-style-type: none"> • BD – the price schedule record applies to business days only within the date range • NBD – the price schedule record applies to non-business days only within the date range • PH – the price schedule record applies to public holidays only within the date range • NPH – the price schedule record applies to all days within the date range that are not public holidays • WD – the price schedule record applies to all weekdays within the date range (including public holidays on a weekday) • WE – the price schedule record applies to all weekend days within the date range (including public holidays on a weekend day) <p>Not case sensitive</p>		
NodeOffered*	<p>Specify the node(s) at which prices are offered. If volume is offered at more than one node, these should be on</p>	Char (8)	HAY2201

Column name	Description	Data type	Example
	separate rows under different ContractIDs. Not case sensitive		
VolumeOffered*	Quantity offered per trading period (in MWh) . One value per group of trading periods, each on separate rows under different ContractIDs.	Decimal (15,3)	123.456
PriceOffered*	Price offered for each contiguous group of trading periods (\$/MWh) . Each group of trading periods on separate rows. For option contracts, this field should contain the option strike price.	Decimal (15,2)	123.45

Example Tables

Figure 1 and Figure 2 show an example of how the Requests: price schedule (details) file should be populated when there is only one product being requested under a certain request (Figure 1) and when multiple products are requested under the same request (Figure 2).

Figure 1 - Price schedule table (Requests) populated with mock data showing a single product requested for RequestID number 20

RequestID	ContractID	StartDate	EndDate	StartPeriod	EndPeriod	DayType	Node	Volume
20	1	2025-08-10	2025-08-15	1	48	ALL	HAY2201	123.456

Figure 2 - Price schedule table (Requests) populated with mock data showing multiple product requested for RequestID number 21

RequestID	ContractID	StartDate	EndDate	StartPeriod	EndPeriod	DayType	Node	Volume
21	1	2025-08-10	2025-08-15	1	48	ALL	HAY2201	123.456
	2	2025-08-10	2025-08-15	13	20	BD	BEN2201	234.567
	3	2025-08-10	2025-08-15	35	46	NPH	OTA2201	345.678

Submitting information

When submitting csv files to the Authority, identify each file using the following table as guidance:

Table 9 – Guidelines for naming csv files for submission

Table	Year of Submission	Submission Quarter	File Name
Requests: master file	2025	Q3	request_master_2025Q3.csv
Requests: details file	2025	Q3	request_details_2025Q3.csv
Requests: price schedule file	2025	Q3	request_schedule_2025Q3.csv
Responses: no offers file	2025	Q3	no_response_2025Q3.csv
Responses: details file	2025	Q3	response_details_2025Q3.csv
Responses: price schedule file	2025	Q3	response_schedule_2025Q3.csv

Note that we expect to receive files named using a *type_subtype_YYYYQQ.csv* format. There is no need to specify company name in the file as such information is automatically captured by the unique SFTP account assigned to each participant.

Note also that files should be saved as csv files (not MS Excel – eg. avoid submitting .xlsx files) using UTF-8 encoding.

Appendix B Redlined version of clause 2.16 notice

Proposed **Clause 2.16 notice**: ~~OTC bids and offers data~~

This over-the-counter (OTC) bids and offers data notice is published under clause 2.16 of the Electricity Industry Participation Code 2010 (Code). ~~, for data covering 1 January 2025 to 31 July 2025. The first data submission will be due no later than 31 August 2025..~~

Overview

Clause 2.16(1) of the Code enables the Electricity Authority Te Mana Hiko (Authority) to publish a notice specifying information a participant must, on a regular basis or because of an identified event, provide to the Authority.

The provision of the required information to the Authority as specified in this notice will enable the Authority to carry out its functions referred to in section 45(a) of the Electricity Industry Act 2010 (Act), including undertaking industry and market monitoring (s16(1)(g) and undertaking and monitoring market facilitation measures (s16(1)(f)).

To whom the notice applies

This notice applies to all retailers, all generators, and large industrials (industrials who are participants under section 7 of the Act) (applicable participants). ~~This will enable us to compare responses made to gentailers' requests to responses made to requests from other retailers and large industrials.~~

Scope of requests

The clause 2.16 notice applies to buy and sell requests. The clause 2.16 notice also applies to buy and sell requests made through energy brokers by applicable participants, but the requirement falls on applicable participants to provide the information on these requests.

This clause 2.16 notice encompasses initial bids and final offers (when the requestor either declines to transact or makes a trade).

All requests where the initial request is made in writing are included – but excluding text messages (or other messenger applications). This includes request for proposals (RFPs), expressions of interest (EOIs), and emails. For the avoidance of doubt, applicable participants may make an initial request via a phone conversation or text message and later record the request in writing (via email or a written memo). These requests are not captured by this information notice. All RFPs and EOIs should be included, as we class these as the initial request regardless of whether this is the initial approach.

Requests made in one quarter where final offers were received in the following quarter should be disclosed in the quarter in which the final offers were received.

Standardised super-peak hedge contract made through auctions run by Aotearoa Energy are explicitly excluded from this notice.

When the information needs to be provided

Regular provision

A response to this information notice should be provided quarterly. If no written requests were sent out during the relevant quarter, an empty requests master file must be submitted. If one or more written requests were sent out during the relevant quarter (that meet the requirements as set out in the notice), the information as set out below must be submitted for that quarter.

Data (or a response specifying no requests were sent out) must be provided to the Authority 10 working days after the end of the quarter.

The Authority may extend the deadline outlined above for a participant but only in exceptional circumstances. If you wish to seek an extension of time under this notice, please apply for one in writing no later than 5pm five working days before the deadline outlined above and include your reasons for seeking the extension.

The way ~~retailers and large industrials~~ applicable participants must provide the information

~~Retailers and large industrials~~ Applicable participants must upload the required information to a secure Azure storage account either by direct deposit or by using the Authority's secure file transfer facility. ~~A secure storage~~ An SFTP account will be provisioned for each qualifying ~~retailer~~. ~~Instructions explaining~~ Participant unless such an account already exists. The information required for the Authority to provision an SFTP account and instructions on how to configure and use the ~~file transfer~~ SFTP facility will be supplied ~~by the Authority, as will the required secure access keys upon request by emailing~~ data.products@ea.govt.nz.

Information that must be provided

We propose to divide the data collection into requests and responses. For each there will be three csv files; tables ~~1-3~~ 5 detail the request files while tables ~~4-6~~ 8 detail the response files. Fields marked with a (*) are the same or very similar to the ones captured in the HDO.⁷

When providing information to the Authority under this notice, ~~retailers and large industrials~~ applicable participants can identify information they consider confidential and the reasons why. Provisions relating to confidential information are set out in clause 2.21 of the Code.

The Authority will handle any confidential information in accordance with clause 2.22 of the Code.

Note: Please see consultation paper and decision paper for further information about confidentiality.

Table ~~1~~ 10 – Requests: contract master file

<u>Field Name</u> <u>Column</u> <u>name</u>	Description	<u>Data type</u>	<u>Example</u>
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⁷ See: [NZX & Electricity Authority. Hedge Disclosure System User Guide for Bulk Upload File Formats \(2024\)](#)

<u>request_id RequestID</u>	<p>Party's own unique identifier for the <u>requested contract</u>. <u>Used by the system to link the request and response tables.</u></p> <p><u>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</u></p> <p><u>Case sensitive.</u></p>	<u>Char (30)</u>	<u>ABC00123</u>
<u>request_type RequestType</u>	<p>The way in which the request was sent. <u>Eg, Inputs:</u></p> <ul style="list-style-type: none"> • <u>RFP</u> – <u>request for proposal</u> • <u>EOI</u> – <u>expression of interest</u> • <u>DREQ</u> – <u>direct request</u> • <u>BROKR</u> – <u>made via broker, etc</u> • <u>OTHER</u> – <u>other types of requests</u> 	<u>Char (5)</u>	<u>RFP</u>
<u>request_sent_to RequestSentTo</u>	<p>A list or description of participants who were sent the request</p> <p><u>Insert text between double quotes ("").</u></p> <p><u>Use a pipe character () to separate items in a list.</u></p>	<u>Text</u>	<u>"Contact Energy Ltd Genesis Energy Ltd"</u>
<u>request_date RequestDate</u>	The date the request was sent out	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
<u>request_close_date RequestCloseDate</u>	Date (deadline) given to respond to the request (as specified in the request)	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>

Table 211 – Requests: contract details file

<u>Field Name</u> <u>Column name</u>	<u>Description</u>	<u>Data type</u>	<u>Example</u>
<u>request_id RequestID</u>	<p>Party's own unique identifier for the <u>requested contract</u>. <u>Used by the system to link the request and response tables.</u></p>	<u>Char (30)</u>	<u>ABC00123</u>

<u>Field Name</u> <u>Column name</u>	Description	Data type	Example
	<p>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</p> <p>Case sensitive.</p>		
contract_id <u>ContractID</u>	<p>Party's own unique identifier for each contract <u>product</u> requested in <u>under</u> the request <u>same RequestID</u></p> <p><u>One product per row with respective ContractIDs.</u></p>	<u>Char (30)</u>	<u>3</u>
party_role <u>PartyRole*</u>	<p>Whether the requestor is the buyer or seller of the contract. <u>Inputs:</u></p> <ul style="list-style-type: none"> • <u>Buyer</u> • <u>Seller</u> <p><u>Not case sensitive</u></p>	<u>Char (6)</u>	<u>Buyer</u>
contract_type* <u>ContractType*</u>	<p>Instrument <u>The type. Eg. of the requested contract.</u></p> <p><u>Inputs:</u></p> <ul style="list-style-type: none"> • <u>CFD - contract for differences</u> • <u>FPFV - fixed-price fixed volume</u> • <u>FPVV - fixed-price variable volume</u> • <u>OPT, or - option</u> • <u>NOVEL - other contract types</u> <p>Note that NOVEL should be used for other contract types</p> <p><u>Not case sensitive</u></p>	<u>Char (5)</u>	<u>CFD</u>
option_variation* <u>OptionVariation*</u>	<p>Whether the Option is American or Asian style.</p> <p><u>Inputs:</u></p> <ul style="list-style-type: none"> • <u>AM – American</u> • <u>AS – Asian</u> • <u>N/A – Not Applicable</u> 	<u>Char (3)</u>	<u>AM</u>

<u>Field Name</u> <u>Column name</u>	Description	Data type	Example
	<p><u>Note: Mandatory for Options contracts, otherwise leave blank.</u></p> <p><u>Not case sensitive</u></p>		
<u>option_type*</u> <u>OptionType*</u>	<p>Whether the option is a Call or put Put. <u>Inputs:</u></p> <ul style="list-style-type: none"> • <u>C – Call option</u> • <u>P – Put option</u> • <u>N/A – Not Applicable</u> <p><u>Note: Mandatory for Options contracts, otherwise leave blank.</u></p> <p><u>Not case sensitive</u></p>	<u>Char (3)</u>	<u>C</u>
<u>option_subtype*</u> <u>OptionSubtype*</u>	<p>Whether the option is a Cap or Floor. <u>Inputs:</u></p> <ul style="list-style-type: none"> • <u>C – Cap</u> • <u>F – Floor</u> • <u>N/A – Not Applicable</u> <p><u>Note: Mandatory for Options contracts, otherwise leave blank.</u></p> <p><u>Not case sensitive</u></p>	<u>Char (3)</u>	<u>F</u>
<u>Premium*</u> <u>Premium*</u>	<p><u>Premium price (\$)</u></p> <p>Mandatory for Options contracts. Blank otherwise.</p>	<u>Decimal (5,2)</u>	<u>123.45</u>
<u>DemandResponse</u>	<p><u>Y or N to whether the request is for a demand responsive product</u></p>	<u>Char (1)</u>	<u>N</u>
<u>effective_date*</u> <u>EffectiveDate*</u>	The start date of the price schedule record	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
<u>end_date*</u> <u>EndDate*</u>	The end date of the price schedule record	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
<u>contract_profile</u> <u>ContractProfile</u>	<p><u>Whether-shaped-or The shape of the requested contract:</u></p> <ul style="list-style-type: none"> • <u>BASE – for baseload</u> 	<u>Char (6)</u>	<u>SHAPED</u>

<u>Field Name</u> <u>Column name</u>	Description	Data type	Example
	<ul style="list-style-type: none"> <u>GENW</u> – for generation following (wind) <u>GENG</u> – for generation following (geothermal) <u>SHAPED</u> – for other shaped products <u>Not case sensitive</u>		
<u>min_volume</u> <u>MinVolume</u>	Where the <u>contract</u> requested <u>contract</u> has variable volume this represents the minimum requested quantity (MW). Where the contract requested has fixed volume this is a fixed amount (MW)	<u>Decimal</u> <u>(15,3)</u>	<u>123.456</u>
<u>max_volume</u> <u>MaxVolume</u>	Where the contract requested has variable volume this represents the maximum requested quantity (MW). Where the contract requested has fixed volume this represents the fixed amount (MW)	<u>Decimal</u> <u>(15,3)</u>	<u>123.456</u>
<u>Quantity*</u> <u>Quantity*</u>	The total volume requested (MWh) <u>]</u>	<u>Decimal</u> <u>(15,3)</u>	<u>1234.567</u>
<u>energy_type*</u> <u>EnergyType*</u>	<p>C – if the contract is tied to electricity consumption, and the volume of the contract is determined by the energy load or usage. For example, for a demand response agreement for a retail customer's load</p> <p>G – if the contract is associated with a specific plant or station, and the volume of the contract is determined by the electricity output of that plant. For example, for a PPA tied to a wind farm's output</p> <p>N/A – for financial contracts that are not tied to specific generation or consumption</p>	<u>Char (3)</u>	<u>G</u>

<u>Field Name</u> <u>Column name</u>	Description	Data type	Example
	volumes. For example, for a standard hedge or swap contract not tied to specific assets or load Optional for Novel Not case sensitive		
<u>index_price*</u> <u>IndexPrice*</u>	Y or N to indicate whether the <u>requested</u> contract is an index-based price contract Optional for Novel Not case sensitive	<u>Char (1)</u>	<u>Y</u>
<u>PriceEscalationFrequency</u>	The frequency at which the <u>requested contract price is readjusted</u> . Inputs: <ul style="list-style-type: none"> • <u>NONE</u> • <u>1YEAR</u> – requests <u>readjusted annually</u> • <u>2YEAR</u> – for requests <u>readjusted every 2 years</u> • <u>3YEAR</u> – for requests <u>readjusted every 3 years</u> • <u>4YEAR</u> – for requests <u>readjusted every 4 years</u> • <u>5YEAR</u> – for requests <u>readjusted every 5 years or more</u> Not case sensitive	<u>Char (5)</u>	<u>1YEAR</u>
<u>SuspensionTriggers</u>	<u>Suspension triggers for the requested contract, if any.</u> <u>Free-form field</u> <u>Insert text between double quotes (“”).</u>	<u>Text</u>	<u>“Example text”</u>
<u>other_information*</u> <u>OtherInformation*</u>	Any other information the participant wishes to disclose. <u>Free-form field</u> <u>Insert text between double quotes (“”).</u>	<u>Text</u>	<u>“Example text”</u>

Table 3-12 – Requests: contract price schedule ~~(details)~~ file

<u>Field-Name</u> <u>Column name</u>	Description	<u>Data type</u>	<u>Example</u>
<u>request_id</u> <u>RequestID</u>	Party's own unique identifier for the <u>requested contract</u> . <u>Used by the system to link the request and response tables.</u> <u>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</u> <u>Case sensitive.</u>	<u>Char (30)</u>	<u>ABC00123</u>
<u>contract_id</u> <u>ContractID</u>	Party's own unique identifier for each <u>contract product</u> requested <u>in</u> <u>under</u> the <u>request same RequestID</u> <u>One product per row with respective ContractIDs (see example below).</u>	<u>Char (30)</u>	<u>3</u>
<u>start_date*</u> <u>StartDate*</u>	The start date of the price schedule record	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
<u>end_date*</u> <u>EndDate*</u>	The end date of the price schedule record	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
<u>start_period*</u> <u>StartPeriod*</u>	The start period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows <u>under different ContractIDs.</u> <u>Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight savings start dates, 50 on daylight savings end dates, and 48 for all other dates)</u>	<u>Integer</u>	<u>48</u>
<u>end_period*</u> <u>EndPeriod*</u>	The end period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows <u>under different ContractIDs.</u> <u>Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight</u>	<u>Integer</u>	<u>48</u>

	savings start dates, 50 on daylight savings end dates, and 48 for all other dates)		
day_type* <u>DayType*</u>	<p>Days on which the <u>requested</u> contract is effective. eg: <u>Inputs</u>:</p> <ul style="list-style-type: none"> • <u>ALL</u> – the price schedule record applies to all days within the date range • <u>BD</u> – the price schedule record applies to business days, etc only within the date range • <u>NBD</u> – the price schedule record applies to non-business days only within the date range • <u>PH</u> – the price schedule record applies to public holidays only within the date range • <u>NPH</u> – the price schedule record applies to all days within the date range that are not public holidays • <u>WD</u> – the price schedule record applies to all weekdays within the date range (including public holidays on a weekday) • <u>WE</u> – the price schedule record applies to all weekend days within the date range (including public holidays on a weekend day) <p><u>Not case sensitive</u></p>	<u>Char (3)</u>	<u>ALL</u>
Node* <u>Node*</u>	<p>Specify the node(s) at which prices are requested. If volume is required at more than one node, these should be on separate rows <u>under different ContractIDs</u>.</p> <p><u>Not case sensitive</u></p>	<u>Char (8)</u>	<u>HAY2201</u>
volume* <u>Volume*</u>	<p>Quantity requested per trading period (in MWh). One value per group of trading periods, each on separate rows <u>under different ContractIDs</u>.</p>	<u>Decimal (15,3)</u>	<u>123.456</u>

Table 413 – Responses: no offers received file (~~Only~~only applicable if the other party provided a response but not an offer)

<u>Field Name</u> <u>Column name</u>	Description	Data type	Example
request_id <u>RequestID</u>	<p>Requesting party's Party's own unique identifier for the requested contract. Used by the system to link the request and response tables.</p> <p>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</p> <p>Case sensitive.</p>	<u>Char (30)</u>	<u>ABC00123</u>
contract_id <u>ContractID</u>	<p>Requesting party's Party's own unique identifier for <u>each</u> product requested under the contract in the request that the offer relates to <u>same RequestID</u></p> <p>One product per row with respective ContractIDs (see example below).</p>	<u>Char (30)</u>	<u>3</u>
other_party_legal_name* <u>OtherPartyLegalName*</u>	<p>The other party legal name.</p> <p>Insert text between double quotes (").</p> <p>Not case sensitive</p>	<u>Text</u>	<u>"Contact Energy Ltd"</u>
decline_reason <u>DeclineReason</u>	<p>The reason given by the other party for declining to not <u>providing an</u> offer for the requested contract. Inputs:</p> <ul style="list-style-type: none"> • <u>FMCA</u> – requestor does not meet FMCA requirements (not an eligible wholesale investor) • <u>CRED</u> – insufficient credit • <u>ISDA</u> – no signed ISDA master agreement • <u>LCOMP</u> – Responses withheld due to legal or compliance constraints • <u>TIME</u> – not enough time between request. # date and request close date 	<u>Char (5)</u>	<u>FMCA</u>

	<ul style="list-style-type: none"> TEST – When requestor was interested in understanding market conditions and did not have the intention to complete the trade OTHER - if no reason provided, should be populated with "Not specified" 		
response_date ResponseDate	The date when the response was sent by the other party	YYYY-MM-DD	2025-08-15

Table 514 – Responses: contract details file

Field-Name Column name	Description	Data type	Example
request_id RequestID	<p>Party's own unique identifier for the requested contract. Used by the system to link the request and response tables.</p> <p>Can be a request for a single product or multiple products. See ContractID field in Tables 4-8.</p> <p>Case sensitive.</p>	Char (30)	ABC00123
contract_id ContractID	<p>Party's own unique identifier for each product requested under the contract in the request that the offer relates to same RequestID</p> <p>One product per row with respective ContractIDs (see example below).</p>	Char (30)	3
other_party_legal_name* OtherpartyLegalName*	<p>The other party legal name. Insert text between double quotes (").</p> <p>Not case sensitive</p>	Text	"Contact Energy Ltd"
response_date ResponseDate	The date when the response was sent by the other party	YYYY-MM-DD	2025-08-15
credit_requested CreditRequested	The amount (in \$) requested by the respondent	Decimal (15,2)	1000.50

Field-Name <u>Column name</u>	Description	Data type	Example
<u>proposal_valid_for</u> <u>ProposalValidFor</u>	The number of days the proposal is valid <u>for</u>	<u>Integer</u>	<u>20</u>
<u>conforming_flag</u> <u>ConformingFlag</u>	Whether <u>Y or N to indicate whether the offer response was conforming or not</u>	<u>Char (1)</u>	<u>Y</u>
<u>ContractTypeOffered*</u>	contract_ <u>The type of the offered contract. Inputs:</u> <ul style="list-style-type: none"> <u>CFD – contract for differences</u> <u>FPFV – fixed-price fixed volume</u> <u>FPVV – fixed-price variable volume</u> <u>OPT – option</u> <u>NOVEL – other contract types</u> <u>Note that NOVEL should be used for other contract types</u> <u>Not case sensitive</u>	<u>Char (5)</u>	CFD
<u>DemandResponseOffered</u>	<u>Y or N to whether the offer is for a demand responsive product</u>	<u>Char (1)</u>	<u>N</u>
<u>premium_offered*</u> <u>PremiumOffered*</u>	The premium value (in \$)- <u>Premium price for the offer (\$)</u> Mandatory for Options contracts. Blank otherwise.	<u>Decimal</u> <u>(15,2)</u>	<u>123.45</u>
<u>option_variation_offered*</u> <u>OptionVariationOffered*</u>	Whether the option <u>Option</u> is American or Asian style. <u>Inputs:</u> <ul style="list-style-type: none"> <u>AM – American</u> <u>AS – Asian</u> <u>N/A – Not Applicable</u> <u>Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive</u>	<u>Char (3)</u>	<u>AM</u>
<u>option_type_offered*</u> <u>OptionTypeOffered*</u>	Whether the option is a call <u>Call or put Put. Inputs:</u> <ul style="list-style-type: none"> <u>C – Call option</u> 	<u>Char (3)</u>	<u>C</u>

Field-Name <u>Column name</u>	Description	Data type	Example
	<ul style="list-style-type: none"> <u>P – Put option</u> <u>N/A – Not Applicable</u> <p><u>Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive</u></p>		
<u>option_buyless* OptionBuyless*</u>	<p><u>Y or N</u></p> <p>Mandatory for a call options contract. Used when disclosing a swaption⁸</p>	<u>Char (1)</u>	<u>Y</u>
<u>option_subtype_offered* OptionSubtypeOffered*</u>	<p>Whether the option is a cap <u>Cap</u> or floor <u>Floor</u>. Inputs:</p> <ul style="list-style-type: none"> <u>C – Cap</u> <u>F – Floor</u> <u>N/A – Not Applicable</u> <p><u>Note: Mandatory for Options contracts, otherwise leave blank. Not case sensitive</u></p>	<u>Char (3)</u>	<u>F</u>
<u>effective_date_offered* EffectiveDateOffered*</u>	<p>The start date of when the price schedule record offer was sent by the other party</p>	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
<u>end_date_offered* EndDateOffered*</u>	<p>The end date of when the price schedule record offer was sent by the other party</p>	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
<u>contract_profile_offered ContractProfileOffered</u>	<p>Whether shaped or <u>The shape of the offer. Inputs:</u></p> <ul style="list-style-type: none"> <u>BASE – for baseload</u> <u>GENW – for generation following (wind)</u> <u>GENG – for generation following (geothermal)</u> <u>SHAPED – for other shaped products</u> <p><u>Not case sensitive</u></p>	<u>Char (6)</u>	<u>SHAPED</u>
<u>min_volume_offered MinVolumeOffered</u>	<p>Where the offered contract has variable volume this</p>	<u>Decimal (15,3)</u>	<u>123.456</u>

⁸ This fulfils the Code under clause 13.219 (1) (h) (ii), which specifies that for call options, one must indicate if the buyer has the right to buy less than the quantity.

Field-Name <u>Column name</u>	Description	Data type	Example
	represents the minimum requested <u>offered</u> quantity (MW). Where the offer <u>offered</u> contract has fixed volume this is a fixed amount (MW)		
max_volume_offered <u>MaxVolumeOffered</u>	Where the offered contract has variable volume this represents the maximum requested <u>offered</u> quantity (MW). Where the offer <u>offered</u> contract has fixed volume this represents the fixed amount (MW)	<u>Decimal</u> <u>(15,3)</u>	<u>123.456</u>
quantity_offered* <u>QuantityOffered*</u>	The total volume requested (in offered (MWh)).	<u>Decimal</u> <u>(15,3)</u>	<u>123.456</u>
exchange_for_physical_offered <u>ExchangeForPhysicalOffered</u>	<u>Y or N</u> Whether the offer is an exchange for physical supply	<u>Char (1)</u>	<u>N</u>
energy_type_offered* <u>EnergyTypeOffered*</u>	C – if the contract is tied to electricity consumption, and the volume of the contract is determined by the energy load or usage. For example, for a demand response agreement for a retail customer's load G – if the contract is associated with a specific plant or station, and the volume of the contract is determined by the electricity output of that plant. For example, for a PPA tied to a wind farm's output N/A – for financial contracts that are not tied to specific generation or consumption volumes. For example, for a standard hedge or swap contract not tied to specific assets or load Optional for Novel Not case sensitive	<u>Char (3)</u>	<u>G</u>

Field-Name <u>Column name</u>	Description	Data type	Example
<u>reference_price_offered</u> <u>ReferencePriceOffered</u>	<p>What <u>price</u> the <u>requested</u> <u>offered</u> contract price is indexed to, if <u>any, eg:</u> <u>applicable</u>. Inputs:</p> <ul style="list-style-type: none"> • <u>SPOT</u> – for spot price • <u>ASX</u> – for <u>ASX</u> price, • <u>MODEL</u> – for modelled price • <u>CPI</u> – for <u>prices referenced to Consumer Price Index (CPI)</u> • <u>PPI</u> – for <u>prices referenced to Producer Price Index (PPI)</u> • <u>OTHER</u> • <u>N/A</u> 	<u>Char (4)</u>	<u>SPOT</u>
<u>index_price_offered*</u> <u>IndexPriceOffered*</u>	<p>Y or N to indicate whether the <u>offered</u> contract is an index-based price contract</p> <p>Optional for novel</p> <p>Not case sensitive</p>	<u>Char (1)</u>	<u>Y</u>
<u>PriceEscalationFrequencyOffered</u>	<p>The frequency at which the <u>contract offered price is readjusted</u>. Inputs:</p> <ul style="list-style-type: none"> • <u>NONE</u> • <u>1YEAR</u> – <u>requests readjusted annually</u> • <u>2YEAR</u> – for <u>requests readjusted every 2 years</u> • <u>3YEAR</u> – for <u>requests readjusted every 3 years</u> • <u>4YEAR</u> – for <u>requests readjusted every 4 years</u> • <u>5YEAR</u> – for <u>requests readjusted every 5 years or more</u> <p><u>Not case sensitive</u></p>	<u>Char (5)</u>	<u>1YEAR</u>
<u>index_price_formula_offered*</u> <u>IndexPriceFormulaOffered*</u>	<p>Formula of index price.</p> <p><u>Insert text between double quotes (").</u></p>	<u>Text</u>	<u>"Example text"</u>

Field-Name Column name	Description	Data type	Example
	Optional free-text field		
ASX_reference_node_offered ASXReferenceNodeOffered	Specifies which ASX node the offer price is referenced to, if applicable. Blank otherwise. <u>Not case sensitive</u>	<u>Char (8)</u>	<u>BEN2201</u>
ASX_last_date_offered ASXLastDateOffered	Specifies the last ASX date specified for the referencing, if applicable. Blank otherwise	<u>YYYY-MM-DD</u>	<u>2025-08-15</u>
ASX_last_price_offered ASXLastPriceOffered	Specifies the last ASX price (<u>\$/MWh</u>) specified for the referencing, if applicable. Blank otherwise	<u>Decimal (15,2)</u>	<u>123.45</u>
negotiation_steps	<u>The number of negotiation steps</u>		
<u>SuspensionTriggersOffered</u>	<u>Suspension triggers for the offered contract, if any.</u> <u>Insert text between double quotes (").</u> <u>Free-form field</u>	<u>Text</u>	<u>"Example text"</u>
other_information_of_offer* OtherInformationOffer*	Any other information the participant wishes to disclose on the offer or negotiation steps. <u>Insert text between double quotes (").</u> <u>Free-form field</u>	<u>Text</u>	<u>"Example text"</u>

Table 6-15 - Responses~~table~~: contract price schedule ~~(details)~~ file

Field-Name Column name	Description	Data type	Example
request_id RequestID	Party's own unique identifier for the <u>requested contract. Used by the system to link the request and response tables.</u> <u>Can be a request for a single product or multiple</u>	<u>Char (30)</u>	<u>ABC00123</u>

Field-Name <u>Column name</u>	Description	Data type	Example
	products. See ContractID field in Tables 4-8. Case sensitive.		
<u>contract_id ContractID</u>	Party's own unique identifier for each contract product requested in under the request same RequestID One product per row with respective ContractIDs (see example below).	Char (30)	3
<u>start_date_offered* StartDateOffered*</u>	The start date of the price schedule record	YYYY-MM-DD	2025-08-15
<u>end_date_offered* EndDateOffered*</u>	The end date of the price schedule record	YYYY-MM-DD	2025-08-15
<u>start_period_offered* StartPeriodOffered*</u>	The start period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows under different ContractIDs. Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight savings start dates, 50 on daylight savings end dates, and 48 for all other dates)	Integer	48
<u>end_period_offered* EndPeriodOffered*</u>	The end period (TP) for each date within the date range. If multiple periods per day (eg. super peak) these should be on separate rows under different ContractIDs. Inputs: 1-50 (unless the record is for a specific date in which case 46 will be the max allowed on daylight savings start	Integer	48

Field-Name Column name	Description	Data type	Example
	<u>dates, 50 on daylight savings end dates, and 48 for all other dates)</u>		
day_type_offered* DayTypeOffered*	<p>Days on which the offered contract is effective. Eg- <u>Inputs:</u></p> <ul style="list-style-type: none"> • <u>ALL – the price schedule record applies to all days within the date range</u> • <u>BD – the price schedule record applies to business days only within the date range</u> • <u>NBD – the price schedule record applies to non-business days only within the date range</u> • <u>PH – the price schedule record applies to public holidays only within the date range</u> • <u>NPH – the price schedule record applies to all days within the date range that are not public holidays</u> • <u>WD – the price schedule record applies to all weekdays within the date range (including public holidays on a weekday)</u> • <u>WE – the price schedule record applies to all weekend days within the date range (including public holidays on a weekend day)</u> <p><u>Not case sensitive</u></p>	<u>Char (3)</u>	<u>ALL</u>
node_offered NodeOffered*	<p>Specify the node(s) at which prices are</p>	<u>Char (8)</u>	<u>HAY2201</u>

Field-Name <u>Column name</u>	Description	Data type	Example
	requested <u>offered</u> . If volume is required <u>offered</u> at more than one node, these should be on separate rows <u>under different ContractIDs</u> . <u>Not case sensitive</u>		
volume_offered* <u>VolumeOffered*</u>	Quantity offered per trading period for each contiguous group of trading periods <u>(in MWh)</u> . One value per group of trading periods, each on separate rows <u>under different ContractIDs</u> .	<u>Decimal (15,3)</u>	<u>123.456</u>
price_offered* <u>PriceOffered*</u>	Price offered for each contiguous group of trading periods <u>(\$/MWh)</u> . Each group of trading periods on separate rows. For option contracts, this field should contain the option strike price.	<u>Decimal (15,2)</u>	<u>123.45</u>

Publication of information

Note: Treat this section as indicative only for consultation:

The Authority will be publishing quarterly some of the information that is contained under this notice. The information that will be published includes that as set out in the table below. The Authority may, as part of undertaking its statutory function, wish to publish information derived from the information collected as part of this notice. In these situations, the Authority's information management policy and the Code will apply:

Example Tables

Figure 1 and Figure 2 show an example of how the Requests: price schedule (details) file should be populated when there is only one product being requested under a certain request (Figure 1) and when multiple products are requested under the same request (Figure 2).

Figure 3 - Price schedule table (Requests) populated with mock data showing a single product requested for RequestID number 20

RequestID	ContractID	StartDate	EndDate	StartPeriod	EndPeriod	DayType	Node	Volume
20	1	2025-08-10	2025-08-15	1	48	ALL	HAY2201	123.456

Figure 4 - Price schedule table (Requests) populated with mock data showing multiple product requested for RequestID number 21

RequestID	ContractID	StartDate	EndDate	StartPeriod	EndPeriod	DayType	Node	Volume
21	1	2025-08-10	2025-08-15	1	48	ALL	HAY2201	123.456
	2	2025-08-10	2025-08-15	13	20	BD	BEN2201	234.567
	3	2025-08-10	2025-08-15	35	46	NPH	OTA2201	345.678

Submitting information

When submitting csv files to the Authority, identify each file using the following table as guidance:

Table 16 – Guidelines for naming csv files for submission

<u>Table</u>	<u>Year of Submission</u>	<u>Submission Quarter</u>	<u>File Name</u>
<u>Requests: master file</u>	<u>2025</u>	<u>Q3</u>	<u>request master 2025Q3.csv</u>
<u>Requests: details file</u>	<u>2025</u>	<u>Q3</u>	<u>request details 2025Q3.csv</u>
<u>Requests: price schedule file</u>	<u>2025</u>	<u>Q3</u>	<u>request schedule 2025Q3.csv</u>
<u>Responses: no offers file</u>	<u>2025</u>	<u>Q3</u>	<u>no response 2025Q3.csv</u>
<u>Responses: details file</u>	<u>2025</u>	<u>Q3</u>	<u>response details 2025Q3.csv</u>
<u>Responses: price schedule file</u>	<u>2025</u>	<u>Q3</u>	<u>response schedule 2025Q3.csv</u>

Note that we expect to receive files named using a *type_subtype_YYYYQQ.csv* format. There is no need to specify company name in the file as such information is automatically capture by the unique SFTP account assigned to each participant.

Note also that files should be saved as csv files (not MS Excel – eg. avoid submitting .xlsx files) using UTF-8 encoding.

Appendix C Format for submissions

Submitter	
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Questions	Comments
Q1. Do you agree with the Authority's proposal to expand the scope of the proposed notice to collect information from non-integrated generators?	
Q2. Do you agree with the Authority's proposal to capture sell requests in addition to buy requests?	
Q3. Do you agree with the Authority's other changes to the proposed notice listed in table 2?	