

000 - Operational Review of Metering and Registry Processes

Submission Reference no: 11

██████████ Transpower NZ Ltd (██████████)
New Zealand

██████████
Submitter Type: MEP
Source: Web Form
Overall Position:

Question

Question 1: Do you agree the costs and benefits identified are appropriately categorised? If you disagree, please provide reasons.

Position

No

Notes

The following costs have not been recognised: for Proposal 002, costs of reconfiguring three phase meters; inaccurate market settlement; economic cost of replacing non-compliant meters. For 020, transaction costs of administrative processes (breach, exemption processes) if grid owner cannot comply with re-certification timeline.

Question

Question 1: If you disagree, please provide reasons.

Notes

The following costs have not been recognised: for Proposal 002, costs of reconfiguring three phase meters; inaccurate market settlement; economic cost of replacing non-compliant meters. For 020, transaction costs of administrative processes (breach, exemption processes) if grid owner cannot comply with re-certification timeline.

Question

Question 2: Do you agree the benefits of the proposals in aggregate outweigh their costs?

Position

No

Notes

We consider the aggregate, qualitative approach is not suitable to support a Code amendment for each proposal. Applying an aggregate approach across many proposals masks important detail of each proposal. We note no quantitative assessment has been made so the Authority's code amendment principle 3 cannot be complied with. Describing the costs and benefits for each proposal (even just qualitatively) would provide better opportunity to assess that a proposal's benefits outweigh its costs.

Question

Question 2: If you disagree, please provide reasons.

Notes

We consider the aggregate, qualitative approach is not suitable to support a Code amendment for each proposal. Applying an aggregate approach across many proposals masks important detail of each proposal. We note no quantitative assessment has been made so the Authority's code amendment principle 3 cannot be complied with. Describing the costs and benefits for each proposal (even just qualitatively) would provide better opportunity to assess that a proposal's benefits outweigh its costs.

001 - Electrical Connection and Disconnection of Points of Connection

Submission Reference no: 6

Transpower NZ Ltd
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?

Notes

We consider problem 2 has already been rectified by the recent code amendments under gazette notice "Notice of the Electricity Industry Participation Code Amendment (Code Review Programme) 2018" dated 24 September 2018. Specifically: Item 4(m) clarifying when a reconciliation participant may connect or electrically connect certain points of connection.

Question

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

Notes

Problem 2: We consider the gazetted Code change has already addressed the problem described

Question

Question 2: Why not?

Notes

Question

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

Notes

Clause 10.33 as amended by the gazette notices, solved the problem and no further change is necessary. We consider the new requirement is 10.29B (2) duplicates existing policy (clause 15.9) for grid owner responsibility for submission information at the NSP. New clause 10.29C is unsubstantiated as the problem definition does not mention any issue with grid NSPs that needs to be addressed

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Notes

Problem 2: Yes, for recently gazetted previous amendment. In our view proposed new clauses 10.29B (2) and 10.29C should not be incorporated into the Code.

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

Problem 2: No. No amendment is necessary as the issue has been addressed

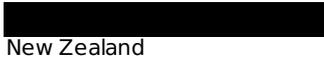
Question

Question 5: Why not?

Notes

002 - Prohibition of net metering

Submission Reference no: 6

 Transpower NZ Ltd (
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

Yes

Notes

We understand the situation outlined in the paper, and support the objectives

Question

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

Position

No

Notes

we are concerned that simply prohibiting net metering 'inside' a three-phase meter will: - require our three phase grid meters to be reconfigured such that import and export from the grid can no longer be measured accurately; and - create similar, if individually less material, inaccuracies at ICP level. Our analysis of the proposal raises the following issues, at both grid and ICP level, from which we conclude the policy needs broader discussion: • most importantly, poor power factors can create significant inaccuracies in quantifying real kWh, so the proposal is contrary to requirements for measurement accuracy in Part 10; • an existing 3-phase meter that cannot be configured to each phase would become redundant. The economic cost of replacing such non-compliant meters need to be considered; • where existing 3-phase meters (for example our High Voltage delta meter installations) can be reconfigured to comply, the reconfiguration cost will be passed on to consumers; and • at ICP level, the proposal creates inequities between solar consumers on single phase and those on three phase meters.

Question

Question 2: Why not?

Notes

Our analysis of the proposal raises the following issues, at both grid and ICP level, from which we conclude the policy needs broader discussion: • most importantly, poor power factors can create significant inaccuracies in quantifying real kWh, so the proposal is contrary to requirements for measurement accuracy in Part 10; • an existing 3-phase meter that cannot be configured to each phase would become redundant. The economic cost of replacing such non-compliant meters need to be considered; • where existing 3-phase meters (for example our High Voltage delta meter installations) can be reconfigured to comply, the reconfiguration cost will be passed on to consumers; and • at ICP level, the proposal creates inequities between solar consumers on single phase and those on three phase meters.

Question

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

Notes

N/a

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Position

No

Notes

Our analysis of the proposal raises the following issues, at both grid and ICP level, from which we conclude the policy needs broader discussion: • most importantly, poor power factors can create significant inaccuracies in quantifying real kWh, so the proposal is contrary to requirements for measurement accuracy in Part 10; • an existing 3-phase meter that cannot be configured to each phase would become redundant. The economic cost of replacing such non-compliant meters need to be considered; • where existing 3-phase meters (for example our High Voltage delta meter installations) can be reconfigured to comply, the reconfiguration cost will be passed on to consumers; and • at ICP level, the proposal creates inequities between

solar consumers on single phase and those on three phase meters. Our main concern is that mandating no net metering 'inside' a three-phase meter will remove the accuracy benefits that a three-phase meter, operating as intended, brings to market settlement. At the very least we consider the proposed Code amendment should not apply to three phase grid meters.

Question

Question 4: Why not?

Notes

Our main concern is that mandating no net metering 'inside' a three-phase meter will remove the accuracy benefits that a three-phase meter, operating as intended, brings to market settlement. At the very least we consider the proposed Code amendment should not apply to three phase grid meters

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.

Position

No

Notes

To address the growing need for import and export at ICP level to be accurately metered we also suggest there may be better solutions than banning net metering within the metrology function of three phase meters. We consider a sensible next step would be an issue-specific consultation, including with technical metering experts and the distributed energy industry,

Question

Question 5: Why not?

Notes

To address the growing need for import and export at ICP level to be accurately metered we also suggest there may be better solutions than banning net metering within the metrology function of three phase meters. We consider a sensible next step would be an issue-specific consultation, including with technical metering experts and the distributed energy industry. Accordingly, we do not support Proposal 002 at this stage.

008 - Prevailing Load Checks

Submission Reference no: 5

[REDACTED] Transpower NZ Ltd ([REDACTED])
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?

Notes

No comment

Question

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

Notes

No comment

Question

Question 2: Why not?

Notes

Question

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

Notes

Yes, we consider the drafting omits the component certification check or an installation component configuration check for a measuring transformer change or a ratio change.

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Notes

No comment

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

No comment

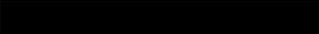
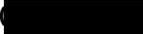
Question

Question 5: Why not?

Notes

009 - ISO 9001 sync with class B ATH application period

Submission Reference no: 3

 Transpower NZ Ltd 
New Zealand


Submitter Type: MEP
Source: Web Form
Overall Position: Support

Question

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

Notes

No comment

Question

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

Notes

No comment

Question

Question 2: Why not?

Notes

Question

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

Notes

Yes, we note that there are references to AS/NZS ISO 9001:2008. As the standard is no longer applicable the reference is redundant and should be removed.

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Notes

No comment

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

No comment

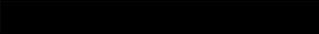
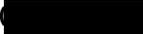
Question

Question 5: Why not?

Notes

011 - Raw meter data and compensation factors

Submission Reference no: 4

 Transpower NZ Ltd 
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?

Notes

No comment

Question

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

Position

No

Notes

In our view, the compensation factor should be applied in the meter. Where this is not possible the compensation factor should be applied at the first download. This approach would create consistency as all data will be scaled primary values either in the meter or as soon as it has left the meter.

Question

Question 2: Why not?

Notes

In our view, the compensation factor should be applied in the meter. Where this is not possible the compensation factor should be applied at the first download. This approach would create consistency as all data will be scaled primary values either in the meter or as soon as it has left the meter.

Question

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

Notes

No comment

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Notes

No comment

Question

Question 4: 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.

Position

No

Notes

Question

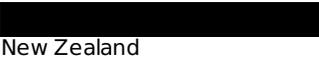
Question 5: Why not?

Notes

We consider a better option is to make it compulsory to apply compensation factors in the meter or where this is not possible, at the first download. A customer or an ATH certifying an installation then has meaningful information displayed at the meter. The certification process should be more efficient and there is less likelihood of errors as the technician can verify the primary values in the meter while on site. Very few modern Current Transformer (CT) meters would not have the capability to record in scaled primary values.

013 - Raw meter data output test

Submission Reference no: 4

 Transpower NZ Ltd (
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?

Notes

No comment

Question

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

Notes

No comment

Question

Question 2: Why not?

Notes

Question

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

Notes

We assume the ammeter with accuracy +/- 5%, under 9 (1) (c) (ib), is used to calculate load that will be used to compare against the raw meter data from the meter. We raise whether the larger accuracy range for the ammeter measurement is consistent with the accuracy requirements under Schedule 10.1 Table 1.

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Notes

No comment

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

No comment

Question

Question 5: Why not?

Notes

014 - HHR certification and interrogation cycles

Submission Reference no: 2

██████████ Transpower NZ Ltd (██████████)
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?

Notes

No comment

Question

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

Position

No

Notes

Question

Question 2: Why not?

Notes

Re Clause 20 (1) new insertion (j)(ii). If the Code drafting in reference number 011 is adopted, then there will be a difference in the one kWh accuracy requirement between a meter that has a correction factor applied in the meter and one where the correction factor is applied by the Trader. The proposal does not explain how the one kWh threshold was determined, the likely impact on the number of installations that may fail the threshold, and the impact on accurate settlement of the market.

Question

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

Notes

Yes. For clause 20, does the metering installation cancelation process only applies to ICPs that are on the registry? The requirement to update the registry clause 20 (2) implies that this may be the case, but we seek clarity. Clause 20 (1) new insertion (j)(i). We consider the maximum interrogations cycle should be referenced.

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Position

No

Notes

Question

Question 4: Why not?

Notes

For above reasons

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.

Position

No

Notes

Question

Question 5: Why not?

Notes

No. We consider an assessment of data quality should be made when there is a difference between the interval and register readings, but certification should only be cancelled if the data used for settlement is inaccurate, defective or not fit for purpose. Readings may not match for valid and explainable reasons which should be sought before incurring costs to recertify an installation that may be functioning correctly

018 - Certification validity periods

Submission Reference no: 4

 Transpower NZ Ltd (
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

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

Yes. While making changes to Table 1 of Schedule 10.1, should also clarify that "maximum metering installation certification validity period" also applies as the "maximum certification validity period" for a meter. Propose either: • amend table 10.1 to convey that the validity periods apply to both the installation and the meter; or • amend Schedule 10.8 clause 1(2) to refer to an installation category, not meter class.

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.

Position

Yes

Notes

Question

Question 5: Why not?

Notes

020 - Alternative certification for POC to the grid

Submission Reference no: 2

██████████ Transpower NZ Ltd (██████████)
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

We consider the problem is an erroneous assumption that all metering installations should have registry records. We agree with an objective for NSP meters to be certified with an appropriate level of accuracy. However, we disagree with the asserted policy intent for clause 32 Schedule 10.7 that alternate certification should only apply to ICPs. We understand the policy behind clause 32 was to limit the alternate certification process only to situations where a measurement transformer could not be certified and to make it a once only option. We do not believe there was any policy discussion on limiting clause 32 to ICPs. (Refer Part D review consultation, 23 Sept 2009). In the initial version of Part 10 there was a Code of Practice 10.5 - Variation of requirements. This and the even earlier COP D5 were the predecessors to clause 32. In both Code of Practices, the variation could be applied to any type of metering installation, i.e. no distinction between ICPs and NSPs. As part of a major overhaul of Part 10/D, COP 10.5 was replaced by clause 32. The accuracy of an NSP metering installation is addressed in Part 10 32 (1)(b).

Question

Question 1: Why not?

Notes

We consider the problem is an erroneous assumption that all metering installations should have registry records. We agree with an objective for NSP meters to be certified with an appropriate level of accuracy. However, we disagree with the asserted policy intent for clause 32 Schedule 10.7 that alternate certification should only apply to ICPs. We understand the policy behind clause 32 was to limit the alternate certification process only to situations where a measurement transformer could not be certified and to make it a once only option. We do not believe there was any policy discussion on limiting clause 32 to ICPs. (Refer Part D review consultation, 23 Sept 2009). In the initial version of Part 10 there was a Code of Practice 10.5 - Variation of requirements. This and the even earlier COP D5 were the predecessors to clause 32. In both Code of Practices, the variation could be applied to any type of metering installation, i.e. no distinction between ICPs and NSPs. As part of a major overhaul of Part 10/D, COP 10.5 was replaced by clause 32. The accuracy of an NSP metering installation is addressed in Part 10 32 (1)(b).

Question

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

Position

No

Notes

Having access to the alternate certification process is the most efficient way for the grid owner to maintain certification compliance. Gaining access to measurement transformers at a grid installation can be more challenging than for an ICP. Grid outages require a great deal of planning to manage Health and Safety, system security and the disruption to our consumers. Even an outage planned well in advance can be cancelled if issues arise. When such situations arise, we can use alternate certification process to maintain compliance until the outage can be rescheduled. We consider the incremental time to recertify does not compromise measurement accuracy in the interim. In situations where we cannot arrange an outage and alternate certification is not available, then the grid owner faces the prospect of not meeting its code obligations. Being unable to comply results in self-breach processes or exemption requests, and both routes create transaction costs. In our view, retaining the original intent for alternate certification for grid metering installations remains the most efficient option.

Question

Question 2: Why not?

Notes

Having access to the alternate certification process is the most efficient way for the grid owner to maintain certification

compliance. Gaining access to measurement transformers at a grid installation can be more challenging than for an ICP. Grid outages require a great deal of planning to manage Health and Safety, system security and the disruption to our consumers. Even an outage planned well in advance can be cancelled if issues arise. When such situations arise, we can use alternate certification process to maintain compliance until the outage can be rescheduled. We consider the incremental time to recertify does not compromise measurement accuracy in the interim. In situations where we cannot arrange an outage and alternate certification is not available, then the grid owner faces the prospect of not meeting its code obligations. Being unable to comply results in self-breach processes or exemption requests, and both routes create transaction costs. In our view, retaining the original intent for alternate certification for grid metering installations remains the most efficient option.

Question

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

Notes

Yes. We consider a better solution is to amend clause 32 (1) to the following: (c)applies; and (d) in the case of an ICP that is not an NSP the metering equipment provider has updated the metering installation's certification in the registry

Question

Question 4: Do you agree with the objectives of the proposed amendment?

Position

No

Notes

No. We believe a better solution is to change 32 (1) to the following: (c)applies; and (d) in the case of an ICP that is not an NSP the metering equipment provider has updated the metering installation's certification in the registry.

Question

Question 4: Why not?

Notes

No. We believe a better solution is to change 32 (1) to the following: (c)applies; and (d) in the case of an ICP that is not an NSP the metering equipment provider has updated the metering installation's certification in the registry.

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.

Position

No

Notes

No. We believe a better solution is to change 32 (1) to the following: (c)applies; and (d) in the case of an ICP that is not an NSP the metering equipment provider has updated the metering installation's certification in the registry.

Question

Question 5: Why not?

Notes

No. We believe a better solution is to change 32 (1) to the following: (c)applies; and (d) in the case of an ICP that is not an NSP the metering equipment provider has updated the metering installation's certification in the registry.