

24 October 2025

Electricity Authority

Via email: wholesaleconsultation@ea.govt.nz

Lodestone Energy submission on 'Consultation paper – requiring the use of half-hourly data for reconciliation'

Strong support for proposal

Lodestone strongly supports the proposal to amend the Code to require half-hourly metered data to be submitted into the wholesale reconciliation process when that data is available.

This is a short submission as Lodestone believes the case for this change is clear, compelling and obvious. We fully support the use of actual data for reconciliation where it exists as this provides greater accuracy for settlement of wholesale purchases for all customers.

This change is overdue. With the introduction of TOU pricing requirements across both Distribution and Retail the need for meter data to be stored and processed at a HHR level is already mandatory for Retailers.

Lodestone is the country's largest renewable energy generation developer and has Tier One Retailer status. We plan to continue to develop and offer innovative retail products and believe using accurate half-hourly meter data wherever possible can help deliver many of the benefits that the electricity system is now capable of delivering.

Load profiling was an effective tool while the roll out of smart meters was underway but with the market now at 96% penetration the concept is no longer fit for purpose creating inefficiencies and inaccuracies which are no longer necessary. We also believe that retaining the use of load profiling will also work against the goal of including energy into the Consumer Product Data legislation, as planned for 2026.

Across the market we now have access to high quality data. We need to consistently use this data to deliver consumer benefits and market efficiency. We agree with the Commission that there are no competition benefits from retaining load profiling when consumers have high-quality smart meters delivering accurate consumption data.

This change is particularly important as our electricity system rapidly evolves into a more dynamic market in which consumers can participate as both consumers and suppliers and as demand side flexibility becomes more valuable and accessible.

Harnessing accurate consumption data will better support the realisation of the benefits from genuine 'time of use' pricing - both for consumers and the electricity system.

The benefits of this change have been well summarised in the consultation document. We support the Code changes being made as quickly as possible. We would be very happy to discuss this with you further if it was helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S McHardy'.

Sarah McHardy
General Manager, Customer