

Review of metering and related registry processes

(Review of Part 10)

9 October 2018

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Project Initiation

- Part 10 came into effect 28 August 2013
- Authority review looks at the entire Part to ensure operational efficiency
 - Fit for purpose?
 - Work to understand best way forward
- Originally began as the “Part 10 Operational Review”
- Contained issues collected from implementation onward
- Issues paper released July 2017
 - Added several unidentified issues
- Any other non-urgent issues were added as time allowed

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- Part 10 came into effect 28 August 2013
 - 5 rounds of consultation
 - advanced metering rollouts continued, industry practices have evolved
 - Authority has observed the effectiveness of the provisions
- Authority review looks at the entire Part to ensure operational efficiency
 - “health of the Code”, fit for purpose, nothing obsolete
 - Review where participants are not complying with the Code and work to understand why and what should be done
- Originally began as “Part 10 Operational Review”
 - Since the review touched on other parts, name broadened
- Contains relatively minor issues collected from implementation onward
 - An issues register for Part 10 problems had been created after implementation
- Issues paper released July 2017
 - Added several unidentified issues
- Further non-urgent issues with these Parts were logged in the register to ensure we dealt with them all
 - any new issues that came up as time allowed
 - Cutoff point pre-external legal review

Review approach

- Analysis of issues one-by-one
- 3 categories
 - Issues requiring a Code change
 - Technical/non-controversial issues
 - Issues that can be resolved without a Code change
- Issues the Authority is investigating further

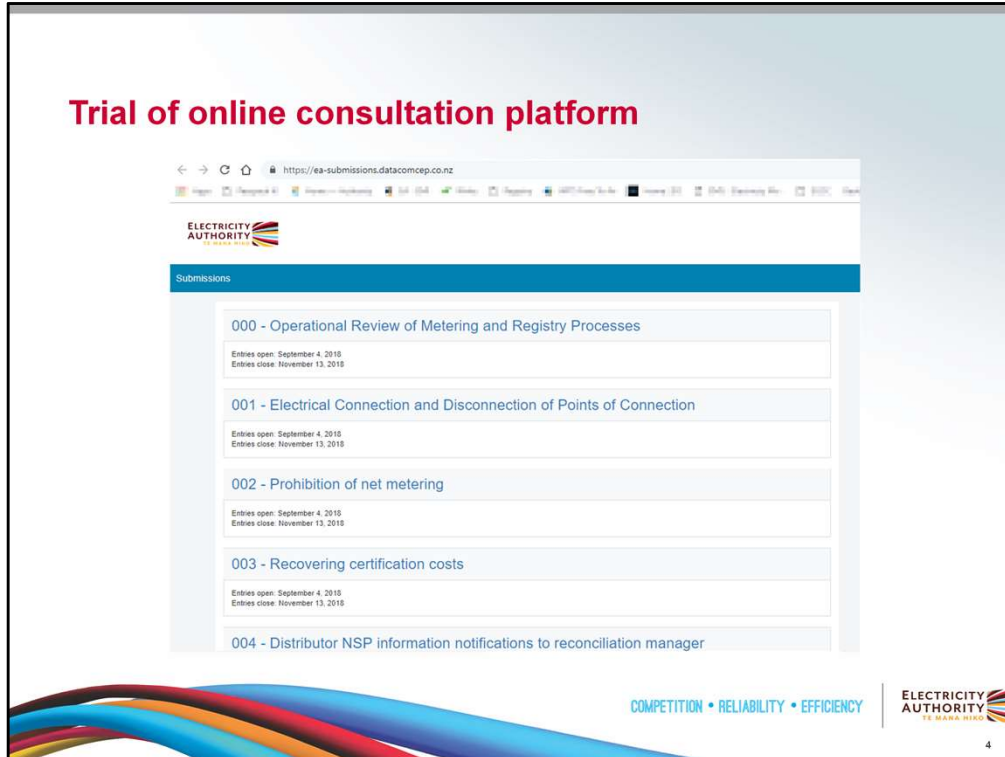
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- Review and analysis of individual issues
 - Many Code issues come to light from specific instances
 - Require us to examine Code wording to ensure intent is clear
 - Determine if issue is specific or systemic
- 3 categories
 - Issues requiring a Code change
 - This is what you are used to seeing in other Code consultations
 - 28 of these
 - Technical/non-controversial issues
 - Same as above, included in usual Code consultations
 - 5 of these
 - Issues that can be resolved without a Code change
 - Newer approach
 - Reasons a Code change may not be the best:
 - might not provide a result where the benefits outweigh the cost
 - may not produce a satisfactory outcome for consumers
 - can address the issue by working with participants directly
 - Visibility: we have looked into the issue and evaluated options
 - Resource for anyone in the future who may have a similar question.
 - Will be sending a memo with more information on these issues
 - 7 of these
- Issues the Authority is investigating further
 - Addressed in another project – technical, large, policy change

Trial of online consultation platform



The screenshot displays a web browser window with the URL <https://ea-submissions.datacomcep.co.nz>. The page features the Electricity Authority logo and a "Submissions" section. The submissions are listed as follows:

Submission ID	Topic	Entries open	Entries close
000	Operational Review of Metering and Registry Processes	September 4, 2010	November 13, 2010
001	Electrical Connection and Disconnection of Points of Connection	September 4, 2010	November 13, 2010
002	Prohibition of net metering	September 4, 2010	November 13, 2010
003	Recovering certification costs	September 4, 2010	November 13, 2010
004	Distributor NSP information notifications to reconciliation manager	September 4, 2010	November 13, 2010

The page also includes the Electricity Authority logo and the tagline "COMPETITION • RELIABILITY • EFFICIENCY" at the bottom right, along with the number "4" in the footer.

- Online platform linked from consultation page on Authority website
- Consultations are individually broken up so able to submit on as many issues as you like. All listed in the landing page, just click into whichever you want to submit on.
- 000 – Operational Review of Metering and Registry Processes contains the cover paper and questions about the global cost-benefit analysis.
 - Attach cover letters to this consultation.
- Once you've clicked through, you'll see the individual issue questions.
- Strongly encourage use of the online platform.

Platform preview

001 - Electrical Connection and Disconnection of Points of Connection

For the details and proposal for this consultation please refer [to the document](#).

Please fill in the form below, then click 'Continue' to return your submission. At any time you may click 'Save and Exit' so that you can return later.

You must provide either a company name or given name(s):

* Company name

* Given names

Surname

* Contact person

Address

Region

Country

Phone

* Email

* Submitter type

* Overall position

Electrical Connection and Disconnection of Points of Connection

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

Position

(Not specified)

Yes

No

Notes

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

Position

(Not specified)

Yes

No

Notes

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

(Not specified)

Yes

No

Notes

Please note we want to publish all submissions we receive. If you consider that we should not publish any part of your submission, please (a) indicate in your submission which part should not be published, (b) Explain why you consider we should not publish that part, (c) Provide a version of your submission that we can publish if we agree not to publish your full submission.

If you indicate there is part of your submission that should not be published, we will discuss with you before deciding whether to not publish that part of your submission. However, please note that all submissions we receive, including any parts that we do not publish, can be requested under the Official Information Act 1982. This means we would be required to release material that we did not publish unless good reason existed under the Official Information Act to withhold it. We would normally consult with you before releasing any material that you said should not be published.

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- Individual issues contain:
 - Link to an individual PDF of the issue
 - Standard consultation questions

Platform features

- “Save and exit”
- Save submitter details
- Document attaching

The screenshot shows a web interface for reviewing a submission. At the top, it says "Please review your submission" and provides instructions: "Your submission is shown below. Please review your submission and then click 'Submit' when you are ready, or 'Edit' if you need to make changes. Your submission will not be sent until you click the submit button below." Below this, there are fields for "Reference no: 2", "Submitter Type: Investor", and "Overall Position: Investor". A question is displayed: "Question 1: Do you agree with the Authority's problem definition?" with a "Yes" response. There is a section for "Supporting documents for your Submission" with a "Drag & drop files here ..." area and a "Be Discern" button. At the bottom, there are radio buttons for "Remember my details for the next consultation" (selected) and "Do not store my details". A "Save & Exit" button is circled in red.

- “Save and exit”
 - If you cannot finish your submission in one sitting, you can save and exit. Will be emailed a link to your submission to come back and complete it.
- Save submitter details
 - Remembers details for the next consultation - Details stored in browser's local storage for a week. Will overwrite any details that may have been saved previously.
 - “Do not store my details” - Will remove any locally saved information. This will not affect your submission.
- Document attaching
 - Press “continue” on the first page of the consultation and the next page of the submission process will open

Please email the market ops team at the Authority with any questions or feedback about the platform.

- marketoperations@ea.govt.nz

Code change proposals

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Code change proposals 1-4

Ref	Title	Clauses Affected
001	Electrical Connection and Disconnection of Points of Connection	Clause 10.29 – When grid owner may connect point of connection to grid Clause 10.29A – When grid owner may temporarily electrically connect point of connection to grid Clause 10.30 – When distributor or embedded network owner may connect NSP that is not point of connection to grid Clause 10.30A – When distributor may temporarily electrically connect NSP that is not point of connection to grid Clause 10.31 – When distributor may connect ICP that is not NSP Clause 10.31A – When distributor may temporarily electrically connect ICP that is not NSP Clause 10.31B – When distributor may electrically connect ICP that is not NSP Clause 10.33 – When reconciliation participant may temporarily electrically connect point of connection Clause 10.33A – When reconciliation participant may electrically connect point of connection Clause 19 of Schedule 11.1 – “Inactive status”
002	Prohibition of Net Metering	New clause 10.13A – Metering installation must record imported electricity separately from exported electricity 10.13(3) – Electricity conveyed 10.24(b) and (c) – Responsibility for ensuring there is metering installation for ICP that is not also NSP 4(2)(a) of Schedule 10.7 – Metering equipment provider obligations
003	Recovering Certification Costs	Clause 10.22 – Change of metering equipment provider
004	Distributor NSP Information Notifications to Reconciliation Manager	Clause 10.25(2) and (3) – Responsibility for ensuring there is metering installation for NSP that is not point of connection to grid Clause 10.30(2) – When distributor or embedded network owner may connect NSP that is not point of connection to grid

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Code change proposals 5-8

005	Like-for-Like Replacements and Consultation	Clause 10.34 – Installation and modification of metering installations Clause 19(2) of Schedule 10.7 – Modification of metering installations
006	Metering Issue Resolution Timing	Clause 10.43 – Metering installations that are inaccurate, defective, or not fit for purpose to be investigated Clause 10.47 – Correction of defects and inaccuracies in metering installation
007	Minimum Voltage Requirements	Table 1 of Schedule 10.1 – Metering installation characteristics and associated requirements
008	Prevailing Load Checks	Table 3 of Schedule 10.1

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Code change proposals 9-12

009	ISO 9001 Sync with Class B ATH Application Period	Clause 4(1)(a) of Schedule 10.3 – Approval of class B ATHs
010	Selected Component Recertification	Clause 7(5)(c) of Schedule 10.4 – Calibration methods Clause 9(3)(a) of Schedule 10.8 – Onsite calibration and certification
011	Raw Meter Data and Compensation Factors	Definition of "compensation factor " in Part 1 Definition of "raw meter data" in Part 1 Clause 8 of Schedule 10.6 – Electronic interrogation of metering installation Clause 11.8A – Metering equipment provider to provide registry metering records to registry manager Clause 7(1) of Schedule 11.4 – Metering equipment provider to provide registry metering records to registry manager Table 1 of Schedule 11.4 Clause 2(3) of Schedule 15.3 – Reconciliation participants to prepare information
012	Monitoring of Event Logs	Clause 10.43 – Metering installations that are inaccurate, defective, or not fit for purpose to be investigated Clauses 8(5)(f) and 8(7) of Schedule 10.6 – Electronic interrogation of metering installation Clause 17(4) of Schedule 15.2 – Electronic meter readings and estimated readings

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Code change proposals 13-16

013	Raw Meter Data Output Test	Clause 9(1)(c) of Schedule 10.7 – Certification tests
014	HHR Certification and Interrogation Cycles	Clause 8 of Schedule 10.6 – Electronic interrogation of metering installation Clause 9 of Schedule 10.7 – Certification tests Clause 20 of Schedule 10.7 – Cancellation of certification of metering installations
015	Comparative Recertification	Clause 12 of Schedule 10.7 – Comparative recertification
016	Error Calculations at Certification	Clause 22 of Schedule 10.7 – Error calculation

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Code change proposals 17-20

017	Application of Error Compensation	Clause 24 of Schedule 10.7
018	Certification Validity Periods	Table 1 of Schedule 10.1 Table 2 of Schedule 10.1 Clause 16 of Schedule 10.7 – Recertification of group of category 1 metering installations by statistical sampling expiry date Clause 27 of Schedule 10.7 – Meter certification expiry date Clause 45 of Schedule 10.7 – Category 1 metering installation inspection requirements Clause 1 of Schedule 10.8 – Meter certification requirements
019	Measuring Transformers and Burdens	Clause 28(4)(b) and (i) of Schedule 10.7 Requirements for a metering installation incorporating measuring transformer Clause 31(7) of Schedule 10.7 Measuring transformer burden and compensation requirements Clause 2(1)(c) of Schedule 10.8 Measuring transformer certification requirements
020	Alternative Certification for POC to the Grid	Clause 32 of Schedule 10.7

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Code change proposals 21-24

021	Obsolete Sticker Removal	Clause 16 of Schedule 10.7 – Recertification of category 1 metering installations by statistical sampling Clause 41 of Schedule 10.7 – Certification stickers
022	Inspection Periods	Table 1 of Schedule 10.1 – Metering installation characteristics and associated requirements Clause 45(1) of Schedule 10.7 – Category 1 metering installation inspection requirements
023	Combining Certification Stickers	Clause 41 of Schedule 10.7 – Certification stickers Clause 8 of Schedule 10.8 – Metering component certification stickers
024	NSP Decommissioning Timeframes	Clause 25 of Schedule 11.1 – Creation and decommissioning of NSPs and transfer of ICPs from 1 distributor's network to another distributor's network

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Code change proposals 25-28

025	MEP updates of HHR/NHH and AMI flags	Clause 10 of Schedule 10.4 – Services access interface Clause 8 of Schedule 10.6 – Electronic interrogation of metering installation Clause 8 of schedule 10.7 – Metering installation certification requirements Clause 11.3 – Metering equipment provider to advise registry manager of changes to registry metering records Clause 3 of Schedule 11.4 – Metering equipment provider to advise registry manager of changes to registry metering records
026	Excluding non-market-related meter registers	Rows 23 to 31 of Table 1 of Schedule 11.4 – Registry metering records Clause 7 of Schedule 11.4 – Metering equipment provider to provide registry metering records to registry manager
027	Meter Resealing by Traders	Clause 10.12 – Interference with metering installation Clause 47 of Schedule 10.7 – Sealing requirements Clause 48 of Schedule 10.7 – Removal or breakage of seals
028	Meter Bridging	Clause 19 of Schedule 15.2

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Submissions closing 13 November

- Submissions will automatically close at 5pm on closing day.
 - Consultations will not be able to be submitted once the consultation period has closed.

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