

# 001 - Electrical Connection and Disconnection of Points of Connection

Submission Reference no: 3

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP

**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**

**Question**

Question 2: Why not?

**Notes**

**Question**


Question 5: Why not?

**Notes**

# 003 - Recovering certification costs

Submission Reference no: 3

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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**

**Question**

Question 2: Why not?

**Notes**

**Question**

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

**Notes**

New MEP has up to 15 business to update metering on the Registry. How would the losing MEP know within 3 business days of the gaining MEP assuming responsibility that some or all of their components may be re-used by the gaining MEP and not re-certified.

**Question**

Question 5: Why not?

**Notes**

**The submitter have elected to withhold their personal details from publication.**

# 005 - Like for like replacements and consultation

Submission Reference no: 3

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP  
**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?

## Notes

Distributors should not dictate to MEP when certification should be cancelled. MEP's will incur all costs associated with cancellation and recertification requirements: b) even when the MEP has consulted with the distributor and trader for a like-for-like replacement,— i) the certification for the metering installation may still be cancelled under clause 19 of Schedule 10.7; and if so ii) the metering installation must be recertified in order to comply with the Code.

## Question

Question 2: Why not?

## Notes

## Question

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

## Notes

Please clarify that cl 19 (3) & (3A) remain unchanged. Spelling mistake in the proposed cl 19 (2C).

## Question

Question 5: Why not?


## Notes

The submitter have elected to withhold their personal details from publication.

# 006 - Metering Issue Resolution Timing

Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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**

**Question**

Question 2: Why not?

**Notes**

**Question**

Question 5: Why not?

**Notes**

The submitter have elected to withhold their personal details from publication.

# 008 - Prevailing Load Checks

## Submission Reference no: 2

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP  
**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

Mostly agree with the proposed solution. See comments below.

### Question

Question 2: Why not?

### Notes

### Question

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

### Notes

Do not agree that a prevailing load test is required when meters are not being replaced i.e. bridging. Suggest that row 2 needs to be split to differentiate between recertification with a new installation, expiry date and recertification with an existing installation expiry date. Suggest that row 6 may need to reference burden changes, since a burden resistor change is a "modification" to the metering installation

### Question

Question 5: Why not?

### Notes

**The submitter have elected to withhold their personal details from publication.**

# 009 - ISO 9001 sync with class B ATH application period

Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP

**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**

**Question**

Question 2: Why not?

**Notes**

**Question**

Question 5: Why not?

**Notes**

The submitter have elected to withhold their personal details from publication.

# 010 - Selected component recertification

Submission Reference no: 1

Intellihub NZ  
New Zealand

Submitter Type: MEP  
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**

A single default uncertainty value removes the need for complicated calculations being done on site

**Question**

Question 2: Why not?

**Notes**

**Question**

Question 5: Why not?

**Notes**

The submitter have elected to withhold their personal details from publication.

# 011 - Raw meter data and compensation factors

Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP

**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**

**Question**

Question 2: Why not?

**Notes**

**Question**

Question 5: Why not?


**Notes**



# 012 - Monitoring of event logs

Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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**

**Question**

Question 2: Why not?

**Notes**

**Question**

Question 5: Why not?


**Notes**

The submitter have elected to withhold their personal details from publication.

# 013 - Raw meter data output test

## Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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?

### Notes

Do not agree with C) Double up of doing the register advancement test, not practical where the installation load may need to be connected during the test. Fluctuations in installation load over a period of time, would mean the test would fail and have to be undertaken multiple times. Does not take into account all methods of raw meter tests.

### Question

Question 2: Why not?

### Notes

### Question

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

### Notes

Some meter configurations may struggle to meet the definitive requirement for the register's least significant digit to increment by at least "1" within a realistic and economically viable test period.

### 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.

### Notes

Agree that the proposed amendment is the ideal, but as mentioned above, we believe that some meter configurations will struggle to meet the definitive requirement for the register's least significant digit to increment by at least "1" within a realistic and economically viable test period

### Question

Question 5: Why not?

### Notes

The submitter have elected to withhold their personal details from publication.

# 014 - HHR certification and interrogation cycles

## Submission Reference no: 1

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP

**Source:** Web Form

**Overall Position:** Do not support

### Question

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

### Position

No

### Notes

No. Better use of the AMI Comms flag should be considered not cancellation of certification.

### Question

Question 1: Why not?

### Notes

No. AMI meters have the capability of providing HHR data and checks are in place by the certifying ATH to certify the installation as HHR. If or when communications fail the AMI Comms flag should be used and maintained by the MEP not cancellation of certification. How long can an installation certification remain as expired?

### Question

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

### Position

No

### Notes

As per above comments.

### Question

Question 2: Why not?

### Notes

As per above comments.

### Question

Question 4: Why not?

### Notes

The submitter have elected to withhold their personal details from publication.

# 015 - Comparative recertification

## Submission Reference no: 1

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP  
**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?

### Notes

Assume that CTs with certifications which have already expired are to be treated as CTs with certifications which will expire before the meter. The only difference between the two situations is whether the CT's certification is current on the day of installation certification.

### Question

Question 2: 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.

### Notes

Agree that the proposed amendment is workable, but suggest a clarification on the interpretation above is necessary

### Question

Question 5: Why not?


### Notes

The submitter have elected to withhold their personal details from publication.

# 016 - Error calculations at certification

Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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**

**Question**

Question 2: 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.

**Notes**

Clause 22 can potentially place a heavy overhead on the certification calculation requirements of a Cat-2 installation, and question whether it is really the most pragmatic approach, particularly for Cat-2 Comparative certification where the meter's accuracy should already be known and traceable ... A possible outcome from this is that Comparative certification may become less preferred to CT replacement and Selected Component certification

**Question**

Question 5: Why not?

**Notes**

**The submitter have elected to withhold their personal details from publication.**

# 017 - Application of error compensation

Submission Reference no: 1

Intellihub NZ ( )  
New Zealand

Submitter Type: MEP  
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**

Selected yes above - suggest there is a glitch with this one?

**Question**

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

**Position**

Yes

**Notes**

**Question**

Question 4: Why not?


**Notes**

The submitter have elected to withhold their personal details from publication.

# 018 - Certification validity periods

Submission Reference no: 2

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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**

**Question**

Question 2: Why not?

**Notes**

**Question**

Question 5: Why not?


**Notes**

The submitter have elected to withhold their personal details from publication.

# 019 - Measuring transformers and burdens

Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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?

**Notes**

4B has the potential to place a heavy overhead on the certification calculation requirements of a Cat-2 installation, and question whether it is really the most pragmatic approach. A possible outcome from this is that Comparative certification may become less preferred to CT replacement and Selected Component certification.

**Question**

Question 4: Why not?

**Notes**

**Question**

Question 5: Why not?

**Notes**

**The submitter have elected to withhold their personal details from publication.**



# 021 - Obsolete sticker removal

## Submission Reference no: 1

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP  
**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

No concerns with this proposal in general, but point out that the procedure for removing an old sticker will need to ensure that if scraping devices are used, caution will be needed on surfaces that can be easily scratched.

### Question

Question 2: Why not?

### Notes

### Question

Question 5: Why not?

### Notes

The submitter have elected to withhold their personal details from publication.

# 022 - Inspection periods

## Submission Reference no: 1

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP  
**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

### Question

Question 2: Why not?

### Notes

### Question

Question 5: Why not?


### Notes

The submitter have elected to withhold their personal details from publication.

# 023 - Combining certification stickers

Submission Reference no: 1

 Intellihub NZ (  
New Zealand

  
**Submitter Type:** MEP  
**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**

Some ATH's will continue to use separate device and installation certification stickers in all situations.

**Question**

Question 2: Why not?

**Notes**

**Question**

Question 5: Why not?

**Notes**

The submitter have elected to withhold their personal details from publication.

# 025 - MEP updates of HHR/NHH and AMI flags

## Submission Reference no: 2

Intellihub NZ ( )  
New Zealand

**Submitter Type:** Distributor  
**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

Per comments below;

### Question

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

### Notes

The gaining Trader's best option is to utilise the NHH/HHR flag and the AMI no coms flag to determine service offerings. The gaining Trader may not have visibility of the metering installation certification report to identify how the ATH has certified an installation. This option to see 'both' on the Registry is not included in this proposal.

### Question

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

### Notes

The proposal to record all relevant Service Access Interfaces applicable to an installation in the Metering Installation Certification Report would also impact on the Maximum Interrogation Cycle specified in the relevant Design Report, i.e. a Design Report should include Maximum Interrogation Cycles for each permissible Service Access Interface and Installation Type.

### Question

Question 4: Why not?

### Notes

The submitter have elected to withhold their personal details from publication.

# 027 - Meter resealing by traders

## Submission Reference no: 1

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP  
**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

Loop hole for a Trader to engage with a non-participant, i.e. electrician. Trader should only engage with and ATH and/or Distributor to comply with code / perform this work.

### Question

Question 2: 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.

### Notes

Potentially many occasions seals are removed by electricians who are not participants to this code, and question whether the proposal to ensure that only qualified personnel are permitted to remove seals will actually be enforceable.

### Question

Question 5: Why not?

### Notes

**The submitter have elected to withhold their personal details from publication.**

# 028 - Meter bridging

## Submission Reference no: 1

Intellihub NZ ( )  
New Zealand

**Submitter Type:** MEP  
**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

Clarify Standing authorization. Can the Trader instruct any MEP or only the current to bridge?

### Question

Question 2: Why not?

### Notes

### Question

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

### Notes

Define immediately (1day - 2days?) be specific if the MEP was not responsible for the bridging. Engaged if we are not aware.  
How would an MEP monitor or prove that electricity is flowing through. ATH can only determine upon completion of job.

### Question

Question 5: Why not?

### Notes

The submitter have elected to withhold their personal details from publication.