

Northpower Submission: Operational Review of Metering and Related Registry Processes

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

Operational Review of Metering and Related Registry Processes	
Submitter	Northpower Limited

Proposal Reference	022 – Inspection Periods
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<i>Northpower wasn't aware of any problem with the method of selecting the sample for the Category 1 meter inspections or the period in which the inspections had to be completed.</i>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p><i>Northpower is concerned about the wording of the proposed Code amendment 45(1)(b)(i) regarding the population from which the sample is selected. This amendment appears to indicate that all category 1 meters, no matter what expiry date, comprise the population from which the inspection sample should be taken.</i></p> <p><i>If this is the case then it is likely that meters that have only recently been installed and certified will be included in the inspection sample. In addition the Code amendment makes no provision for removal of meters that were inspected by virtue of being in earlier year's samples from the population from which the current sample is being taken.</i></p> <p><i>If a MEP had 100,000 category 1 meters of which 80,000 had been installed and certified within the last 7 years then, using the entire population of 100,000 meters, the sample would statistically have a larger quantity of recently certified meters as opposed to those that had been certified for a period greater than 84 months.</i></p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<i>Refer to our comment in Question 2 above regarding the population from which the sample of category 1 meters is to be taken.</i>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	

Although we agree with the objectives of the proposed amendment to clarify that all inspections should be completed within a calendar year we believe the Code amendment section regarding the population from which the sample is taken is badly worded and misleading.

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.

Proposal Reference	027 – Meter Resealing by Traders and Distributors
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Question 1: Do you agree with the Authority's problem definition? If not, why not?

Northpower agrees with the Authority's problem definition covering the circumstances that give rise to the seals in a metering installation, or a component at a metering installation, being broken.

Question 2: Do you agree with the Authority's proposed solution? If not, why not?

Northpower agrees with the Authority's proposed solution and the proposed Code changes covering the permitting of breaking seals at a metering installation and the process to be followed in reinstating the seals.

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

Northpower supports the Code amendments as proposed by the Authority.

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

Northpower agrees that the proposed Code amendment meets the Authority's 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.

Northpower agrees that the proposed Code amendment is the preferred method to meet the Authority's objectives.

Proposal Reference	028 – Meter Bridging
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
<i>Northpower agrees with the Authority's problem definition covering the circumstances that generally give rise to a meter being bridged at an ICP.</i>	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<i>Northpower agrees with the Authority's proposed solution and the proposed Code changes covering the process for both bridging meters at an ICP and managing the resolution of the metering. We believe the time frames proposed in the Code are adequate for all parties to manage this process.</i>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
<i>We believe the Code amendment should include an additional obligation for the trader to notify the affected participants (Distributor and MEP) within 5 business days of the ICP metering being reinstated that this has occurred. This additional obligation would allow the affected participants to "close off" any process they have in place for managing bridged metering.</i>	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
<i>Northpower agrees that the proposed Code amendment meets the Authority's objectives.</i>	
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.	
<i>Northpower agrees that the proposed Code amendment is the preferred method to meet the Authority's objectives.</i>	

D.4 Please complete the table below if you wish to submit on the issues that we propose to resolve without a Code amendment.

Question 6: Do you require further clarification of any of the issues presented here? If so, please note which issues below and your questions.

034 – Certification of Metering Installations and Trading

We would disagree with the Authority that a Code amendment is not required to prohibit traders from trading at ICPs with uncertified metering installations in favour of pursuing MEPs and traders for alleged Code breaches in this area.

There are cases where the customer either refuses to engage with the MEP and trader or refuses to make suitable arrangements for the meter installation certification to be completed. The Code effectively leaves the MEP and trader with no options to force a customer to allow the metering installation to be certified. We believe that all MEPs and traders are well aware of their responsibilities under the Code relating to metering installation certification and related obligations to report alleged breaches under these sections of the Code. However, there is little point in reporting an alleged breach when the responsibility for causing the breach falls on a customer who refuses to engage with either of the participants.

The Authority needs to amend the Code to allow a customer who is responsible for the MEP and trader being in breach of the Code regarding certification of their metering installation to be disconnected after a specific process and time frame has been followed. This may also mean that the Authority has to stand behind the participants in relation to the customer's reaction to this sanction.