FLEXFORUM

Progress with delivering the Flexibility Plan

An assessment of the pace and direction of flexibility progress in 2025

19 August 2025

Table of Contents

Flexibility progress is gaining momentum

Flexibility progress gets a pass mark, but critical tasks are getting ticked off

Flexibility progress in 2025 gets a pass mark, but momentum is building. There is increasing focus and effort directed at delivering tasks and actions to make flexibility an easy and routine choice.

FlexForum has found activity to deliver the 41 steps in Flexibility Plan 2.0 is mostly underway, but may not be sufficient to deliver the associated outcomes within timeframes which maximise the value of flexible resources for people, the electricity system and the wider economy.

FlexForum Members consider a pass mark is understandable, though not ideal. Making flexibility easy and routine is a massive exercise which requires challenging and rethinking long-held industry assumptions and practices. Such a change is not straight-forward and takes time.

There is positive progress since the 2024 assessment. A series of regulatory change proposals from the Electricity Authority during 2025 should tick off several actions needed for people to easily and routinely discover their flexibility options. However, the key to unlocking flexibility – filling holes in the value stack – is unfinished business and remains a top priority when deciding where to dedicate resources in 2026.

Learning-by-doing is increasing and is increasingly focused on practically using flex

Learning-by-doing is increasing and is increasingly focused on how to practically use flex. We see learning (and doing) occurring across the flexibility journey, with a clear concentration of activity on technical and operational aspects needed to enable flexibility propositions to be developed and offered.

There are tensions about the pace of progress. Parties wanting to offer flexibility propositions are waiting on traditional players to deliver a range of flexibility enabling steps and actions. These parties are experiencing a natural delay as they only see progress once these enabling actions are complete.

That said, the earlier stages of the flexibility journey do require more learning-by-doing focus because maximising the value of flexible resources relies on people finding the journey to say yes to flex easy and routine.

Project transparency has improved since 2024. However, detailed information about project objectives, design choices, successes and failures remains difficult to easily get. We need much greater transparency in the thinking and learning-by-doing with the goal that all activities should support end-to-end involvement of all key interests.

Looking ahead to 2026

The electricity market design and long-standing operational practices are being tested, perhaps to destruction, by fundamental changes to how and when people use electricity, the inexorable rise of distributed energy resources, a generation fleet with an increasing proportion of variable fuel sources such as wind and solar, and more frequent extreme weather events.

Looking ahead to 2026, FlexForum considers the straightest path from enabling flex to using flex is to prioritise efforts which result in more flexibility propositions and people having more opportunities and reasons to say yes to flex. This means **investing in actions** which **provide the foundations for more flexibility propositions** and which **support flexibility champions**.

A priority for 2026 is the set of actions needed to create cash signals which motivate dependable flexible responses to unpredictable events. This will **provide the foundations for more flexibility propositions**. Saying yes to flex requires having something to say yes too. A wider range of flexibility propositions which leverage the dynamic value of flexible resources to the system requires cash signals which work to avoid costs in the moment.

We need to support our flexibility champions. Flexibility is new and different, and FlexForum Members regularly observe that a flexible system is not a foregone conclusion, with many decision-makers and potential users not yet confident or convinced flexibility is a dependable business and usual option.

Sharing of experience is an increasing focus for FlexForum. Regular monthly forums will provide Members a neutral place to tell a story, share and problem or ask a question. FlexForum workshops and events like Flex Day provide neutral territory to collaborate. We are also finalising a project information template to identify and standardise the information that people across the electricity ecosystem want to know, and help to make providing that information easy

Invest in action. Flexibility Plan 2.0 has 41 steps. None are trivial. All require effort and resources to understand, explore, test and implement solutions. But the pay-off is also material given the critical role flexibility has in delivering the affordability and reliability benefits of a smart power system. We need to invest in action to have resources dedicated to getting the flexibility ball rolling.

This report is a FlexForum perspective given its objective and purpose and drawing on the expertise and perspectives of FlexForum Members. Individual FlexForum Members may have their own perspectives and positions.

Contact info@flexforum.nz with questions or to find out more.

An assessment of the pace and direction of flexibility progress

FlexForum is an incorporated society with Members[1] from across the electricity ecosystem committed to working together to make it easy for households, businesses and communities to maximise the value of flexibility and electrification.

Flexibility[2] – from things like electric vehicles (EV), solar, battery storage, heating and cooling equipment and energy management systems – gives households and businesses greater agency and autonomy over their energy costs and outcomes and provides another tool for ensuring a reliable and affordable electricity system.[3]

Flexibility is our focus because it is central to affordable and reliable electrification and a key enabler of a truly consumer-centric electricity market and system.

Flexibility Plan 2.0 is a checklist to deliver an easy and routine flexibility journey

Flexibility Plan 2.0 provides a checklist of 41 tasks and actions intended to deliver a capability, process or practice which makes flexibility choices easy and routine for households, businesses and communities.

Each step in some way supports people having the option and opportunity to realise one or more of five[4] flexibility outcomes according to their preferences and circumstances.

[1] FlexForum Members are listed at https://flexforum.nz/about/. Members span the electricity ecosystem and include electricity generators, retailers, metering services providers, EV charger manufacturers, energy management software firms, Transpower, distributors, advisory services firms, industry associations, universities, and individuals.

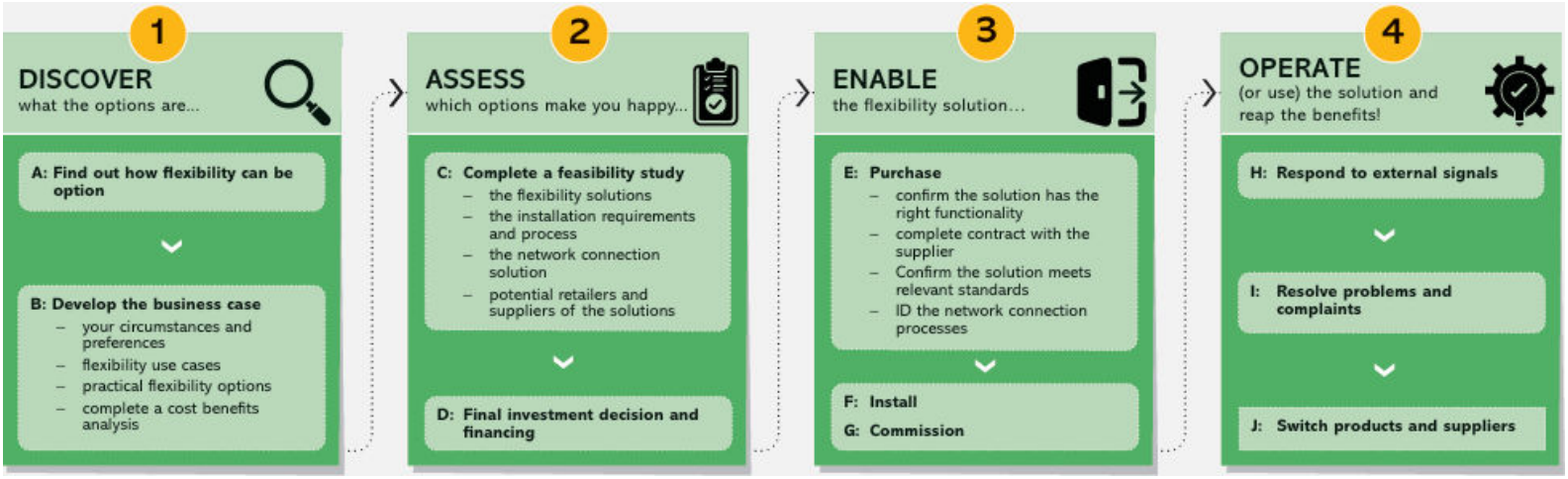
[2] For readers looking for a definition, we think flexibility is the modification of generation injection and consumption patterns, on an individual or aggregated level, often in reaction to an external signal, to provide a service to the owner or within the power system.

[3] The benefits of flexibility are flagged by a range of parties including Transpower, the Market development advisory group, and the BCG Climate change in New Zealand: the future is electric report.

[4] The outcomes are: Minimise connection costs; Minimise energy-related ongoing costs; Manage reliability and resilience; Reduce emissions; and Monetise flexible resources. Keen readers of Flexibility Plan 1.0 will at this juncture ask why we are referring to 5 outcomes rather than the 7 actually listed…the reason is the 3 outcomes relating to providing services across the electricity supply chain are combined because they are variations of the same thing.

Flexibility Plan 2.0 was published in April 2025 as an upgrade to the August 2022 version. The upgrade includes the flexibility lessons and experiences gained since 2022 and more explicitly anchors steps and tasks to the actions and choices people have when considering whether to say yes to flex across the four stages of the flexibility journey.

Figure 1 The flexibility journey



Flexibility Plan 2.0 is a reference point to coordinate and prioritise the complex and inter-related set of activities required to develop a smart, flexible and consumer-centric power system.

FlexForum is committed to regularly reviewing progress with delivering the Plan and updating the Plan as learning identifies new tasks and tasks are ticked off. This iterative approach allows course correction and adaptation to changing circumstances.

This is the second flexibility progress report. The assessment method and process are described in the Appendix.

Flexibility progress in 2025 gets a pass mark

Flexibility progress for 2025 gets a pass mark from FlexForum Members. Activity to deliver the 41 steps in Flexibility Plan 2.0 is generally underway but may not be sufficient to deliver the associated outcomes within timeframes which maximise the value of flexible resources for people, the electricity system and the wider economy.

FlexForum Members rated whether activity is sufficient to deliver each step within 12-18 months using a 1-5 scale, with 1 representing insufficient activity (step will not be delivered) and 5 representing sufficient activity (step will be delivered).[5]

None of the 41 steps are seen as achieving sufficient progress towards being delivered by the close of 2026.[6] Figure 2 shows the average rating of progress for each step.

- 21 steps are rated as having progress above a pass mark. Steps #7 (common use case descriptions) and #19 (common minimum functionality for each use case) are rated as having the most sufficient level of activity (both scoring 3.1/5), but not necessarily enough activity to deliver these steps by December 2026.
- 16 steps are rated as having progress below a pass mark. Step #41 (have a plan to enable switching flex products/suppliers) is rated as having the least sufficient level of delivery activity (scoring 1.7/5).

[5] The assessment method and process is described in the Appendix.

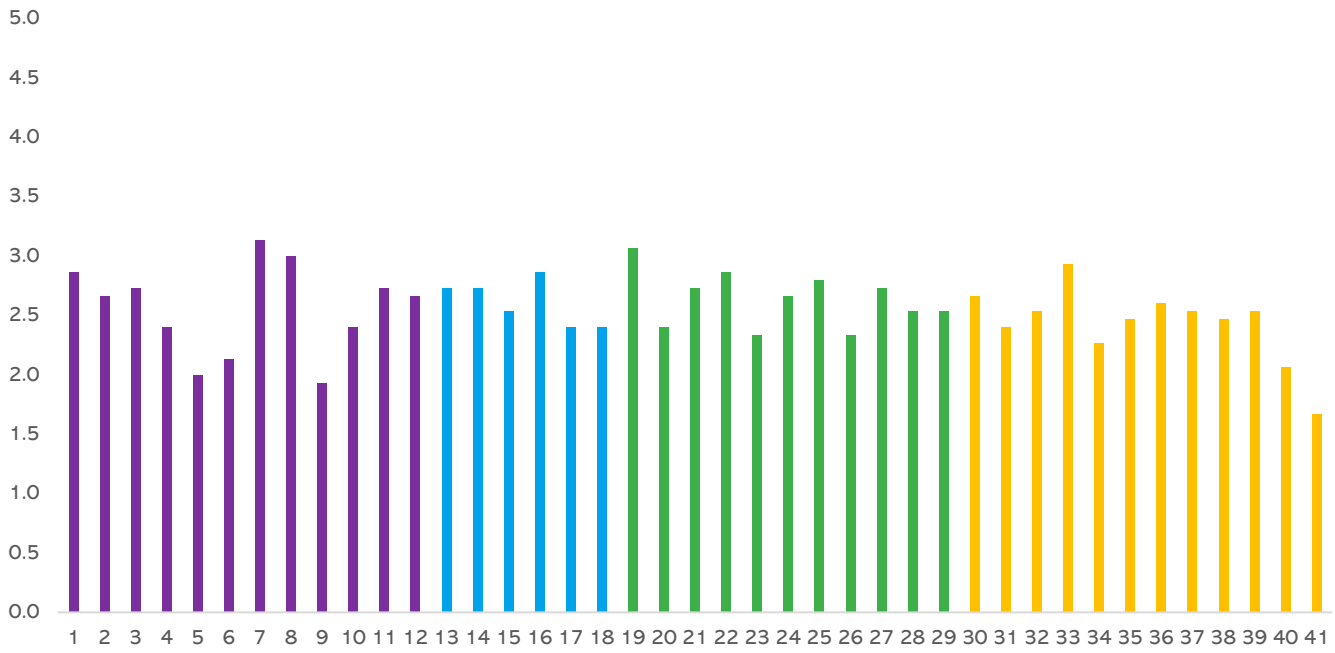
[6] Each Flexibility Plan 2.0 step was developed to be deliverable in an ideal world without resource constraints within 12-18 months, ie, the close of 2026.

FlexForum Members consider a pass mark is understandable, though is not ideal. Making flexibility easy and routine is a massive exercise requiring challenging and rethinking of long-held industry assumptions and practices. Such a change is not straight-forward and takes time.

Members highlighted that the traditional electricity sector operates at a slower pace to innovators and start-ups, so we cannot expect things to change overnight. There is clear evidence of flexibility progress, but the traditional players are inherently risk averse7 and progress depends on the time they require to develop, demonstrate and communicate flexibility options and opportunities.

Pace also depends on circumstances and motivations. For example, the main network-related flexibility use case is to avoid or defer network investment. However, load growth has not increased in the past 3 years, reducing the motivation to use flex.

Figure 2 Average rating of progress with each Flexibility Plan step (1 = not sufficient. 5 = sufficient)



The overall view of progress hides the differing perspectives on progress of traditional and non-traditional electricity ecosystem participants.

Figure 3 shows the average progress rating of traditional participants (ie, distributors, retailers metering providers) compared to non-traditional participants (everyone else in the ecosystem).

Traditional participants clearly consider the level of activity and progress is more sufficient. Flexibility 'innovators' are banking on faster progress to capture value and survive as businesses. These innovators operate at a higher cadence due to less patient capital, which causes a mismatch in expectations of progress for traditional and not-traditional parts of the ecosystem.

Tensions about the pace of progress are exacerbated by the sequence of effort. Parties wanting to offer flexibility propositions are waiting on traditional players to deliver a range of flexibility enabling steps and actions. These parties are experiencing a natural delay as they only see progress once these enabling actions are complete.

[7] Risk aversion is a feature of investing in and managing long-lived critical infrastructure.

Figure 3 Progress according to traditional and non-traditional electricity ecosystem participants

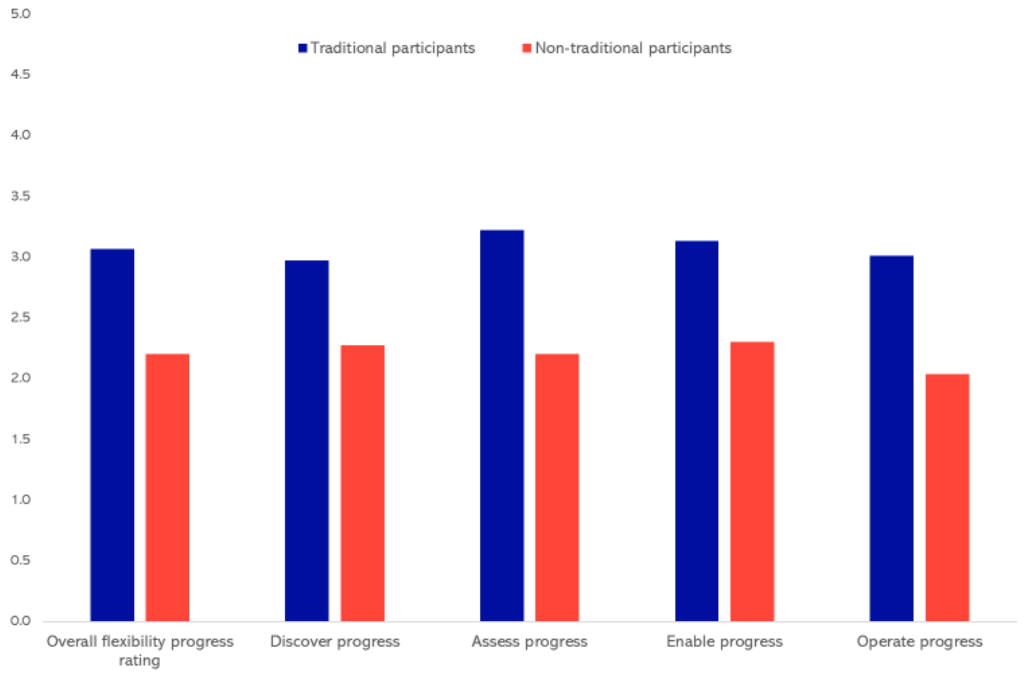
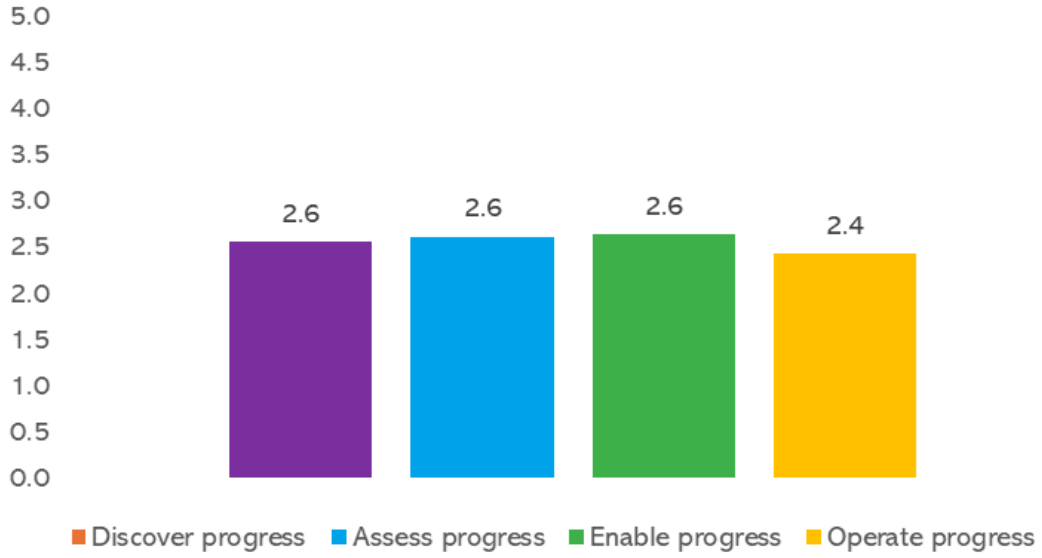


Figure 4 shows the average rating of progress for the Discover, Assess, Enable and Operate stages of the flexibility journey.

Overall progress is relatively equivalent across each of the 4 stages. This equivalence is positive as the 2024 progress assessment found progress with the Discover stage was materially less advanced relative to the rest of the flexibility journey. However, celebration should be muted given the hesitancy expressed about any step being delivered sufficiently promptly.

Figure 4 Progress across the 4 stages of the flexibility journey



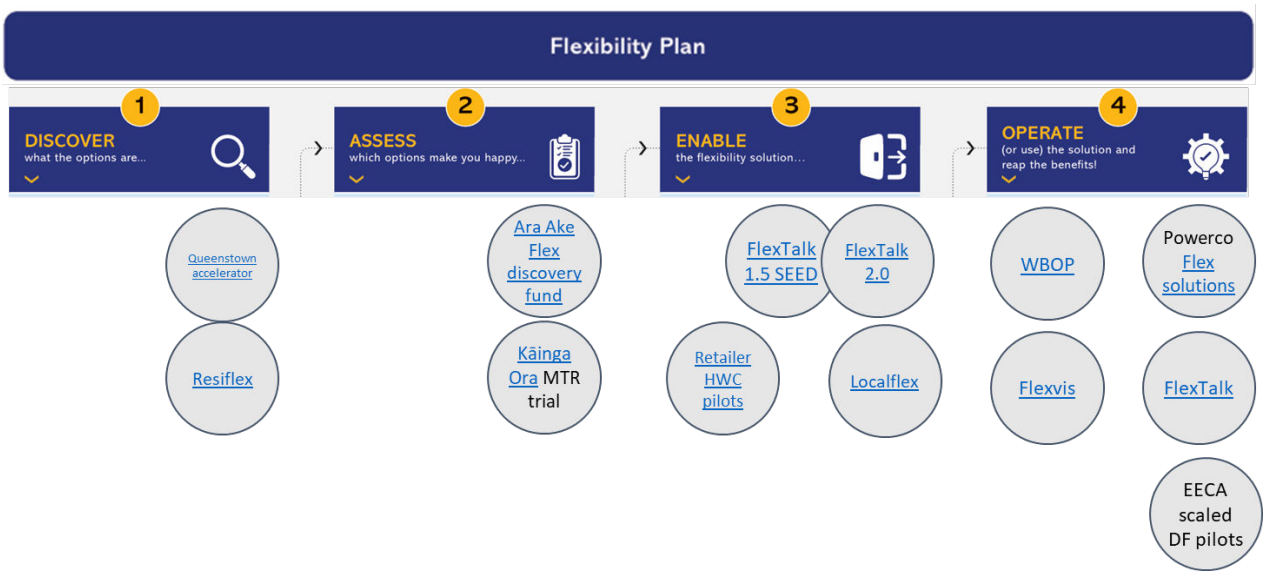
Learning-by-doing is increasingly focused on practically using flex

Learning-by-doing is increasing and is increasingly focused on how to practically use flex.

Figure 5 shows 13 live or imminent activities (pilots, trials or projects) which individually and collectively are expected to help to deliver multiple Flexibility Plan 2.0 steps. More information on the 13 activities is available in Table 1 below

This is not meant to be a comprehensive list of flexibility projects. These activities are singled out because they are delivered collaboratively, focus on practical solutions to critical challenges to flexibility, and information is (mostly) publicly available.

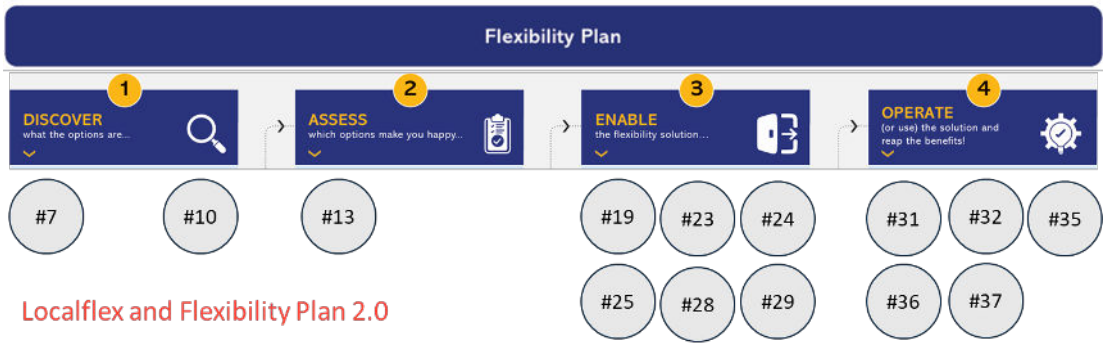
Figure 5 Learning-by-doing across the flexibility journey



Each activity is placed in the stage of the flexibility journey to which it contributes the most. However, this obscures the breadth of learning coming from individual activities.

For example, the Localflex project being delivered by Our Energy, EPEX Spot, Powerco and Unison is expected to inform delivery of 17 Flexibility Plan 2.0 steps.8

[8] For the curious, Localflex will help deliver Flexibility Plan 2.0 steps: #7 (use case descriptions), #10 (fill holes in the value stack), #13 (flexibility lexicon), #19 (common minimum functionality); #23 (flexibility market participation requirements), #24 (flexibility exchange mechanisms), #25 (flexibility terms of trade), #28 (register flexibility resources), #29 (technical qualification methods), #31 (flexibility forecasting requirements and capability), #32 (collate flexibility experience), #35 (flexibility-enabling operating practices), #36 (a common approach to connectivity), #37 (consistent use case triggers and messaging structures) and #38 (methods for measuring, validating and settling flexibility transactions).



Effort is concentrated on enabling and operating flexibility

Referencing these activities to the Flexibility Plan means we can see learning (and doing) occurring across the flexibility journey. An obvious focus is the steps in the Enable and Operate phases exploring the commercial frameworks and mechanisms9 which are needed to fill the holes in the value stack and underpin the flexibility propositions offered to people.

The concentration of activity in the Enable and Operate stages reflects the focus on enabling tasks needed to develop and offer flexibility propositions.

The FlexTalk Flexibility scan highlighted a similar concentration of effort finding the projects assessed predominantly focus on Network Management and Market Design and Development, and customer engagement-related activity is underrepresented in learning-by-doing.

Our observation from 2024 remains relevant…

> *… a greater focus on the "Discover" and "Assess" phases of the flexibility journey should be a priority because this will let people make informed decisions in their own context. As with any business case, people need inputs – information and advice – that is relevant to their situation.*

The Discover and Assess phases of the flexibility journey require more explicit learning-by-doing focus because maximising the value of flexible resources relies on people finding the journey to saying yes to flex easy and routine.

Project transparency is improving

Project transparency has improved since 2024, for example through the FlexTalk flexibility scan. However, detailed information about project objectives, design choices, successes and failures remains difficult to easily get.

We need much greater transparency in the thinking and learning-by-doing with the goal that all activities should support end-to-end involvement of all key interests.

[9] The commercial framework and mechanisms terms are from the Orion and Wellington Electricity Resi-flex project. A commercial framework involves calculating the economic value of flexibility to distributors and translating that value into price signals and payment budgets. A commercial mechanism is the possible ways to pay for or price flexibility. See Wellington Electricity and Orion, June 2025, Innovation Project Allowance Report - Resi-Flex, section 5.

FlexForum Members are not confident that experience is being shared or is translating into enduring arrangements.[10] Documenting and sharing experience and thinking is not straightforward due to factors such as time and resources and commercial sensitivities. However, visibility of activity and sharing of experience is critical to fast and efficient development of flexibility, and particularly for experience to be implemented and embedded across the ecosystem.

Sharing of experiences is an increasing focus for FlexForum.

Regular monthly forums will provide Members a neutral place to tell a story, share and problem or ask a question. FlexForum workshops and events like Flex Day provide neutral territory to collaborate and particularly focusing on sharing common technologies and methodologies which aren't part of the competitive offering.

We are also finalising a project information template to identify and standardise the information that people across the electricity ecosystem want to know and help to make providing that information easy. The intention is to build on the question set used for the Flex Talk flexibility scan to draw out the project 'so what' and get greater insight into experience and thinking at the beginning, middle and end of an activity.

We will know if these efforts help by the detail available and the ease of completing the equivalent of this table in the 2026 progress report.

[10] Members at a 24 July 2025 workshop were asked 'How confident are you that experience from learning will be implemented and embedded across the system?' (1 = not confident. 5 = very confident). 67% of attendees were not or not very confident (giving a rating of 1 or 2).

Table 1 More information on learning-by-doing activities delivering Flexibility Plan 2.0 steps

Flexibility journey	Activity
Discover	• Resiflex, a Orion Energy and Wellington Electricity project exploring commercial frameworks and mechanisms which enable households to maximise the value of their flexible resources and provide flexibility for network uses. The current (third) phase involves partnering with flexibility coordinators to co-design flexibility propositions and trial these with consumers. These trials will help inform which mechanisms to scale. • Queenstown Electrification Accelerator. Rapid electrification and emissions reduction via practical deployment of flexible, distributed resources, particularly prompted by natural hazard resilience and a looming transmission upgrade expected to increase customer bills by $500/year. The upgrade cost can be delayed by about 4 years if sufficient flexible resources are available in time. The QEA is focused both on making decisions easy for humans, as well as challenging the electricity system to enable the right things to occur.
Assess	• Kainga Ora multiple trading pilot, a project supported by Ara Ake to test unbundling of household retail and selling spare solar. The purpose is to explore a solution that: maximises the benefits of solar energy for all customers, even those whose homes are not suitable for solar panels, and allows people to continue using solar energy and purchase additional electricity from the grid, maintaining their consumer rights.
Enable	• Local Flex – a project testing an auction based flexibility exchange platform which connects flexibility buyers (initially Powerco and Unison) with flexibility owners/sellers. • distributor requests for proposals to provide flexibility to assist with managing network operation. Powerco is responsible for the bulk of the flex solution requests in the past 12 months. • Transpower Western Bay of Plenty upgrade project which, as part of a 10 year works programme, includes exploring how a non-transmission solution (NTS) option can be used to manage the timing and cost of transmission and distribution network upgrades. The NTS – flexibility – option will be developed through a learning-by-doing approach. • various electricity retailer propositions based on flexible of residential hot water, eg, Electric Kiwi, Meridian, and Octopus Energy.

Operate	• FlexTalk 1.0, 1.5 and 2.0 is an Electricity Engineers Association project, supported by EECA, to test the use of a common communications protocol to coordinate EV charging in near real time.
	  ○ FlexTalk 1.0 explored how to better enable customer flexibility to be utilised by testing the interoperability of a two-way common communication protocol between an electricity distribution company and flexibility supplier.
	  ○ FlexTalk 1.5 (Seed project) tested selected technologies for their suitability for demand flexibility, assessed the cost, installation complexity and scalability of selected consumer devices, and provided insights into smart device installation best practices.
	  ○ FlexTalk 2.0 is in development. It will explore the impact of retrofitting connectivity within 100+ homes and then optimising energy use and flexibility.
	• Ara Ake National Flex Discovery Fund is supporting flexibility coordinators to make flexible resources visible to the electricity system and possible buyers, thereby helping to accelerate the scale and reliability of flexible resources.
	• FlexViz, a Cortexo project supported by Ara Ake to test a way to make flexible resources and owners visible to potential users. Flexibility coordinators provide site supply data every five minutes, showing the amount of flexibility available and the amount of energy being supplied to your site that is not being drawn from the electricity distribution network (avoided import). This data is used to show the amount of flexibility available at every grid exit point (GXP) on the New Zealand transmission network.
	• EECA Scale demand flexibility demonstration pilots project. Several distributors have signed collaboration agreements with EECA to conduct flexibility pilots that are principally aimed at deferring traditional network investment. All involved distributors have committed to demonstrating flexibility at a scale that will meaningfully defer a real network investment (or set of investments), but are also exploring other benefits. Most projects are principally focused on households, while one is specifically focused on commercial/industrial scale flexibility. EECA is contributing funding to support the deployment of flexibility-enabling equipment in consumer's premises, to be used as part of the pilots. The pilots are expected to run for at least 2 years, including the design and installation phase.

The assessment indicates progress with 2025 priorities and signals priorities for 2026

Regularly assessing Flexibility Plan progress indicates how things are going and highlights where any extra effort is needed to understand, explore, test and implement solutions to make flexibility easy and routine for people.

This assessment indicates positive progress with the 2025 priorities (identified in 2024) and signals where effort is needed in 2026.

Positive signs of progress on 2025 priorities

The 2024 progress report11 found that flexibility progress was mostly in the Enable and Operate stages of the flexibility journey on '…'how do we make flexibility work inside the electricity system?' and 'how do we make it usable for market participants'…'. There was much less focus and progress in the Discover and Assess stages to answer 'how do people easily evaluate their options?', 'how can people be routinely rewarded for making their flexibility available?', and 'how can the choices be made easier?'.

This insight led FlexForum to identify two priorities to make a material difference to enabling flexibility:

- Actions to provide people the ability to easily and routinely get personalised information and advice either directly or from advisers, particularly focusing on the data inputs people need for their flexibility business cases. Key tasks are steps #2 (existing retail price data), #3-5 (network reliability, capacity and resilience data), #9 (usage data) and #11 (pricing options information).
- Actions to fill the holes in the value stack, particularly by providing cash signals to motivate and incentivise dependable flexible responses to unpredictable electricity supply and network conditions. The key task is step #10 (a plan to fill the holes in the value stack).

More data should become available for people to discover and assess their flexibility options

A series of regulatory change proposals from the Electricity Authority during 2025 should tick off several actions needed for people to easily and routinely discover their flexibility options.

- the Authority consulted on electricity product data proposals in July 2025 which could deliver steps #2 (existing retail price data) and #11 (pricing options information).
- the Authority plans consulting in October-December 2025 on proposals to improve access to consumer usage data. The proposal will include data exchange standards along with an accreditation and verification system to enable people or authorised third parties to request information about their consumption in a streamlined way. This could tick off step #9.
- the July 2025 Authority decision on Distribution connection pricing fast-track measures may partly deliver step #12, depending on how the requirement for distributors to offer a least-cost technically acceptable solution, including a lower-quality/lower-cost 'flexible' connection option is practically implemented.
- The June 2025 proposals to allow people to buy and sell from separate retailers would partly deliver step #17 (supplier choice), and provide a starting point for people to easily contract with a range of market interface agents, ie, retailers, flexibility coordinators.

[11] Progress with delivering the Flexibility Plan: 2024 assessment, August 2024, at https://flexforum.nz/wp-content/uploads/2025/05/4-Progress-with-delivering-the-Flexibility-Plan-August-2024.pdf

- The key inputs to the flexibility business case that remain difficult to get are distribution network reliability, capacity and resilience data (steps# 3-5). More data is becoming available, for example through network capacity maps, but local (feeder level) data is not routinely or easily available.

Holes in the value stack still need to be filled though

Holes in the value stack still need to be filled. We outlined in March 2025 five holes in the value stack caused by missing cash signals or cash signals not being translated into benefits for the flexible resource owner (ie, the customer).

Some progress is occurring due to decisions from the Commerce Commission and the joint Commerce Commission and Electricity Authority Electricity Competition Taskforce.

Most of the progress is due to Commerce Commission decisions in the 2025 DPP to provide an innovation and non-traditional solutions allowance (INTSA) and a low voltage data opex allowance. Several distributors are using the INTSA to invest in developing flexibility options.12 FlexForum discussions indicate the new opex allowance for data is a key reason for recent investments to get more granular low voltage network operational data.13 This data supports delivering steps #30 and 31 and provides capability to create the cash signals needed to fill the main network-related holes in the value stack.

The Taskforce has made proposals and decisions related to the holes in the value stack. None addressed the largest and highest priority hole caused by a lack of routine and accurate cash signals to motivate dependable responses to *unpredictable transmission and distribution events.*[14] The July 2025 proposal to establish an emergency reserve scheme may help to fill the hole caused by inadequate cash signals motivating and incentivising flexible responses to *unpredictable electricity supply conditions* when the wholesale market cannot meet demand, improving security of supply during unexpected shortages.

A likely source of progress in this area are the investments by FlexForum Members Alpine, Electra, Orion, The Lines Company, Transpower, Wellington Electricity and Vector, and other distributors such as Aurora and Unison, in learning-by-doing how and when to use flexibility.

The focus of these efforts is to use flexibility to avoid network costs in the moment, not at some possible point in the future. FlexForum Members are saying that relying solely on price-based flexibility (eg, via TOU price structures) is not a practicable or effective way to motivate the dependable flexible response needed to avoid costs in the moment. They are all exploring how to motivate people to say yes to flex for network reasons, including through a standalone contracted price via a flexibility exchange or platform.

Looking ahead to 2026

The electricity sector is in ferment. The market design and long-standing operational practices are being tested, perhaps to destruction, by fundamental changes to how and when people use electricity, the inexorable rise of distributed energy resources, a generation fleet with an increasing proportion of variable fuel sources such as wind and solar, and more frequent extreme weather events.

Adapting to all this change is attracting lots of attention and resource, and calls for difficult choices about where to focus effort and scarce resources.

FlexForum looked at priorities for 2026 from 3 perspectives with the starting point of progress gets a pass mark, but learning-by-doing is increasing.

[12] For example, Powerco and Unison are investing in the development and rollout of a local flexibility market (ie, Localflex).

[13] For example, Alpine, Orion and Vector.

[14] The decisions requiring distributors to offer peak period export credits and retailers to offer time-of-use pricing plans are expected to over time (eg, 10 years +) motivate shape-based responses from households that may flatten aggregate network and electricity usage profiles.

- Are the 2025 priorities still priorities?
- Where should FlexForum focus out of the 11 steps involving whole-of-system coordination15 which FlexForum took responsibility for driving progress?
- What three actions would make it easier in 2026 for people to say yes to flex?

A priority for 2026 is the set of actions needed to create cash signals which motivate dependable flexible responses to unpredictable events

The key to unlocking the value of flexibility is filling the holes in the value stack, particularly by creating routine and accurate cash signals to motivate dependable flexible responses to unpredictable market and network conditions.

The criticality of creating these missing cash signals is highlighted by how FlexForum Members prioritised action on the 11 steps involving whole-of-system coordination.

Table 2 lists the 5 steps FlexForum Members consider deserve the most focus. Four of these priority steps involve tasks focused on enabling flexibility to be transacted by working out how to measure flexibility performance (to determine payment), make flexibility bids and offers easy, commoditise transactions through standard product definitions (ie, use cases) and have the connectivity needed to send and respond to external signals. The other priority (and highest ranked) task is to isolate the specific reasons for the general hesitancy from network operators and electricity retailers to create the external cash signals needed for all sources of flexibility to become a routine operational and risk management tool.

Each of these tasks should be delivered – in whole or in part – through the Enable and Operate-related learning-by-doing activities listed in Table 1.

Table 2 The five steps FlexForum should focus on in 2026

#	Step	Context
33	Identify the financial and non-financial barriers which reduce the motivation of potential flexibility users to invest in developing and scaling flexibility.	Potential flexible buyers need to invest in capability and build experience with procuring, deploying and using flexible resources to create the new cash signals to motivate flexible responses. But there is a chicken-and-egg situation, with buyers wanting confidence the flexibility product is available at the point of purchase despite sellers needing buyers to commit to buying before investing in the flexibility production line. Mixing metaphors, resolving this stand-off by identifying the root causes is a necessary condition to create enduring new cash signals. This involves understanding the criteria and factors behind buyer decisions to invest (or not) in flexibility capability and experience.
38	Develop common methods and the associated capability sets for measuring, validating and settling flexibility transactions across the use cases	Sending external (cash) signals relies on having measurement, validation and settlement processes able to accurately calculate the nature and benefit of a flexible response, and settle accounts. This task will not be completed in isolation. It depends on decisions about service performance (use cases - #7), deployment triggers (#37), and connectivity and communication requirements (#36). Answers should be had from the learning-by-doing through Localflex and other activities.
24	Identify and develop mechanisms for exchanging flexibility for each use case which are low cost, support liquidity and participation and make it easy for people to maximise the benefits of their flexibility	This task is to work out how to easily match buyers and sellers, and simplify business to business counterparty relationships, eg, vetting suppliers, agreeing contracts, product testing and verification etc. FlexForum Members have observed that scaling flexibility relies on simple, standard procurement/offer processes to minimise the transaction costs of buying/selling flexibility.
7	Develop an initial common description of the use cases for each electricity outcome	This task is to identify an initial standard flexibility product definition. This will inform technical choices about external signals, deployment triggers and connectivity and communication requirements, and, as importantly, help people make flexibility investment decisions that enable them to say yes to flex.

[15] Flexibility Plan 2.0 identifies a responsible party for each step. They are considered most able to progress the step based on its interests and role. FlexForum took responsibility for 11 steps with no natural owner because they involved a whole-of-system effort.

#	Step	Context
	• network use cases (distribution and transmission) • electricity use cases (individual, retail and wholesale) • ancillary (system) service use cases.	Learning-by-doing underway and proposed will provide the basis for a standard menu of flexibility options underpinned by appropriate external cash signals.
36	Develop a common approach to connectivity which easily integrates and maximises the value of flexible resources.	Sending signals relies on connectivity and communication flows between resources, sellers and buyers to send and respond to external signals. Connectivity is a necessary condition for integrating flexibility resources into the market and system. This task is expected to be completed alongside activities to deliver steps #7 and #37.

The remaining 6 steps also involve tasks associated with enabling flexibility to be transacted by working out that flexibility can be relied on to do the job (#39), how to physically coordinate a flexible power system (#39), use consistent triggers to deploy flexibility (#25), apply consistent qualification requirements (#29 – ie, confirming a device can provide the relevant use case), and use consistent terms of trade (#25) and product disclosure information (26).

These steps should also be delivered through the learning-by-doing underway and proposed.

Actions to make saying yes to flex easier in 2026

Flexibility Plan 2.0 is all about making flexibility easy and routine for households, businesses and communities. This recognises that most flexibility will come from people saying yes to flex.

Effort is required to enable flex and to make saying yes to flex easy and routine.

FlexForum Members discussed actions to make saying yes to flex easier in 2026. The discussion suggested a continued emphasis on actions to enable flex. However, the underlying theme was to prioritise efforts to offer people more flexibility propositions and more opportunities and reasons to say yes to flex through three complementary types of effort.

Provide the foundations for more flexibility propositions. Saying yes to flex requires having something to say yes too.

The range of flexibility propositions is constrained by the narrow scope of existing cash signals with propositions currently designed around 3 cash signals: the electricity spot price, distribution (daily) time-of-use pricing and distribution control discounts (on the variable price component).

A wider range of flexibility propositions which leverage the dynamic value of flexible resources to the system requires cash signals which work to avoid costs in the moment. Activities expected to help achieve this outcome include:

- have a common methodology for describing, pricing, transacting flex which answers (at least indicatively) questions like who pays for what, where is the flex, where is flex needed and how it can be applied.
- fill holes in the value stack by offering payment for services offered, including by having a 'good enough' formula to value flex against poles & wires (for distributors).
- simple solutions for people underpinned by robust underlying systems and counterparty relationships which enable a wider range of flexibility propositions to be designed and offered.

Support flexibility champions. Flexibility is new and different, and FlexForum Members regularly observe that a flexible system is not a foregone conclusion, with many decision-makers and potential users not yet confident or convinced flexibility is a dependable business and usual option.

Efforts to build understanding and confidence must continue, particularly by supporting flexibility champions through:

- developing and share information and experience, particularly to showcase (and demystify) applied learning on the value of flex, its availability and benefits (specifically and more generally), and how risks with flexibility have been managed.

- support learning-by-doing and investments which specifically include flex, such as early enablement for non-transmission solutions to grow the capability before the need.
- provide a high-level view of the indicative values of all the various forms of flex, what use has the greatest impact and which use should be the focus of efforts.

Invest in action. Flexibility Plan 2.0 has 41 steps. None are trivial. All require effort and resources to understand, explore, test and implement solutions. But the pay-off is also material given the critical role flexibility has in delivering the affordability and reliability benefits of a smart power system.

- invest in action, with resources dedicated to getting the flexibility ball rolling.
- get some momentum with some small wins on some low hanging fruit rather than trying to do everything all at once.
- ensure coordination and a joined-up approach from government and the sector to the flex opportunity.

Prioritising activities which **provide the foundations for more flexibility propositions** , **support flexibility champions** and **invest in action** provides a pathway from enabling flex to using flex.

Appendix

Appendix: 2025 assessment method and process

The 2025 assessment of Flexibility Plan progress was completed in 3 stages.

Stage 1. **A survey to get Member views on progress with each step and identify activity underway**. Members were surveyed in May and June 2025. The survey asked two questions for each of the 41 steps:

- Rate on a 1-5 scale whether activity is sufficient to deliver the step within 12-18 months? (1 = not sufficient and 5 = sufficient).
- What other action is being taken?

The survey received 15 responses (35% of Members) from experts across the membership base: flexibility coordinators (3), metering and connectivity systems providers, electricity retailers (3), distributors (2) and individuals/experts (4).

At the same time, feedback on activity underway was requested from the responsible parties listed for each step.

Stage 2. **Reality test the survey results**. Members reviewed and critiqued the survey results and implications at a 24 July 2025 workshop discussing:

- the results of the survey of progress
- learning and implementation
- things FlexForum should prioritise.

Stage 3. Confirm the assessment. The insights and conclusions from the survey and Members were documented (in this progress report) and reviewed by Members in August 2025.

Appendix: Overview of activity completed, underway, or planned for each step in the Flexibility Plan

This overview of activity was collated on a best endeavours basis using material provided by Members while developing Flexibility Plan 2.0, the progress survey, input from the Electricity Authority and EECA, and desktop research, including the EEA flexibility scan.

The collation effort required, the high probability of missed activity, and the not always satisfying level of detail about the activity, highlight and reinforce the need for greater transparency.

The progress rating for each step is out of 5 and is the average of the ratings given by Members to the survey question asking whether 'activity is sufficient to deliver the step within 12-18 months? (1 = not sufficient and 5 = sufficient).'

The discover stage involves a person finding the flexibility solutions which could provide the electricity outcomes they want. Discovering a short list of flexibility solutions involves a person finding out how flexibility can be an option and completing a flexibility business case. The business case requires people to get information and data to: specify their preferences; identify the potential flexibility use cases/purpose; identify potential flexibility options; and complete a cost/benefit analysis.

#	Step	Progress Rating	Activity completed, underway or planned
1.	Develop and distribute information on the electricity outcomes available to households, businesses and communities from using flexibility,	2.9	• Information about the potential uses of flexibility is limited. Most information is in electricity sector channels and not consumer facing. And 'our experience is people don't read this stuff'. • EECA Genless provides basic information, eg, Explore smart homes — save money on energy

#	Step	Progress Rating	Activity completed, underway or planned
	the nature of the potential benefits, and potential solutions for each outcome.		• Rewiring Aotearoa guides focus on fuel cost savings of electric devices, with reference to flexibility benefits • EEA Seed project report includes technical insights about flexible solutions. • EECA - Jacobs research and model to establish demand flexibility potential by sector (C&I focus). Expected publication in August 2025. • several distributors have flexibility information on their websites (eg, https://www.welectricity.co.nz/smarterpower/emerging-technologies/flexibility-services). Some retailers are providing flexibility information (eg, solar/battery or responding to winter) to their customers.
2.	Determine if people can easily get information about their existing electricity retail rates and charges.	2.7	The July 2025 EA electricity product data proposals would make it mandatory for power companies to share the details of a customer's current electricity plan, in a standardised form. If implemented, the proposal should provide a mechanism to make it easy for people to get and use their existing retail rates and charges.
3.	Determine what network capacity information people need for decision-making, what data is available, what data is needed, and how the missing data will be obtained.	2.7	• Individual distributors are providing available network capacity information, eg, Powerco, Orion. A high-frequency power quality data service is being piloted by Bluecurrent with Vector. This service delivers batches of 5-minute power quality data reads every 20 minutes. • Projects like Localflex will soon start to identify specific network locations (at GXP, substation and/or distribution transformer levels) where flexibility may be needed.
4.	Determine the options to report historical and current network reliability and quality information (eg, voltage) for the LV layer.	2.4	• ID regime requires distributors to report network wide SAIDI and SAIFI data only. • Some EDBs publish capacity maps (eg, Orion, Powerco). However, LV data for end-user feasibility remains unavailable in most regions.
5.	Determine the options to provide people information about network resilience for their location, eg, similar to flood zone information.	2	• No visible progress on sharing LV resilience at spatial level relevant to homeowners. No methodology or mandate yet. Most distributors do not have this information themselves. • Networks are more likely to be doing this as part of annual asset management plans (could potentially consider providing our perceived risk for various assets near customer sites).
6.	Determine the options to provide people with granular emissions intensity data for their location.	2.1	• EMS emissions data is calculated using the intensity factor of grid generation by trading period. The WattTime marginal emissions signal is produced for NZ. • More granular data may not be needed. Research on marginal emissions (i.e. the emissions that occur if demand is increased or decreased more than expected) showed that 99% of the time at all GXP that this was met by hydro.
7.	Develop an initial common description of the use cases for each electricity outcome a. network use cases (distribution and transmission) b. electricity use cases (individual, retail and wholesale) c. ancillary (system) service use cases.	3.1	Flexibility use cases/product specifications have/are being developed through various projects, eg, FlexTalk, Our Energy/EPEX Local flex project, and by Powerco and Aurora.
8.	Develop and distribute information for people and expert advisers about flexibility options and potential solutions with the input and support of relevant industry and professional associations, eg, Master Electricians, SEANZ, Master Builders, Green Building Council etc.	3	Various tools/advice are available to inform choices about flexibility options, • Powerswitch, Genless solar calculator and vehicle cost calculator. • Rewiring Aotearoa has a Household Energy Savings Calculator. • EECA is starting to accept data from retrofitted 'smart' houses. From this evidence base/data a tool is planned to enable consumers to self assess the value from flexibility personalised to their household. Data from EECAs scaled pilots (estimate 2500 retrofitted 'smart' homes) will build the data set to ground the tool • FlexTalk has developed training material for electricians to retrofit connectivity and a HEMS to existing homes. We plan to develop this material with Master Electricians into online training modules.

#	Step	Progress Rating	Activity completed, underway or planned
9.	Introduce rules to require data holders (eg, retailers) to instantaneously respond to requests by a person or their agent for usage data from the data holder.	1.9	The Authority plans consulting on proposals to improve access to consumer data in October-December 2025. The proposal will include data exchange standards along with an accreditation and verification system to enable people or authorised third parties to request information about their consumption in a streamlined way.
10.	Develop and deliver a plan to provide cash signals which are accurate (as possible), give easy access to benefits, and motivate efficient responses.	2.4	There is a growing list of complementary activities underway which could, with effective coordination, deliver the step. ● FlexForum identified the holes in the value stack caused by a lack of cash signals to incentivise and motivate dependable flexible responses to unpredictable events. ● Taskforce decisions ○ 2A to require distributors to pay a rebate for supply at peak times. ○ 2B and C to require retailers to offer time-varying plans for use and generation. (export pricing options increased by MTR proposal). ● Powerco is developing Flex solutions and proposes to test a flexibility exchange (via the Our Energy/EPEX Local flex project) ● Transpower wants to test flexibility options as part of its WBOP project.
11.	Identify the causes and impact of transaction costs for discovering retail and electricity pricing information and find options to reduce those transaction costs.	2.7	The July 2025 EA electricity product data proposals would make it mandatory for power companies to make it mandatory for power companies to share the details of pricing plan information. Other activities which could improve transparency/reduce transaction costs of finding the price of flex are: ● Powerco is developing Flex solutions and proposes to test a flexibility exchange (via the Our Energy/EPEX Local flex project) ● Transpower wants to test flexibility options as part of its WBOP project ● The EA is procuring a comparison and switching service provider (starting 1 July 2025)
12.	Determine the options to make it easy for people to compare their connection options and costs with and without flexibility. a. identify and provide the network information people need to assess their connection options with and without flexibility. b. develop initial with-flexibility physical or contractual connection options, eg, connection agreements with dynamic operating envelopes or lower capacity connections c. provide people with incremental price information for common plausible connection scenarios.	2.7	The EA Distribution connection pricing fast-track measures may partly deliver this step, specifically the minimum scheme requirement … 'Networks will be required to offer a least-cost technically acceptable solution for connecting an applicant to the network unless the applicant asks for specific enhancements. In addition, applicants may request (and networks must offer) a lower-quality/lower-cost 'flexible' connection in which their demand can be curtailed at times of network congestion.' Delivery depends on development/implementation of capability to routinely offer flexibility options as part of a minimum scheme …' the least-cost solution for any connection works provided by a distributor, including for security and firmness of capacity, in accordance with the distributor's connection and operation standards or a lower standard if agreed to in writing between the connection applicant and the distributor.

The assess stage involves a person completing a feasibility study to assess which specific flexibility solutions could deliver the outcomes they want and making a final investment decision. The feasibility study involves selecting the right flexible devices, identifying the installation requirements and process, identifying the network connection solution (if any is required), and identifying the potential market interface agents.

#	Step	Progress Rating	Activity completed, underway or planned
13.	Develop and establish a common lexicon for the electricity ecosystem to describe the functional requirements and performance of flexible resources and flexibility use cases for people to easily see if a thing will provide the flexibility use case.	2.7	Relevant activities include: ● the EECA EV charger white list ● EEA work on standardisation of technical requirements. EEC Act changes are being brought into Parliament to enable EECA to specify connectivity and interoperability of devices and systems in regulation (a rules based approach). The first technology will be EV chargers (including V2X) followed by inverters, HEMS and space and water heating technologies. Voluntary mechanisms (PAS, White Lists, Smart labels) will be introduced to pull the market in the direction future regulation will land. However, the new regulatory powers will not necessarily result in system wide use of open communication protocols based on international standards with all actors using the same language to exchange data/messages.
14.	Understand device features which may frustrate people from maximising value. Understanding may identify frustrations that require some response.	2.7	Delivering this step depends on completing steps #7, #10 and #19 as these underpin the sources of flexibility value. Relevant activities include: ● the EEA Seed and Seed extension projects by providing practical advice about features and functionality ● the EECA scaled pilots with 5 x EDBS to unlock flexibility in up to 2500 homes and businesses
15.	Develop guides providing a checklist of potential installation requirements and process for typical installation scenarios.	2.5	Relevant activities include: ● the EEA Seed and Seed extension projects by providing practical advice about features and functionality. ● awareness with installers is key to this (might not be for customers directly but for the installers). A Seed extension project requirement is for electricians to assess sites and provide pictures of installations not worth touching.
16.	Develop guides describing the network connection implications and requirements of typical flexibility solutions.	2.9	EEA is developing technical guidelines for connection and commissioning of distributed energy resources. ● household level applications of consumer energy resources ● small-scale distributed generation connections of < 10kW ● medium-scale distributed generation connections ● large distributed generation connections.
17.	Introduce rules to allow people to easily contract with separate market interface agents (ie, retailers, flexibility coordinators).	2.4	● The Electricity Authority proposed in June 2025 to allow people to buy and sell from separate retailers. This proposal, if implemented, is part of a staged approach which could evolve into a range of possibilities, including sharing power between households and communities, retailers for specific appliances (like EV chargers), or different retailers for different days or times of the week. This depends on how stage 1 progresses. ● Ara Ake is setting up full peer-to-peer MTR pilot in Auckland with Counties Energy in 2025 for future Code changes information.
18.	Develop and deliver a range of financing arrangements and options for people in all circumstances.	2.4	● Bank products, eg, ANZ EV loans, ASB offer of 0% loans to farmers, etc ● EECA Warmer Kiwi Homes limited to owner-occupiers. ● Queenstown Electrification Accelerator testing solar for renters with Octopus ● Rewiring Aotearoa is working with Councils to look at financing electrification through a ratepayer assistance scheme. ● The Centre for sustainable finance is working with partners to accelerate private finance into affordable, abundant clean energy by identifying financing opportunities, supporting financial product innovation, developing tools that support market uptake and sharing knowledge.

The enable stage involves a person implementing their flexibility solutions by working through what is involved to confidently purchase, install and commission a physical or services flexibility solution.

#	Step	Progress Rating	Activity completed, underway or planned
19.	Develop a common minimum functionality for each flexibility use case so the same device can provide the same services across the country.	3.1	Relevant activities include: ● FlexTalk tested comms functionality for indicative network use cases ● Resiflex is testing comms, dispatch and measurement functionality for network use cases ● EECA scale DF demonstration pilot project will test both OpenADR and IEEE2030.5 ● Local Flex.
20.	Ensure technical standards establishing minimum functionality for flexible devices remain up to date.	2.4	The new rules-based system for technical standards is designed with sunset clauses to ensure advice is kept current through rapid changes. The intention is to specify the functionality prescriptively and signpost the standard as a means of compliance (rather than citing the standard as a mandatory requirements).
21.	Develop a common technical standard for devices, including but not limited to flexible resources, connected to a network which can individually affect network performance or safety.	2.7	The EEA project to develop technical guidelines for connection should provide relevant input. It is to produce a technical guide for household level applications of consumer energy resources to provide a framework, principles, approach, and technical settings for distributors and applicants to connect and manage power quality. Some distributors (e.g., Powerco, Aurora) using own guidelines
22.	Develop network connection application and delivery processes which make it easy for people and distributors to connect flexible resources as quickly as possible.	2.9	Changes to network connection processes are to come into effect in 2026. Specific requirements are to be developed by individual distributors. It is not known if the requirements will result in application and delivery processes that enable flexible resources to be easily and quickly connected. Electricity Networks Aoteara is mapping connection process pain points and improvement options. Initial quick wins are: connections self-serve manual, connection FAQs, connections introduction guide, connection journey steps, pre-application EDB manual and pre-application customer template and glossary (link to ENA website, also linked in implementation instructions). These actions should make application and delivery processes easier for people.
23.	Develop participation requirements that enable specialist flexibility providers to interface with and integrate their activities into the market and system.	2.3	Input should be available from projects including: ● the Our Energy/EPEX Local Flex project ● the multiple trading arrangements pilot The Authority is supporting pilots through the Power Innovation Pathway (eg, Counties DSO, Our Energy/Cortexo flexibility market pilot, Basis demand-side flex pilot), which will inform participation requirements for flexibility coordinators interacting with the market/system.
24.	Identify and develop mechanisms for exchanging flexibility for each use case which are low cost, support liquidity and participation and make it easy for people to maximise the benefits of their flexibility.	2.7	Input should be available from projects including: ● the Our Energy/EPEX Local Flex project ● the multiple trading arrangements pilot ● EECA scaled DF demonstration pilot project ● Transpower WBOP project ● Flexviz
25.	Develop consistent terms of trade for transactions for all flexibility use cases.	2.8	Input should be available from projects including: ● distributor requests for non-network services ● FlexForum insights into contracting arrangements and terms of trade ● the Our Energy/EPEX Local Flex project ● the multiple trading arrangements pilot ● EECA scaled DF demonstration pilot project ● Transpower WBOP project.

#	Step	Progress Rating	Activity completed, underway or planned
26.	Develop product disclosure information and practices sufficient to help people make informed decisions a flexibility-related contract is structured for their circumstances.	2.3	No activity reported. However, this is not unexpected given the dearth of flexibility propositions.
27.	Develop a process to collate, document and share good installation practices for common flexibility resources.	2.7	The EEA Seed and Seed Extension projects are retrofitting flex functionality to test installation, connection and connectivity. The experience can inform installation practice guides. Publicly available standards (PAS) are planned as part of the regulatory pull strategy for demand flexible devices and systems. PAS are ideal documents to showcase best practice and can be a requirement for incentive grant or loan programmes.
28.	Make changes to the registry to make flexible resources visible to the market and system.	2.5	The EA approved registry changes in August 2024 to include more DG information. From August, registry fields will be expanded to include more detail on the distributed generation installed at an ICP, eg, information about batteries and inverters where these exist alongside solar generation. The Authority's retail market monitoring notice will require retailers to provide information on the types of flexibility services they are aware of associated with their customers, but this is not sought at an ICP level.
29.	Develop technical qualification methods for each flexibility use case which are low cost and scalable.	2.5	Ara Ake commissioned Otago University in early 2025 to do a literature review and provide advice on baselining methods and approaches.

The operate stage involves a person using their flexibility solutions by responding to external signals and sometimes asking the service(s) provider how to resolve a problem, or switching products or providers to reflect changed circumstances, preferences or opportunities. Each of these actions rely on backoffice processes. Responding to an external signal relies on the signaler being able to create and send the signal. Resolving a problem relies on the supplier having resolution processes. Switching providers relies on simple, low cost switching processes.

#	Step	Progress Rating	Activity completed, underway or planned
30.	Develop a minimum set of operational visibility requirements and capability to support integration of flexible resources into distribution networks and the system.	2.7	Activities which inform delivery include: ● efforts of individual distributors, eg, Orion and Aurora installing smart substation monitoring. ● Ara Ake 2022 EDB challenge. ● A high-frequency power quality data service is being piloted by Bluecurrent with Vector. This service delivers batches of 5-minute power quality data reads every 20 minutes.
31.	Develop a minimum set of forecasting requirements and capability to support integration of flexible resources into distribution networks and the system.	2.4	Activities which inform delivery include: ● efforts of individual distributors, eg, Orion ● Ara Ake 2022 EDB challenge
32.	Collate the experience with procuring, deploying and using flexible resources which is needed for decision makers to confidently invest in flexibility.	2.5	There is a growing list of projects providing learning by doing relevant to this step, eg, EECA scale DF project and Ara Ake 2023 Winter Innovation Peak Pilot. However, the insights/learning/actions have not been systematically collated. There is no clearinghouse.

#	Step	Progress Rating	Activity completed, underway or planned
33.	Identify the financial and non-financial barriers which reduce the motivation of potential flexibility users to invest in developing and scaling flexibility.	2.9	The FlexForum Insights on finding and filling holes in the value stack identifies the critical barriers to using flexibility to support the power system. These barriers should be further explored to identify potential remedies. Other relevant inputs are the Ara Ake report on Flexibility Market Development in New Zealand: Innovators' Perspective.
34.	Check the regulatory settings enable the System Operator to buy and use all sorts of flexibility for ancillary services.	2.3	The SO in early 2025 proposed updates to the Ancillary Services procurement plan. Unclear whether these updates enable the SO to buy and use all sorts of flexibility.
35.	Develop a consistent approach to the design of flexibility-enabling operating practices such as operating envelopes so people and flexible resources have an equivalent experience where ever they are.	2.5	Individual distributors are using flexible contracts eg, WE*, and developing DOEs, eg, Aurora, Vector. ENA FNF load management protocol project considering operating practices.
36.	Develop a common approach to connectivity which easily integrates and maximises the value of flexible resources.	2.6	There is a growing list of projects providing learning by doing relevant to this step, eg, ● the EEA FlexTalk provides connectivity related learning-by-doing ● EECA scale DF project ● Ara Ake 2023 Winter Innovation Peak Pilot ● the Flexviz pilot platform demonstrates connectivity options showing real time data for flexibility at GXPs ● Ara Ake Flexibility Discovery Challenge 2025 to provide support for initial visibility to market on open access platforms….etc However, the insights/learning/actions have not been systematically collated.
37.	Develop a common approach for deploying flexibility with consistent use case triggers and messaging structures.	2.53	There is a growing list of projects providing learning by doing relevant to this step, eg, ● the EEA FlexTalk provides connectivity related learning-by-doing ● EECA scale DF project ● Local Flex contributes, but common message syntax across use cases is absent ● the Flexviz pilot platform demonstrates connectivity options showing real time data for flexibility at GXPs
38.	Develop common methods and the associated capability sets for measuring, validating and settling flexibility transactions across the use cases.	2.5	There is a growing list of projects providing learning by doing relevant to this step, eg, ● Local Flex ● Ara Ake commissioned Otago University in early 2025 to do a literature review and provide advice on baselining methods and approaches
39.	Identify the functions, capability and roles required to coordinate a power system with multi-directional power flows and flexibility.	2.5	Relevant activity includes: ● ENA work on models for distribution system operation ● EA future security and resilience programme work on system operation…
40.	Develop a problem resolution process which makes it easy for people to know who to call when electricity and flexibility outcomes depend on integrating and coordinating a bundle of devices, products and services potentially involving multiple providers.	2.1	No clear flexibility service ombudsman or delegated dispute resolution pathway. Including flex services in UDL's Energy Complaints Scheme would require both legislative change and a change to UDL's rules involving consultation and Ministerial approval. UDL could set up a voluntary disputes scheme for flex providers to join, however without mandatory membership it will be difficult to capture the whole flex market. Alternatively the existing court framework can be used. The disputes tribunal is a general forum that can look at a range of issues a consumer might raise
41.	Develop and implement a plan to update market systems to make switching flexibility products and services as easy as switching retailer.	1.7	Market systems still retailer-centric. No flexibility product registry or switch infrastructure yet. The MTR project takes a multi-stage approach. Future stages could include supporting a wider range of use cases so that flexibility providers providing retail offerings can be switched as easily as the primary retailer.