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**To: The Electricity Authority**

**Email: [wholesaleconsultation@ea.govt.nz](mailto:wholesaleconsultation@ea.govt.nz)**

### **Genesis submission on half-hourly date for wholesale reconciliation**

Genesis Energy Limited (**Genesis**) welcomes the opportunity to comment on the Electricity Authority's (**the Authority**) *Requiring the use of half-hourly data for reconciliation* consultation paper. We support the Authority's objectives and that more accurate half-hourly data can deliver benefits for the sector and consumers. Over 96 per cent of Genesis customers have smart meters and for the majority we submit half-hourly data for reconciliation.

However, the Authority's preferred option would add unnecessary costs without proportionate increased benefits, particularly the proposal to bring forward by one business day the deadline for providing reconciliation data to the reconciliation manager, and the proposal to require data to be submitted at an ICP rather than an NSP level. We therefore strongly urge the Authority to adopt its second alternative option i.e. require submission, as aggregated half-hourly quantities, of electricity consumption / generation of half-hour metered consumers.

We note several of the key benefits can be realised at lower cost under the alternative option, namely:

- The ability to treat customer-submitter photo reads as actual reads (although clarification is needed on the timestamp requirement);
- Reduction in the number of submission revision cycles (although the proposed timing still requires further consideration);
- Removal of the current obligation to provide monthly read frequency reporting.

Thank you for considering our feedback.

Yours sincerely,

Mitchell Trezona-Lecomte

**Senior Advisor, Government Relations and Regulatory Affairs**

## Consultation question and Genesis' response

Questions	Genesis Comments
Q1. Do you agree the issue identified by the Authority is worthy of attention?	Yes, consistent with recommendations by IPAG and MDAG, we agree this issue warrants attention.
Q2. Do you agree with the objective of the Code amendment proposal? If not, why not?	Yes, consistent with the Authority's legislative function, we agree with the objective of promoting the efficient operation of the electricity industry by improving the accuracy of the wholesale electricity generation market's reconciliation of consumers' electricity use and generation.
Q3. Do you agree with the Authority's 'minimum change' implementation approach?	We support minimising system disruption; however, the Authority should consider the significant volume of concurrent regulatory change also requiring system updates. Implementation timeframes must reflect industry capacity and allow proper integration and testing.
Q4. Do you agree the Authority has correctly identified the benefits and costs of the proposed amendment?	We acknowledge that more accurate half-hourly data will deliver benefits. However, the Authority's proposal will also impose significant implementation costs on retailers, and we cannot confirm whether the Authority has fully or accurately identified these impacts (benefits and costs). We note that retailer costs could be materially reduced by removing the requirement to submit data at an individual ICP level.
Q5. Do you agree the benefits of the proposed amendment outweigh its costs?	We are unable to confirm this at this stage.
Q6. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option by reference to the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	<p>No. We believe that Alternative B (Require the submission of aggregated half-hourly quantities) is the preferable option. As noted, the alternative option delivers the same benefits at lower cost than the Authority's preferred option.</p> <p>Notably, the proposed requirement on retailers to submit ICP-level disaggregated data directly (section 3.18) would require substantial system redevelopment and generate large, complex datasets with limited incremental benefits.</p> <p>All retailers should have sufficient controls in place to ensure that their aggregated volumes include all ICPs where they are the trader, and this is checked as part of the reconciliation participant audit. We agree that the changes highlighted in paragraphs 2.47, 2.51 and 2.54 should remain as part of any alternative option.</p>
Q7. Do you agree the proposed amendment complies with sections	Yes, the proposal appears to comply with the relevant legislative requirements.

17(1) and 32(1) of the Electricity Industry Act 2010?	
Q8. Do you have any comments on the drafting of the proposed Code amendments?	<p>We make the following comments in reference to the consultation paper paragraphs as specified (and in relation to the corresponding Code provisions).</p> <p><b>Paragraph 2.50:</b> While we appreciate the additional work required by the Reconciliation Manager (RM), we do not support moving the day-4 requirement for initial submission to day-3 as per clause 11.26 of the Code. While it is true the changes will create additional work for the RM, for the same reason they will also create additional work for retailers.</p> <p><b>Paragraph 2.51:</b> We fully support the removal of these current reporting requirements under schedule 15.2 of the Code and compliance with the obligations being covered in the reconciliation participant's audit.</p> <p><b>Paragraphs 2.52–2.53:</b> We support the change to the revision cycles but recommend further consideration of the proposed timings. Removing month 1 and replacing it with a month 2 revision may be more effective due to the limited time between initial submissions and month 1 revisions. The most effective revision cycle may be months 2, 6 and 13, instead of the proposed 1, 5 and 13.</p> <p><b>Paragraph 2.54:</b> We support photo-verified customer reads being treated as actual reads. We need confirmation from the Authority as to what constitutes a time-stamp, specifically whether it is on the image, or meta data within the file properties.</p> <p><b>Paragraphs 2.44 and 3.18:</b> Requiring retailers to submit data at an individual ICP level represents a substantial change and would necessitate significant system redevelopment, along with a long lead time for implementation. It would also generate extremely large datasets that retailers would need to compile and transfer to the Reconciliation Manager. Given the scale of these impacts, we do not consider that this proposal delivers sufficient additional benefit to justify the cost and complexity involved. This is why our preferred option would be alternative 2 (Require the submission of aggregated half-hourly quantities).</p>