

21 November 2025

Wholesale Market team

By email: wholesaleconsultation@ea.govt.nz

Electricity Authority

Tēnā koe,

Use of half-hourly data for reconciliation – efficiency in data format

We welcome the opportunity to respond to the Electricity Authority (**Authority**)’s consultation paper on amending the Code to require half-hour (**HH**) data to be submitted into the wholesale electricity market’s reconciliation process, where this data is available.

As an EDB, this change won’t affect Powerco materially. It’s clearly important that market participants have the incentives to respond to efficient price signals. We ensure the use of actual half-hour data in the way that we charge for distribution use-of-system, and we support any change that ensures that all parties in the wholesale market are exposed to the actual costs of the loads that they are responsible for.

While we don’t have any specific feedback on the consultation questions, we would note that if the Authority is contemplating a similar Code change to require HH submissions for network billing, the current EIEP3 would not be scalable. Even with the small quantity of data we receive outside billing processes, the file sizes are very large given the EIEP3 data structure.

We would suggest that the Authority progress the Codification of a new file format such as the EIEP3A that it proposed adding to the Standing Data Formats Group work programme¹ to better accommodate HH metering information from smart meters to enable traders to provide mass market half hourly data in a more scalable format (with trading periods across columns rather than separate rows) to the market and eventually to distributors.

We’re always keen to meet with the Authority to share insights and test thinking. To arrange such a discussion, or if you have any questions on the points we have raised in the submission, please contact Emma Wilson (Emma.Wilson@powerco.co.nz).

Nāku noa, nā,



Emma Wilson

Head of Policy, Regulation and Markets

POWERCO

¹ *Electricity Information Exchange Protocols (EIEPs) 2017 Operational Review – Decision*. Electricity Authority, 2 October 2018. p.35