

## Appendix D Format for submissions

D.1 Please complete the table below for each proposed Code amendment requiring a regulatory statement. Only include those you wish to submit on.

Note: Please use table D2 to submit on technical and non-controversial proposals.

Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	003 – Recovering Certification Costs
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We don't agree with the problem definition as we believe retailers are driving the changes and recovery costs need to be directed to them.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>No, In some instances the solution appears to remove any costs being retrievable based on a time frame.</p> <p>The costs of a metering asset and its installation don't change and are recovered by the lease fee to retailers over a certain period of time.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
<p>The Code drafting does not reflect the current practice of certified AMI meters being removed and replaced by another MEPs as was its intention.</p> <p>Retailers are driving MEP changes using their preferred/exclusive contracts to displace knowing they do so without penalty. Indeed retailers routinely displace metering installed within weeks of a retailer change The recoverable costs should be aimed at the retailer and include any non-return of assets to the MEP.</p>	

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**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

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**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.**

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D.2 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.**

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D.3 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.**

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

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	008 – Prevailing Load Checks
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We agree with the items with exception to the below listed with their respective reasons.</p> <p><b><i>“Most category 3 meters do not include an accumulating register. In such instances, all meter readings are dependent on the data storage device. A data storage device check should not be onerous. It should simply be a check:</i></b></p> <p><b><i>a) that the battery is working, and</i></b></p> <p><b><i>b) that readings are being stored and are recoverable, and</i></b></p> <p><b><i>c) if the data storage device is a separate component, that it is certified.”</i></b></p> <p>Clarification - Most meters, including category 3 and above, do have accumulating registers. We have found that this information has not been placed on the registry, which may have influenced this statement.</p> <p>The battery in a data storage device does not ensure the data on it will be retained. It is our view that this would not be included as part of a problem definition.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>We agree with the changes in this section.</p> <p>It is not clear however the definitions of each table item. These should be consulted and then added or amended in Part 1 of the EIPC as required to ensure participants are clear on each meaning.</p>	

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

It is not clear what the definitions are on each table item. These should be consulted and then added or amended in Part 1 of the EIPC as required to ensure participants are clear on each meaning.

**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

Agree.

**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.**

Agree.

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N/A.

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Agree.

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Agree.

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	12 – Monitoring of Event Logs
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We agree there needs to some clarification on requirements of event logs.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>We do not agree with the Authority's proposal.</p> <p>We believe all of the events described relate to submitting accurate electricity volumes and should not be split between the reconciliation participant and the MEP but all be assessed by the reconciliation participant. There are many types of events that could mean malfunctioning or tampering and identifying these has not been made clear. The reconciliation participant is best placed to assess the event log and decide what action is necessary. They have direct contact with the customer and are better placed to decide if any investigation is required depending on the type of event and its frequency.</p> <p>Investigating any event log such as malfunctioning or tampering could drive a number of site visits which incurs costs – who does the EA anticipate would pick these costs up?. Cost of energy is a political topic currently and this process change seems to be designed to drive additional cost into the MEP process. These costs cannot be absorbed by a marginal business so would inevitably be on charged to the retailer and therefore the customer.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	

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**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

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**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.**

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	015 – Comparative Recertification
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We agree with majority of the problem definition.</p> <p>In addition to the problem outlined we see no difference for CAT 2 and LV CAT 3. We recommend CAT 3 installations to also be included to be able to use the Comparative Recertification method.</p> <p>This alleviates the need to isolate the customers' power supply during testing and costs to do so, for majority of installations, reducing non-compliance when an outage date is not achievable with the customer.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
See Answer 1.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
See Answer 1.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	

See Answer 1.

**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.**

Agree, with the inclusion of Answer 1.

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

No.

D.3 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.**

Agree.

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

Agree.

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	016 – Error Calculations at Certification
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We agree in part the need for clarity on this subject.</p> <p>We also agree the additions as described below are also required to enable test houses to accurately identify actual or expected accuracies.</p> <p>1 - It is not reasonable to produce an expected load profile on new connections.</p> <p>2 - There is no account for meter error, but only it's class for fully calibrated certifications</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>Problem 1</p> <p>We do not agree that there is no further action required. Provision for meter accuracy should be considered for error calculations and not a meter accuracy class.</p> <p>By using an accuracy class this typically leaves a lower amount of error for the Error calculation and a higher class meter than required to become acceptable.</p> <p>There are additional costs for these higher accuracy class meters placed on the MEP (and in turn the retailer and potentially the end user), when there is no influence on actual accuracy.</p> <p>Problem 2</p> <p>We do not agree that there is no further actions required. There is no reasonable way to profile an end users minimum and maximum load amounts and power factors with no customer usage profile.</p> <p>There needs to be exemption under this clause to reflect these scenarios.</p>	

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

We believe there is an important need to include issues raised in Question 1 and 2. Leaving these out of the proposed changes will continue the doubt on how to correctly calculate error.

**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

We believe the Authority has a point of clarification being made under these clauses.  
There is an opportunity to ensure certification is based on error and not accuracy class and have answered questions 1 and 2 respectively.

**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 Answers 1 and 2.

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

See answers 1 and 2.

D.3 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

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	017 – Application of Error Compensation
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Agree	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Agree	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
Agree	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Agree	

**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.**

Agree

D.2 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.**

Agree

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

Agree

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

Agree



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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	018 – Certification Validity Periods
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
There is no evidence provided to show an issue with electronic meters failing within a short time frame. We do not agree with including this meter type unless evidence has been produced that confirms this.	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
We do not agree with the proposal to introduce a shelf life for electronic meters. Accuracy is also proven on installation with test houses confirming the meter performs within accuracy tolerances required. With no evidence of any impact of accuracy on electronic meters this should not be included.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
As outlined in Questions 1 and 2 Electronic meters should not be given a shelf life.	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
As outlined in Questions 1 and 2 Electronic meters should not be given a shelf life.	

**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

D.2 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

D.3 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.**

As outlined in Questions 1 and 2 Electronic meters should not be given a shelf life.

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

As outlined in Questions 1 and 2 Electronic meters should not be given a shelf life.

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	019 – Measuring Transformers and Burdens
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We agree with the problem list as identified.</p> <p>There is the same risk of burden resistors failing in low voltage installations than there is on high voltage installations.</p> <p>There is no mention of this risk in the problem list but there is solely a focus of burden on high voltage installations. In our view this same risk should have been also added to the problem list.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>We agree with solutions except for solution 3B.</p> <p>There is also the risk that by installing burden resistors they may fail, without any warning or sign of deterioration. This is the same risk posed on high voltage installations.</p> <p>A Class B test house can confirm accuracy on in service burden levels, which it does on every installation at time of testing. There is an additional requirement in the code to install burden resistors, which should not be required if the installation is accurate.</p> <p>Costing to complete this has been given at \$50, does not meet any real world costing. We are unsure how the Electricity Authority has come to determine this, but costs to complete installation of burden resistors will be well in excess of this stated figure.</p> <p>With burden resistor requirements we have been replacing majority types of CT's where burden resistors are required. We understand this practice to also be used by other MEP's due to the risk involved with burden resistors. This has caused end users to be without power for long durations, while CT's are replaced. This comes at a large cost to both them and the MEP's, typically measured in thousands of dollars per occasion.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	

<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>
We agree, with the inclusion of Answers 1 and 2.
<b>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.</b>
N/A

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<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.</b>
N/A

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

As described in answer 2.

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

Agree

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	025 – MEP updates of HHR/NHH and AMI flags.
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We agree that there needs to be clarification of the use of AMI flags and HHR NHH certification due to communication changes.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>We agree with clauses a , c, d ,f ,g            We disagree with clause b and e.            We believe there are a number of factors the EA have not taken into consideration in relation to AMI meters and the cost in relation to establishing communication faults and the time frames suggested.            Our current position is to install all HHR meters with coms unless requested not to by the retailer. The meter is certified HHR AMI communicating yes. If the meter does not communicate within its interrogation cycle we change to AMI no NHH certified integration cycle 365 days. If the meter has communicated and has stopped we would expect an SR from the retailer to investigate and amend any metering records as per the outcome.            We believe the following points need to be considered.            1 – The varying types of comms faults such as vacants, seasonal work , holiday homes , rentals all use the main switch to turn the power off making the comms unavailable.            Intermittent service areas from service providers, Customer intervention.            2 – Requiring MEPs to investigate all comms faults. This should be based on contractual relationships between the MEP and the retailer. These may vary some retailers do not take AMI reads from us and manually read all meters.            3 – Requiring the MEP to update the registry for AMI meters that have stopped communicating. . 1 and 2 above should be taken into consideration. Intermittent comms can drive a number of site visits which incurs cost – who does the EA anticipate would pick these</p>	

cost up ?. Cost of energy is a political topic currently and this process change seems to be designed to drive additional cost into the MEP process. These costs cannot be absorbed by a marginal business so would inevitably be on charged to the retailer and therefore the customer.

4 – The time frames suggested. We believe this should be the interrogation cycle.

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

**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

**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.**

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Operational Review of Metering and Related Registry Processes	
Submitter	FCLM
Proposal Reference	027 – Meter Resealing by Traders and Distributors
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
<p>We disagree .</p> <p>The code is not imposing unnecessary transaction costs on participants.</p> <p>There will always be a need for the MEP to do a site visit for a broken seal.</p>	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
<p>We agree that a distributor can remove a seal to bridge a relay to restore customers controlled load in after-hours situations. However there should then be a notification to the MEP to repair the fault and carry out any testing necessary and reseal the relay.</p> <p>We agree that the retailer can authorise the removal of seals to bridge a meter in emergency situations. However once the meter is bridged we believe the certification will be automatically cancelled. We would expect an SR to go and recertify the meter. In no circumstances would we permit a bridged meter to be unbridged and sealed by a retailer.</p>	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	

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**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

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