

# 002 - Prohibition of net metering

## Submission Reference no: 3

**AccuCal Limited** ( [REDACTED] )  
14 River Oaks Place,  
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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Do not support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

No

### Notes

### Question

Question 1: Why not?

### Notes

The problem definition seems to apply to Cat 1 installations that may have small generation capability. It is not stated that this applies to only Cat 1, or if it applies to all. Also seems to imply that some meters do actually 'Nett' import and export, which is something we have never seen. All meter we have encountered clearly record import as import and export as export. The 'per phase' issue is a different matter, and for Cat 1 we agree with this. We don't believe this should apply to Cat 3 and above, open to discussion on Cat 2. Also need to consider if this applies to reactive energy.

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

No

### Notes

### Question

Question 2: Why not?

### Notes

Needs to clarify the Category of installation that this applies to. Agree with the proposal for Cat 1 only.

### Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

### Notes

Needs to state for Cat 1 only.

### Question

Question 4: Do you agree with the objectives of the proposed amendment?

### Position

Yes

### Notes

But needs to clarify the category.

### Question

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.

**Position**

No

**Notes****Question**

Question 5: Why not?

**Notes**

Again, needs to specify the category. Definitely cannot apply to any High Voltage installations and we believe not to Cat 2 and above.

# 003 - Recovering certification costs

Submission Reference no: 4

**AccuCal Limited** ( [REDACTED] )  
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**Submitter Type:** MEP  
**Source:** Web Form  
**Overall Position:** Do not support

**Question**

Question 1: Do you agree with the Authority's problem definition?

**Position**

Yes

**Notes**

**Question**

Question 2: Do you agree with the Authority's proposed solution?

**Position**

No

**Notes**

**Question**

Question 2: Why not?

**Notes**

I think the proposal still leaves losing MEP's out of pocket, but I don't know how this can be addressed. It is a complex situation with many possible scenarios. The cost of re-certifying components that have been removed is often minor compared to the costs of site certification activities, and this was where the losing MEP would lose recovery, particularly on a recently certified installation.

**Question**

Question 3: Please detail any comments on the Authority's proposed Code drafting.

**Notes**

I don't think this proposal suitably covers the possible scenarios.

**Question**

Question 4: Do you agree with the objectives of the proposed amendment?

**Position**

Yes

**Notes**

**Question**

Question 4: Why not?

**Notes**

# 007 - Minimum Voltage Requirements for Category 3 and 4 Metering Installations

## Submission Reference no: 1

**AccuCal Limited** ( [REDACTED] )  
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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

Yes

### Notes

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

No

### Notes

Agree with the intended solution, but needs to include Cat 2.

### Question

Question 2: Why not?

### Notes

This also needs to include Category 2 installations as we have encountered this combination for Cat 2.

### Question

Question 3: Do you have any comments on the Authority's proposed Code drafting?

### Notes

As above, needs to include Cat 2.

### Question

Question 4: Do you agree with the objectives of the proposed amendment?

### Position

Yes

### Notes

### Question

Question 4: Why not?

### Notes

### Question

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in

section 15 of the Electricity Industry Act 2010.

**Position**

Yes

**Notes**

# 008 - Prevailing Load Checks

## Submission Reference no: 3

**AccuCal Limited** ( [REDACTED] )  
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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Do not support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

No

### Notes

### Question

Question 1: Why not?

### Notes

The first paragraph is wrong, a prevailing load test is not 'a test of the accuracy of an electricity meter'. We cannot find any definition of a prevailing load test in the code. We believe that a prevailing load test and a 'raw meter output test' are effectively the same and are essentially a 'functional test' of an installation. An 'accuracy test' of a revenue meter required multiple factors to be accounted for such as test equipment error, test equipment uncertainty, environmental conditions etc. Further to this, we don't understand the rest of the issues, but as they seem to relate to Cat 1 installations with multiple meters under a single certification, we won't comment further. Mainly wanted to highlight our concerns on 'prevailing load tests'.

### Question

Question 4: Why not?

### Notes

# 010 - Selected component recertification

## Submission Reference no: 2

**AccuCal Limited** ( [REDACTED] )  
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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Do not support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

No

### Notes

This should never have been considered as a change.

### Question

Question 1: Why not?

### Notes

The uncertainty is only a part of the process for a calibration. The 'error' of the working standards is also a major part of the process and this seems to not be considered under this proposal. To obtain a meaningful, and compliant calibration of a component the error of the working standard as well as the uncertainty for that error need to be accounted for. ATH's should have sufficient controls in place to assist with the correct selection of corrections and uncertainties. This would not be a high cost exercise. Totally disagree with this definition.

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

No

### Notes

### Question

Question 2: Why not?

### Notes

A default value of uncertainty is not valid for different working standards, and 'actual error' of the standards also needs to be included. It is not hard to have systems that account for different errors and uncertainties.

### Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

### Notes

Disagree with proposed change.

### Question

Question 4: Do you agree with the objectives of the proposed amendment?

### Position

No

### Notes

**Question**

Question 4: Why not?

**Notes**

We believe this compromises the accuracy of testing.

**Question**

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.

**Position**

No

**Notes****Question**

Question 5: Why not?

**Notes**

It is not hard to have systems that correctly identify both 'error' and 'uncertainty' for working standards.



# 013 - Raw meter data output test

## Submission Reference no: 2

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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

Yes

### Notes

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

Yes

### Notes

But, would like to see clarification that sub-clause C relates to NHH. Would also like to see consideration of whether the 5% load needs to be on all phases and if the load should be balanced across the phases.

### Question

Question 2: Why not?

### Notes

### Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

### Notes

Would like to see clarification that sub-clause C relates to NHH. Would also like to see consideration of whether the 5% load needs to be on all phases and if the load should be balanced across the phases.

### Question

Question 4: Do you agree with the objectives of the proposed amendment?

### Position

Yes

### Notes

### Question

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.

### Position

Yes

### Notes

### Question

Question 5: Why not?

### Notes



# 015 - Comparative recertification

## Submission Reference no: 2

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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Do not support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

Yes

### Notes

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

No

### Notes

### Question

Question 2: Why not?

### Notes

The solution addresses Problem 2, points a and b, but not c, which is the most contentious part. Still open to interpretation.

### Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

### Notes

Needs to address Problem 2 - c.

### Question

Question 4: Do you agree with the objectives of the proposed amendment?

### Position

Yes

### Notes

### Question

Question 4: Why not?

### Notes

# 016 - Error calculations at certification

## Submission Reference no: 3

**AccuCal Limited** ( [REDACTED] )  
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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Do not support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

No

### Notes

### Question

Question 1: Why not?

### Notes

No comment on problem 1. Problem 2 does not address all of the issues around this process. To our knowledge, there is currently no tool that completely complies with this requirement. The 'MIE' calculator does not use 'Meter Class', but does use actual load profile data. The alternative method does use meter class, but uses an alternative to actual load profile by calculating the extremes of error at the normal extremes of low/high load and power factor. There is also a potentially larger issue in that this applies to 'Comparative' certifications as well. We cannot see any way of complying with these requirements for comparative method as there is simply no error data to use for different loads and power factors.

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

No

### Notes

### Question

Question 2: Why not?

### Notes

We believe this 'ongoing' issue needs to be addressed by a Technical Working Group consisting of the Chief Metrologist, IANZ, Class A ATH technical personnel, Class B ATH technical personnel and EA representatives.

### Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

### Notes

Needs to address all of the issues.

### Question

Question 4: Do you agree with the objectives of the proposed amendment?

### Position

Yes

### Notes

### Question

Question 5: Why not?

### Notes



# 017 - Application of error compensation

Submission Reference no: 4

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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Support

**Question**

Question 1: Do you agree with the Authority's problem definition?

**Position**

Yes

**Notes**

**Question**

Question 1: Why not?

**Notes**

N/A

**Question**

Question 2: Do you agree with the Authority's proposed solution?

**Position**

Yes

**Notes**

**Question**

Question 4: Do you agree with the objectives of the proposed amendment?

**Position**

Yes

**Notes**

**Question**

Question 4: Why not?

**Notes**

**Question**

Question 5: Do you agree the proposed amendment is preferable to any other alternatives that meet the objectives of the proposed amendment? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.

**Position**

Yes

**Notes**

# 018 - Certification validity periods

## Submission Reference no: 5

**AccuCal Limited** ( [REDACTED] )  
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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

Yes

### Notes

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

No

### Notes

Have questions re problem 1, OK with the remainder.

### Question

Question 2: Why not?

### Notes

We agree with the chief metrologist's view that electronic meters should have a 'shelf life'. At the forum, it was indicated that this change applied to meter 'certification' only and not 'calibration'. We disagree with this as 'certification' is basically a paper exercise based on a 'calibration', it does not ensure the meter is still operating within the required limits. We feel a 'shelf-life' of half of a meters normal validity period should be applied, i.e. class 0.2 shelf-life = 18 months, class 0.5 = 30 months, etc.

### Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

### Notes

Clause 27 (4) should state calibration, not certification.

### Question

Question 4: Do you agree with the objectives of the proposed amendment?

### Position

Yes

### Notes

### Question

Question 4: Why not?

### Notes

# 019 - Measuring transformers and burdens

## Submission Reference no: 2

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**Submitter Type:** ATH  
**Source:** Web Form  
**Overall Position:** Do not support

### Question

Question 1: Do you agree with the Authority's problem definition?

### Position

No

### Notes

### Question

Question 1: Why not?

### Notes

Problem 3A - Why does actual service burden errors need to be limited to greater than 1kV? There is no reason for this at all. Any installation that can be certified WITHOUT loading resistors is going to be less prone to failure (of loading)..

### Question

Question 2: Do you agree with the Authority's proposed solution?

### Position

No

### Notes

### Question

Question 2: Why not?

### Notes

Do not understand what sub-clause a of proposal for problem 3B relates to. Seems to be way off-track. Proposal for Problem 4A needs to clarify that if the comparative recertification method is used, it can only be used for Cat 2. Also, as stated in another submission, we don't believe the comparative recertification method can be used for clause 22 of Schedule 10.7 due to lack of data for installation load range. Also, when using the comparative method, the CT's are not actually certified, only the installation is, so wording around burdening with respect to component certification needs to be checked.

### Question

Question 3: Please detail any comments on the Authority's proposed Code drafting.

### Notes

Need to check wording around comparative certification method.

### Question

Question 5: Why not?

### Notes