

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	Metrix
Proposal Reference	001
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comments on the Authority's proposed Code drafting.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees

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.

Metrix agrees

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.

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.

Metrix agrees

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

Metrix agrees

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	002
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees and we believe the proposed change makes the Code more explicit about Net Metering. However, Metrix meters do not use Net Metering, therefore this will not affect us.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
No. Providing the Trader requests the MEP to change the metering configuration to import/export prior to generation being introduced at a metering installation.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees

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.

Metrix agrees

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.

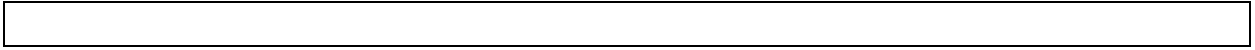
D.3 Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

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

Metrix agrees

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

Metrix agrees



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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	003
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees that certification costs are often lost in the case of MEP switching.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No. Metrix does not believe that the problem has been appropriately addressed i.e. the allocation of cost does not sit with who benefits from MEP switching and does not sufficiently deter inappropriate MEP switching.</p> <p>1) The process mentioned in the 'a)' section of the proposal may not be required, as the losing MEP's will continue to charge for the lease of their assets, which should cover the cost of the certification and calibration. Certification costs should only be recovered in the case of an asset displacement</p> <p>2) MEP switching is controlled by the Trader who should be included in the equation for allocation of certification and calibration costs. Metrix suggests identifying three cases where an MEP asset displacement occurs and assigning responsibilities in each case;</p> <p style="padding-left: 40px;">Beneficial Displacement – The gaining MEP can offer enhanced services to the Trader, however the existing metering is functioning. In this case the Trader has benefited from this and should pay the appropriate certification and calibration costs to the losing MEP, as they have chosen to displace a functioning asset. The Trader may then seek to recover this cost from the consumer, if it is consumer related activity that has required a meter change.</p> <p style="padding-left: 40px;">Displacement of Faulty Assets – The existing MEP is not resolving a faulty meter issue albeit being within the control to resolve it and having sufficient time to do so e.g. not attempting to resolve AMI communications issues. In this case, lost certification and calibration costs should remain with the losing MEP.</p>	

Displacement for convenience – Where a Trader chooses to switch out an MEP based on an alternative preferred supplier i.e. where the gaining MEP makes a like-for-like switch, or instances where a meter change is not required. This scenario will ultimately add unnecessary cost to the market which will be borne by the consumer. Metrix does not see a clear mechanism within the Code to deter this behaviour.

3) Metrix considers the timing of 3 days between nomination and a change to the metering installation to be arbitrary. The time limit adds unnecessary complexity to the process. Although this should give an incentive for MEPs to organise site visits quicker, introducing charges to the industry may also introduce an increase in metering service prices. In the case where a meter has been installed for half the certification period, the gaining MEP may have to pay half of the certification cost to the losing MEP, effectively only retaining half the money they were paid to do in the first place. In response, the gaining MEPs could increase their price to cover the cost of the job minus the money to be paid to the losing MEP. This would drive operating prices up, and should be against the Authority's goals.

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

Metrix has highlighted concerns with the proposed solution. The proposed Code drafting is in line with the proposed solution and hence does not address our concerns.

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

Metrix does not agree, as we believe some responsibility to pay certification and calibration costs should sit with the Trader.

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.

There are no alternatives provided. Given that Metrix does not agree that the problem has been addressed by the proposed solution, Metrix would like to see some alternatives to ensure that the source causing the metering equipment change, bears the cost of lost certification.

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.

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	Metrix
Proposal Reference	005
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comment.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees	

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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.

Metrix agrees

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.

Metrix agrees

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

Metrix agrees

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	006
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees; however, we would like to see some guidance from the EA on what it considers "best endeavours" in terms of the 25-day timeframe and some examples for what they would consider a non-compliance or insufficient attempt to resolve	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix believes this clause amendment will clarify the timelines required to resolve issues with defective assets.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees	

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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.

Metrix agrees

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.

Metrix agrees

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

Metrix agrees

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	008
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees with most of the changes. However, we disagree with Row 4 on the proposed Table 3 which suggests that the certification expiry date for the entire installation can be extended, including for pre-existing meters. We are not aware of any clauses in the Code which allows an ATH to extend the certification life of a meter, simply by carrying out a PLT while doing selected component recertification. Furthermore, we do not believe that the ATH can confirm the unchanged meter/s will be functionality fit for purpose for up to a further 15 years, just via a PLT. Therefore, we would be interested to receive further information from the EA in relation to this issue.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Issue is included within response to Q2.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees

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.

Metrix agrees

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.

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.

Metrix agrees

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

Metrix agrees

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	009
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comment.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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.

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.

Metrix agrees

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

Metrix agrees

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Submitter	Metrix
Proposal Reference	010
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comment.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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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.

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.

Metrix agrees

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

Metrix agrees

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Submitter	Metrix
Proposal Reference	011
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees. All Metrix Cat 2 meters are programmed with the CT ratio therefore the external multiplier is always 1.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
For Metrix metering installations, the compensation factor is always 1, because the CT ratios have been programmed in the meters. Metrix does not apply the Registry compensation factor to the data. Therefore, the proposed change does not have any impact on us.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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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.

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.

Metrix agrees

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

Metrix agrees

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	012
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees with the allocation of responsibility. Metrix would like to see the Trader responsibilities altered to indicate that the Trader should not necessarily have to refer to the full event log; in the event where MEPs pass relevant events to the Retailer, this should be sufficient.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
For the most part, Metrix agrees. We would simply suggest that the wording under Schedule 15.2 Clause 17 (4)(f) refers to the "event log OR relevant events passed through by the MEP in accordance with Schedule 10.6 Clause 8 (5A)".	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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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.

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.

Metrix agrees

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

Metrix agrees

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	013
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix disagrees, as we believe there is no problem to solve. This is because current practice in the industry is well understood, simple and cost effective to undertake.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix disagree with the proposed solution, as this proposed method will be economically unviable to Metrix. The smallest increment for Metrix meters is 1kWh, hence this proposed change will require a technician to wait for approximately 30 minutes for 1 kwh to accumulate when applying a 2kw load for a meter with a 1,000 pulse/kwh pulse rate. This 30 additional minutes onsite will significantly increase the cost for all parties involved. And as such we have concerns regarding the cost this would impose on the participants and ultimately the end consumer.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Issues as detailed in the response to Q2	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees with the objectives

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.

Metrix would like to see an alternative proposed Code amendment, which better describes current practice and does not incur unnecessary cost via extended testing requirements.

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.

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.

Metrix disagree, as costs will significantly rise for Metrix.

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

Metrix disagree, as the assessment of costs is incorrect.

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	014
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>Metrix agrees with part (a).</p> <p>Metrix has concerns regarding the various scenarios and impact on the market, of the solution proposed for part (b). The proposal will drive unnecessary recertification costs and associated admin, resulting in unnecessary Trader switching. Retailers who can only reconcile based on HHR will have to switch out customers when the HHR certification is cancelled:</p> <ol style="list-style-type: none"> 1. For a short period to resolve a sumcheck issue, 2. Due to no interrogation occurring due to valid reasons e.g. mains power off for seasonal or vacant properties <p>If a meter has communicated and the back-office process confirmed a successful sum check, then the meter installation is HHR certified and capable of providing HHR certified data. Metrix would propose that once HHR certification is achieved, the installation should remain HHR certified. The following includes proposed exceptions to this:</p> <ul style="list-style-type: none"> - if persistent communications issues arise (i.e. maximum interrogation cycle is breached) without a valid reason like mains power off, and the MEP/ATH cannot or choose not to resolve - if a meter fails sum check and is not resolved within a timely manner, say 5 days <p>When there are communication issues that are endeavouring to be resolved, it would be more pragmatic for the installation to remain HHR certified, but identified as AMI non-communicating.</p> <p>Metrix is also concerned with certification being cancelled if the installation fails sumcheck by more than 1kWh. This can be breached for valid reasons such as precision and slight timing</p>	

differences between the scalar and interval registers. Metrix proposes that sumcheck failures of more than 1kWh, should be investigated within 1 business day and if no valid reason can be found for the difference, the MEP should notify the Trader identifying the impacted data and resolve the issue within 5 days.

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

Metrix does not agree with the proposed Code drafting for Cancellation of certification of metering installations, for the reasons provided in response to Q2.

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

Metrix agrees with the objective, but does not agree the proposed solution is the most pragmatic way to achieve the objective or resolve the problem.

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.

Metrix would like to see an alternative proposed amendment that addresses the concerns raised in response to Q2.

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	Metrix
Proposal Reference	015
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix disagrees with problem 2c.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>We have separated the problems out for convenience.</p> <p>Problem 1) Metrix agrees.</p> <p>Problem 2a) Metrix agrees.</p> <p>Problem 2b) Metrix agrees.</p> <p>Problem 2c) Metrix disagrees, as we believe the current wording is sufficient.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>Metrix believes that the proposed wording does not allow for the current Metrix ATH practice, which is to pre-certify a component in advance, for subsequent use in either the Selected Component of Comparative methods of certification. The proposed wording implies that the only way that a meter can be certified is as part of the Comparative Certification Process. The new wording does not prescribe how this component certification will take place. The certification process described in Clause 10.8 is clear and unambiguous.</p> <p>Therefore, Metrix suggests that in relation to problem 2c, the underlined phrase "<i>as part of the comparative recertification method</i>" should be left out.</p>	

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

Metrix agrees with the objectives of the proposed amendment, but does not entirely agree with the proposed solution.

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.

Metrix would like to see alternative proposed amendment that addresses the concerns raised in response to Q3.

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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.

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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Submitter	Metrix
Proposal Reference	016
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>We have separated the problems out for convenience.</p> <p>Problem 1) Metrix has no comment.</p> <p>Problem 2) Metrix disagrees, as we believe this may be impractical as it is not possible to predict the load on an installation over the next 12 months. This could be due to factors outside of our control or knowledge, such as the use of the building may change without the knowledge of the ATH. Metrix is confident, based on test results, in the accuracy of its CT metering installations over a wide range of loads (from no load to the upper limit for the Category) and Power Factors.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>We have separated the problems out for convenience.</p> <p>Problem 1) Metrix has no comment.</p> <p>Problem 2) Metrix disagrees, as this process will make the certification process for Category 2 unnecessarily complex.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>Metrix is concerned that the proposed draft introduces unnecessary complexity in the Category 2 certification process.</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees with the objectives, however does not agree with the proposed solution associated with problem 2.

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.

Metrix would like to see a simpler alternative associated with problem 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.

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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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	Metrix
Proposal Reference	017
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comments to make, as this will have no impact on Metrix ATH, as it does not apply error compensation factors.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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.

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.

Metrix agrees.

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

Metrix agrees.

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	Metrix
Proposal Reference	018
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>We have separated the problems out for convenience.</p> <p>Problem 1) Metrix disagrees, as this is likely to cause stock management issues, with parts of certified batches remaining in our Warehouse. We suggest that the more appropriate time consideration could be the duration between calibration and certification, which may help to improve accuracy.</p> <p>Problem 2) Metrix agrees. Problem 3) Metrix agrees. Problem 4) Metrix agrees.</p>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>Metrix would like to see the concerns raised in response to Q1 addressed in the proposed solution.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>The proposed Code drafting needs to be amended to accommodate the concerns raised in response to Q1.</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees with the intent of the objectives.

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.

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.

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.

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	Metrix
Proposal Reference	019
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees that the impossible situation of considering burden when certifying a transformer in a lab needs to be remedied.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>Metrix disagrees with the need to add burden resistors when using the comparative method, as we have found that there has been no adverse effect on metering installation accuracy when burdens have been low.</p> <p>Metrix is concerned about adding devices into the secondary circuits of CTs as this can add a potential point of failure (there are intermediate connections created). We are not aware of a specific device designed for this purpose and have concerns about some of the methods currently used, such as long runs of coiled up conductors, and poorly connected Nichrome wire in the CT chamber or at the test block.</p> <p>We are concerned about whether there will be a standard specified for burden resistors. This is because if the intention is that burden resistors are classified as a metering component, they will therefore require separate laboratory certification, as all metering components need to be calibrated and certified in a laboratory.</p> <p>Metrix would not be comfortable utilising any of the solutions for fitting burden resistors that we have seen so far as in our view, a fit for purpose component would need to be specified, manufactured, tested and installed.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix would like to see the concerns raised in response to Q2, addressed within the proposed code drafting.	

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

Metrix agrees with the intent of the objectives.

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.

Metrix would like to see alternatives that address the concerns raised in response to Q2.

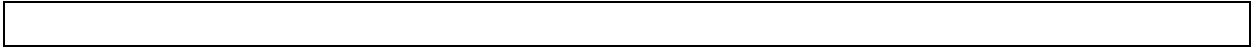
D.2 Please complete the table below if you wish to submit on the technical and non-controversial Code proposals in Appendix B.

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

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.



Appendix D Format for submissions

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

Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	021
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees and we are curious to know how the Authority expects consumers and other non-participants will react to statistically recertified installations which have expired stickers attached to them?	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comments.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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.

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.

Metrix agrees.

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

Metrix agrees.

Appendix D Format for submissions

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

Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	022
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees with the problem definition. Metrix utilise a Statistical Sample inspection process, hence this change will have no impact on Metrix.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees these Code Amendments provide clarity to the process.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comments.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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.

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.

Metrix agrees.

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

Metrix agrees.

Appendix D Format for submissions

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

Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	023
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comments.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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.

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.

Metrix agrees.

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

Metrix agrees.

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	Metrix
Proposal Reference	025
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<p>Metrix generally agrees with the problem definition, however has some concerns:</p> <ul style="list-style-type: none"> - There are valid reasons for a meter to not be required to communicate with the back-office systems e.g. mains power off. This does not mean that the meter is no longer AMI. An HHR meter installation should be able to be manually read without impacting the certification of the meter. 	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No.</p> <p>Metrix has many meters with a maximum interrogation cycle of 40 days. As 25% = 10 days, this is too short a time period to resolve and would drive unnecessary costs in areas with intermittent communications, especially given that at 25% of MIC, there is no risk of loss of data. We would propose the earlier of 75% of MIC or 30 days. Otherwise, an MEP will be more motivated to set AMI = N rather than remedy for the benefit of the consumer. Where Traders do not support AMI=N, then consumers would be switched out when their meter can be fixed and the switch is not necessary. This will reduce competition.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<p>Metrix agrees with most of the proposed Code drafting, but would like to see Schedule 10.6 clause 8 (11) updated to the timing provided in Metrix's response to Q2.</p>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees.

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.

Metrix would like to see an alternative proposal that provides a more pragmatic approach and considers the impact on Retailers of unnecessary changes to AMI Flags and/or impractical resolution timeframes, especially in areas with known intermittent communications.

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.

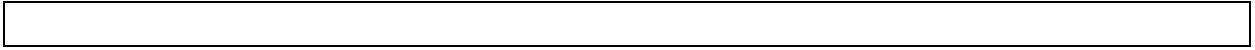
D.3 Please complete the table below if you wish to submit on the CBA for the proposals that require a regulatory statement.

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

Metrix does not feel that the cost of resolving communications issues has been appropriately reflected, especially given the short resolution timeframes when assessed based on 25% of MIC.

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

No. Metrix believes this will drive unnecessary additional cost in the market associated with unnecessary field visits and retailer switching.



Appendix D Format for submissions

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

Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	026
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix agrees.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Metrix has no comment to make.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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.

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.

Metrix agrees.

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

Metrix agrees.

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	Metrix
Proposal Reference	027
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>Metrix agrees with the proposed solution, as it is amending the Code to allow for current practice and enforces the requirement to notify the MEP.</p> <p>For the most part, Metrix agrees with the proposed solution. However, Metrix would like to reiterate that interferences with an MEP's installation is only to be performed by suitably qualified personnel who will not cause damage to the installations or their accuracy. And that the Trader/Distributor continues to be required to notify the MEP of any interference, otherwise this will cause issues with MEP processes, such as tamper event management, post installation audit, CAT1 inspections etc.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
No, providing the concerns raised in response to Q2 is covered in the proposed code amendments.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Metrix agrees.

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.

Metrix agrees.

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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.

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.

Metrix agrees.

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

Metrix agrees.

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

Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	028
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Metrix agrees.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Metrix has concerns with the feasibility of resolving bridged meters within 5 days, as historically there has been a high percentage of consumer related access issues.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Yes, Metrix believe it is hard to define what is meant by “a period of time that will cause significant disadvantage to them” and would be interested to see any associated guidelines from the EA.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Metrix agrees.	

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.

Metrix agrees.

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.

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.

Metrix agrees.

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

Metrix agrees.

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Operational Review of Metering and Related Registry Processes	
Submitter	Metrix
Proposal Reference	032
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
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.

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.

Metrix agrees with the changes

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	Metrix
Proposal Reference	033
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
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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Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.

Metrix agrees with the changes

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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	Metrix
Proposal Reference	034
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
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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Question 6: Do you have any comments on any of the technical/non-controversial changes? If so, please note which change and your comments.

For the most part, Metrix agrees with the proposed solution, however the requirement to breach will be an increase in administration and will increase costs to the market. Metrix would suggest an alternative to an "admin war" and not breaching one another. Clarification of responsibilities of participants to the code would be beneficial to the industry along with examples of common scenarios and expected resolutions. It may be more beneficial for MEP's/Trader's to be able to provide proof of communications with the other party, highlighting where the breach sits, without actually having to administer the EA breach process. For example, as an MEP we may notify a Trader of the sites where there have been multiple consumer turndowns upon attempting to recertify a metering installation, advising that the responsibility lies with them to arrange access with the consumer. Similarly, a Trader may notify an MEP of uncertified sites where there has been no attempt to recertify, despite the Trader arranging access. This would be much less overhead than administering the EA breach process and could be made available during EA audits or upon request from the EA.

We are curious as to what the education of responsibilities under the Code will include and would be interested to find out more information from the EA.

Metrix understands that currently the responsibilities around gaining access to metering installations rests with the retailer whereas pre-emptively monitoring and recertifying expiring installations lies with the MEP.

Metrix hopes that the EA is aware that there are certain circumstances where neither the MEP or the retailer has sufficient leverage to force the consumer to make changes to their metering installation/wiring to recertify and/or replace. We are curious to know what steps the EA would propose to resolve these types of scenarios.

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.