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Submission on the Operational Review of Metering and Related Registry Processes

Introduction

1. This is Vector Limited's (Vector) submission on the Electricity Authority's (the Authority) consultation paper on the *Operational Review of Metering and Related Registry Processes*, dated 4 September 2018.
2. We set out below our comments on the Authority's proposals that are particularly relevant, or of interest, to Vector's advanced metering business.
3. No part of this submission is confidential. Vector's contact person for this submission is:

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Comments on selected proposals

Reference number 003 – Recovering certification costs

4. Vector believes the buffer of 3 days does not allow sufficient time for a metering equipment provider (MEP) to manage any exceptions. We consider a buffer of 10 business days to be reasonable and more practical while still providing certainty to the losing MEP.

Reference number 014 – HHR certification and interrogation cycles

5. Vector has some issues with the proposed code amendments.
6. The Authority's proposal assumes that the meter is powered at all times when, in reality, this is not always the case. An example where a meter is not read within the max interrogation cycle would be a holiday home that is powered off for most of the year. No power is consumed and the half hourly data is stored in flash memory in the battery until power is restored. As soon as power is restored, the meter will communicate, an interrogation will occur, and the data will be validated. This meter is and remains HHR, but this proposal will force the MEP to change it to NHH, forcing the retailer to send a meter reader to what could be a remote location at considerable cost for no material benefit. In our experience as an MEP, it is often the case that the retailer requests the meter to remain HHR.
7. This proposal also contradicts with the proposal under Reference number 025 in the consultation paper. That proposal recommends that an MEP must restore any communications failure within a maximum timeframe, potentially shorter than the max interrogation cycle, or set the AMI flag to 'N'. Once the AMI flag is set to 'N', the site becomes

NHH, so cancellation of HHR metering certification for that installation cannot technically happen.

8. Proposal b) ii) B) provides for the automatic cancellation of the HHR metering installation's certification if the comparison check is greater than 1KW hour. It does not indicate whether the site can be changed to NHH or whether a full recertification is required. Given the new ATH powers under clause 8A of Schedule 10.7, we expect that a change to NHH is allowed. We seek clarification from the Authority on this matter.
9. In our view, the proposed changes under Reference number 014 will not achieve the intended outcome. For some retailers, it is important to know the metering services that are available at an ICP, particularly whether an ICP is communicating and therefore potentially HHR. The registry will never display this information accurately enough, even with the timeframes being proposed. Metering installations can stop communicating for any number of reasons, and internal investigations take a certain amount of time. Imposing shortened timeframes will add additional overhead cost to MEPs without the desired improvements.

Reference number 015 – Comparative recertification

10. In reference to proposed clause 2(A), we seek confirmation from the Authority whether this means that the comparative recertification process can be used for all Cat 2 sites including those with expired CTs and yet to expire CTs.

Reference number 025 – MEP updates of HHR/NHH and AMI flags

11. Vector agrees with the proposed changes to amend clause 10 of Schedule 10.4 to require the ATH to specify all service interface options and associated conditions where they can be used. This will remove the need for ATHs to update their certification documents whenever an MEP updates the AMI flag in the registry.
12. We do not agree with the timeframes proposed for correcting a non-communicating meter. A 30-day max interrogation cycle only gives the MEP 8 days (25%) to identify, inspect, and fix the issue, or set the AMI flag to 'N'. This is impractical, given most retailers generally give 10 days' notice to customers before a technician attends the site. This will create unnecessary additional effort on the part of MEPs, who will have to monitor the AMI status and keep it up to date within the proposed constraints. We consider the status quo to be a better option in this case, with MEPs using 'best endeavours' to ensure they keep the information as accurate as possible.

Concluding comment

13. We are happy to discuss with the Authority any aspects of this submission.

Yours sincerely
For and on behalf of Vector Limited

A handwritten signature in blue ink, appearing to read "Richard Sharp".

Richard Sharp
Head of Regulatory and Pricing