24 March 2026

Bluecurrent
[redacted]

Electricity Authority, Commerce Commission and
Energy Efficiency and Conservation Authority
Wellington

By email: distribution.feedback@ea.govt.nz

Supporting the Joint Open Letter to Distributors on Non-network Solutions

Bluecurrent strongly supports the joint letter from regulators encouraging distributors to leverage efficient non-network solutions.

1. Bluecurrent welcomes the open letter jointly issued by the Electricity Authority (the Authority), the Commerce Commission (the Commission), and the Energy Efficiency and Conservation Authority (EECA) to electricity distributors, dated 24 February 2026.
2. We strongly support the joint letter which sets out regulators' understanding of the opportunity that non-network solutions offer to improve the efficiency of distribution networks. The joint letter also identifies some key actions that distributors should be taking now and in the future to leverage non-network solutions effectively and efficiently.
3. Data generated by smart meters provides the digital foundation for many efficient non-network solutions. Bluecurrent has forged partnerships with an increasing number of distributors to deliver solutions that enable them to make their network smarter while avoiding more costly new network investment or expansion – which ultimately benefit consumers. The joint letter is a timely encouragement for more distributors to consider more efficient non-network solutions, including the use of smart meter data.
4. We describe below how our existing and emerging smart meter data services unlock real long-term benefits for distributors and importantly, consumers. These services include our:
    - Network Operations Data service;
    - High Frequency service;
    - Dynamic Load Control service;
    - Outage Management service; and
    - Installation of the next generation of smart meters.

Bluecurrent's NOD service enables visibility of low-voltage networks.

5. Bluecurrent's Network Operations Data (NOD) service provides low-voltage meter data directly to distributors, supporting them to make informed decisions about network capacity, investment, safety, event management and infrastructure investment.
6. Our NOD service captures detailed voltage, current and phase angle data in 5-minute intervals from our extensive network of smart meters. Data is collected, processed and delivered every day to provide distributors with timely information that enables them to make better decisions.
7. We now have more than one million smart meters in New Zealand delivering our NOD service across 12 distribution networks.
8. Our NOD service gives our network partners visibility of their low-voltage network, which helps them to:
    - spot issues earlier;
    - respond to faults faster; and
    - plan network investment more confidently.

9. The result is more reliable power and better customer experiences for people at home.
10. Our NOD service is also helping distributors to:
    - increase residential solar export limits from 5kW to 10kW;
    - cut down on truck rolls and reliance on data loggers;
    - improve health and safety outcomes;
    - plan for seasonal population changes; and
    - better understand how energy use is shifting.
11. We deliver NOD data daily, multiple times a day (Intraday), or every 15 minutes (High Frequency data – described below), depending on what each network needs and when.
12. And we are not stopping there. Later this year, we will take the next step in the evolution of NOD delivery with our Outage Management service (described further below), helping communities get back online faster when weather related events or unplanned outages hit.
13. Orion New Zealand, the first distributor to sign up for our NOD service, describes the benefits of gaining greater visibility of its low-voltage network:

> "By accessing this smart meter information we'll be much better placed to improve the optimisation of our network as our region's demand for electricity increases with decarbonisation. Gaining access to smart meter operational data gives us terrific visibility and understanding of our low voltage network, including electricity load and voltage across the day."
> **Orion Annual Report 2024**

14. Other stories about how distributors and their low-voltage network and customers benefited from our NOD service can be viewed on our website, https://bluecurrent.co.nz/news.
15. Bluecurrent is ready to support all New Zealand distributors in meeting anticipated low-voltage network visibility requirements. Our NOD service is market-ready and can be rapidly deployed across networks, providing a cost-effective way for distributors to gain immediate network visibility and deliver savings relative to traditional monitoring practices.

Our High Frequency service provides near real-time insights for timely and informed decision making and more efficient network management.

16. Bluecurrent is piloting a high frequency power quality data service with Vector and Northpower, two of New Zealand's biggest distributors. This new service can deliver power quality data from our smart meters at 5-minute intervals on 15-minute frequency. This innovation provides distributors unprecedented visibility of their low-voltage network and supports real-time coordination.

17. Our High Frequency service gives networks and retailers a clear view of usage across customer sites and improves their ability to forecast usage, respond to price events, provide near-real time insights, and improve customer service through faster responses to issues. This service enables: load forecasting, cost optimisation, demand response and flexibility services, personalised tariffs and tailored customer engagement, billing accuracy and transparency, and sustainability and carbon tracking.
18. Bluecurrent is currently the only provider of this high-frequency data service in New Zealand, and a network is now undergoing trials in Australia. We expect to make this service available to other New Zealand distributors in the coming months through pilots that will enable them to make a robust business case. In the future, we will work with customers to make the delivery of critical services even faster.

Our DLC service enables network flexibility and stabilisation.

19. More than 500,000 Bluecurrent smart meters in New Zealand and Australia are capable of flexible control, and this number is growing. Flexible energy management services are enabled by smart meters which allow control of as much as 1.5GW of load. Based on pre-set rules, energy consumption can be automatically reduced without impacting the home or business.
20. By moving discretionary load from peak usage times, our fully automated Dynamic Load Control (DLC) service enables network stabilisation, reduces energy costs, and provides flexibility of control to network and retail customers. This service is easily scalable (single site or bulk connection processing), can deliver up to 15-minute interval actions to address volatility, and integrates easily with most systems.
21. For example, we have partnered with Meridian Energy to roll out our DLC service for its customers. Meridian's Smart Hot Water Programme, powered by Bluecurrent, enables the shifting of electricity use by managing hot water heating loads. During peak times, hot water heating can be remotely turned on and off at a customer's premise (if the customer has joined the programme), helping to reduce reliance on non-renewable fuels and smooth out electricity demand. Customers on the programme will get lower bills and $120 of value back each year, by way of $10 credit each month. It is a win for Meridian customers, who benefit from cheaper power and whose water supply remains hot for when they need it.
22. Our DLC service is a cost-effective alternative to aging ripple relay systems – ensuring a stable and efficient power grid. We are in the process of signing more New Zealand and Australian networks and retailers for this service, which will pave the way for broader adoption of demand side flexibility.

Our Outage Management service will enable more timely and targeted responses to emergencies.

23. Bluecurrent is planning to introduce an Outage Management service this year. Traditional outage detection relies heavily on customer complaints, creating significant delays between fault occurrence and restoration response. This reactive approach results in extended outage durations, reduced customer satisfaction, and increased operational costs.
24. Power outages are no longer rare or isolated. Storms, floods, wildfires, grid stress, and rising demand for electricity are putting pressure on networks like never before. Our Outage Management solution represents a transformative approach to power network monitoring, specifically targeting low-voltage networks at customer properties. This intelligent system integrates three powerful data sources to create a comprehensive picture of 'network health', providing unprecedented visibility into network performance and outage events:

    - Meter heartbeat data – sends regular '*I am here*' checks from the meter every 15 minutes;
    - POWER ON data – sends an automatic '*Yes, I'm back*' signal after an outage; and
    - Power Quality Data – provides real-time insights into voltage, current and phase angle at individual connections upon power restoration.

25. Through our Outage Management service, each meter effectively becomes a sensor on the network – a smarter way of managing outages that is already built into the network. This creates a new layer of data which enables:

    - faster detection of faults;
    - near-real time confirmation of power restoration;
    - less reliance on customer outage calls;
    - better targeting of field crews; and
    - improved customer communications and satisfaction.

We are installing the next generation of smart meters that deliver even better data services to distributors and other interested parties.

26. Last month, we installed the first NEOS smart meters in New Zealand, as part of our partnership with EDMI. Our first installations occurred in Auckland's North Shore for Mercury and Contact Energy.

27. NEOS meters are a new generation of smart meters that are now being used for new builds and will gradually replace existing smart meters over the next 15 - 20 years. With more memory, these meters allow us to provide more innovative business services and retain data longer.

28. Being physically smaller (3.5cm shorter), the NEOS meters can be installed more easily, especially on smaller, tight boards.

Bluecurrent will continue to forge partnerships with distributors that enable efficient non-network solutions for the long-term benefit of New Zealand electricity consumers.

29. We are happy to discuss with regulators how Bluecurrent's ongoing partnerships with distributors are enabling innovative and efficient non-network solutions that unlock benefits for consumers, and other such partnerships 'in the pipeline'. Please contact Luz Rose (Senior Regulatory and Policy Partner) at [redacted]

30. This response does not contain confidential information, and we are happy for the Authority and/or the Commission or EECA to publish it in its entirety.

Yours sincerely

[redacted]

Matt Bostwick
Chief Customer Officer NZ