

## Code review programme #5

User: Corrie Stobie

Submitted: 10/10/2023 10:26:24 AM

Reference: d03c04bf-bf95-43c5-9de6-b09601615274

Summary of information submitted

### Who are you submitting as...

Industry participant

Which industry participant

Intellihub Ltd and Energy Data Limited

### Code amendment proposal items

#### Would you like to submit on any items

Yes

#### Please select which item you'd like to submit on

Item 1 - Definitions of business day and national holiday

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes.

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No.

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No.

Item 3 - Statistical recertification validity period for electronic meters

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes.

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

Yes - One could argue that 7 years for class 1 meters (tolerance of  $\pm 2.0\%$ ) as this is the accuracy for general purpose meters metering and For Category 1 Schedule 10.1 Table 1 - maximum permitted error of  $\pm 2.5\%$ .

This also covers using a meter of class 1. so therefore, why even reference the class?

Should it just pertain to meters suitable for Category 1 metering?

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No

#### Item 8 - When assumption of rights and obligations (schedule 1.1) take effect

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes.

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No.

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No.

#### Item 9 - Prohibiting ICPs being connected in series

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes.

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes - Use of the word "series" is confusing as it could also imply double metering (whether double metering is intended or not).

More appropriate would be "jointly fused" or "connected by a single protection device" or something similar.

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No

#### Item 10 - Definition of 'reconciliation participant'

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes.

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No.

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No.

#### Item 11 - Removal of references to 'embedded network operator'

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes.

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No.

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No.

## Item 12 - Retention of metering records

*Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.*

Yes. Comments:

Problem 1 – Agree

Problem 2 – Agree, Refer to Q5

Problem 3 – Agree

*Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.*

Yes.

*Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.*

Yes.

*Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.*

Yes.

*Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.*

Yes. The proposal for problem 2 includes "an MEP may stop keeping metering records only if at least 48 months have passed since the metering installation was recertified". This could be interpreted to read an MEP can delete all records relating to metering installation 48 months after recertification, whereas should this target all outdated records (i.e., we still must retain the latest information, and anything not superseded by the recertification)

Recommendation to align CRP5-012 with CRP5-013.

CRP5-012. Reference to the metering records in sched 10.6 4(5) rather than a reference to the "now superseded" metering records.

(5) If subclause (4)(a), 4(b) or 4(c) applies, the metering equipment provider must retain the metering records until at least 48 months have passed since the event described in those subclauses.

CRP5-013. The wording of sched 10.6 4A is clear with the statement of that record. for at least 48 months.

4A Metering equipment provider retention of ATH records

If a metering equipment provider receives an ATH record under clause 13(2) of Schedule 10.4 or clause 13A (2) of Schedule 10.4, the metering equipment provider must retain that record for at least 48 months after the date of expiry of the certification of the metering installation or metering component to which the record relates.

*Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.*

No.

*Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)*

No.

## Item 13 - Retention of ATH records

*Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.*

Yes.

*Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.*

Yes.

*Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.*

Yes.

*Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.*

Yes.

*Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.*

No.

*Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.*

No.

*Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)*

No.

#### Item 14 - Final interrogation of metering installations

*Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.*

No. Comments: No there are already systems in place for final reads for modification on metering installations. AMI meters supply retailers read daily. Final register reads are sent to retailers at the completion of a modification of a metering installation.

*Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.*

No. Comments: The EA have made assumptions about reducing market operational costs. We believe it will increase costs and that:

- a) it is already clear in the rules.
- b) the changes are being made on a possibility.

As a MEP, we believe there is very little data being lost on modification of metering installations.

*Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.*

No. Comments: The costs for a MEP would increase substantially, as major changes to processes would be required. For example, compliance work is packaged in bulk and sent to our service provider to schedule. This would mean the contractor would have to assess if the meter is AMI, communicating and contacting the MEP responsible to do a final interrogation of the meter when on site. This would add substantial costs to a meter change. The volumes in the Mass market field services are substantially higher than the large commercial space where this is currently done.

*Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.*

No. Details of your preferred option: We believe the current rules are sufficient.

*Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.*

No.

*Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.*

We believe the current process is sufficient as

- AMI meters are read nightly and the interval data between midnight and the actual removal time is unlikely to be high in relation to the costs of creating the new processes needed to meet this Code change.
- If a meter is removed a register read is supplied to the Retailer. This change would add major costs to the industry to collect one day of half hour data for an AMI communicating meter that has been removed.
- A register read is supplied to the Retailer for all meters AMI communicating and Non-communicating and for NHH meters.
- If a Retailer requires HHR data for any reason, we supply a service to download the meter once returned.
- Also, the timeliness of receiving displaced meters would not assist the retailer with consumer billing and the other issue is we sometimes do not receive the meter back at all for legacy and AMI assets. If this is implemented by the EA then this change should only pertain to communicating AMI meters which are flagged on the Registry as "Y," otherwise the current process of the read from the paperwork being sufficient.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No.

#### Item 16 - Timeframes to update the registry when dependent on metering equipment provider (MEP) updates

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes.

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes.

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes.

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes.

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No.

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

Yes. The bigger problem is the reverse:

MEPs are unable to update the registry when dependent on Network, Retailer, or other MEP Updates.

Main causes are:

1. Networks are not making ICP ready when site is energised.
2. Retailers are not nominating a change of MEP until after the metering has been changed.
3. AMI flags updated by the previous MEP are required to be reversed to enable the gaining MEP to populate their new metering records.

Should MEP AMI flag updates have a different type of event date that does not impact the updating of the Registry timely and accurately.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

No.

#### Item 18 - Ensuring participant audit obligations remain in effect

Q1. Do you agree the issue(s) identified by the Authority need attention? Please answer Yes/NO and comment if applicable.

Yes

Q2. Do you agree with the objectives of the proposed amendment? Please answer Yes/No and comment if applicable.

Yes

Q3. Do you agree the benefits of the proposed amendment outweigh its costs? Please answer Yes/No and comment if applicable.

Yes

Q4. Do you agree the proposed amendment is preferable to any other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010? Please answer Yes/No and comment if applicable.

Yes

Q5. Do you have any comments on the drafting of the proposed amendment? Please answer Yes/No and comment if applicable.

No.

Q6. Do you have any further comments on the proposal? Please answer Yes/No and comment if applicable.

No.

Q7. Is any part of your submission confidential? Please answer Yes/No and comment if applicable. If yes, please explain which part, why it is confidential and provide a publishable replacement (refer paragraphs 1.9 to 1.11 of the consultation paper)

*Would you like to comment on any technical and non-controversial items?*

No

## **Cover note**

*Would you like to add anything further to support your submission?*

Please find our Submission response as both Intellihub Ltd and Influx Energy Data Ltd. We have responded and commented where appropriate. We have not commented on all issues on the basis that these are more relevant to other participants than to MEPs.

*Please attach any covering comments to support your submission (optional)*

---