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	Steve Woods, Veritek Limited
Proposal Reference	003 – Recovering Certification Costs
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Yes	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
No The solution does not consider ownership and therefore future revenue from components left in place. The solution does not address the issue of "financial penalty". In point (a), if the losing MEP is also a component owner they will get ongoing revenue through lease fees for remaining components and should not be reimbursed for expenses associated with these components. They should, however be reimbursed for expenses associated with certifying the rest of the installation and the removed components. In summary, reimbursement should be for removed components and the installation, not for remaining components. The proposed solution in point (b) does not match the problem definition. The problem definition is that *"…the outgoing MEP ("losing MEP") is unable to recover these costs from the retailer, even if the costs may have only recently been incurred. This places a financial penalty on the losing MEP."* If a losing MEP certifies a metering installation and a gaining MEP removes all of the components within the certification period (which is the most common scenario), the losing MEP has a financial penalty but cannot recover any of their costs.	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	

The Code drafting matches the proposed solution, but the proposed solution does not address or resolve the defined problem of financial penalty for losing MEPs.

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

The objective of clarifying when a gaining MEP must pay for certain costs is met but the objective of clarification is different to the problem definition which is financial penalty for the losing MEP.

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.

No

The proposed amendment mandates financial penalties for losing MEPs rather than addressing financial penalties.

The current wording in the Code addresses financial penalties and should be retained.

The existing clauses are shown below. They are clear and unambiguous, and they address financial penalties.

(2) The **gaining metering equipment provider** must, within 20 **business days** of assuming responsibility for a **metering installation**, pay the **losing metering equipment provider** the proportion of the costs described in subclause (3).

(3) The costs payable under subclause (2) are those directly and solely attributable to the **certification** tests and **calibration** tests of the **metering installation** or any of its **metering components** from the period beginning on the date the **gaining metering equipment provider** assumes responsibility for the **metering installation**, for the remainder of the **certification** validity period for the **metering installation** or the **metering component**.

Operational Review of Metering and Related Registry Processes	
Submitter	Steve Woods, Veritek Limited
Proposal Reference	010 – Selected Component Recertification

Question 1: Do you agree with the Authority's problem definition? If not, why not?

No

The proposal reference refers to “selected component recertification” but the clause referred to is relevant to both selected component and fully calibrated certification types.

The quantity of working standards used for on-site calibration is quite small. The problem definition seems to imply there are a large number.

The uncertainty of measurement needs to be calculated to ensure it is within the threshold so using the maximum allowable uncertainty would not save any time or cost.

It is inappropriate to use the maximum allowable uncertainty rather than the calculated uncertainty.

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

No

As mentioned above, there is not a problem, therefore a solution is not required.

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

As mentioned above, there is not a problem, therefore the Code does not need to be changed.

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

The objective of reducing cost will not be met because uncertainty will still have to be calculated. Using the maximum uncertainty allowed will not reduce calibration errors, in fact knowledge of the actual error will be less clear.

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.
No The best option is to leave the Code as it's written because the problem definition is not correct.

Operational Review of Metering and Related Registry Processes	
Submitter	Steve Woods, Veritek Limited
Proposal Reference	013 – Raw Meter Data Output Tests

Question 1: Do you agree with the Authority's problem definition? If not, why not?

Partially

The current wording in the Code seems clear and is applied in a consistent manner.

I agree that setting a minimum load will assist the industry.

The requirement to test Ferraris disc meters at two loads could be explained further. If there is a mechanical issue with the meter it will be evident at one test point.

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

Partially

Point (a) needs to specify a different figure for CT metered installations, where the percentage will relate to the primary CT rating not the meter rating.

I agree with point (b)

Point (c) also relates to Ferraris disc meters and often the “smallest digit” is graduated and not numbered. The proposal could require this to “rotate” rather than increase by 1

There doesn’t seem to be sufficient information to support point (d)

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

The comments in Question 2 are relevant to this question.

Clause 9(1)(c)(ia) still refers to a “measured increase in load”. It would be clearer to say *“ensure the load is greater than 5% of the meter’s maximum rated current for Category 1 metering installations or greater than 5% of the rated primary current of the current transformers for metering categories greater than Category 1.”*

This will allow the ATH to use the prevailing load if it’s greater than 5%

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

No

The proposal won't reduce complexity or cost, they will remain the same.

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.

No

The answers in question 2 outline my proposal.

Operational Review of Metering and Related Registry Processes	
Submitter	Steve Woods, Veritek Limited
Proposal Reference	014 – HHR Certification and Interrogation Cycles
Question 1: Do you agree with the Authority's problem definition? If not, why not?	
Yes	
Question 2: Do you agree with the Authority's proposed solution? If not, why not?	
Yes	
Question 3: Do you have any comments on the Authority's proposed Code drafting?	
It is not clear whether installation certification is cancelled if the following scenario occurs: Installation is originally certified as AMI and HHR. Registry is changed to AMI = N and HHR = N. It would help with clarity to specify responsibilities if this scenario occurs.	
Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?	
Yes	
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.	
Yes	

Operational Review of Metering and Related Registry Processes	
Submitter	Steve Woods, Veritek Limited
Proposal Reference	016 – Error Calculations at Certification

Question 1: Do you agree with the Authority's problem definition? If not, why not?

No

I don't believe problem 1 exists. This seems to be targeted at comparative certification, which is inherently simple.

Problem 2 is not relevant for clause 12 (comparative). Comparative certification allows testing to occur using one test point (normally the prevailing load) and without additional test points the load profile and power factor information have little value.

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

No

This will add considerable additional steps for comparative certification processes and will increase costs.

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

I recommend consideration of load profile and power factor be removed from comparative certification requirements.

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

No

The objective states the accuracy of metering installations will be improved. This is only correct if metering installations are currently inaccurate. There is no evidence this is the case.

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.

No

I recommend the comparative certification process be simplified by removing the requirement to consider load profile and power factor fluctuations.