

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	Nova Energy
Proposal Reference	Appendix A Reference 003- Recovering Certification Costs
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Nothing to add	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
<p>No</p> <p>The gaining MEP should pay prorated certification/calibration costs at any time. The losing MEP has lost monetarily at any time its components are removed by another MEP before its Certification/Calibration expires.</p> <p>Nova MEP recommends that this remains unchanged.</p>	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
As above	
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.

Refer Answer to Question 2

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.

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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	Nova Energy
Proposal Reference	Appendix A 010 The Authority proposes to amend the Code to allow an ATH to use a default value for a working standard's uncertainty, when calculating the uncertainty of measurement associated with calibrating a metering component.
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Yes, however this problem is a result of ATH's trying to cut corners and not meet the minimum level of uncertainty measurement.	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
No, Nova ATH fundamentally disagrees with this proposal. It is the opinion of this ATH who has done the required calculations and separate templates per working standard to reflect the individual uncertainty of each working standard that other ATH's also do so. This request and proposal is simply an effort to short cut the minimum standards as required to calculate uncertainty.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
Yes, the wording should stay unchanged.	

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

No, it is surprising that the Chief Metrologist is not objecting to this proposal.

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.

