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Requiring the use of half-hourly data for reconciliation

Transpower welcomes the opportunity to submit to the Authority's consultation *requiring the use of half hourly data for reconciliation*, published 10th of October 2025. This submission is from Transpower as grid owner.

As grid owner Transpower is responsible for submitting half hourly meter information to the reconciliation manager for electricity volumes flowing across *network supply points* (NSPs). NSPs are used to reference information to grid connection points for reconciliation purposes. While the consultation is about submitting half hourly volumes from *installation control points* (ICPs) several of the code changes proposed cut across established and efficient grid owner processes for its own submission information for these NSPs.

We consider the proposed changes are not intended to apply to the grid owner, but we highlight certain aspects of the proposed code amendments that would affect grid owner processes. Further drafting will be necessary to ensure that the grid owner's submission procedures for its half-hourly data remain unchanged and are kept distinct from the new procedures proposed for volumes submitted from ICPs.

Proposed deletions under Schedule 15.3 (8) (6).

Schedule 15.3 of Part 15 of the code covers the calculation and provision of submission information to the reconciliation manager and applies to traders and the grid owner (as reconciliation participants). Clause 8 (6) currently specifies that half hour submission information must be volume information aggregated to the following levels *NSP code, reconciliation type, profile, loss category code, flow direction, dedicated NSP and trading period*.

The code proposal has deleted most of these levels (flow direction and trading period remain) and inserted only that the volume information must be aggregated at the ICP level. While this change meets the policy intent for providing half-hourly volumes from ICPs, the deletions have inadvertently removed the long-standing process by which the grid owner submits its own half hourly information to the reconciliation manager. NSPs are not ICPs, and it is impossible for the grid owner to comply with the proposed code revision.

- We submit that for the grid owner Schedule 15.3 clause 8 (6) must be retained in its entirety.

Proposed change for when submission process starts in a month, from 4 business days to 3. Given the anticipated increase in half hourly data volumes that traders must submit to the reconciliation manager we understand the rationale for proposing that the submission process to the reconciliation manager starts one business day earlier in the month, at 3 business days. However, the paper does not cover whether this proposal would also apply to the grid owner.

- We submit that for the NSP volumes from the grid owner no change is necessary, and its submission processes should continue to begin at four business days.

Finally, we note that despite 96% coverage of smart meters across New Zealand, some ICPs will still have to provide **non** half-hourly submission information. However, the proposed deletion of **clause 15.6** *Retailer and direct purchaser ICP days information* means that the reconciliation manager will no longer receive information about ICP days¹ for these non half-hourly submissions. In consequence the reconciliation manager cannot know if scaling is required or how much is needed, and this information gap could affect accuracy of the settlement process. Clause 15.6 should remain for the non half-hourly submissions.

Yours sincerely

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¹ The Authority describes that "ICP days scaling factor...address the possibility of unaccounted-for-energy caused by traders' submission information missing ICPs and/or days, when electricity is being used, or used and generated, at an ICP" [Requiring the use of half-hourly data for reconciliation](#) 2.48