

Progress with delivering the Flexibility plan

2026 assessment of the pace and direction of
flexibility progress

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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.

2026 assessment of the pace and direction of progress with delivering the Flexibility Plan

[FlexForum](#) is an incorporated society with Members from across the electricity ecosystem committed to sharing knowledge and collaborating to enable households, businesses and communities to easily and routinely maximise the value of their flexible electricity resources.¹

Households, businesses and communities increasingly have electric vehicles (EVs), solar, battery storage, electric heating and cooling equipment and diverse electric machines and appliances.

These flexible² resources give people more options and control over where they get power, and when and how it gets used, providing more sustainable, reliable, resilient and cheaper power.³ This flexibility also provides the electricity ecosystem with another tool for operating a reliable and efficient power system.

We consider flexibility integral to the smart power system that Aotearoa New Zealand must develop to underpin a productive growing economy, reduce carbon emissions, and provide households, businesses and communities with a reliable, resilient and affordable power supply.

Flexibility progress had a reality check; it's proving a bigger, tougher job than people expected

The past year has been a reality check for flexibility progress in Aotearoa New Zealand.

Progress picked up pace. There is more learning-by-doing underway, more regulatory change being implemented, and more organisations are actively testing how flexibility can work in practice. Yet experience has also shown that making flexibility easy and routine for households, businesses and communities is a much bigger job than initially expected.

This report sets out our 2026 assessment of progress against [Flexibility Plan 2.0](#). We found that while activity spans almost all 41 steps, much of it is not yet sufficient to provide households, businesses and communities with easy and routine access to the full benefits of their flexible resources. Nor is activity sufficient for the electricity ecosystem to easily and routinely use flexibility to operate a reliable and resilient power system at lowest system costs.

- Progress is strongest where regulatory decisions are being implemented or practical trials are underway, and weakest where delivery depends on shared systems, common standards or coordinated industry action.
- Learning-by-doing is the engine of progress, but its value depends on better coordination, visibility and translation into common practice.

¹ FlexForum is an incorporated society with 49 Members from across the electricity ecosystem. Members include: gentailers, retailers, metering services suppliers, electric vehicle charger manufacturers, energy management software firms, Transpower, distributors, solutions providers, universities, and some real people.

² For readers looking for a technical 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 FlexForum refers to 5 outcomes people can get using flexibility: Minimise energy-related ongoing costs; Minimise connection costs; Manage reliability and resilience; Reduce emissions; and monetise flexible resources. See the [Flexibility Plan](#).

- Progress is also mostly occurring in the back-office. From a customer perspective - as succinctly described by a Member - the most notable shift in the past year is the emergence of niche, non-pilot commercial propositions, though these remain relatively unknown to households, businesses and communities.

The priority for the coming year is to focus on developing and delivering scalable flexibility propositions that customers can see, understand, and experience flexibility benefits. That means concentrating effort on the enabling conditions that turn pilots and back-office progress into routinely available customer offers: more customer propositions, better signals, connected devices, usable data, shared standards, transparent learning and sustained support for the people driving change.

Experience over the past 12 months shows that scaling flexible initiatives requires significantly more coordination and resources than many organisations budgeted for or currently have available. Flex-related learning is complex and not a typical infrastructure or product delivery project. While the outputs are using flex, more importantly it's learning how to get diverse technologies, processes and partners to all work together to make available a range of flex propositions which maximise the value and benefits of the flex resources of households, businesses and communities.

This reality check may explain the reduced optimism about the pace of flex progress. People have found that Flex Plan outputs are in practice further away than they appeared.

We think the assessment tells us the sector should treat flexibility less as an experiment and more as core system capability. The practical test of progress should be whether more people can see a clear proposition, understand the value, trust the offer, and say yes to flexible resources with confidence.

Flexibility Plan 2.0 is a checklist of tasks

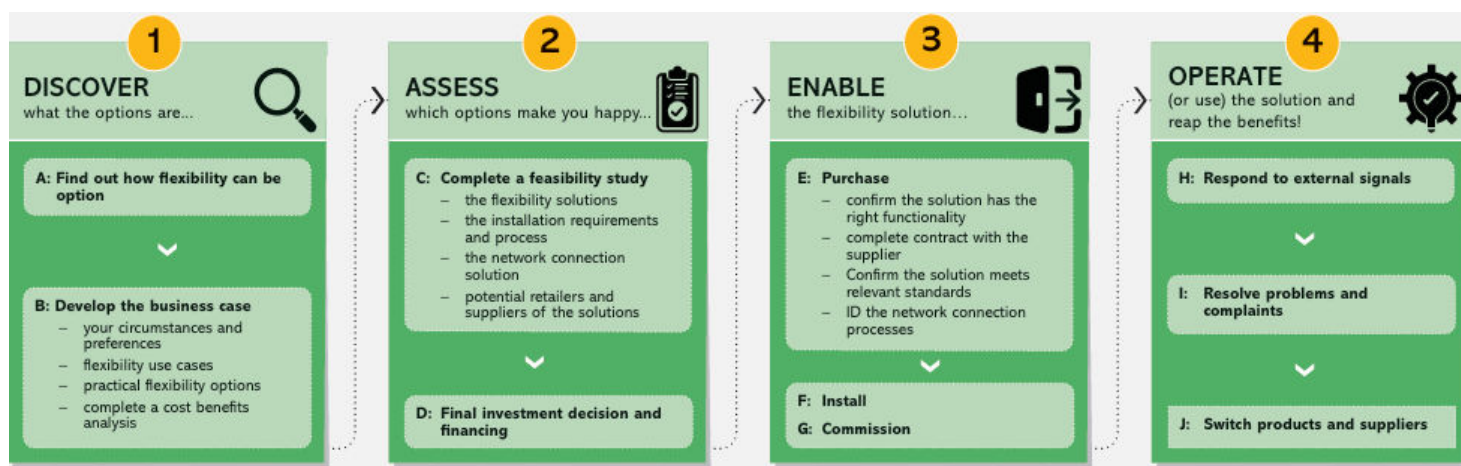
[Flexibility Plan 2.0](#) provides a checklist of 41 tasks and actions intended to deliver a capability, process or practice which makes flexibility choices easy and routine for households, businesses and communities.

Each step in some way supports people having the option and opportunity to realise one or more of five⁴ flexibility outcomes according to their preferences and circumstances.

Flexibility Plan 2.0 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: Discover, Assess, Enable and Operate.



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 third flexibility progress report. The assessment method and process are described in the Appendix.

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.

Practical experience is clarifying the size of the flexibility task

The key insight from the 2026 progress assessment; the job of making flexibility easy and routine is bigger than the electricity ecosystem expected.

Practical hands-on experience in the past year has tempered the relative optimism about the pace of progress expressed in 2025.

Flexibility progress in the past year was assessed by scanning activity underway and planned, and FlexForum Members rating 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

Figure 2 shows the average rating of progress for each step. Average progress across all 41 steps was rated 2.2 / 5 for 2026, compared to 2.5 / 5 for 2025. However, the activity scan enables a more nuanced assessment of progress.

Two steps are effectively delivered, though this is not obvious from the average ratings as some Members took a “wait and see” approach due to concerns about implementation hiccups.

New rules from the Electricity Authority coming into force in October 2026 are expected to deliver the outcomes sought from steps #2 (information about existing electricity retail rates and charges) and #11 (Identify the causes and impact of transaction costs for discovering retail and electricity pricing information).

11 steps (including #2 and #11) are rated as making decent progress (2.5), due to regulatory changes underway or being implemented and learning-by-doing, with [Localflex](#) a stand-out initiative for delivering a flexible future.

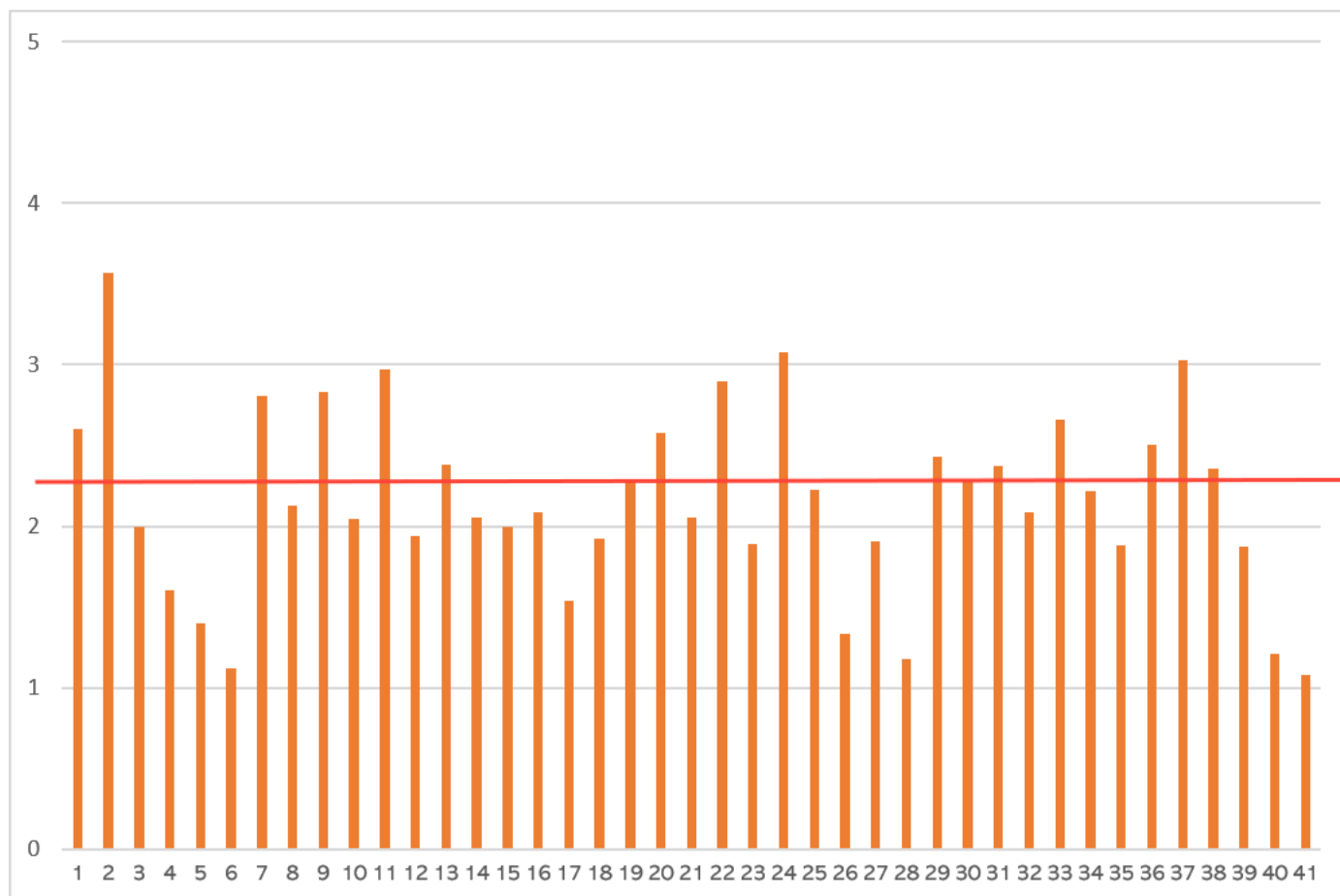
30 steps are rated as having less than ideal progress.

There are several things going on here:

- A majority of these steps are not progressing as fast as people would like because progress depends on practical learning by doing, plus coordinated activity to update system architecture, develop common standards or develop common capabilities.
- Both the learning-by-doing and systematically collating and sharing practical experience require more effort than expected, and more resourcing than is currently available.
- For a handful of steps, activity is not currently needed as the tasks depend on completing other activity (eg, #6, #40 and #41).

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

Figure 2 Average rating of expected progress over the coming 12-18 months for each Flexibility Plan step



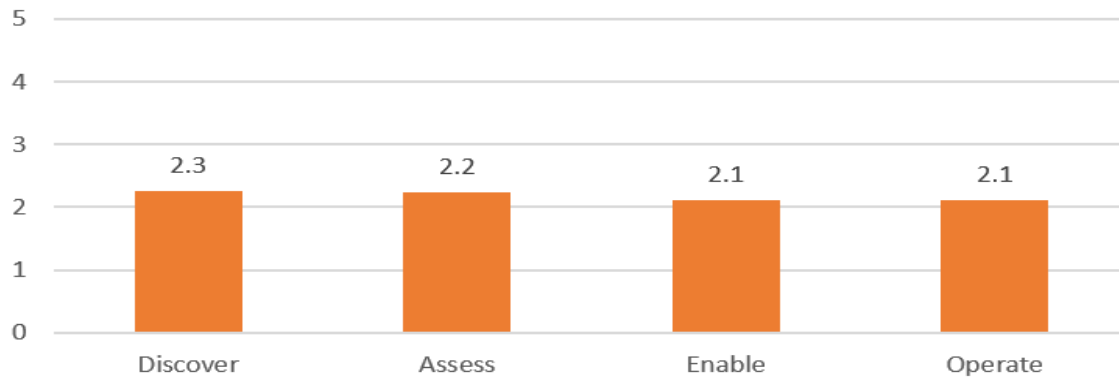
Source: FlexForum

Figure 3 on the next page 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. A highlight is the Discover stage easing ahead of the more technically focused stages of the flexibility journey. This contrasts with previous assessments when progress with the human-facing Discover stage was less advanced relative to the rest of the flexibility journey.

The improved pace of progress with the Discover stage can be attributed to new Electricity Authority rules about billing information, accessibility of pricing and product data and network connections

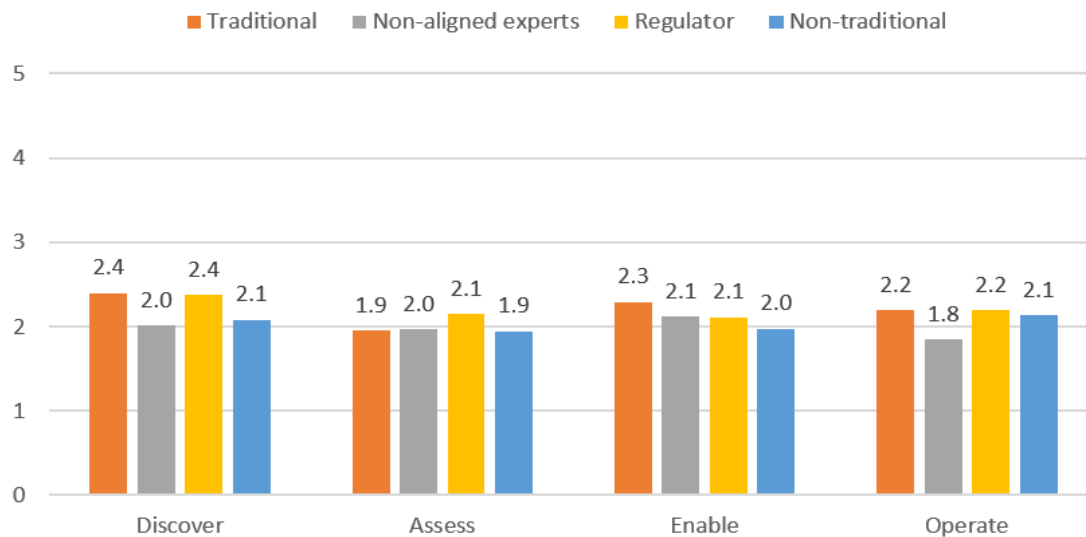
Figure 3 Progress across the 4 stages of the flexibility journey



Source: FlexForum

The overall view of progress hides differing perspectives on progress. Figure 4 shows the average progress rating of traditional participants (ie, distributors, retailers metering providers), regulators, non-aligned experts and non-traditional participants (everyone else in the ecosystem). Traditional participants and regulators are more optimistic about the pace of progress. Non-traditional participants and experts are less so.

Figure 4 Perspectives on expected progress



Source: FlexForum

Customers largely have not seen the fruits of the progress made

According to FlexForum members, the transition toward energy flexibility is slowly emerging but remains largely invisible and overly complex for the everyday household.

While high electricity costs, the fuel crisis, and a growing awareness of EVs and solar panels has put flexibility in the mainstream media, flexibility propositions and benefits have been confined to a niche group of customers, eg, people in the Coromandel or Clutha regions, EV owners and about 80,000 customers (of about 1.8 million) with a 'smart' hot water proposition.

FlexForum Members highlight that customers don't want flex. They want: 'money back in their pockets', 'the same benefits as their neighbour', 'more control over their bills', or 'resilience when an outage or disaster hits'.

Initiatives, such as time-of-use pricing and hot water programs, are beginning to offer direct bill savings and discounts. However, many customers still lack clear guidance on how to optimise their smart devices to see real benefits.

Industrial customers are showing significant interest in flexibility as they seek to manage rising energy costs. They are viewing batteries and flexibility as potential solutions. Innovative commercial platforms are also proving that distributed assets can be successfully integrated into the wider grid to monetise peak shifting and spot market predictions.

Learning-by-doing is the engine room of flex progress

Learning-by-doing is the engine room of flex progress.

There has been an obvious shift from planning to delivery over the past year with a material increase in the number, scope and scale of learning underway or getting underway.

There has also been a shift from technology focused learning to a greater focus on developing and testing customer propositions which will produce the dependable flexible response needed to reduce system costs and encourage people to say yes to the savings from flex.

Experience from the past 12 months shows that scaling initiatives like this requires significantly more coordination and resources than many organisations budgeted for or currently have available.

Table 1 features a list of **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.

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.

Table 1 Learning-by-doing activities delivering Flexibility Plan 2.0 steps

Flexibility journey	Activity
 Discover	• 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. • FlexTalk Seed project (10 households) and FlexTalk 2.0 (with 145 households) are providing experience with device installation, connectivity and flex coordination.
 Enable	• Localflex is a stand-out initiative which will inform delivery of at least 17 steps.⁶ The auction-based flex trading platform – being rolled out on the Powerco, Unison, Vector and Horizon networks - connects flexibility buyers with flexibility owners/sellers. • Aurora Energy has requested Flexibility solutions for its Upper Clutha, Queenstown and Wanaka regions. The requests are for defined flex use cases (ie, products). • Transpower developed a flex use case and product specification for non-transmission (flex) solutions for the western Bay of Plenty.
 Operate	• The Vector Suburb of the Future Stage 1: LV Network Lab project (April 2026) to pilot the installation and integration required for comprehensive real-time monitoring and control of LV networks. • Orion Energy is testing flex use cases through its Lincoln Flexibility Trial and Resi-flex project (with Wellington Electricity). • Powerco is undertaking stage 1 of a project to develop automated, disaggregated demand forecasting capabilities which it considers a necessary functionality of a distribution system operator. A key output is to enable network usage (including flexibility) to underpin network management and investment decisions. • The Orion Visibility and System Insights for the Orion Network (ViSION) project which led it to adopt the Future Grid Compass platform in May 2025 to securely gather low voltage data and use it to identify system constraints, network performance improvements and efficiency for optimal investment. • Horizon Networks announced in March 2026 it is trialing a tool to automate extreme weather risk assessments which could be used to inform long-term resilience investment planning.

⁶ 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).

Flexibility journey	Activity
	Horizon expects the tool to: identify asset vulnerabilities to extreme weather; forecast financial risk and reliability metrics; and measure the resilience benefits of interventions. • 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. • The Electricity Authority Power Innovation Pathway is supporting learning-by-doing testing alternative models of system/market participation, eg, SUPA Energy intelligent community hubs, and Blackcurrent wholesale aggregation project.

Flex-related learning is complex

Flex-related learning is not a typical infrastructure or product delivery project. The outputs are using flex, but more importantly it is learning how to get diverse technologies, processes and partners to all work together to make available a range of flex propositions which maximise the value and benefits of the flex resources of households, businesses and communities.

We cannot make this point strongly enough; flex learning will take more time and more resources. There will be questions, doubts, concerns to resolve. Cats herded. Knowledge and understanding developed and shared. There are few shortcuts.

This is the reality underpinning the reduced optimism about the pace of flex progress.

The greatest value and impact of flex learning is the process and being able to show the working. This means the full range of partners and interests can be part of the learning process from the outset, there is open sharing of questions and perspectives, honest reality testing of assumptions, and working is shown.

We acknowledge that a number of activities supported by Ara Ake helped to deliver multiple steps, including the [National Flex Discovery Fund](#), however with the disestablishment of Ara Ake there is no indication if these initiatives will continue.

Project transparency remains a work in progress

Project transparency remains a work in progress. Regular information for practitioners about project objectives, design choices, successes and failures remains difficult to easily get.

Visibility of activity and sharing of experience are critical to the fast and efficient development of flexibility, particularly where practical experience needs to be implemented and embedded across the ecosystem.

Sharing of experiences is a core focus for FlexForum. We established an improved [Knowledge Hub](#) in late 2025 including [a learning updates section](#).

Flex project updates documenting and sharing experience and thinking remain hard to get due to a lack of time and resources and commercial sensitivities.

We hope to see more experience sharing over the coming year due to reporting requirements of INTSA and project funding agreements.

We encourage others - particularly regulators - to increase the amount and frequency of information shared. This should include material that shows mistakes were made. Nobody is perfect, but sharing mistakes as well as successes will help others a lot.

The assessment signals priorities for 2027

The assessment points to a simple 2027 priority: shift flexibility from promising activity to implementing trusted, scalable flexibility propositions that customers can see, understand and benefit from. That means concentrating effort on the enabling conditions that turn pilots and back-office progress into routinely available customer offers.

- **Make customer propositions the organising objective.** The sector needs to move from niche and relatively unknown flexibility offers to a growing range of propositions that are available to households, businesses and communities wherever they are and whatever flexible resources they have.
- **Put pricing signals and communications connectivity in place.** More capable propositions depend on signals that show where and when flexibility has value, and on connected devices that can respond reliably to customer and system needs.
- **Build the data and registry foundations.** The system needs a clearer view of what flexible resources exist, where they are, what capability they have, and how they are being used, so progress can be tracked and risks such as double-counting can be managed.
- **Coordinate standards, use cases and terms of trade.** Practical learning is generating useful models, but those learnings need to be collated, standardised and translated into common ways of describing, pricing, procuring and operating flexibility.
- **Protect customer trust while the market matures.** People will only invest in flex-enabled devices if they have confidence that the benefits are real, understandable and durable, and that rules or rewards will not change in ways that undermine investments made in good faith.
- **Resource the flexibility champions and the shared work programme.** Making flexibility easy and routine is a bigger job than expected, and progress depends on sustained collaboration, better allocation of scarce effort, and support for the people and organisations turning learning into practice.

The 2026 assessment shows that flexibility progress is real, but still too fragmented and too invisible to customers. Learning-by-doing has accelerated, and regulatory changes are helping, but many of the steps needed to make flexibility easy and routine depend on coordinated whole-of-system effort rather than isolated projects. For 2027, the assessment suggests the sector should treat flexibility less as an experiment and more as core system capability. The practical test of progress should be whether more people can see a clear proposition, understand the value, trust the offer, and say yes to flexible resources with confidence.

That requires three linked foundations:

1. Accurate-enough pricing and value signals are needed so customers, retailers, distributors, Transpower and flexibility coordinators can see where flexibility is valuable and how benefits can be shared.
2. Communications and device capability must support both customer-activated and system-activated flexibility.
3. Data and registry functions need to make flexible resources visible enough to support market operation, progress tracking, risk management and efficient coordination.

The assessment also highlights the need to turn practical learning into common practice. Projects such as Localflex, network procurement processes, flexible connection work, FlexTalk and scaled pilots are producing valuable experience, but the benefits will be limited unless the learning is captured, shared and translated into standard use cases, minimum functionality requirements, common terms of trade and clear customer disclosure.

The timing matters. A larger stock of potentially flexible resources is likely as households and businesses invest in solar, batteries, electric vehicles, hot water control, heat pumps and other flexible devices. If the sector does not set the direction now, there is a risk people will invest in equipment that is not connected, not visible, not rewarded, or not able to provide the full value of flexibility.

The priority for 2027 is therefore not to do everything at once. It is to **focus scarce effort on the enabling moves that make flexibility visible, valuable, dependable and trusted**: more customer propositions, better signals, connected devices, usable data, shared standards, transparent learning and sustained support for the people driving change.

Appendix: detailed assessment of progress against the Flexibility Plan

2026 assessment method and process

The 2026 assessment of Flexibility Plan progress was completed in 3 stages.

Stage 1. A desktop scan of current and planned activity was developed. The overview of activity relating to each step was collated in May 2026 on a best endeavours basis with input from Members, the Electricity Authority, EECA and the Commerce Commission. Members and partners were asked in late May to correct inaccuracies and include missing information. The scan results are provided in the 'Current and planned activity' column of the following tables.

Stage 2. Member views on progress were obtained via 5 online workshops. Members were asked to:

- rate progress on a 1-5 scale... is activity and progress sufficient to deliver this step within 12-18 months?. The ratings were used to produce Figures 2, 3 and 4. The average rating for each step is provided in the 'Rating' column of the following tables.
- describe the practical increase in flexibility options and benefits households, businesses and communities have experienced in the past 12 months. Comments informed the assessment of the customer experience of flexibility.
- identify the 5 activities or tasks which should be prioritised for households and businesses to practically benefit from flexibility. Comments informed the assessment of priorities for 2027.

Stage 3. Confirm the assessment. The insights and conclusions from the desktop scan and online workshops were documented (in this progress report) and confirmed at the annual general meeting on 30 July 2025.

Flexibility journey: Discover stage

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 & Action by the human	Current and planned activity	Rating	Next steps / commentary
1.	Develop and distribute information on the electricity outcomes available to households, businesses and communities from using flexibility, the nature of the potential benefits, and potential solutions for each outcome Find out how flexibility can be an option. Awareness of flexibility options – what, when, where, how and why – is not widespread and flexibility is not routinely considered. People need to know the option exists...	Progress is as good as can be expected. People can find information about practical flexibility outcomes, benefits and solutions from various sources, with three lenses – general, sales and process. General information, eg, regulators, Rewiring Aotearoa - Regulators – the Energy Efficiency and Conservation Authority and the Electricity Authority provide high-level and general flex information, eg, what is flexibility, and overviews of solutions, eg, time-of-use pricing, hot water flex. - Rewiring Aotearoa electrification guides outline the benefits of electric devices with reference to flexibility Sales-focused, eg, retailers, banks, Cogo - Electricity retailers provide general advice about flexibility options typically in conjunction with product information, eg, solar and battery products, EV flex products, hot water flex products, and commercial flex products. - Banks provide information on the benefits of going electric (eg, ASB) alongside finance options. Cogo is a web platform which takes people through the electrification (and flexibility) decision process – from identifying solutions based on your preferences to connecting people to equipment suppliers Process, eg, distributors - Distributors typically outline the distributors' interest in flexibility (eg, Aurora) or provide advice about connecting distributed generation (ie, solar, batteries or V2G, eg, Electra or Vector).	2.6	Delivering this step practically relies on flexibility and flexibility propositions becoming easy and routine.

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
2.	Determine if people can easily get information about their existing electricity retail rates and charges. Establish personal preferences. These are informed by experience and circumstances and are defined by factors including existing retail rates and charges. Retail prices are available on power bills, but key terms may not be easily found.	Completed. This step was delivered in November 2025. The Electricity Authority introduced rules to <u>improve electricity billing</u> and require electricity retailers to provide clearer, more consistent billing information to, amongst other things, make it easier to compare electricity retail rates and charges. The rules apply from 30 October 2026.	3.6	Do we know if the change has practically made it easier for people to find 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. Preferences are informed by network capacity information. Information is increasingly available but is not routinely available for the low voltage (LV) network layer.	Some progress. Some network operators are publishing high voltage network capacity information in more accessible and user-friendly formats: • <u>Powerco</u> provides a demand capacity map showing the approximate capacity available on its HV network and a DG hosting capacity map showing hosting capacity of its HV network. • <u>Orion</u> is developing load growth and hosting capacity maps and provides a prototype showing capacity available given forecast load growth for 2025-2029. • <u>Transpower</u> provides a geospatial interface to information about transmission network constraints and planned investments. The Electricity Authority <u>proposed in May 2026</u> to require distributors to publish maps showing several datasets for high voltage networks (>1kV), ie, design capacity, load and export capacity, network topology, planned upgrades, and historical reliability. Similar requirements for low-voltage networks would be considered later.	2.0	What is practically needed to create/share LV capacity related datasets? How long will that take?
4.	Determine the options to report historical and current network reliability and quality information (eg, voltage) for the LV layer. Preferences are informed by network reliability and quality information. Granular, local information is not available because reliability and quality data is not routinely collected for the LV layer.	Some progress. The <u>Commerce Commission Information disclosure regime</u> (schedules 10 and 10a) requires distributors to annually report several reliability-related datasets: interruptions by circuit and feeder; worst performing feeders; fault rates by cause and equipment category; and SAIDI and SAIFI measures. The Commerce Commission reliability datasets provide an annual historical snapshot of LV to HV network reliability starting with 2025. The Electricity Authority <u>proposed in May 2026</u> to require distributors to publish SAIDI and SAIFI measures for <u>higher voltage</u> (1kV+) networks the immediate past 12 months using standardised formats. Although the LV reliability dataset exists, there is no obligation for distributors to present this dataset in an accessible, user-friendly way, eg, using a geospatial tool or map.	1.6	How could the existing reliability dataset become more easily accessible?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
5.	Determine the options to provide people information about network resilience for their location, eg, similar to <u>flood zone information</u>. Preferences are informed by network resilience information. Granular, local information on network resilience is not routinely available.	Some progress. There is activity relating to this step. Horizon Networks announced in March 2026 it <u>is trialing a tool</u> to automate extreme weather risk assessments which could be used to inform long-term resilience investment planning. Horizon expects the tool to: identify asset vulnerabilities to extreme weather; forecast financial risk and reliability metrics; and measure the resilience benefits of interventions. Subject to the trial outcomes, the tool could be used to create a network resilience dataset and indicative outage timeframes following equipment failures and natural disasters such as weather, earthquake or fire. The <u>project description</u> notes this dataset is not currently created due to limitations of previously available tools and approaches.	1.4	What is a best guess indicative timeline for moving from the Horizon pilot to creating and sharing a resilience dataset?
6.	Determine the options to provide people with granular emissions intensity data for their location. Preferences are informed by emissions intensity information.	Emissions data is available from <u>Energy Market Services</u> and <u>WattTime</u>, but is reported at the transmission level. EMS emissions data is <u>calculated</u> using the intensity factor of grid generation by trading period. The WattTime <u>marginal emissions signal</u> is produced for all NZ.	1.1	Is more granular emissions data needed for Scope 2 emissions reporting?
7.	Develop an initial common description of the use cases for each electricity outcome - network use cases (distribution and transmission) - electricity use cases (individual, retail and wholesale) - ancillary (system) service use cases. Identifying the flexibility use case/purpose which delivers the desired outcome will be easier if the use cases are clearly and consistently described.	Some progress. Flexibility use cases are being developed and documented case-by-case, with most focus on network use cases. The FF pricing and orchestration deep dive should highlight any remaining 'missing' use cases. Network (distribution and transmission) use case examples: <u>Localflex</u> – an auction-based flex trading platform – being rolled out on the Powerco, Unison, Vector and Horizon networks <u>will initially trade</u> a long-term scheduled utilisation product and a Scheduled availability and operational utilisation product. These products were developed and documented by the participating distributors and prospective flex coordinators. - Transpower developed a flex use case and product specification for <u>non-transmission (flex) solutions</u> for the western Bay of Plenty. - Aurora Energy has requested <u>Flexibility solutions</u> for its Upper Clutha, Queenstown and Wanaka regions. The requests are for defined flex use cases (ie, products). - Orion Energy is testing flex use cases through <u>its Lincoln Flexibility Trial</u> and <u>Resi-flex</u> project (with Wellington Electricity).	2.8	Is the next key step to collate and 'formalise' initial use case specifications? When should it happen? How/who will lead that activity?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
		Note, the network use cases and product specifications were not publicly available at the time of writing. Electricity (wholesale) use case examples: • <u>Wholesale flexibility (financial) products</u> provide tools to manage volatility of high spot prices at specified times. The most recent is a <u>standardised super-peak product</u>. Ancillary (system) use case examples: An <u>emergency reserve</u> ancillary service is being developed by the System Operator for implementation by late 2026.		
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. Identifying the flexibility options for each flexibility use case requires information about preferences, circumstances, use cases, and the capability and features of flexibility solutions.	Progress is as good as can be expected. Delivering this step practically relies on flexibility and flexibility propositions becoming easy and routine. Progress therefore depends on scaling flex solutions and a greater range of flexy customer propositions. Information about the flexibility options and solutions available to people from various sources, with three lenses – general, sales and process (see step #1 for details). The sales-focused information most closely achieves the actions described for this step providing propositions for specific technology/resources, eg, hot water, EVs, solar, and batteries. The Cogo tool takes people through the electrification (and flexibility) decision process – from identifying solutions based on your preferences to connecting people to equipment suppliers.	2.1	Completing this step practically relies on flexibility and flexibility propositions becoming easy and routine.
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. Completing a CBA requires usage data to provide the Q in the PxQ benefit calculations. The action will be easier if usage data is available instantaneously. It is not.	The instantaneous automated access to a customer's usage data by the customer or their agent is expected to be achieved through implementing <u>a consumer data right for electricity</u>. The regime is expected to apply from mid-2027. The rule-set for managing this dataset, including privacy and trust frameworks and exchange protocols, can provide a template for establishing the inclusive, open, cyber-secure and adaptive data sharing infrastructure and data system that is a necessary condition for a smart, flexible power system.	2.8	Will the CDR (electricity) enable instantaneous usage data access from mid-2027?
10.	Develop and deliver a plan to provide cash signals which are accurate (as possible), give easy access to benefits, and motivate efficient responses. Completing a CBA requires price information to provide the P in the PxQ benefit calculations. Across the value stack, pricing mechanisms do not provide an accurate cash signal, access to benefits is not easy or the signal does not motivate an efficient response.	There is quite a lot of activity across the sector on individual holes in the value stack — Electricity Authority workstreams, Transpower non-transmission solution procurements, and individual network operators, electricity retailers and flex coordinators are exploring commercial (ie, pricing) mechanisms — but there is not yet a shared view of the overall architecture that ties pricing and physical orchestration mechanisms together to underpin a smart, flexible power system. A whole-of-system assessment is needed to identify common operational and economic factors, assumptions and design principles for effective and timely development and integration of	2.0	FF is developing a whole-of-system view. Other activity is siloed.

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
		the suite of pricing and physical signals required by a smart flexible power system.		
11.	Identify the causes and impact of transaction costs for discovering retail and electricity pricing information and find options to reduce those transaction costs. Completing a CBA requires retail and electricity price information to provide the P in the PxQ benefit calculations. Specific retail and electricity pricing information is not generally disclosed or is not easy to find.	The action for this step has been enabled, though practical delivery depends on the new dataset being used for people easily and routinely to get information about the retail rates and charges available to them. The Electricity Authority introduced electricity information exchange protocol 14A to standardise how retailers will share information about their electricity products and plans (including legacy plans) with any person (ie, other industry participants, providers of electricity plan comparison tools or human) who requests the information. Electricity retailers are required to use EIEP14A from 30 October 2026 to respond to requests for product information, within five business days.	3.0	A solution is being implemented and is scheduled to apply from 30 October 2026.
12.	Determine the options to make it easy for people to compare their connection options and costs with and without flexibility. - identify and provide the network information people need to assess their connection options with and without flexibility. - develop initial with-flexibility physical or contractual connection options, eg, connection agreements with dynamic operating envelopes or lower capacity connections - provide people with incremental price information for common plausible connection scenarios. Completing a CBA may require network connection options and costs. People cannot easily or routinely compare their connection options and costs with and without flexibility.	Some progress. This step is about providing parties connected/connecting to distribution networks with easy access to information about their flexibility options and connection cost implications. The Electricity Authority has required (from 1 April 2026) distributors to 'offer a least-cost technically acceptable solution for connecting an applicant to the network... [and] 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.' Distributors are also now obliged to 'prepare a reconciliation that breaks down their quoted connection charge into incremental cost, incremental revenue and network cost components.' The ease of obtaining information on flexibility options depends on the distributor. Practical experience described to FlexForum indicates information is available on a bespoke basis by requesting flexible (non-firm) arrangements with the distributor as part of a connection request. No standing process and information is yet available (note: this is based on a scan of activity, not an exhaustive review). Some distributors offer a flexible (or dynamic) connection product for larger connections, eg, Counties Power, Vector, Wellington Electricity. Connection costs are discoverable on application (as these schemes apply to larger 'bespoke' connection requests). The ENA FNF is considering a dynamic capacity management project to identify principles and methods for dynamic capacity management and dynamic operating envelopes ahead of field trials and identifying a standardised approach.	1.9	Is the key next step to develop a consistent approach to dynamic capacity management? What is a best guess indicative timeline for moving from the FNF project to widespread implementation?

Flexibility journey: Assess stage

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 & Action by the human	Current and planned activity	Rating	Next steps / commentary
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. Selecting the right flexible device may require assessing the features of unfamiliar products. People need to do their own research or pay for bespoke expert advice. For people to be confident they are spending (potentially a lot) on the right thing they should be able to easily find and compare the flexibility functional requirements for each use case with the technical functionality and performance of the various device/equipment options, ie, will this thing do what I need it to do.	Some progress. Information about the functional requirements for flexible resources is becoming available, eg, EV charger whitelist, and Solar products whitelist. EECA established a technical advisory group in June 2026 to develop a principles-based set of specifications for products to be flexible, starting with heat pumps, electric resistive water heaters and heat pump water heaters. This activity responds to input to its green paper published in late 2025.	2.4	How dependent is availability of standard 'functional' information formalising initial flexibility use cases (step #7) and use case functionality (step #19)?
14.	Understand device features which may frustrate people from maximising value. Understanding may identify frustrations that require some response. Selecting the right flexible device will be easier if people can easily find features of device/equipment options which might prevent them from maximising value over time, eg, proprietary software solutions which preclude interoperability.	Some progress. There is an increasing amount of activity developing flexibility use cases and flexibility propositions. This activity is necessary to identify technical/functional characteristics of a flexible device which prevents harnessing its full flexibility potential. Activities include: - the EEA Seed project provided practical experience with the features and functionality of various flexible resources and connectivity solutions. - the EECA scaled pilots include activities which should lead to minimum functionality specifications for flexibility use cases and flexibility propositions. This will also act as an input to the EECA technical advisory group.	2.1	When will we have a standard set of functionality specifications? How dependent is availability of standard 'functional' information formalising initial flexibility use cases (step #7) and use case functionality (step #19)? Who is explicitly considering whether customer propositions, flex use cases or technical requirements could prevent harnessing the full flexibility potential of flexible resources?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
15.	Develop guides providing a checklist of potential installation requirements and process for typical installation scenarios. Identifying the device installation requirements and process provides clarity about things like site specific requirements (eg, is there room in the garage to fit the EV charger), timeframes and whether electrical, building or other trade assistance is required. People need to do their own research or pay for bespoke expert advice.	Some progress. <u>FlexTalk Seed project</u> (10 households) and <u>FlexTalk 2.0</u> (with 145 households) are providing experience with device installation, connectivity and flex coordination. Further learning-by-doing kicking off in 2026 – particularly the Scaled pilots – will provide further device installation experience. These projects provide a starting point for developing guides which collate and share installation experience.	2.0	Who is responsible for documenting the installation and other insights from these projects? When will this happen?
16.	Develop guides describing the network connection implications and requirements of typical flexibility solutions. Identifying whether a network connection solution or alternative connection arrangements are needed for a flexibility solution requires information about the solution and the situation. Identifying potential changes to connection requirements and arrangements is not always easy.	Some progress. The EEA is <u>developing technical guidelines for connection</u> and commissioning of distributed energy resources. It <u>completed a survey of connection documentation</u> in September 2025 to provide an evidence base for developing national standardised connection guidelines beginning with household (LV) and medium voltage connections.	2.1	When will these guidelines be ready?
17.	Introduce rules to allow people to easily contract with separate market interface agents (ie, retailers, flexibility coordinators). Identifying the retailers and/or flexibility coordinators which provide the desired products/services may be needed if the flexibility solution involves market participation. People cannot access a full range of options because regulatory settings require people to contract with a single party for all market interactions. This means people are not able to pick and choose products/services to maximise the value of their flexibility and their preferences.	Some progress. This step involves changes to the data system to allow wider access to the datasets used for market activity (reconciliation, settlement etc). The Electricity Authority outlined a <u>revised proposal</u> in January 2026 to implement multiple trading relationships. Ara Ake had 2 pilots testing the concept. • <u>Franklin energy sharing trial</u> • <u>Kainga Ora Wellington pilot</u>.	1.5	Is the proposed MTR solution hampered by the fundamental problems with the existing data system?
18.	Develop and deliver a range of financing arrangements and options for people in all circumstances. Make the final investment decision, and payment arrangements, to say yes to flex.	Some progress. A range of financing options for flexibility solutions are available, and work is underway to further expand access to financing. • <u>Bank products</u>, eg, ANZ EV loans, ASB offer of 0% loans to farmers, etc • Queenstown Electrification Accelerator is <u>testing solar for renters</u> • Rewiring Aotearoa is working with Councils to look at financing electrification through a <u>ratepayer assistance scheme</u>.	1.9	

Flexibility journey: Enable stage

ENABLE: 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 & Action by the human	Current and planned activity	Rating	Next steps / commentary
19.	Develop a common minimum functionality for each flexibility use case so the same device can provide the same services across the country. Purchasing a physical solution involves checking a device has the required minimum functionality for the use case. However, limited information exists on what functionality is required for something to be flexible.	Some progress. See step #7. Each flex use case will require a specific: response type (ie, raise, lower), speed (ie, seconds, minutes), and duration (ie, seconds, minutes, hours), programmability; and connectivity and messaging. The specific functionalities for each use are not yet formally documented. Flex use cases are being developed and tested through various projects, including: • <u>Localflex</u> – an auction-based flex trading platform – being rolled out on the Powerco, Unison, Vector and Horizon. • Transpower developed a flex use case and product specification for <u>non-transmission (flex) solutions</u> for the western Bay of Plenty. • Aurora Energy has requested <u>Flexibility solutions</u> for its Upper Clutha, Queenstown and Wanaka regions. • Orion Energy is testing flex use cases through <u>its Lincoln Flexibility Trial</u> and <u>Resi-flex</u> project (with Wellington Electricity). • <u>FlexTalk</u> tested connectivity and messaging functionality for several indicative network use cases. A technical advisory group established by EECA in June 2026 to develop a principles-based set of specifications for products to be flexible (see step #13) is considering communications-related flex functionality requirements.	2.3	When will initial specific functionalities for each flexibility use case be formally documented? How will the narrow comms focus of EECA's advisory group complement the practical market and system requirements of flex use cases?
20.	Ensure technical standards establishing minimum functionality for flexible devices remain up to date. Checking a device has the required minimum functionality for the use case may be complicated if changes to technical standards do not always flow through.	<u>Amendments to the Energy Efficiency and Conservation Act are underway</u> to establish a new rules-based system that, amongst other things, would enable a regulatory framework which adapts to evolving standards. The amending Bill is to be introduced to Parliament later in 2026.	2.6	
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. Purchasing a physical solution involves checking a device meets all relevant technical/connection standards.	See step #16. The EEA is <u>developing technical guidelines for connection</u> and commissioning of distributed energy resources. It <u>completed a survey of connection documentation</u> in September 2025 to provide an evidence base for developing national standardised connection guidelines beginning with household (LV) and medium voltage connections. The ENA FNF is considering a dynamic capacity management project to identify principles and methods for dynamic capacity management	2.1	When will these guidelines be ready? Is the DOE work relevant to the guidelines? Will the guidelines need to accommodate DOEs?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
	Technical standards are set out in distributor connection policies and other instruments. Policies are not standard across the country.	and dynamic operating envelopes ahead of field trials and identifying a standardised approach..		
22	Develop network connection application and delivery processes which make it easy for people and distributors to connect flexible resources as quickly as possible. Purchasing a physical solution may involve navigating the network connection application and delivery process. Existing connection processes assume small numbers of connection requests from both small and larger-scale flexible resources.	Some progress. The <u>Electricity Authority decided changes to network connection processes in September 2025</u> including changes to create efficiencies in the application process for DG connections. The requirements will apply from 1 December 2026, and 1 June 2027 for load application processes. The ENA Future Networks Forum <u>mapped connection process pain points and improvement options</u> identifying 6 quick wins which have been shared for adoption by all distributors: a connections self-serve manual, connection FAQs, connections introduction guide, connection journey steps, pre-application EDB manual and pre-application customer template and glossary. The FNF is now developing standard contracts for large load and DG connections, a queue management policy and a standard approach for implementing network capacity maps.	2.9	Have the EA changes made application and delivery processes for connecting flexible resources easier? Have the 6 quick wins been implemented consistently by all distributors?
23	Develop participation requirements that enable specialist flexibility providers to interface with and integrate their activities into the market and system. The initial focus can be to understand the upgrades to market systems and processes, including switching, reconciliation and settlement, needed to integrate flexible resources. Contracting a service solution involves contracting with the agent/flexibility coordinator offering the value maximising service. This is not always possible because only <u>participants</u> can offer people contracts for services which require a market or system interface, eg, retail supply service is via a trader. Existing participant categories do not necessarily align with flexibility coordination activities, thus requiring parties to meet unnecessary obligations.	No activity specifically directed at delivering this step. The <u>Electricity Authority Power Innovation Pathway</u> is supporting learning-by-doing testing alternative models of system/market participation, eg, SUPA Energy intelligent community hubs, and Blackcurrent wholesale aggregation project.	1.9	What information is needed to begin developing more flexible participation requirements? What overlap is there with upgrading the data system?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
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. The agent/flexibility coordinator must be able to easily and routinely establish business to business counterparty relationships with other participants, eg, with a distributor, System Operator or a retailer.	Two types of mechanism for exchanging and transacting flexibility are being tested. A platform approach. • <u>Localflex</u> – an auction-based flex trading platform – being rolled out on the Powerco, Unison, Vector and Horizon. • <u>Ara Ake is supporting flex coordinators/owners</u> to integrate with open access exchange platforms. The traditional request for proposal approach. • Transpower requested <u>non-transmission (flex) solutions</u> for the western Bay of Plenty. • Aurora Energy requested <u>Flexibility solutions</u> for its Upper Clutha, Queenstown and Wanaka regions, and will do so shortly for upper South Island.	3.1	When will it be possible to compare the two approaches?
25	Develop consistent terms of trade for transactions for all flexibility use cases. Business to business relations may not be easy due to high transaction costs of buying/selling flexibility.	There is no activity underway or planned to develop consistent terms of trade for flex buyers and flex sellers. Several flex projects provide the starting point for developing consistent business-to-business terms of trade. • <u>requests for non-network services</u> by multiple distributors. • the <u>Local Flex</u> project includes a Master Electricity Flexibility Services Agreement • <u>Transpower WBOP flex procurement project</u>.	2.2	When will someone collate a standard set of B2B terms of trade?
26	Develop product disclosure information and practices sufficient to help people make informed decisions a flexibility-related contract is structured for their circumstances. Contracting a service solution involves seeing and understanding the impact of contract terms, including risk allocation, obligations, costs and prices.	There is no known activity underway or planned to develop flex-specific product disclosure information. Individual retailers and flex coordinators offer flex contracts. Product disclosure practices will be consistent to the extent required by relevant legislation, eg, Fair Trading Act.	1.3	Are concerns or complaints being fielded about flex propositions? How is product disclosure influenced by B2B terms of trade?
27	Develop a process to collate, document and share good installation practices for common flexibility resources. Installing the physical and/or service solutions involves people finding an experienced supplier/installer, and/or getting installation information, and/or having clear instructions or the option to contact a helpdesk. This information is not routinely available.	<u>FlexTalk Seed project</u> (10 households) and <u>FlexTalk 2.0</u> (with 145 households) are providing experience with device installation, connectivity and flex coordination. Further learning-by-doing kicking off in 2026 – particularly the Scaled pilots – will provide further device installation experience. These projects provide a starting point for developing guides which collate and share installation experience.	1.8	Who is responsible for documenting the installation and other insights from these projects? When will this happen?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
28	Make changes to the registry to make flexible resources visible to the market and system. Commissioning processes will be specific to the physical and/or service solutions and the use cases. Some solutions may require the flexible resource to be visible to the market and system through the <u>registry</u>. Upgrades to the registry are needed to include information about the full range of flexible resources, eg, heat pumps, hot water cylinders, refrigeration, plus to establish processes making it easy to input that information.	There is no known activity to identify and add flex datasets – eg, response type, capacity, flex users etc – to the registry. The Electricity Authority <u>approved registry changes in August 2024</u> to include more DG information in the registry from August 2026. The Electricity Authority is collecting several flex-related datasets though its <u>retail market monitoring notice</u> (see table 7). These datasets are not yet public. Several of the datasets, eg, flex capacity, flex uses, are appropriate to include in the registry.	1.1	When will someone identify the flex datasets to include in the registry?
29	Develop technical qualification methods for each flexibility use case which are low cost and scalable. Some solutions may require flexible resources to meet technical qualification criteria for a flexibility use case. Technical qualification methods and processes do not exist for each use case because the use case has not been 'formalised' or are bespoke with the qualification and testing requirements set out in the contract with the flexibility coordinator or are designed assuming the service comes from a small number of large suppliers.	The University of Otago undertook <u>research for Ara Ake on flexibility baselining</u> including methods and approaches (June 2025). Baselining methods are being selected and tested through the various flex projects including <u>Localflex</u> and Transpower WBOP flex procurement.	2.4	When will the results of using various baselining methods be assessed? What other technical qualification practices are involved in on-boarding flex?

Flexibility journey: Operate stage

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 relies on back-office processes. Responding to an external signal relies on the signaller 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 & Action by the human	Current and planned activity	Rating	Next steps / commentary
30.	Develop a minimum set of operational visibility requirements and capability to support integration of flexible resources into distribution networks and the system. Creating signals requires operational visibility of power flows across the system and networks.	Individual distributors are scoping and developing operational data capabilities. Examples include: - the Orion Visibility and System Insights for the Orion Network (<u>ViSION</u>) project which led it to adopt the Future Grid Compass platform in May 2025 to securely gather low voltage data and use it to identify system constraints, network performance improvements and efficiency for optimal investment. - the Vector <u>Suburb of the Future Stage 1: LV Network Lab project</u> (April 2026) to pilot the installation and integration required for comprehensive real-time monitoring and control of LV networks.	2.3	Is the Orion experience a template for a minimum set of operation data capabilities? How many distributors have their desired network operational data capabilities?
31.	Develop a minimum set of forecasting requirements and capability to support integration of flexible resources into distribution networks and the system. Creating signals may require power system analysis and forecasting capability. This capability exists for transmission, high and medium voltage networks. It is being developed for the low voltage layer as distributors work out how to get and use granular usage and operational data.	Powerco is undertaking <u>stage 1 of a project</u> to develop automated, disaggregated demand forecasting capabilities which it considers a necessary functionality of a distribution system operator. A key output is to enable network usage (including flexibility) to underpin network management and investment decisions.	2.4	What is the current state for forecasting capabilities? Is the Powerco project unique?
32.	Collate the experience with procuring, deploying and using flexible resources which is needed for decision makers to confidently invest in flexibility. Creating signals requires planning and investment practices to include flexibility as a business-as-usual operational tool, with the buyer and signaller planning to routinely buy flexibility via a cash signal and associated external signal. Buyers across the value chain are building experience in how to procure, deploy and use flexible resources. Networks in particular want to better understand what flexibility can be offered by which people, when it is	There is a growing list of flexy learning-by-doing projects producing experience and insights. As was the case in 2025, however, the learning is not being systematically collated and shared. The FlexForum Knowledge Hub (<u>Learning project updates</u>) is the best available clearinghouse. Nor is learning routinely and regularly documented and shared with a continued preference for after-the-fact project closure reports.	2.1	How does knowledge sharing become more regular and routine?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
	wanted, and how to most easily and routinely secure the resource.			
32.	Collate the experience with procuring, deploying and using flexible resources which is needed for decision makers to confidently invest in flexibility. Creating signals requires planning and investment practices to include flexibility as a business-as-usual operational tool, with the buyer and signaler planning to routinely buy flexibility via a cash signal and associated external signal. Buyers across the value chain are building experience in how to procure, deploy and use flexible resources. Networks in particular want to better understand what flexibility can be offered by which people, when it is wanted, and how to most easily and routinely secure the resource.	There is a growing list of flexy learning-by-doing projects producing experience and insights. As was the case in 2025, however, the learning is not being systematically collated and shared. The FlexForum Knowledge Hub (Learning project updates) is the best available clearinghouse. Nor is learning routinely and regularly documented and shared with a continued preference for after-the-fact project closure reports.	2.1	How does knowledge sharing become more regular and routine?
33.	Identify the financial and non-financial barriers which reduce the motivation of potential flexibility users to invest in developing and scaling flexibility. Creating signals requires potential buyers to invest to build experience with procuring, deploying and using flexible resources. There is a chicken-and-egg situation. Sellers often need buyers to commit to buying before investing in integration. Buyers appear to want sellers to show the resource is integrated before buying.	There are two forms of activity to identify financial and non-financial barriers to investments by flex users (ie, supply chain participants) in flex capability. The activities are, however, lightly resourced and not well coordinated. Problem identification and definition • FlexForum Deep dives and Knowledge sharing efforts • State of play assessments from Ara Ake, eg, its February 2026 report on Aotearoa New Zealand's flexibility market: state of play. Practical learning support includes: • The Electricity Authority Power Innovation Pathway provides regulatory advice and enhanced regulatory support for learning. A high-level overview of the support is provided in a September 2025 Year one insights report. • Ara Ake and EECA provide learning 'support', eg, via their National Flex Discovery Fund and Scaled flexibility pilots project (no webpage). • individual learning-by-doing efforts to identify, test and develop capabilities.	2.7	How does barrier identification become more coordinated and better resourced?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
34.	Check the regulatory settings enable the System Operator to buy and use all sorts of flexibility for ancillary services. [FP1.0 #22] Creating signals requires potential buyers to have flexibility on the menu. Regulatory settings may not make it easy for some buyers to use some flexible resources flexibility easy, eg, for some ancillary services.	An <u>emergency reserve</u> ancillary service is being developed by the System Operator for implementation by late 2026.	2.2	Does the SO procurement plan enable the SO to use suitable flex resources for ancillary services?
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. Creating signals requires buyers to have transparent and predictable rules and arrangements underpinning the contractual and counterparty relationships for how and when they will use flexibility. These rules are developing, eg, flexible connection agreements or dynamic operating envelopes. Flexibility-enabling operating practices rely on things like defined performance expectations, communication and connectivity, and cash signals. Consistency across these things will make it easier for people to take advantage of the opportunities.	A range of activities are underway to develop more flexible network operating practices. - individual distributors are using flexible contracts eg, WE*, and developing DOEs, eg, Aurora, Vector. - the ENA published a <u>common load management protocol</u> and data sharing agreement in March 2026 to provide a consistent national approach to managing flexible load. Since publication, concerns have been raised that provisions of the protocol materially undermine the development of flex propositions. - The ENA FNF is considering a dynamic capacity management project to identify principles and methods for dynamic capacity management and dynamic operating envelopes ahead of field trials and identifying a standardised approach.	1.9	How are the implications for design and delivery of flexibility propositions being considered? How well coordinated is the design of pricing and physical orchestration mechanisms?
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. There is not a common approach to connectivity.	A range of activities are underway exploring communications connectivity requirements and capabilities for integrating and using flexible resources in the system and market. <u>FlexTalk Seed project</u> (10 households) and <u>FlexTalk 2.0</u> (with 145 households) are providing experience with device installation, connectivity and flex coordination. - Ara Ake <u>National Flex Discovery Fund</u> - EECA Scaled flexibility pilots project (no webpage). - Dynamic capacity management practices (see #35) - the Flexviz pilot platform demonstrates connectivity options showing real time data for flexibility at GXPs - A technical advisory group established by EECA in June 2026 to develop a principles-based set of specifications for products to be flexible (see step #13) is considering communications-related flex functionality requirements. None of the activities, however, are being undertaken with reference to a clear understanding of the minimum functionality required by future fit data system and data sharing infrastructure.	2.5	How do we ensure the development of communications and connectivity requirements support a future fit data system and data sharing infrastructure?

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
37.	Develop a common approach for deploying flexibility with consistent use case triggers and messaging structures. Sending signals relies on the dispatch practices for deploying flexibility when and where it is needed, including messaging options and structures. Deployment and dispatch practices are developing. Challenges include standardising the use case triggers and messaging structures.	A range of activities are underway which are testing flexibility deployment approaches. • EECA Scaled flexibility pilots project (no webpage) includes pilots testing a variety of deployment triggers. • Transpower has outlined flex deployment triggers for <u>non-transmission (flex) solutions</u> for the western Bay of Plenty. • Orion Energy is testing flex deployment through <u>its Lincoln Flexibility Trial</u> and <u>Resi-flex</u> project (with Wellington Electricity).	3.0	Can we find out what deployment triggers are being considered or tested?
38.	Develop common methods and the associated capability sets for measuring, validating and settling flexibility transactions across the use cases. Sending signals relies on measurement, validation and settlement processes to accurately calculate the nature and benefit of a response. There is not a common approach. Exchanging flexibility will be easier with common methods and capability for measuring the response, eg, amount, duration; method and capability for validating the response and method and capability for settlement of accounts payable.	A range of activities are underway which are exploring methods and capability to measure, validate and settle flexibility transactions. • EECA Scaled flexibility pilots project (no webpage) includes pilots testing a variety of deployment triggers. • Transpower has outlined flex deployment triggers for <u>non-transmission (flex) solutions</u> for the western Bay of Plenty. • Orion Energy is testing flex deployment through <u>its Lincoln Flexibility Trial</u> and <u>Resi-flex</u> project (with Wellington Electricity).	2.4	Can we find out what methods are being considered or tested?
39.	Identify the functions, capability and roles required to coordinate a power system with multi-directional power flows and flexibility. Sending signals will require more coordination across the system to manage the potential for external signals created by participants across the supply chain to pull in different directions. The potential for conflict has been observed with distribution and spot market signals. Multi-directional power flows and flexibility require coordination across the system – the system operator, grid owner, distributors and network users will need processes and capability to maintain a secure, reliable power supply that maximises benefits to system users.	A range of activities are underway to identify functions, capability and roles required to coordinate network and system operation with flexible resources. • ENA FNF produced an assessment in May 2025 <u>evaluating models for distribution system operation</u> • Powerco, Vector and other distributors have DSO programmes exploring and developing the capability needed to perform the function – Powerco is undertaking a <u>DSO transformation programme focused on identifying and developing enabling capabilities</u> • The Electricity Authority is <u>developing a future system operation 'roadmap'</u> to support progress on developing DSO capabilities and functions.	1.9	Is there a generally agreed list of known DSO functions and capabilities? • See appendix 5 of <u>this Powerco INTSA application</u>

#	Step & Action by the human	Current and planned activity	Rating	Next steps / commentary
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. People will encounter problems with their devices and services. A future where outcomes are obtained using a bundle of flexible devices, products and services could make it difficult for people to know who to call, particularly if blurred responsibilities lead to buck passing.	There is no specific activity to consider whether flex products and services are within the jurisdiction of UDL's Energy Complaints Scheme.	1.2	
41.	Develop and implement a plan to update market systems to make switching flexibility products and services as easy as switching retailer. People will want to switch products or service providers. Switching flexibility products and services is a necessary condition for maximising the value and benefits of flexible resources. Market systems are designed to changing the supplier of the retail electricity retail service. Switching flexibility products and services is not contemplated.	There is no known activity to consider how well market systems support customers switching flexibility products and services. Market systems are still retailer-centric, and there is no flexibility resource data in the registry.	1.1	