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## Submission on the Electricity Authority's 2026/27 Levy-funded Appropriations

### Introduction

1. Bluecurrent welcomes the Electricity Authority's (the Authority) consultation paper on its proposed 2026/27 levy-funded appropriations, dated 18 November 2025.
2. We broadly support the Authority's vision of "consumers having choices in accessing the energy they need now, and in the future, to ensure they and New Zealand prosper". We support the Authority's desired outcomes for 2026/27 of "affordable electricity" for consumers and an electricity system that is "secure and resilient" – in support of its vision.
3. Bluecurrent is highly aware of the critical role our smart metering and data services play in the achievement of the above vision and outcomes. Smart meter data provides the digital foundation for a modern electricity system that enables consumers to switch to the service providers of their choice and have greater control over their power bills – promoting consumer mobility and energy affordability. Data generated by smart meters enables network visibility, helping ensure a power system that is secure and resilient and contributes to an orderly transition to a highly digitalised and renewable electricity system.
4. We set out below our responses to the consultation questions, focusing on areas where we believe smart meter data services can best contribute to, or facilitate, the achievement of the Authority's vision and desired outcomes.

### Responses to the consultation questions

Consultation questions	Bluecurrent's comments
<b>Q1.</b> Do you agree with the proposed approach to the Authority's <i>Electricity Industry Governance and Market Operations</i> appropriation?	Bluecurrent broadly agrees with the proposed approach to the Authority's <i>Electricity Industry Governance and Market Operations</i> appropriation.
<b>Q2.</b> Do you have any feedback on the Authority's work programme for 2026/27?	<p>We set out below our feedback and some suggestions relating to the Authority's current work programme (2025/26) and proposed programme for the coming financial year (2026/27). We focus on areas where we believe smart metering and data services can best support the Authority's desired outcome of "affordable, reliable power for consumers".</p> <p><b>Network visibility</b></p> <p>Bluecurrent supports the findings of the Authority's recent review of smart meter data pricing which forms part of its ongoing network</p>

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	<p>visibility workstream. The review “did not identify any material concerns with respect to proportionality, fairness or transparency, and the observed price being charged to distributors for consumption and power quality data from smart meters”.<sup>1</sup> The Authority concluded that “the price being charged for data is reasonable for now” and observed “metering equipment providers [MEPs] negotiating and agreeing different contract terms that appear to suit distributors’ needs”.<sup>2</sup></p> <p>We appreciate the Authority basing its review conclusions on the evidence, following a review of MEPs’ data agreements. We encourage the Authority to continue to uphold evidence-based decision making – consistent with good regulatory practice.</p> <p>We believe the current market-led approach in the New Zealand metering market, based on direct commercial engagement, is delivering significant value and innovation for electricity distributors and consumers. More prescriptive arrangements would be administratively costly and would stifle innovation that is much needed in the market, including future product development in critical areas like network outage management, high-frequency data, and the delivery of flexibility services that help avoid costly new network investment or expansion.</p> <p>Non-prescriptive arrangements are consistent with the competitive nature of the New Zealand metering market. The increasing number of data agreements suggests that the New Zealand metering market is working.</p> <p>Bluecurrent is a vital partner in the journey distributors are on to transform their networks into smarter assets that enable the delivery of affordable electricity and a secure and resilient power system. We will continue to forge partnerships with distributors that enable network visibility – a requisite for the achievement of these outcomes.</p> <p>We have ongoing partnerships with distributors such as <b>Orion, Aurora Energy, Vector, Northpower</b>, and more recently with <b>Powerco</b> for the cost-effective provision of network operational data (NOD). Our NOD service provides distributors visibility of their networks, particularly at low-voltage (LV) level. This enables distributors to deliver innovative and cost-effective solutions that help keep power prices down, including by enabling distributors to avoid unnecessary investment in additional infrastructure. It also helps ensure a secure and resilient power system – all in support of the Authority’s vision and outcomes.</p> <p>Smart meter data provided by Bluecurrent has given Northpower and Aurora the confidence to say ‘yes’ to more solar, doubling solar export limits on their networks from 5kW to 10kW. This is game-changing for households and small businesses that are looking to maximise their solar investment and contribute more clean energy into the grid.</p> <p>We are also piloting a high-frequency power quality data service with Vector and Northpower which delivers smart meter power quality data every 20 minutes (up to 72 times a day). High-frequency data provides</p>

<sup>1</sup> [https://www.ea.govt.nz/documents/8309/Exploring\\_network\\_visibility\\_costs\\_benefits\\_and\\_value\\_-\\_Discussion\\_paper.pdf](https://www.ea.govt.nz/documents/8309/Exploring_network_visibility_costs_benefits_and_value_-_Discussion_paper.pdf), page 18

<sup>2</sup> *Ibid.*

Consultation questions	Bluecurrent's comments
	<p>these distributors unprecedented visibility of their networks and supports more real-time orchestration on their networks.</p> <p><b>Consumer mobility</b></p> <p>Bluecurrent supports the Authority's ongoing and proposed updates to align the data access frameworks in the <i>Electricity Industry Participation Code 2010</i> (the Code) with arrangements for the impending Consumer Data Right (CDR) for the electricity sector. We support the adoption of widely accepted industry standards and protocols that promote consumer mobility, greater interoperability, and a minimum level of service for all consumers.</p> <p>While the use of the appropriate standards is expected to facilitate the uptake of new/improved services that benefit consumers, this should not preclude parties from providing more customised/advanced services that meet the unique needs of some customers – promoting innovation.</p> <p>We welcome the Authority's use of a series of collaborative workshops to obtain stakeholder feedback on consumer mobility, particularly on improving access to electricity (consumer and product) data. This approach enables more stakeholders to better understand existing market and regulatory arrangements, and provide input that would inform the development of future Code changes and data access framework updates. It allows participation from a wider range of stakeholders, including those who may not have the wherewithal to be nominated for membership, or actively participate, in the Authority's working groups.</p> <p>Bluecurrent uses a collaborative approach to help deliver services that support consumer mobility. For example, we have partnered with retailers to unleash a wave of innovation by using smart meter data to flexibly manage energy demand and reduce peak load – benefitting residential consumers:</p> <ul style="list-style-type: none"> <li>• <b>Mercury's</b> hot water programme uses Bluecurrent's Dynamic Load Control to shift hot water heating away from peak times, saving customers money and easing pressure on the grid.<sup>3</sup></li> <li>• <b>Meridian's</b> Smart Hot Water Programme offers residential customers \$120/year power bill discount to participate.<sup>4</sup></li> <li>• <b>Genesis</b> is running a trial with 10,000 residential customers to see whether altering the time of their hot water heating will reduce their power bills and relieve strain on the national grid at peak times.<sup>5</sup></li> <li>• <b>Contact's</b> Hot Water Sorter turns off power to customers' hot water cylinder for a short period at certain times of the day without impacting the household's hot water needs. This is potentially good for customers' bills and reduce reliance on non-renewable generation.<sup>6</sup></li> </ul>

<sup>3</sup> <https://bluecurrent.co.nz/news/mercury-signs-up-for-dynamic-load-control-service>

<sup>4</sup> <https://bluecurrent.co.nz/news/meridian-and-bluecurrent-partnership-for-a-lower-carbon-future>

<sup>5</sup> <https://www.genesisenergy.co.nz/about/news/genesis-trials-hot-water-control-in-new-demand-flexibility-service>

<sup>6</sup> <https://contact.co.nz/support/guides/hot-water-sorter>

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	<p><b>Metering compliance</b></p> <p>Bluecurrent suggests that the Authority consider making the MEP and ATH forum it held in September 2024 an annual event, or hold such a forum at least every 18 months. This would allow MEPs, Approved Test Houses (ATHs), and other relevant industry participants to discuss current and emerging compliance issues in metering. Resolving these issues requires a shared understanding of how metering provisions in the Code could be implemented, or better implemented, to avoid unnecessary or disproportionate compliance costs.</p> <p>Holding regular MEP and ATH forums could also help uncover potentially more systemic or complex issues that require significant consideration before they become more costly to resolve.</p> <p><b>Regulatory sandbox framework</b></p> <p>Bluecurrent reiterates the suggestion in our submission on the 2025/26 levy-funded appropriations for the development of a regulatory sandbox framework for the electricity sector. The Authority could explore frameworks akin to the Energy Innovation Toolkit administered by the Australian Energy Regulator, supported by other Australian regulators; see <a href="https://energyinnovationtoolkit.gov.au/">https://energyinnovationtoolkit.gov.au/</a>.</p> <p>While we support the Code exemption process to enable innovative trials – particularly multi-party trials – to proceed, individual exemption applications would be a piecemeal solution to trialling innovative solutions. The electricity sector needs a more comprehensive framework that is tailored to facilitate/deliver new and innovative (game-changing) solutions, rather than relying on the compliance framework to avoid potential breaches of existing Code provisions.</p> <p><b>More interactive and cost-effective stakeholder engagements</b></p> <p>Bluecurrent welcomes the Authority's use of more interactive consultation approaches such as online and in-person workshops and engagements with interested parties outside of the sector. We would support the Authority using more online and interactive tools for consultation purposes, e.g. online surveys in lieu of formal submissions and collaborative workshops. This provides greater flexibility for stakeholders and could help them avoid 'consultation fatigue' in the context of the multiple reforms stakeholders currently face and need to navigate. This also allows the Authority to capture feedback that could otherwise be lacking in formal submissions, e.g. a stakeholder could simply provide a few lines regarding a particular issue of importance via an online survey.</p> <p>We welcome the Authority's intention to explore the use of artificial intelligence (AI) to achieve operational efficiencies. We suggest that the Authority further consider the implications of AI for the electricity system of the future, including its potential in facilitating the delivery of new and innovative business models and services that benefit consumers.</p>
<p><b>Q3.</b> Do you agree with the proposed approach to the Authority's <i>Managing the</i></p>	<p>Bluecurrent generally agrees with the proposed approach to the Authority's <i>Managing the Security of New Zealand's Electricity Supply</i> appropriation.</p>

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<i>Security of New Zealand's Electricity Supply</i> appropriation?	We note the contingent nature of this appropriation, i.e. it will not be drawn on in the normal course of managing the electricity system. We further note that levies will only be collected relating to this appropriation up to the level of actual expenditure incurred.
<b>Q4.</b> Do you agree with the proposed approach to the Authority's <i>Electricity Litigation Fund</i> appropriation?	Bluecurrent generally agrees with the proposed approach to the Authority's <i>Electricity Litigation Fund</i> appropriation.  We note the contingent nature of this appropriation, which will only be used if certain events/situations arise.

### Concluding comments

5. We look forward to engaging with the Authority and collaborating with multiple stakeholders in 2026/27 and beyond.
6. We are happy to discuss any aspects of our submission with the Authority. Please contact Luz Rose (Senior Regulatory and Policy Partner) at [REDACTED]
7. This submission does not contain confidential information, and we are happy for the Authority to publish it in its entirety.

Yours sincerely



**Matt Bostwick**  
Chief Customer Officer NZ