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2degrees supports the use of half-hour data for reconciliation

Introduction:

2degrees supports the move to half-hourly data for reconciliation, with a realistic timeline for implementation. We welcome the Authority's proposal to require submission of half-hourly metered data for wholesale market reconciliation. This change is sensible and pro-consumer – with over 95% of ICPs now equipped with smart meters, leveraging their half-hour data will improve the accuracy of settlements and strengthen price signals for consumers.

In principle, 2degrees is supportive of the proposal and agrees it will ultimately benefit consumers and competition.

Recommend practical and proportionate implementation periods

However, we emphasise that implementation must be practical and proportionate. Rushing the timeline could risk system issues or billing errors, which would not be in consumers' interests. Moreover, there are multiple regulatory initiatives in progress (such as new billing rules and the mandated introduction of time-of-use plans by July 2026 for large retailers). Stacking too many major changes on tight deadlines can strain industry resources and potentially disadvantage smaller retailers, ultimately reducing competitive benefits for consumers.

Accordingly, 2degrees recommends extending the implementation timeline for mandatory half-hourly reconciliation. The consultation's indicative timeframe (late 2026) appears ambitious given the work required. We request at least an additional 12 months beyond the proposed date – i.e. no earlier than late 2027 – for the Code change to take effect. This extra time will allow us (and others in a similar position) to complete system development, thoroughly test new processes, and phase in customers gradually onto half-hourly data, ensuring a smooth transition. A realistic lead time is a proportionate approach that balances the industry-wide benefits of half-hourly reconciliation with the practical constraints of implementation. It will help ensure the policy's success by avoiding rushed rollouts or unintended compliance issues.

We also suggest the Authority coordinate this timeline with other reforms to minimise overlap and avoid overloading implementation capacity.

Concluding remarks

In summary, 2degrees continues to support the half-hourly data reconciliation proposal and is investing in making it a reality. We simply urge a pragmatic transition period so that all retailers can implement the changes effectively, which will lead to better outcomes for consumers and a truly competitive market.

Thank you for the opportunity to provide feedback on this consultation. We remain committed to working constructively with the Authority to achieve a modern, consumer-centric electricity system.