

14 September 2026

Electricity Authority
Level 7, AON Centre,
1 Willis Street,
Wellington 6011

Dear Policy team,

Intellihub Submission on the Improvements to Industry Switching Processes Technical Consultation Paper

Intellihub Group ("Intellihub") welcomes the opportunity to provide its views on the Improvements to Industry Switching Processes Technical Consultation Paper ("Consultation Paper").

Intellihub supports the evolution of switching processes as a means to improve outcomes for industry participants and end consumers. Our submission incorporates feedback in several areas. This feedback is intended to support the Authority in refining the proposed changes and delivering the intended benefits. We would welcome further discussion if that would be helpful.

Please do not hesitate to contact me if Intellihub can provide further assistance.

Yours sincerely

Daniel Pinny
GM Customer Data & Analytics

Appendix B – Technical submission form

Improvements to switching processes

Submissions should be emailed to policyconsult@ea.govt.nz with 'Consultation – Improvements to switching processes' in the subject line by 5pm, Monday 14 September 2026.

The Authority invites technical submissions on the Code amendment drafting to give effect to its decisions on ICP switching process changes. We are not seeking further submissions on the intended decisions or their supporting rationale.

Name	Daniel Pinny
Organisation	Intellihub

Q1. Would you prefer an implementation timeframe longer than 12 months?

If so, please indicate if 15 or 18 months is preferred and give reasons why.

Intellihub requests that the Authority provide an 18-month implementation timeframe. The changes required to our IT systems will involve significant development effort, and it is critical that the changes are tested thoroughly to mitigate the risk of impacts at go-live. We do not believe 12 months is sufficient for this to occur.

In addition, our preference is to spread the technical changes out rather than have them all grouped together as one change, where it makes sense to do so. The ability to opt in to the technical side of the change ahead of the Code changes allows for some streamlining of activity and risk mitigation compared with a single cutover event.

It is also worth noting that a 12- or 15-month timeframe may see the changes go live with a limited contingency window before the Christmas season and pre-planned IT brownouts. If go-live is delayed in any way, participants' change programmes would also be impacted, potentially leading to resourcing and change management challenges. This may, in turn, lead to delays in participants remediating market-impacting issues post go-live.

Question 2: Are there any parts of the Code drafting that, in your view, do not accurately reflect the provisional decisions outlined in this paper?

If so, please identify the issue and set out any proposed amendment(s).

Part/ Clause	Comments
Part 1 Preliminary provisions 1.1 Interpretation	MEP source precision and trader rounding responsibility The MEP will provide the switch event meter reading to the trader using the precision normally supported by the applicable meter reading file format. The MEP is not a direct participant in compiling or exchanging trader switching files. Any rounding or formatting required to insert the switch event meter reading into a switching file should remain the responsibility of the trader performing that switching-process function. At present, the draft Code wording could be read as implying that the MEP will round switching reads. We wanted to highlight this interpretation as unworkable on the basis that our existing file formats for exchanging data with traders include four decimal places of precision, and changing this would have unnecessary impacts on trader and MEP systems. We ask that the Authority consider whether the existing drafting needs any revision to clarify that the trader is responsible for rounding switch event reads.
Part 10 Metering Schedule 10.6 - Metering equipment provider ongoing obligations and functions	SAI enablement versus data availability Clause 10.20 focuses on enabling access to the Service Access Interface (SAI), but providing access does not guarantee that data will always be available. Intermittent or delayed communication may mean that SAI access is established but data may not immediately be available. The 4, 6, and 10 business-day measures should be adjusted to reflect that the obligation on the MEP is to provide SAI access to “available” meter data in the stated timeframes. We note also that the new Communication Status field will separately provide information on the regularity of communication that should be expected for a given meter. Notification to Traders regarding delays The wording in clause 1E(b), which requires the MEP to communicate with traders regarding any data that is not available within three business days, is unworkable. Across a large meter fleet, there are regular changes in the communication status of devices, and the volume of devices caught under this clause would be substantial. It is also unlikely that the MEP would be able to diagnose a firm date to remedy such an issue within three business days, as it may be indicative of a device moving into a non-

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	communicating or fault state that may self-resolve or require field remediation. It will not be possible to reasonably comply with this clause, so it should be removed. Data Agent We also suggest amending the drafting so an eligible organisation, rather than only a person, may perform the data-agent function.
Part 11 Registry information management	
Schedule 11.1 Creation and management of ICPs, ICP identifiers and NSPs	
Schedule 11.2 Transfer of ICPs between distributors' networks	Distributor transfer does not address configuration compatibility At the point of a network transfer, the existing meter configuration may be invalid for the gaining network. The draft should be revised to place an obligation on the party initiating the transfer to evaluate the configuration and initiate works with the MEP to adjust the metering configuration where needed prior to the transfer occurring.
Schedule 11.3 Trader switching	Provision of switch reading Clause 11(3) requires that the MEP provide the switch event reading to both the gaining and losing traders for midnight of the event date. In line with our feedback on SAI enablement under Part 10, this wording should be adjusted to reflect that the MEP needs to provide "available" raw meter data. MEP reading is not prioritised Clause 12(1-3) does not require the trader to use a switch reading provided by the MEP for midnight of the switch event date where this is available. Incorporating this requirement may help to reduce switch read disputes. Fieldwork before gaining parties become responsible Clause 23 is problematic as it allows the gaining trader, who is not yet the trader of record, to ask a new MEP, who cannot have been formally nominated by the gaining trader because the gaining trader is not yet the trader of record and is not yet able to raise an MEP nomination, to change the metering. It effectively allows two participants, neither of whom is officially related to the site yet, to request and/or make changes to the site.

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	This contradicts the requirement for an MEP nomination in Part 10, clause 10.22, Change of MEP. It also conflicts with the concept of trader of record and enables parties that do not officially have responsibility for the site to order and make changes. There is no ability for an MEP to validate and accept a request from a gaining trader if this is not formalised via the registry. Decoupling this requirement presents a material safety and privacy risk. It also presents a significant contractual problem for MEPs and traders, given contractual arrangements rely on the trader of record to underpin operational, safety, and customer-related obligations. Furthermore, clause 23 may leave the losing trader with a configuration they did not request if the switch is withdrawn. The draft wording does not appear to clearly define which trader is responsible for rectifying this configuration if it's incompatible with the losing trader's systems or products. The lack of defined responsibilities for remediation is likely to lead to disputes between traders. As a result, it is unworkable for both MEPs and retailers to complete works before the gaining trader and nominated MEP become responsible.
Schedule 11.4 Metering equipment provider switching and registry metering records	Commencement of Work Clause 1 (1) (a) (iii) should also limit work so that it cannot be completed prior to the proposed date in 1 (1) (a) (ii). Timeframes for changes to metering records The five-day timeframe proposed for updates to metering records in clauses 2 and 3 is not workable. As indicated in our earlier submissions, completing 75% of updates in five days and 100% in 10 days is more realistic, given that an MEP has dependencies on technicians, contractors, ATH certification, registry availability, and the correction of incomplete records. Reinstatement of Decommissioned Metering Clause 5(2)(e) should not be required. If an ICP is decommissioned, it is permanently removed from future switching and reconciliation processes under clause 11.1-20 of the Code. Overlapping Installation and Removal Times Recording installation and removal at the installation time destroys chronology and conflicts with clauses 8(a) and 8(b).

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	Suggestion is to delete clause 8(c). Retain each notified time and apply a published sequence rule where both events resolve to the same trading period.
Table 1: Registry metering records	AMI Flag versus Communication Status The new Communication Status field clashes with the requirements of Schedule 10.6, clause 8(13), in that the AMI Flag must be set to N if communication occurs less frequently than 25% of the MIC. This will preclude use of some Communication Status field options where the intermittence level is greater than 25% of the MIC, but still within it. This will, in turn, make it challenging for participants to rely on the new field due to inconsistencies in how it is set. As outlined in Q3, we suggest that the AMI Flag be reverted to its original purpose, such that a device remains AMI Y if it is capable of remote communication, to resolve this conflict.
Part 16A Audits	

Q3. Other feedback

If you have any other feedback on the draft Code amendments, please detail this below:

We feel that, conceptually, the changes reflect the desire to improve the Code and industry operations in general, but believe there would be benefit in separating a new record type for communication status updates from configuration updates.

Communication Status

We do not feel it is appropriate for communication status measurements to be included within the metering configuration (METERCOMP) record as these updates do not directly relate to the configuration of the meter in most cases. We feel that metering configuration records should only be updated when there is a change to the metering on site or remotely that requires an update.

The inclusion of communication status in the metering configuration record would cause a proliferation of metering configuration records which may or may not actually contain updated configuration information. This will make it difficult for participants to identify true configuration changes as distinct from communication status updates.

We propose the introduction of a separate record for meter communications performance-related measurements. It is intended that these records could be updated independently of the other metering records as their own new “MM-0X0” type event, but that they might also be sent as part of a normal “MM-010”.

An example of this record when extracted from the registry might look like this:

```
METERCOMMS,<ICP>,<METERSERIAL>,<UPDATED BY>,<DATE UPDATED>,<STATUS>  
METERCOMMS,9999999999AB123,6677AB,MEPA,12/09/2026,OK  
METERCOMMS,9999999999AB123,6677AC,MEPA,12/09/2026,N1
```

With different record types, this approach could be used for any performance- or measurement-related data for assets stored within the registry and kept separately from configuration data. Parties can then opt out of seeing this information within their normal extracts until such time as they determine it is appropriate for them to include it.

Communication Status Measurements

We also feel that the existing proposed communication status measurements lack a certain level of granularity and do not reflect the performance of modern communications and smart meters, or how they tend to communicate. Instead, we propose a different set of codes that provide the information we believe is required in a way that parties will be able to easily ingest and process.

The following suggested two-letter codes allow for easy determination of state by the first character, with the second providing some level of nuance where required. They also reflect measurable metrics that highlight expected performance. The suggestions also incorporate a treatment for newly installed meters where a track record of communication is not yet available.

METERCOMMS.commsStatus = OK → Meter has full remote two-way communications and is expected to communicate every day under normal circumstances. It has not missed more than three days of communication in the last 30 days.

METERCOMMS.commsStatus = I1 → Meter has full remote two-way communications but has slightly intermittent communications. It has communicated on at least 20 of the last 30 days.

METERCOMMS.commsStatus = I2 → Meter has full remote two-way communications but has intermittent communications. It has communicated at least once in the last 30 days.

METERCOMMS.commsStatus = I3 → Meter has full remote two-way communications but has very intermittent communications. It has communicated at least once during its maximum interrogation cycle.

METERCOMMS.commsStatus = IU → Meter has only recently been installed (< 30 days) and its communications status is currently unknown. The status will be updated once it has been installed for more than 30 days.

METERCOMMS.commsStatus = NU → For unknown reasons the meter has experienced a loss of connectivity that is not intermittent, and the MEP is investigating.

METERCOMMS.commsStatus = N1 → Meter installation does not have remote communication capability available (i.e. was not installed with, or is not capable of having a communications module installed, telco connectivity is not available or has been withdrawn, etc). Meter must be interrogated by the **TRADER**.

METERCOMMS.commsStatus = N2 → As for N1, but the meter will be interrogated by the **MEP** instead.

Metering Type

With the introduction of Communication Status, we feel we should revert the AMI field to its original use. When used in conjunction with the existing MeterType field, this would achieve the same results as the new proposed MeteringType field. This means we can avoid the introduction of a new field as currently proposed.

METERCOMP.meterType = NHH + METERCOMP.AMIflag = N → Proposed “Non-AMI” metering type where the meter is a legacy meter with no remote communication capability and must be interrogated by the trader. Communication Status for this meter would always be set to N1 or N2 as appropriate.

METERCOMP.meterType = NHH + METERCOMP.AMIflag = Y → This combination has not been proposed and should probably be treated as an invalid configuration. Theoretically it would be a remote read service on a legacy meter that is not able to deliver half-hour / interval data, and remote read ability and quality would be determined by Communication Status.

METERCOMP.meterType = HHR + METERCOMP.AMIflag = N → Proposed “C+I” metering type where the meter is capable of delivering half-hour data but is not a smart meter, and remote read ability and quality are determined by Communication Status.

METERCOMP.meterType = HHR + METERCOMP.AMIflag = Y → Proposed “AMI” metering type where the meter is a smart meter, and remote read ability and quality are determined by Communication Status.

The introduction of a C+I MeteringType will inevitably lead to confusion and misconfiguration, given the industry’s general inconsistency around what constitutes a C+I site or solution, and therefore would best be avoided.