

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	001 – Electrical Connection and Disconnection of Points of Connection
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Yes	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Generally agree with proposed solutions with the exception of the following proposed clauses:	
<p>(a) 10.33A (1) (a) (i) (B) (3) – The Code amendment refers to “from the time of electrical connection” implying an intra-day switch request / status update however the registry cannot currently recognise this concept. Contact recommends the wording is refined to reflect the current registry functionality.</p> <p>(b) 10.33A (5) (a) – The requirement to electrically disconnect the ICP using the same method of electrical disconnection as the losing trader used, needs to also recognise where AMI meters have been bypassed as part of the attempted reconnection process.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>The proposed Code drafting around gaining traders reconnecting ICPs does not improve the effectiveness or efficiency of this switch gain process as it still relies on communications (email, calls, etc) outside of the switching process to exchange information that is critical in ensuring the correct switch date is applied.</p> <p>In order for this proposed Code change to be applied effectively, it is recommended that either a new switch type be created that recognises this type of switch (ie that allows a gaining trader to set the switch date to align with the reconnection date) or the parameters for an AMI switch be extended to allow gaining traders to use this switch type for this purpose.</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Yes	
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.	
Yes	

D1 Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.
N/A

D2 Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.
N/A
Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.
N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	003 – Recovering certification costs
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>No – the problem definition is unclear whether the certification costs referred to relate to the losing MEP's certification of assets only or the certification of third party assets (such as CTs) which are certified using the comparative method in combination with the meter.</p> <p>If it is the former, then since the losing MEP has selected this method of certification (vs a selected component certification) the MEP has accepted the risk that if at any time its meter is replaced, the overall installation will require recertification.</p> <p>If it is the latter, then since the losing MEP's assets remain on a site, there is nothing preventing an MEO to pass on the agreed asset leasing costs directly to the trader. This practice occurs today without formal agreements in place between MEPs and MEOs.</p> <p>Furthermore, there is no reason why MEOs need to attempt to recover certification costs if they have an agreement with the respective MEP regarding passing through asset leasing costs to traders via the MEP.</p> <p>Contact sees no compelling reason for this proposed Code change.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No – the proposed solution is convoluted and unnecessary and Contact sees no compelling reason for this proposed Code change.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>See above</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
<p>No – see Question 1 above.</p>	

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.

Contact recommends that MEPs and MEOs enter into agreements with each other as required under the Code to address scenarios such as this and to also address issues such as the responsibility for burdens and ongoing certification costs where a number of metering components have been certified using the comparative method.

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.

N/A

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.

N/A

Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.

N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	006 – Metering issue resolution timing
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>No – The problem definition is silent on (a) the issue of <u>interval data</u> vs <u>midnight reads</u> validation failure for half hour certified meters and (b) whether this constitutes a metering issue.</p> <p>Where a half hour certified meter's interval data (versus consumption calculated from the master accumulating register for the element) exceeds an acceptable threshold (note: in the absence of a Code defined allowable threshold) agreed between traders and MEPs, then if the MEP believes the metrology of the meter is not compromised there is no incentive for an MEP to investigate this type of issue.</p> <p>However from a trader perspective this type of issue is becoming more common and is impacting on the ability of trader to submit accurate and timely HHR consumption information and also bill customers while traders await MEPs to investigate the cause of these validation failures.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Yes – however further Code amendments are required to expand the resolution of metering issues to include half hour data issues relating to AMI meters.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Contact recommends that the proposed Code amendments include half hour volume information accuracy for half hour certified AMI meters and not just relating to the physical metrology of the metering installation.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
N/A	
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.	
N/A	

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.
N/A

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.
N/A
Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.
N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	012 – Monitoring of event logs
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>No - The problem definition does not include the need for distributors to respond to power quality events identified by AMI meter event logs.</p> <p>Participant responsibilities go beyond accurate electricity volumes / integrity and operation of the metering installation. Power quality issues also need to be actively monitored to ensure electricity is being delivered to consumers at an acceptable level of quality.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
No – Distributors need to also be included in the proposed solution to respond to power quality events.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Clause 8 subpart 5A, schedule 10.6 – the amendment must include an obligation (a) on the MEP to advise the relevant distributor of any power quality events and (b) on the distributor to investigate and take the appropriate action to remedy the issue.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
N/A	
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.	
N/A	

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.	
N/A	

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.
N/A
Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.
N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	025 – MEP updates of HHR/NHH and AMI flags
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>The definition is missing the requirement for MEPs to manually download half hour data up to the point of the update of the AMI flag where a site communications investigation successfully accessed the meter.</p> <p>This expectation on MEPs was made clear to all participants in a memo from the Authority dated 26 July 2017 with a subject line: “Expectation on use of the AMI flag in the registry, and determining if an AMI meter is non-communicating”. The memo also identified timeframes for MEPs to investigate communication issues however these timeframes have not been included in this proposed code amendment</p> <p>The memo’s final paragraph made it clear these expectations would be included in a future proposed Code amendment –</p> <p>“The Authority intends to propose a Code change to clarify the timeframes for completing an investigation and updating the registry, and will be using the above expectations as the basis for consultation on the proposed Code change”.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No. The solution should make it a clear what happens if communications are restored at a future date – will the metering installation require recertification as HHR? Could this be done virtually without the need for a site visit?</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>Clause 8 (11) of Schedule 10.6 is inconsistent the proposed clause 8 (10) in terms of MEP obligations. Clause 8 (10) states that MEPs must investigate communication failures however clause 8(11) implies MEPs can choose whether to investigate or not.</p> <p>Clause 8(11) requires rewording to make clear what the MEP obligations are.</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
<p>Proposed amendments are incomplete as they have not included the requirement for MEPs to manually download and deliver half hour data as part of a site investigation.</p>	

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.

N/A

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.

N/A

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.

N/A

Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.

N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	026 – Excluding non-market-related meter registers
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
No – check meters and registers should also included in this problem definition.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
No	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
See above	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
See above	
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.	
See above	

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.
N/A

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.
N/A
Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.
N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	028 – Meter bridging
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>No – Our comments are as follows:</p> <ul style="list-style-type: none"> • With the level of AMI meters now being settled as HHR, the impacts of meter bridging impacts all traders' submissions from the corruptions of the Residual profile shapes used in NHH settlements. This impact is more pronounced for (a) embedded networks due to the smaller population of ICPs per network and (b) residual load ICPs where they are settled by difference. • The level of service (staffing hours / system blackout periods) provided by MEPs to support the use of internal relays within a meter to disconnect / reconnect a consumer's supply is inconsistent for traders to meet their Code obligations. Contact completed almost 7,000 after hours reconnections over a 12 month period which shows that a solution supported by an extended business hours support arrangement rather than a 24/7 solution with both a remote and an onsite mechanism to operate a meters internal relay is not fit for purpose. <p>Contact's disconnection and reconnection processes are consistent with most tier 1 traders however the number of bridging incidents and the period of time to resolve a bridged meter is more significant than the level of meter bridging highlighted in RPS audits.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No – The proposed solution does not encourage the service providers of remote connection services to provide an alternative solution to reconnect a consumer's supply when back office staff / system unavailability prevents a reconnection from occurring.</p> <p>Of the 4 current AMI MEPs that provide remote disconnection / reconnection services to Contact, only one MEP provides field staff with hand held devices which either provide a local signal to complete the reconnection or connects directly with the meter to complete the reconnection task. This proposed Code Amendment does not provide any incentive for MEPs whose field staff do not have hand held devices to extend the level of service they currently provide.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>The proposed drafting in its current format is likely to result in an increase in meter bridging and as a consequence a degradation of settlement accuracy.</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
<p>No – As stated in Question 3, Contact believes this proposed Code amendment is likely to increase the impact of the bridging practice to the market settlement (a) for all NHH traders directly due to residual profile shape corruption and (b) for all traders from inaccurate UFE allocations.</p>	

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.

No – Contact proposes that the Authority consider requiring participants who wish to provide additional AMI services (such as remote disconnections / reconnections) to undergo a material change audit so that the Authority can have confidence that the solutions provided to other participants are fully compliant with the Code and will not result in subsequent Code breaches incurred by other participants.

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.

N/A

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.

N/A

Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.

N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	032 – Automatic cancellation of metering certification
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
No – The problem definition does not acknowledge or identify the obligation a trader inherits from the decision by the MEP as to the method to certify a metering installation in this manner. Additionally, the problem definition does not consider the consequence of cancelling the certification on the trader, where the trader may only be certified as a NHH trader.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
No – Since MEPs are able to perform in situ testing and certification of components (such as CTs) the proposed amendment, which we believe to be unwieldy and outdated, is not required.	
For example: If you consider the scenario of a NHH trader switching a metering installation certified as Cat 2 under this mechanism but has a physical capacity that determines the ICP as Cat 3. There is no way for the trader to be aware of this reporting obligation at the time of the switch and the trader has no process to deliver the required report to the MEP. The report is not provided in time therefore the MEP must cancel the Cat 2 certification – as part of this process the Meter installation Category is updated to reflect the physical capacity as Cat 3. The trader is now in breach as they have no means to settle this ICP as HHR as they have no system or processes nor are they certified as a NHH reconciliation Participant.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
We believe that the proposed amendment is not necessary. If however, the Authority believes that there is still a place for this type of certification, then the proposed amendment needs to require the MEP to have the means to monitor the current levels of all metering installations certified in this way.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
No – This method of certification is outdated and unwieldy and we recommend to the Authority to remove this option from the certification methodologies available to MEPs in light of the ability of MEP to now perform in situ testing and certification of components such as CTs.	
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.	
See above.	

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.
N/A

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.
N/A
Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.
N/A

Operational Review of Metering and Related Registry Processes	
Submitter	Contact Energy Limited
Proposal Reference	037 – Regulating metering used for non-reconciliation purposes
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
In general yes – however Contact is concerned about (a) the installation of non-regulated metering equipment onto metering installations, in many cases by non-participants, and (b) what impacts these installations may have on the burden levels of the meter used for settlement purposes and therefore the potential impacts to the certification of the metering installation.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
See above	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
See above	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
See above	
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.	
See above	

D1. Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.
N/A

D2. Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

Question 7: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.
N/A

Question 8: Do you agree the benefits of the proposals in aggregate outweigh their costs? If you disagree, please provide reasons.

N/A