

Requiring the use of half-hourly data for reconciliation – FAQs

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Purpose

On 27 March 2026, the Authority released the '*Requiring the use of half-hourly data for reconciliation – Decision paper*'.¹ This decision amended the Electricity Industry Participation Code 2010 (Code) to require traders, from 1 October 2026, to submit half-hour (HHR) metered electricity quantities into the wholesale electricity market's reconciliation process, where this data is available.

These FAQs address commonly raised questions about the amendment and its implications for traders and other interested parties.

Outline of FAQs

1. What is the policy intent of the Half Hourly Data for Reconciliation Amendment?
2. How do traders determine which ICPs to include in their HHR submissions for category 1 and 2 metering installations?
3. How does a trader determine whether to include an ICP in its HHR submissions where the ICP contains more than one metering installation?
4. How do traders transition between NHH and HHR submission types for an ICP?
5. Must traders undergo a material change audit if transitioning from solely NHH submissions to predominantly HHR submissions?
6. What is the expectation on estimation accuracy?
7. How will the reconciliation manager know which ICPs must be submitted as HHR and report when they are missing?
8. What are the expectations around customer reads?

¹ [Requiring the use of half-hourly data for reconciliation – Decision paper](#).

FAQs

1. What is the policy intent of the Half Hourly Data for Reconciliation Amendment?

The intention of the amendment is to require traders to submit aggregated half-hourly metered quantities into the reconciliation process where that data is available. This will provide more accurate wholesale cost allocation, strengthen price signals for consumers and better inform consumption and generation decisions.

'Available' refers to those installation control points (ICPs) with communicating (or intermittently communicating) advanced metering infrastructure (AMI). Traders may submit non-half-hourly (NHH) metered quantities only for ICPs without AMI or with permanently non-communicating AMI. When an AMI meter is communicating intermittently or is temporarily uncommunicating, traders are still expected to submit half-hourly information by estimation.

2. How do traders determine which ICPs to include in their HHR submissions for category 1 and 2 metering installations?

Reconciliation participants must submit initial HHR submission information for the previous consumption period to the reconciliation manager in an AV-090 report by 1600 hours on the fourth business day of the current reconciliation period.

The population of AV-090 reports should be informed by information recorded in the electricity registry and responsibility for metering interrogation. The registry holds attribute data for each metering component installed in a metering installation at an ICP. The key attribute for determining HHR submission information is:

- **Meter Type:** An identifier (HHR/NHH/PP – for meters only) of the type of meter.

The registry also records an attribute for AMI or communication status of metering installations:

- **AMI Comm Flag:** An indicator (Y/N) that the component contains an advanced infrastructure metering device.

Reconciliation participants may ignore the AMI Comm Flag for the purposes of determining which ICPs to include in their HHR submission information because the binary (Y/N) flag may not always provide an accurate representation of whether a meter is experiencing ongoing and permanent communication issues or merely temporary faults. This allows reconciliation participants to continue to submit HHR information into the reconciliation process by estimation for ICPs with meters recorded in the registry as **AMI Comm Flag = 'N'**.

Reconciliation participants are expected to include an ICP in its HHR submissions in circumstances where it is recorded in the registry as **Meter Type = 'HHR'** and the reconciliation participant or the MEP is responsible for the electronic interrogation of its meter.

In 2023, the Authority published a memo containing our updated advice about data collection responsibilities for HHR metering installations.² This sets out that reconciliation participants are responsible for electronic meter interrogation where the MEP will provide the interrogation capability, password, or encryption to the reconciliation participant and where it is possible for other parties to interrogate the metering installation. The MEP is responsible for electronic interrogation

² [Compliance memo: responsibility for data collection.](#)

where it will not provide the interrogation capability, password, or encryption to the reconciliation participant.

In each of these scenarios, the reconciliation participant is expected to submit half hourly data for respective ICPs recorded in the registry as **Meter Type = 'HHR'**.

Irrespective of the registry metering attributes, the onus is on the reconciliation participant to submit HHR information when it is capable of doing so. However, if the reconciliation participant is responsible for the electronic interrogation of a meter at an ICP that is experiencing ongoing communication issues, it may decide to move to manual interrogation once exhausting all options with the MEP to restore reliable communications. In these circumstances, it would be admissible to include the ICP in NHH submissions.

For audit purposes, the reconciliation participant will need to demonstrate that the decision to move to manual interrogation was made on reasonable grounds.

3. How does a trader determine whether to include an ICP in its HHR submissions where the ICP contains more than one metering installation?

If all metering installations at an ICP are recorded in the registry as **'HHR = Y'**, the trader must apply the logic outlined in **Question 2** to determine whether the ICP should be submitted into the reconciliation process as half-hourly or non-half-hourly.

However, where an ICP has multiple metering installations or metering components with different 'Meter Types' (meaning at least one is recorded as **'HHR = Y'** and at least one as **'HHR = N'**) the trader may choose to submit the ICP as NHH or submit the respective metering installations as HHR and NHH.

This does not apply for ICPs that contain both metered and unmetered load. Unmetered load must be submitted as NHH or HHR using an approved profile.

4. How do traders transition between HHR and NHH submission types for an ICP?

NHH traders that can provide 100% HHR volumes for initial submissions (using AMI meters reads at the end of each consumption month) must ensure the transition of all valid ICPs from 1 October 2026.

To transition between NHH and HHR submission types, traders must update the profile Code in the registry.

When a profile code is changed, a boundary reading is required for the affected meter(s) at an ICP. As set out in clause 7 of Schedule 15.3 of the Code, this involves using either a validated meter reading or a permanent estimate on the day of the profile change to determine the meter's volume data for the relevant ICP. This data must then be used to calculate the associated historical estimates for each profile applied to that meter.

In practice, if a validated meter reading is used, the trader will need to refer back to the most recent midnight reading for all meters at the ICP. Alternatively, the trader may use an estimated value in place of an actual reading, derived from an estimation algorithm based on prior validated meter readings.

NHH traders that use one billing read per month sometime within the consumption month can transition the ICPs over to HHR submission type using the meter read validated for billing/submission for the respective date in October. This will remove the need to apply an interim actual read or permanent estimate without billing/validation to achieve a 1 October 2026 transition date.

Reporting is being developed as part of the registry audit compliance report to monitor this transition and also ongoing compliance with this obligation.

5. Must traders undergo a material change audit if transitioning from solely NHH submissions to predominantly HHR submissions?

Under clause 16A.11, when there is a material change to a participant's systems or processes that are subject of regular audits under (in this case) clause 15.37A, the participant must arrange for an additional material change audit. This is required to be completed no later than five days before the relevant change is implemented.

We expect that traders who have historically submitted only NHH information into the reconciliation process for ICPs with HHR-capable meters will, in many cases, be making system changes of a type that would ordinarily meet the threshold for a material change audit under clause 16A.11. Our expectation is that all retailers will comply with the Code. We expect to see clear progress toward these audits being undertaken in appropriate circumstances.

However, we recognise that auditor availability may not align with system development timelines in this case. If this presents issues, traders should take a pragmatic approach by ensuring that new or updated functionality has been subject to an appropriate level of internal review and testing to confirm it is operating effectively, even if a formal material change audit is completed at a later stage.

Given that the reconciliation process allows for three interim volume revisions, with volumes only finalised after the last revision (thirteen months after initial settlement), traders may continue to refine their systems over this period. In this context, we consider the final wash-up following the introduction of the amendments to be the relevant implementation point for the purposes of audit completion. Any necessary material change audits should therefore be completed in advance of December 2027.

6. What is the expectation on estimation accuracy for reconciliation participants?

Because interval HHR data delivery from MEPs can be inconsistent, traders will at times be required to estimate some proportion of their HHR submission information. At present, these estimations must meet an accuracy tolerance of ± 10 per cent in accordance with the default thresholds to be applied for HHR estimates under clause 15(2) of Schedule 15.2.

The current AV-090 report does not include a quality flag outlining the proportion of submission volumes that are actual and estimated. We are considering future enhancements to the reconciliation manager's functional specifications and the Code to simplify the Authority's monitoring and the reconciliation manager's validation in this area.

We will continue to work with MEPs to ensure that all available interval data is supplied to traders, and that the processes used to retrieve this data allow for the capture of the maximum possible information possible during each meter interrogation.

Traders are required to develop estimation methodologies (including validation of estimated data for reasonableness) to account for instances of missing HHR data from HHR meters. Traders will need to develop two HHR estimation methodologies:

- a) **a permanent estimation methodology** – as defined in the Code to estimate missing interval values between actual (midnight) meter reads where data is confirmed as unrecoverable by the AMI MEP

- b) **an interim estimation methodology** - to estimate missing interval values due to communication related issues where no AMI meter reads are available.

Permanent estimation methodology

This methodology should determine the consumption to be estimated into intervals based on the consumption calculated between two meter reads either side of an interval data gap (less any interval values that have been received for the affected period).

Where there is sufficient HHR interval data from an ICP, meter or channel to enable a trader to determine an appropriate consumption shape for the affected period, the trader may apportion the estimated consumption volume across the missing intervals using this shape.

Where there is insufficient HHR interval data from the ICP, meter or channel to determine an individual consumption shape, the trader should use an appropriate NSP derived or residual profile shape (GR-020) for the respective NSP.

Interim estimation methodology

Where adequate HHR consumption history exists, the trader can derive HHR interval values by extrapolating from the ICP, meter, or channel data records. It is important to account for seasonal variations as well as any additional consumer-related information available to the trader (for example, notification of appliance installation or removal, or the recent installation of distributed generation).

Where there is not sufficient HHR consumption history, the trader should determine an appropriate daily average consumption value for the relevant ICP, meter or channel and apportion this into HHR intervals using an appropriate NSP derived or residual profile shape (GR-020) for the respective NSP.

A trader may, in its discretion, use its permanent estimation methodology for interim estimation or develop a more simple approach. As required, interim estimations must be replaced by permanent or historical estimates.

7. How will the reconciliation manager know which ICPs must be submitted as HHR and report whether they are missing?

Reconciliation participants are required to identify the ICPs where HHR submission must be provided and reflect this on the registry by updating the submission type flags and the profiles to HHR.

The Registry Manager will then provide the reconciliation manager the registry ICP days report for the consumption periods involved in the reconciliation process broken down by NHH and HHR submission flags. The onus is on the trader to undertake the appropriate assessments of which ICPs are required to be submitted as HHR from 1 October 2026.

The reconciliation manager receives an AV-070 report from the Registry which contains the list of HHR ICPs. It compares this report with the monthly HHR ICP aggregates received from traders (and direct purchasers) via the AV-140 file.

The reconciliation manager will generate a GR-090 report identifying discrepancies between the AV-070 and AV-140 files, including any missing HHR ICPs. Traders are expected to correct any missing information in the next revision cycle.

8. What are the expectations around customer reads?

To treat a customer-provided meter reading as a validated actual, the meter reading must be validated according to the existing requirements for ordinary raw meter data.

These reads must be photographs. They may not be provided verbally or in writing without an attached photograph. This ensures the interrogation requirements in clause 5 of Schedule 15.2 can be adequately performed. These include:

- ensuring visibility of the meter register value
- ensuring seals are present and intact
- checking the phase failure indicator
- checking for signs of tampering or damage
- checking for electrically unsafe situations.

An appropriately validated meter reading, even if provided by a customer, may be treated as an actual meter reading for all purposes (including as a switch event reading).

The photograph and records of the steps taken to verify the meter reading must be archived and stored in accordance with clause 18 of Schedule 15.2.

Contact us with any questions

If you have any further questions, please contact wholesaleconsultation@ea.govt.nz

If you have any concerns about your readiness to comply, please contact compliance@ea.govt.nz