

21 November 2025



Electricity Authority

By email: [wholesaleconsultation@ea.govt.nz](mailto:wholesaleconsultation@ea.govt.nz)

### Requiring the use of half-hourly data for reconciliation

Meridian welcomes the opportunity to comment on the Electricity Authority's consultation on a proposal to require electricity retailers to submit half-hour metered electricity quantities to the wholesale market's reconciliation process.

Meridian supports this proposal. We support the Authority's move towards using more accurate reconciliation methods for consumer electricity use and generation. Meridian is currently in the process of migrating customers to half-hourly submissions through the rollout of the Kraken platform. Using half-hourly submissions will allow retailers to fully recognise the benefits of any demand-side flexibility. Our view is that this will then also support the wider market to implement innovative products and reflect cost savings for customers. New time-of-use pricing options being offered by network companies will also support this.

We note that there may be significant costs to some retailers with implementing this new approach, which the analysis in the paper also reflects. The timeline for implementation should allow retailers to prepare for the necessary changes and seek to minimise implementation costs.

We would also like to make the following comments on the Code drafting and consequential policy development:

- **Non half-hourly ICP submission gap:** It is not proposed that submission information for NHH metered ICPs be provided by ICP so Meridian queries how the reconciliation manager will determine whether a participant has not supplied data for an active NHH metered ICP and apply the relevant ICP adjustment under proposed clause 7(3) of Schedule 15.4. The Authority should clarify how this will operate in practice.
- **Remove electricity supplied reporting:** we recommend removing the requirement for reconciliation participants to provide electricity supplied information under clause 15.7, and the associated requirements for the Reconciliation Manager to calculate the scorecard rating under schedule 15.4(17) and (18). This is because the information is not used in the reconciliation process as was originally intended and the scorecard rating defaults to 1, meaning that it has no effect. Removing this requirement would improve efficiency and eliminate the need for existing and new participants to develop the report (which is effectively not used in the reconciliation process) when developing new systems.
- **Consider consequential amendments:** The Authority should confirm whether changes to the reconciliation revision cycle (from 3, 7, and 14 months to 5 and 13 months) require consequential amendments to EIEPs or DDA terms.
- **Support ICP-level submission with safeguards:** We support the proposed move to submit HHR data by ICP rather than aggregated to NSP, as this improves accuracy. However, we recommend the Authority ensure clear guidance on file structure and validation, and that the RM system prevents overwriting when multiple

files are provided by different parties. This may be important for example where a participant outsources the submission of a subset of its ICPs to a third party or multiple third parties.

Nothing in this submission is confidential and it can be released in full. I can be contacted to discuss any of the points outlined above.

Nāku noa, nā

A handwritten signature in blue ink, reading "Evealyn Whittington", written over a horizontal line.

Evealyn Whittington  
**Senior Regulatory Specialist**