



21 November 2025

Electricity Authority

By email to: wholesaleconsultation@ea.govt.nz

Tēnā koe

Response to “Requiring the use of half-hourly data for reconciliation”

Public Version

This is a public version of our submission, confidentially sensitive information has been redacted.

Contact and Simply Energy welcome the opportunity to respond to this consultation and support the general direction or goal of increasing the number of ICP's that are submitted to the wholesale electricity market using half hourly metering information. However, we are concerned that the proposed mandates have a wide range of impacts and factors that will result in unintended costs and complexity.

We have summarised our feedback and suggestions below as opposed to filling out the response template:

- The observation from the EA that 96% ICP's are currently communicating smart meters is a bit broad. There are a number of conditions or exceptions to the rule that will need to be captured to avoid unnecessary burden on Retailers and technical breaches. At a minimum the requirements should only apply to meters where the AMI flag is Y. Additionally the EA must consider and develop rules for scenarios where data isn't available but the AMI flag is Y. This can occur because of intermittent data, customer behaviour impacts (turning off mains) etc. Some leniency or tolerances for technical issues that result in data gaps/exceptions should be built into the Code to offset the potential over burden or administration effort that may arrive with correcting immaterial historical issues. i.e. accept and capture that a small proportion of metering data will be estimated and unrecoverable beyond 14 months.
- While we receive all HHR consumption information from MEPs, we do not process or validate all data to a billing or settlement quality level. We currently only prioritise and validate HHR information that is used to support our ToU product and billing requirements. Expanding the requirement to all HHR capable meters will significantly increase the validation and handing efforts. Our high level assessment of the overhead to manage the additional HHR data exceptions, gaps, estimations and revisions arrives at an FTE [**Commercially sensitive information**]

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- Bringing forward submissions from BD4 to B3 is unworkable given the volume of validation and corrections happening during this time, particularly if the EA is requiring us to triple the volume of validation and handling efforts for HHR reconciliation. Furthermore, we are also concerned about the processing power and system constraints/challenges due to the sheer volume of data being processed to meet this requirement. The high level estimate to change our systems to comply with this proposal is around **[Commercially sensitive information]**].
- We disagree with the proposal to change the wash up cycle from R3 to R5, this introduces too much financial risk to parties carrying costs from incorrect R1 submissions for another two months. We are ambivalent about the removal of R7 as in our experience most inaccuracies are resolved by R3 however if implemented the final profile shape should be published at the final revision to ensure accuracy. We also consider the move from R14 to R13 to be questionable in terms of introducing change for minimal to no benefit. Any changes in the wash up cycle from the RM perspective should be reflected in the network wash up cycles.
- We disagree with the removal of the scaling penalties system and feel it is important that this be retained for whatever NHHVOLS submissions remain following implementation to ensure there are good incentives for participants to submit accurate data outside of their audit cycles.
- We do not consider the cost benefit analysis has been accurately estimated. The analysis ignores the sizeable one-off system change cost, and the significant ongoing resource cost to manage and handling more data. This will not be offset by the minor financial market benefits, which mostly relate to timing. We also disagree with the EA's position that mandating HHR reconciliation will create stronger incentives on retailers to pass on customer price signals. As indicated above, we already have ~160k customers (and growing) on ToU products without the mandate.

We appreciate the EA considering our submission and would be happy to discuss any specific feedback or questions further.

Ngā Mihi



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Contact Energy.