

## **CODE OF PRACTICE D5 REVIEW PANEL**

**6 September 2004**

### **Submissions: Subcontracting of Metering Work Rule Change Proposal**

This paper summarises the submissions received on the Subcontracting of Metering Work Rule Change Proposal.

## Introduction

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**Background** At its 21 July 2004 meeting, the Electricity Governance Rules (EGR) Committee received a paper containing three proposed metering rule changes. This paper included a proposed change to the Subcontracting of Metering Work rule (Rule 3.1 of Code of Practice D3).

The EGR Committee approved the circulation of this proposed rule change to Participants for submissions. Submissions closed on the 18 August 2004.

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**Submissions** A matrix summarising the submissions received has been included with this paper in appendix 1.

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**Action** It is recommended that the COP D5 Review Panel discuss the submissions and determine if any consequential changes are required.

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## APPENDIX ONE: SUMMARY OF SUBMISSIONS ON THE SUBCONTRACTING OF METERING WORK RULE CHANGE PROPOSAL

**Submission received**

This matrix summarises the submissions received on the subcontracting of metering work rule change proposal. Submissions where received from: Genesis, Areva TD NZ Ltd, Meridian, Mighty River Power, Northpower and Orion.

Rule	Submitter	Submission	Action
Rule 3.1	Genesis	Genesis Power Limited supports the rule change proposed in the Subcontracting of Metering Work Consultation Paper (Rule 3.1 Part D Schedule D1 COP D3).	
	Meridian	The current rules restrict the installation of any metering equipment to employees and sub-contractors of approved test houses. This is not always practical. The proposed change will allow electrical construction work to be completed by other person, such as subcontractors of lines companies and Transpower.  We support the proposed change in Rule 3.1 of part D Schedule D1 of Code of Practice D3.	
	Mighty River Power	Mighty River Power is generally supportive of the proposed rule change.	

	<b>Northpower</b>	<p>We wonder whether the proposed deletion actually gives effect to the intention of the proposed rule change? Reading the amended Clause 3.1 still does not make it clear (to me) as to what work can be performed by people who are not employees or subcontractors of approved test houses.</p> <p>The reason given for the rule change relates to the placement of large outdoor metering transformers. However there is another important area that should not be overlooked. When new switchboards are being constructed for LV metering, it most efficient to send the small current transformers (CT's) to the switchboard manufacturer so they can be installed while the board is being built or altered, rather than waiting for the board to be delivered and then partially dismantling it to fit the CT's. Similarly when existing switchboards are being modified, it is often preferable to allow the electrical contractor to fit the new CT's to minimise disruption to the customer.</p>	
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	<p><b>Areva TD NZ Ltd</b></p>	<p>If my understanding is correct the intent of the rule change is to allow personnel other than those of Test Houses or their subcontractors to carry out installation or replacement of metering equipment. This is current practice and examples are:</p> <ul style="list-style-type: none"> <li>• Transpower installing high voltage current and voltage transformers, cabling, auxiliary equipment and wiring including the complete wiring and installation of metering cabinets.</li> <li>• Network companies and switchgear manufacturers installing high voltage and low voltage current and voltage transformers, auxiliary equipment and wiring.</li> <li>• Switchboard manufacturers installing 400V current transformers auxiliary equipment and wiring.</li> </ul> <p>In summary installation and replacement of equipment by personnel other than Test Houses and their subcontractors is commonplace and widespread across the industry.</p> <p>The proposed addition to 3.1 "where such work may have any effect on the accuracy of the metering installation" only serves to fuel debate on what work is allowed. Surely it would be better to replace the complete rule with:</p> <p>3.1 General Installation or Replacement of metering equipment. Metering equipment shall be installed to meet the requirements of appendix 1. Components of a metering installation including auxiliary equipment and wiring may be installed by suitably qualified personnel other than employees of a Test House or their subcontractors provided that in all cases:</p> <ul style="list-style-type: none"> <li>• Test House employees or their subcontractors only, shall check, test, calibrate, certify, as appropriate prior to the metering equipment being commissioned.</li> </ul> <p>The last sentence of 3.1 - "This requirement shall not include the visual inspections of category 1 and 2 metering installations referred to in the note to table 8 of rule 7.1." should be deleted regardless of the above being accepted as the note to table 8 already allows suitably qualified personnel to complete inspections of all categories.</p>	
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	<p><b>Orion</b></p>	<p>Orion agrees with the concerns the Transpower has raised in relation to rule 3.1 of Part D Schedule D1 Code of Practice D3. Orion submitted on the 20th January 2004 to the MARIA Governance Board (MGB) in relation to this issue. In our submission to the MGB, Orion outlined that in addition to the problem identified by Transpower there are also similar issues relating to metering transformers that are fitted to switchgear or switchboards at the time of manufacture and will by necessity have had connections made to them to part the manufacturing process by non-test house staff or subcontractors. A further issue that needs to be considered is whether test house employees or subcontractors hold the appropriate certificates to gain access to various parts of the distributor's network or Transpower's network or hold the appropriate work authority to carry out work in these areas.</p> <p>We were however, unable to agree with the amendment to the MARIA rules proposed to address this issue, as we believe the amended rule did not in fact address the problem.</p> <p>Orion still holds these concerns and considers that the proposed change to the Electricity Governance rules will not resolve either Transpower's concern or the additional issues raised above. In fact, the existing rule 3.1 already provides for people other than employees and subcontractors of approved test house to carry out work in relation to metering installations, it provides for this by way of exceptions to be detailed in the code of practice. Orion considers that this is the most appropriate way to resolve this issue, and whilst it will require more specific drafting of rules it does provide for a degree of control to be retained. Orion therefore recommends that a further clause be added the COP listing the exceptions to work on a metering installation that may be carried out by non-test house staff or subcontractors. We would consider that this could be drafted to include:</p> <p>Situations where the metering equipment such as VT's or CT's are integrated within the switchgear or switchboard at the time of manufacture or where they are physically large and the installation of such equipment would normally be carried out by electrical fitters or construction personnel rather than test house staff.</p>	
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Please note that Mighty River Power sent their submission in by the 18<sup>th</sup> of August due date, and sent an amendment to this document the following day.