

CODE OF PRACTICE D5 REVIEW PANEL

6 September 2004

Submissions: Wiring of Transformers Rule Change Proposal

This paper summarises the submissions received on the Wiring of Transformers Rule Change Proposal.

Introduction

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 Wiring of Transformers rule (rule 3.3 of Part D Schedule D1 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.

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

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

SUMMARY OF SUBMISSIONS ON THE WIRING OF TRANSFORMERS RULE CHANGE PROPOSAL

Submission received

This matrix summarises the submissions received on the wiring of transformers rule change proposal. Submissions where received from: Genesis, Meridian, Mighty River Power, Northpower and Orion.

Issue	Submitter	Submission	Action
General	Genesis	Genesis Power Limited supports the rule change proposed in the Wiring of Transformers Consultation Paper August 2004 (Rule 3.3 Part D Schedule D1 COP D3).	
	Meridian	Meridian supports the requirements that conductors be identified. We suggest that the rule is extended to record the identification used on the metering system design. In addition, it would be possible to adopt a standard numbering system for metering systems, so that all metering systems can be readily understood.	
	Mighty River Power	Mighty River Power is generally supportive of the proposed rule change.	

	<p>Northpower</p>	<p>Generally supported.</p> <p>We would like to see the word "measuring" in front of the word "transformer" as most people in the industry think of transformers as being those very large objects in substations or on the roadside, and this rule is clearly not intended to cover those transformers.</p> <p>While the proposed requirement is desirable for new installations, it may be impractical to apply it in some existing installations when they are re-certified.</p> <p>There needs to be an exemption for sites certified prior to the operative date of the rule change. Otherwise an auditor might fail a site that does not comply with the new requirement when in fact it was certified prior to the requirement becoming operative. Clearly it would be unfair to require all sites already certified to be made compliant to this new requirement.</p>	
	<p>Orion</p>	<p>Orion agrees with the reasons for the proposed change to rule 3.3 part D schedule D1 code of practice D3, however we are concerned that as drafted the proposed rule could to be considered to apply retrospectively to existing installations. Orion does not consider this to be appropriate and recommends that the proposed wording should be altered to ensure the rule only applies to metering installations installed after the date of the rule change or provides an adequate timeframe for compliance of existing metering installations.</p>	

Please note that Mighty River Power sent their submission in by the 18th of August due date, and sent an amendment to this document the following day.