

Memo

To Metering Equipment Providers
Copies Approved Test Houses
Approved Auditors
From Grant Benvenuti
Date 22 July 2016
Subject Obligation to ensure metering installations are certified in accordance with the Code

Recent MEP Audits have uncovered an emerging issue

During our recent participant audit reviews we have found that some metering equipment providers (MEPs) appear to be confused about the scope of work required for ATHs to certify metering installations and about the demarcation between MEPs and ATHs. In particular, audits have identified that some ATHs have not performed all the activities required for the ATH to certify a metering installation. We understand that, in these instances, the MEPs thought the ATH was contracted to do all the work, but the ATH believed they had only been contracted to perform part of the work.

For clarity, the Code requires MEPs to **ensure** all of the required work is done, and ATHs to **do** the work in accordance with the Code.¹

This means that MEPs need to have an arrangement with an ATH to certify metering installations, and need to monitor and enforce the terms of that arrangement.

MEPs are responsible for the certification of metering installations

MEPs are responsible for:

- ensuring that electricity conveyed through a point of connection, at which it is the MEP, is measured in accordance with Part 10 of the Code²
- ensuring their metering installations are certified in accordance with the Code³
- keeping accurate records.⁴

This means that the MEP must ensure that:

- meters are calibrated⁵
- metering components and metering installations are certified⁶

¹ Clause 10.38(b)

² Clause 10.13(3) and (4)

³ Clause 10.38

⁴ Clauses 4(1) and 4(3) of schedule 10.6

⁵ Clause 7 of schedule 10.4

⁶ Clause 10.38(a)

- it keeps certification records, demonstrating that the above work has been completed in accordance with the Code.

MEPs must arrange for an ATH to perform certification activities

MEPs need to have an arrangement with one (or more) ATHs to perform the work necessary to ensure that metering installations are certified in accordance with the Code.⁷

This arrangement needs to include the scope of work that the ATH will provide. If the scope of work is less than the full scope for certification required by the Code, (for instance if the ATH is only contracted to calibrate the meters), the MEP must arrange another ATH to perform the remaining activities to ensure the MEP's metering installations are certified.

The requirement to be clear on the scope of work applies regardless of whether the MEP uses an internal or external ATH.

ATH must comply with the Code when certifying metering installations

When certifying a metering installation an ATH must:

- a) carry out all of the functions specified in the Code for certifying metering installations, or verify that those functions have been carried out by another ATH (for example component calibration) if they have not been engaged by the MEP to do so⁸
- b) not certify a metering installation if the maximum permitted error of the metering installation falls outside the requirements of Table 1 of Schedule 10.1.⁹

Note that the certification of a metering installation is automatically cancelled on the date that one of the events listed in clause 20 of Schedule 10.7 occurs.

MEPs should check to ensure ATH meeting Code obligations

To ensure metering installations are certified in accordance with the Code, it may not be sufficient for the MEP to rely on an ATH to meet the terms of the arrangement. MEPs should actively manage the arrangement and ensure the ATH is fulfilling its obligations with regards to the certification activities it has been engaged to do.

Commonly this will include activities such as spot checks of the certification records returned from the ATH, regular performance reviews of the ATH, and field audits of the ATH's field staff while they are performing the calibration or certification activities.

If, for example, the ATH is not providing appropriate certification records, or if the MEP's certification records cannot demonstrate that the metering installation was certified in accordance with the Code, the MEP should take action to enforce its arrangement with the ATH.

If an audit identifies metering installations are not certified or records are not kept, MEP may be required to take remedial action

If metering installations are not certified, or the MEP is not keeping records, then the MEP cannot prove that it has complied with the Code.

As a result, the MEP will need to arrange for an ATH to recertify the metering installation, obtain copies of the certification records and arrange for the registry to be updated.

⁷ Clause 10.38(b)

⁸ Clause 10.42

⁹ Clauses 21 and 22 of Schedule 10.7