

VERITEK

Electricity Industry Participation Code Audit Report

For



Class B Approved Test House

Prepared by Steve Woods – Veritek Limited

Date of Audit: 28/04/22

Date Audit Report Complete: 16/05/22

Date Audit Report Due: 14/05/22

Executive Summary

WEL Networks (WEL) is a Class B Approved Test House and is required to undergo an audit by 14 May 2022, in accordance with clause 16A.19(b).

The audit was conducted in accordance with the ATH Audit Guidelines V1.3 produced by the Electricity Authority.

The audit found two non-compliances and makes three recommendations. All of the nine non-compliances from the previous audit were cleared.

In general, compliance is of a high standard. The issues identified are as follows:

- some late updates of certification records to the MEP,
- register advance checks not conducted because meters do not have decimal places; it is likely WEL can use a “non-numerical symbol” to confirm the register advance, provided a Class A ATH approves this method, and
- the inspection process does not confirm the operation of the data storage device.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table below provides some guidance on this matter and recommends a next audit frequency of 36 months. WEL demonstrated a strong willingness to achieve compliance by resolving all nine issues from the previous audit. I have confidence the two issues identified during this audit will also be resolved. I agree with the 36-month recommendation.

The matters found are shown in the tables below:

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Advise MEP of Records, Certificates or Reports for a Metering Installation	3.9	14 Of Schedule 10.4	Three of 11 MEP updates made late.	Strong	Low	1	Identified
Certification Tests	5.12	9(1)(ii)(B) of Schedule 10.7	Register advance check not conducted because decimal places are not available. Prevailing load test not conducted for three installations recertified.	Moderate	Low	2	Identified
Future Risk Rating						3	
Indicative Audit Frequency						36 months	

Future risk rating	1-3	4-6	7-8	9-17	18-26	27+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Remedial Action
Quality manual	2.8	16 Of Schedule 10.4	Update the “Installation and Maintenance Reference for Smart Grid Meters” document to include recent Code changes.	Identified
Type test reports	4.12	5 of Schedule 10.8	Prepare and maintain a register of type test reports detailing checks conducted, whether compliance is achieved, the date checks were conducted and who conducted them.	Identified
Raw meter data output tests	5.12	9(1)(ii)(B) of Schedule 10.7	Ensure the results of the raw meter data output tests are included in the “printed” metering installation certification report.	Cleared

Table of Issues

Issue	Description	Remedial action
Category 1 prevailing load tests	<p>Table 3 states that for Category 1 metering installations, where recertification occurs without meter replacement, a prevailing load test must be conducted using a working standard.</p> <p>The industry does not have a Category 1 prevailing load test capability and to establish one would cost approx. \$12,500,000 just for the working standards, then each job would take longer, which would also add to costs.</p>	I recommend the Authority changes the Code to allow recertification of single meter Category 1 installations with a raw meter data output test but not a prevailing load test.
Multiple MEOs on category 1 installations.	As mentioned in WEL’s MEP audit, clarification is required regarding how certification and certification reporting should be managed when both WEL and NGCM MEPs have meters in series in metering installations.	Authority to provide guidance.

Persons Involved in This Audit

Auditor:

Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

WEL personnel assisting in this audit were:

Name	Title
Jeths Lacson	Maintenance Strategy Engineer
Deborah Bowyer	Business Systems & Data Analyst
Mitch Jones	Risk and Audit Manager
Craig Evans	Smart Metering Support
Andrew Maseyk	Metering & Reconciliation Manager
Joanne Norton	MEP Relationship Manager

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1. ADMINISTRATIVE

1.1 Exemptions from Obligations to Comply with Code (Section 11 of Electricity Industry Act 2010)

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

I checked the Authority's website for any relevant exemptions.

Audit commentary

Exemption 285 came into force on 9 July 2020. WEL Networks Limited ("WEL") is exempted from complying with the obligations in clause 4(1)(a) of Schedule 10.3 and 4(1)(b) of Schedule 10.3 of the Electricity Industry Participation Code 2010 ("Code") to hold and comply with AS/NZS ISO 9001, the scope of which covers the activities that it undertakes or proposes to undertake. This exemption expires on the earlier of:

- a. the close of 1 May 2023; or
- b. the close of 1 May 2021 if WEL does not have ISO 55001 accreditation, or
- c. the date on which WEL certifies a Category 2 or higher category meter.

WEL confirmed that ISO 55001 accreditation is not in place, so the exemption has expired. WEL has maintained its ISO 9001 accreditation as recorded in **section 2.6**.

1.2 Scope of Audit

WEL is a Class B ATH and this audit was performed at their request, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 16A.19(b).

The Authority has stipulated that the next audit was due by 14 May 2022 in accordance with clause 1(4)(c) of schedule 10.3.

The audit was conducted in accordance with the ATH Audit Guidelines V1.3 produced by the Electricity Authority.

WEL's Test House certification is limited to Category 1 metering; all Category 2 and 3 installation and certification work is conducted by other Test Houses appointed by the MEP.

WEL wishes its ATH approval to include the following functions of Clause 4(2) of Schedule 10.3:

- (b) installation and modification of metering installations:
- (c) installation and modification of metering components:
- (e) certification, using the selected component certification method, of:
 - (i) category 1 metering installations:
 - (ii) category 2 metering installations:
 - (iii) category 3 metering installations with a primary voltage of less than 1kV:
- (h) issuing of certification reports in respect of certifications of metering installations under paragraphs (e) to (g):

(i) inspection of:

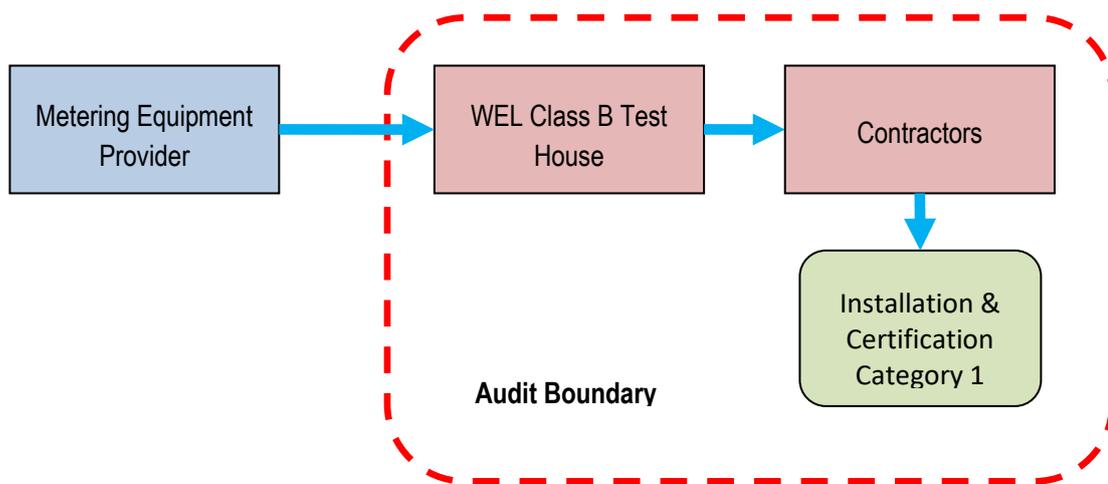
(i) category 1 metering installations:

(ii) category 2 metering installations:

(iii) category 3 metering installations with a primary voltage of less than 1kV.

WEL also requires approval to certify metering components. I note that neither the Class B or Class A functions listed in Clauses 3(2) and 4(2) of Schedule 10.3 include certification of metering components. The Authority confirmed on 23 December 2021 that if an ATH is approved to certify a metering installation, then they are also approved to certify metering components.

The boundaries of this audit are shown below for greater clarity.



1.3 Previous Audit Results

The last audit was conducted in April 2021 by Brett Piskulic of Veritek. The tables below show the findings:

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Metering Installation Type	3.2	8(2) of Schedule 10.7	Each services access interface not recorded for 25 metering installations certified since 1/02/21.	Cleared
Services Access Interface	3.5	10 of Schedule 10.4	Each services access interface not recorded for 25 metering installations certified since 1/02/21.	Cleared
Meter Requirements	3.11	26(4) of Schedule 10.7	Maximum interrogation cycle recorded incorrectly for 13 metering installations.	Cleared

Subject	Section	Clause	Non-compliance	Status
Maximum interrogation cycle	3.14	36(3) of Schedule 10.7	Maximum interrogation cycle not recorded for each services access interface for three metering installations.	Cleared
Metering component stickers	4.14	8(2) of Schedule 10.8	Name of the ATH or the approved calibration laboratory who calibrated the metering component not recorded on certification stickers.	Cleared
Certification Tests	5.12	9(1)(ii)(B) of Schedule 10.7	ATH did not record the accumulation of pulses when conducting raw meter data tests.	Cleared for this issue. Different issues identified in this audit.
Removal of certification stickers	5.46	41(1) of Schedule 10.7	Invalid metering installation certification stickers not removed or obscured when certifying installations.	Cleared
General inspection requirements	6.1	44 (1) (a) to (e) of Schedule 10.7	Category 1 inspection process does not confirm the operation of the data storage device or check the remaining battery life.	Cleared
Raw meter data test	6.2	44 (1) (f) of Schedule 10.7	Category 1 inspection process does not include a check of the master accumulation register and the sum of the meter registers.	Cleared

Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Status
Calibration of Metering Components Where Relevant	5.58	7(1) Of Schedule 10.4	I recommend WEL obtains copies of the certification and calibration records of the other MEPs metering components.	Cleared

2. ATH REQUIREMENTS

2.1 Use of Contractors (Clause 10.3 of Part 10)

Code related audit information

A participant may perform its obligations and exercise its rights under this Part by using a contractor. A participant who uses a contractor to perform the participant's obligation under this Part remains responsible and liable for, and is not released from, the obligation, or any other obligation under this Part.

Audit observation

I checked WEL understands of this requirement by conducting a walk-through of contractor management processes. I checked the audit regime in place to ensure contractors are competent and are following WEL's instructions.

Audit commentary

WEL has engaged Wells to undertake certification work under the WEL ATH.

WEL requires Wells to conduct invasive audits of 3% of all work completed each month. The results are provided via the mobile job app for these.

In addition to this WEL conducts photo checking of all work completed when jobs are processed as an extra quality control step.

Audit outcome

Compliant

2.2 Provision of Accurate Information (Clause 10.6 of Part 10)

Code related audit information

A participant must take all practicable steps to ensure that information that it provides under this Part is:

- *complete and accurate*
- *not misleading or deceptive*
- *not likely to mislead or deceive.*

If a participant, having provided information under this Part, becomes aware that the participant has not complied with these requirements, the participant must, except if clause 10.43 applies, as soon as practicable provide such further information, or corrected information, as is necessary to ensure that the participant complies.

Audit observation

I checked compliance with this clause at the end of the audit to determine whether compliance had been achieved.

Audit commentary

I did not find any information that was not complete and accurate, or likely to mislead or deceive.

Audit outcome

Compliant

2.3 Dispute Resolution (Clause 10.50(1) to (3) of Part 10)

Code related audit information

Participants must in good faith use best endeavours to resolve any disputes related to Part 10 of the Code. Disputes that are unable to be resolved may be referred to the Authority for determination. Complaints that are not resolved by the parties or the Authority may be referred to the Rulings Panel by the Authority or participant.

Audit observation

I checked whether any disputes had been dealt with by WEL during the audit period.

Audit commentary

WEL has not needed to resolve any disputes in accordance with these clauses.

Audit outcome

Compliant

2.4 ATH Approval (Clause 10.40 of Part 10)

Code related audit information

A person wishing to be approved as an ATH, or an ATH wishing to renew its approval, must apply to the Authority:

- *at least two months before the intended effective date of the approval or renewal*
- *in writing*
- *in the prescribed form*
- *in accordance with Schedule 10.3.*

A person making an application must satisfy the Authority (providing, where appropriate, suitable evidence) that the person:

- *has the facilities and procedures to reliably meet, for the requested term of the approval, the minimum requirements of this Code for the class or classes of ATH for which it is seeking approval*
- *has had an audit under Schedule 10.3*
- *is a fit and proper person for approval.*

Audit observation

I checked the most recent application for re-certification.

Audit commentary

WEL has appropriate approval and appropriate facilities and procedures to meet the minimum requirements of the Code.

Audit outcome

Compliant

2.5 ATH Requirements (Clause 10.41 of Part 10)

Code related audit information

An ATH must, when carrying out activities under this Part:

- *only carry out activities for which it has been approved by the Authority*
- *exercise a degree of skill, diligence, prudence, foresight, and economic management, taking into account the technological complexity of the metering components and metering installations being tested:*
 - *determined by reference to good industry practice*
 - *that would reasonably be expected from a skilled and experienced ATH engaged in the management and operation of an approved ATH*
- *comply with all applicable safety, employment, environmental, and other enactments*
- *exercise any discretion given to it under this Part by:*
 - *taking into account the relevant circumstances of the particular instance*
 - *acting professionally*
- *recording the manner in which it carried out its activities and its reasons for carrying the activities out in that manner.*

Audit observation

I checked policy and process documentation to confirm compliance with these clauses.

Audit commentary

WEL has only conducted activities that fall within the scope of their approval. I have concluded from this audit that WEL has met the requirements of this clause.

I checked compliance with other enactments, specifically the electricity regulations with regard to safety practices and I confirm the following critical points are managed in a robust manner:

- access to basic insulation,
- livening practices, specifically polarity testing - instructions are clear in relation to this,
- general safety practices and the appropriate use and testing of personal protective equipment - policy and instruction are clear in relation to this,
- the only environmental issue identified is the management of metering enclosures contain asbestos material; Wells, as a contractor has robust asbestos identification and management practices,
- the only employment related requirement is the use of an employer license, WEL does not use an employer license, all of their personnel conducting metering and electrical work are registered electricians, but Wells operates an employer license, which means they can employ

technicians who are not registered electricians; the employer license is subject to an approval and audit regime.

Audit outcome

Compliant

2.6 Quality Management Systems (Clauses 3(1) & 4(1) of Schedule 10.3)

Code related audit information

An ATH must establish, document, implement, maintain, and comply with a quality management system which records its processes and procedures to ensure compliance with this Part.

An applicant applying for approval or renewal of approval, as a class A ATH must, as part of its application, confirm that it holds and complies with AS/NZS ISO 17025 accreditation, for at least the requested term of the approval.

An applicant applying for approval, or renewal of approval, as a class B ATH must, as part of its application to the Authority, confirm that it holds and complies with AS/NZS ISO 9001:2008 or AS/NZS ISO 9001:2016 certification for at least the requested term of the approval.

Audit observation

I obtained and reviewed the most recent ISO 9001 audit report and certificate of approval to confirm the scopes were appropriate and that certification was in place.

Audit commentary

WEL provided a copy of their most recent ISO 9001:2015 audit report, completed on 8th to 11th March 2022, which was conducted by Lloyd's Register. The scope of the certification is appropriate for the work undertaken and is recorded as "The design, planning, installation, procurement of materials, maintenance and servicing of operations. Relating to utility networks, the operation of an Approved Test House class B and as a Metering Equipment Provider, in accordance with the requirements of Electricity Industry Participation Code. The report did not contain any actions for WEL.

Audit outcome

Compliant

2.7 Organisation and Management (Clause 15 of Schedule 10.4)

Code related audit information

An ATH must ensure that it has managerial staff who, unless otherwise permitted in the relevant approval, all have the authority and resources needed to discharge their duties; and the responsibilities, authority, and functional relationships of all its personnel are fully and accurately specified and recorded in the ATH's records.

An ATH must appoint a technical manager (however named) with overall responsibility for technical operations, who must have appropriate engineering qualifications and experience in the operation of an approved ATH; and a quality manager (however named), with responsibility for the quality management certification and the implementation of the quality management system.

Audit observation

I checked records in the quality manual to confirm compliance.

Audit commentary

Jeths Lacson is appointed as the Quality Manager and the Technical Manager. Jeths holds appropriate qualifications and experience for these positions.

An ATH must ensure that all staff who perform or supervise work or activities regulated under this Part are technically competent, experienced, qualified, and trained for the functions they perform. I checked the training and competency assessment processes and I confirm compliance with this clause.

Audit outcome

Compliant

2.8 Document Processes and Procedures (Clause 16 Of Schedule 10.4)

Code related audit information

An ATH must establish, document, implement, maintain, and comply with a quality management system which records its processes and procedures.

Audit observation

I checked the Class B quality documentation, and I reviewed the relevant ISO report.

Audit commentary

WEL has a quality management system, which is compliant with the Code. I checked the “Installation and Maintenance Reference for Smart Grid Meters” document, which is effectively the quality manual for field technicians. The most recent update was in 2015, and there have been changes to the Code since then which will change the instructions to technicians. I recommend the document is updated to include those changes.

Recommendation	Description	Audited party comment	Remedial action
Quality manual	Update the “Installation and Maintenance Reference for Smart Grid Meters” document to include recent Code changes.	Work has commenced on updating the document and will be completed in due course.	Identified

Audit outcome

Compliant

2.9 Material Change Requirements (Clause 16A.11)

Code related audit information

If the ATH intends to make a material change to any of its facilities, processes, procedures, or the scope of the ATH's ISO accreditation is reduced, the ATH must arrange for an additional audit at least five business days before the change or reduction in scope take place.

Audit observation

WEL has not conducted any material changes.

Audit commentary

WEL has not conducted any material changes.

Audit outcome

Not applicable

2.10 Audit Required For ATH Approval (Clause 16A.12 and 16A.13)

Code related audit information

The ATH must provide an audit report to the Authority by the due date. If there are areas where compliance is not achieved, the ATH must also submit a compliance plan which specifies the actions that the ATH intends to address, any issues identified in the audit report and the time frames to complete those actions.

Audit observation

WEL is currently undergoing an audit and the report will be provided with a compliance plan.

Audit commentary

WEL is currently undergoing an audit and the report will be provided with a compliance plan.

Audit outcome

Compliant

2.11 Quality Standard Required for Field Work (Clause 17 Of Schedule 10.4)

Code related audit information

If a class A ATH arranges for another person to carry out field work, it must ensure that person is certified to the relevant AS/NZS ISO9001:2008 or AS/NZS ISO9001:2016 standard at all times while the person carries out the work.

Audit observation

WEL does not operate a Class A ATH.

Audit commentary

WEL does not operate a Class A ATH

Audit outcome

Not applicable

2.12 Accommodation & Environment (Clause 1 of Schedule 10.4)

Code related audit information

An ATH must maintain a list of personnel who are authorised to access and use its laboratory and storage facilities and restrict access to its laboratory and storage facilities to:

(i) the personnel specified

(ii) the Authority

(iii) an auditor conducting an audit

(iv) any other person who is, at all times, directly supervised by a member of personnel specified.

Audit observation

WEL does not operate a laboratory function, their scope is limited to field installation work.

Audit commentary

WEL does not operate a laboratory function, their scope is limited to field installation work.

Audit outcome

Not applicable

2.13 Compensation Factors (Clause 8 of Schedule 10.4)

Code related audit information

If an ATH is approved to certify metering installations, the ATH must have a documented process for the determination of compensation factors.

Audit observation

WEL only certifies Category 1 metering installations, therefore compensation factors are not applied.

Audit commentary

WEL only certifies Category 1 metering installations, therefore compensation factors are not applied.

Audit outcome

Compliant

2.14 Metering Component Stickers (Clause 8(3) of Schedule 10.8)

Code related audit information

An ATH must ensure that a certification sticker is:

- made of weather-proof material*
- permanently attached*
- filled out using permanent markings.*

Audit observation

I checked WEL's component stickers to confirm compliance.

Audit commentary

All component stickers are compliant with this clause.

Audit outcome

Compliant

2.15 Interference with Metering Installations (Clause 10.12)

Code related audit information

An ATH may not directly or indirectly interfere with a metering installation unless it is also the MEP or has been instructed to do so by the existing or gaining MEP for the installation.

Audit observation

I audited this clause by exception.

Audit commentary

I did not identify any interference by WEL during the audit.

Audit outcome

Compliant

3. METERING RECORDS AND REPORTS

3.1 Physical Location of Metering Installations (Clause 10.35 of Part 10)

Code related audit information

If it is not practical in the circumstances to locate the metering installation at the point of connection, the reconciliation participant must calculate the quantity of electricity conveyed through the point of connection using a loss compensation process approved by the certifying ATH.

If this occurs the ATH must record the calculation, measurements, and assumptions in the installation certification report.

Audit observation

I checked whether WEL had certified any installations with loss compensation.

Audit commentary

WEL has not been required to conduct any loss compensation calculations.

Audit outcome

Compliant

3.2 Metering Installation Type (Clause 8(2) of Schedule 10.7)

Code related audit information

The metering installation certification report must specify whether the installation is half hour, non-half hour or half hour and non-half hour metering.

The metering installation certification report must also record each services access interface and the conditions under which each services access interface may be used.

Audit observation

I checked 35 certification records to confirm compliance.

Audit commentary

This clause was changed from 1st February 2021 to require the ATH to record each services access interface and the conditions under which each services access interface may be used. Prior to this change the ATH was required to determine and record a single services access interface.

All reports correctly recorded all services access interfaces and interrogation cycles.

The HHR/NHH field was correctly populated in all 35 certification reports.

Audit outcome

Compliant

3.3 Record Metering Installation Category (Clause 8(4) Of Schedule 10.7)

Code related audit information

An ATH must record the category of the metering installation in the metering installation certification report.

Audit observation

I checked 35 certification reports to confirm compliance.

Audit commentary

All reports correctly recorded the metering category.

Audit outcome

Compliant

3.4 Calibration Test Points (Clause 7(7) Of Schedule 10.4)

Code related audit information

An ATH may select a test point other than those specified in the relevant standard listed in Table 5 of Schedule 10.1, or at a lower burden than specified in the standard, but must, if it does this, document its reasons for the selection of these test points in the calibration report.

Audit observation

WEL does not calibrate components.

Audit commentary

WEL does not calibrate components.

Audit outcome

Not applicable

3.5 Services Access Interface (Clause 10 of Schedule 10.4)

Code related audit information

An ATH must, when preparing a metering installation certification report, determine, and record in the certification report, the services access interfaces and the conditions under which each services access interface may be used. The services access interface means the point, at which access may be gained to the services available from a metering installation, that is:

- *recorded in the certification report by the certifying ATH for the metering installation,*
- *where information received from the metering installation can be made available to another person*
- *where signals for services such as remote control of load (but not ripple control) can be injected.*

Audit observation

I checked 35 certification records to confirm compliance.

Audit commentary

This clause was changed from 1st February 2021 to require the ATH to record each services access interface and the conditions under which each services access interface may be used. Prior to this change the ATH was required to determine and record a single services access interface.

All reports correctly recorded all services access interfaces and interrogation cycles.

Audit outcome

Compliant

3.6 Certification & Calibration Reports (Clause 11(1) of Schedule 10.4)

Code related audit information

An ATH must, for each metering installation that it certifies, produce a certification report in accordance with Schedule 10.7. An ATH must, for each metering component:

- *that it calibrates, produce a calibration report in accordance with Schedule 10.8*
- *that it certifies, produce a certification report in accordance with Schedule 10.8.*

Audit observation

I requested a sample of 35 certification records to confirm compliance.

Audit commentary

Certification reports are produced for all installations.

WEL does not calibrate components.

Component certification records are contained in the WEL metering database. Meter certification and expiry dates are contained in the database. This meets the requirements for a certification report. WEL has added a 'report button' to the component certification record to enable the generation of a component certification report which can be provided as required. I checked the content of the metering component certification report and confirmed that it contained all the required information.

Audit outcome

Compliant

3.7 ATH Record Keeping Requirements (Clause 12 of Schedule 10.4)

Code related audit information

The ATH must document and maintain its record keeping system for certificates, reports, and any other records. The records can be stored in any media, such as hard copy or electronically. The records should be stored in a manner that prevents deterioration or damage and that retrieval of a record cannot result in change or damage to the record. Electronic storage should be backed up.

The ATH must securely store all records, certificates, and reports and ensure that each metering installation is:

- *uniquely identified*
- *sufficiently detailed to verify the tests carried out including test conditions, the test equipment used and the personnel carrying out the tests.*

Audit observation

I checked the certification records for 35 metering installations along with the storage practices.

Audit commentary

All records were available, and records are stored indefinitely.

Audit outcome

Compliant

3.8 Retention of Records (Clause 13 of Schedule 10.4)

Code related audit information

The ATH must keep all records, certificates, and calibration reports for all components and installations certified for at least 48 months after the date of decommissioning.

Audit observation

I checked the certification records for 35 metering installations along with the storage practices.

Audit commentary

All records were available, and records are stored indefinitely.

Audit outcome

Compliant

3.9 Advise MEP of Records, Certificates or Reports for a Metering Installation (Clause 14 Of Schedule 10.4)

Code related audit information

The ATH must provide the MEP responsible for the metering installation with the record, certificate, or report for the metering installation within five business days of certification. The ATH must ensure the MEP receives the record. This can be either as an electronic copy or any other agreed format.

Audit observation

I checked the communication trail for 35 metering records.

Audit commentary

In cases where WEL is the ATH and the MEP, records are provided immediately once certification is completed.

For other MEPs WEL is providing a weekly report of all certifications completed. Certification for other MEPs occurs in cases where the WEL meter is installed in series with the other MEPs meter and is effectively a check meter. WEL considers their meter to be part of the metering installation and includes it in the design report and certifies the installation accordingly. I checked a spreadsheet called "NGCM MEP Equipment Changes 20220328" which is a daily report of certification records provided to NGCM as an MEP. This report contains the certification date as well and showed that three of 11 ICPs did not have records provided within five business days. The late records were due to late updates from Wells. Validation is in place for ICPs where the meter is communicating but the certification

records have not been provided, but it's difficult to check new connections or ICPs where the meter is not communicating.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.9 With: Clause 14 Of Schedule 10.4 From: 01-May-21 To: 05-May-22	Three of 11 MEP updates made late. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Data was provided to the MEP as soon as was available.		n/a	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued management of the daily report will ensure updates to MEPs are made as soon as data is available from the field.		Ongoing	

3.10 Certification at a Lower Category (Clause 6(4) Of Schedule 10.7)

Code related audit information

If the ATH makes a determination to certify a metering installation at a lower category under clause 6 of Schedule 10.7, the certification report must include all information required to demonstrate compliance.

Audit observation

WEL has not certified any installations as a lower category, no certification activity takes place above category 1.

Audit commentary

WEL has not certified any installations as a lower category, no certification activity takes place above category 1.

Audit outcome

Compliant

3.11 Meter Requirements (Clause 26(3) & (4) of Schedule 10.7)

Code related audit information

The ATH needs to document the following in the metering records:

- *the meter manufacturer's required recommendations for regular maintenance*
- *any maintenance that has been carried out on the meter, such as battery monitoring and replacement.*

An ATH must record in the metering installation certification report, the maximum interrogation cycle for the metering installation before it certifies a metering installation incorporating a meter.

Audit observation

I checked process documentation, conducted a walk-through of the process and checked 35 certification records.

Audit commentary

As a Class B ATH, WEL is unlikely to deal with any meters where maintenance is required. All AMI devices installed have battery monitoring conducted as part of the data collection function.

I checked 35 certification reports to confirm the maximum interrogation cycle is recorded. The maximum interrogation cycle was recorded correctly for all installations regardless of the MEP.

Audit outcome

Compliant

3.12 Meter Certification Expiry Date (Clause 27(5) of Schedule 10.7)

Code related audit information

The ATH must record the certification expiry date for each meter in a metering installation in the metering installation certification report and the meter certification report.

Audit observation

I checked 35 certification records to confirm compliance.

Audit commentary

Meter certification expiry dates are correctly calculated and recorded.

Audit outcome

Compliant

3.13 Measuring Transformer Requirements (Clause 28(3) of Schedule 10.7)

Code related audit information

The ATH needs to document the following in the metering records:

- the manufacturer's recommendations for any regular maintenance required for the measuring transformer
- any maintenance that has been carried out on the measuring transformer.

Audit observation

WEL does not complete any certification above category 1.

Audit commentary

WEL does not complete any certification above category 1.

Audit outcome

Not applicable

3.14 Determine Maximum Interrogation Cycle (Clause 36(3) & (4) Of Schedule 10.7)

Code related audit information

An ATH must record the maximum interrogation cycle for each services access interface for the metering installation. The maximum interrogation cycle for a metering installation is the shortest of the following periods:

- the period of inherent data loss protection for the metering installation
- the period of memory availability given the data storage device configuration
- the period in which the accumulated drift of a data storage device clock is expected to exceed the maximum time error set out in Table 1 of clause 2 of Schedule 15.2 for the category of the metering installation.

Audit observation

I checked 35 certification reports to confirm the maximum interrogation cycle is recorded.

Audit commentary

This clause was changed from 1st February 2021 to require the ATH to record each services access interface and the conditions under which each services access interface may be used. Prior to this change the ATH was required to determine and record a single services access interface.

All 35 of the certification records checked had all services access interfaces and maximum interrogation cycles recorded correctly.

Audit outcome

Compliant

4. CALIBRATION AND CERTIFICATION OF METERING COMPONENTS

4.1 Accommodation and Environment (Clause 1(D)-(E) Of Schedule 10.4)

Code related audit information

The ATH must ensure that the environment in which its activities are undertaken is monitored, appropriate for the tests being carried out and unlikely to affect the required accuracy.

Audit observation

WEL does not operate a laboratory function, their scope is limited to field installation work.

Audit commentary

WEL does not operate a laboratory function, their scope is limited to field installation work.

Audit outcome

Not applicable

4.2 Use of Measurement Standards (Clause 1(F) Of Schedule 10.4)

Code related audit information

The ATH must comply with the specific requirements of the applicable standard listed in Table 5 of Schedule 10.1.

Audit observation

WEL does not calibrate any metering components.

Audit commentary

WEL does not calibrate any metering components.

Audit outcome

Not applicable

4.3 Test Equipment (Clause 2 of Schedule 10.4)

Code related audit information

An ATH must, at all times, ensure that it has access to all items of equipment required for the performance of the calibrations and tests it is approved to undertake under this Part; and each item of equipment it uses is maintained in accordance with the manufacturer's recommendations and this Code. A class B ATH must have and maintain procedures for the purchase of test equipment and associated consumables.

Audit observation

WEL maintains a register of equipment, including test equipment. I confirmed this was up to date and that all relevant equipment is regularly checked and tested.

Audit commentary

WEL maintains a register of equipment, including test equipment. I confirmed this was up to date and that all relevant equipment is regularly checked and tested.

A class B ATH must have and maintain procedures for the purchase of test equipment and associated consumables. The relevant process was demonstrated during the audit. The relevant consumables are seals and stickers.

Audit outcome

Compliant

4.4 Calibration of Reference & Working Standards (Clause 3(1)(a), (b)(i) and (6) of Schedule 10.4)

Code related audit information

An ATH must ensure that any reference standard is calibrated by an approved calibration laboratory and that any working standard is calibrated by an approved calibration laboratory or class A ATH. The calibration reports for the calibrated standards must be held by the ATH and indicate that the standard is within the manufacturer's accuracy specifications.

Audit observation

WEL undertakes category 1 field certification work only so has no requirement for the use of reference or working standards.

Audit commentary

WEL undertakes category 1 field certification work only so has no requirement for the use of reference or working standards.

Audit outcome

Not applicable

4.5 Calibration Interval (Clause 3(2) of Schedule 10.4)

Code related audit information

Each reference standard or working standard must be calibrated within the applicable calibration interval set out in Table 1 of Schedule 10.4.

Audit observation

WEL undertakes category 1 field certification work only so has no requirement for the use of reference or working standards.

Audit commentary

WEL undertakes category 1 field certification work only so has no requirement for the use of reference or working standards.

Audit outcome

Not applicable

4.6 Calibration of Reference Standards (Clause 3(1)(B)(li), (2), (3)(C), (4) And (5) Of Schedule 10.4)

Code related audit information

Class A ATHs must ensure that in calibration of reference standards, any uncertainties are sufficiently small so that the overall uncertainty in the measurements used to test a metering installation does not exceed one third of the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of metering installation that the reference standard will be used to calibrate.

If a reference standard is used in conditions that deviate from those in the calibration report, the class A ATH must calculate and apply adjustments using its own processes and procedures so that the reference standard achieves the reference conditions.

If a reference standard is used in conditions that deviate from those in the calibration report, the class A ATH must calculate and apply adjustments using its own processes and procedures so that the reference standard achieves the reference conditions.

Audit observation

WEL does not have a reference standard.

Audit commentary

WEL does not have a reference standard.

Audit outcome

Not applicable

4.7 33kv Or Above Calibrated By An Approved Calibration Laboratory (Clause 3(3)(B) Of Schedule 10.4)

Code related audit information

Class A ATHs must ensure that a working standard on a system operating at a voltage of 33kV or above has been calibrated by an approved calibration laboratory.

Audit observation

WEL does not use HV working standards.

Audit commentary

WEL does not use HV working standards.

Audit outcome

Not applicable

4.8 Metering Component Testing System (Clause 4 of Schedule 10.4)

Code related audit information

An ATH may use a complete calibrated metering component testing system (a test bench) as an alternative to a separately calibrated working standard only if the ATH:

- *calibrates the test bench as if it was a working standard*
- *carries out a testing system accuracy test, using approved reference standards before completing the calibration report.*

Audit observation

WEL does not have a laboratory.

Audit commentary

WEL does not have a laboratory.

Audit outcome

Not applicable

4.9 Calibration Errors (Clause 5 of Schedule 10.4)

Code related audit information

A Standard cannot be used if the ATH believes it has a calibration error. If an error is found, then all ATH's that have used the standard must be notified. All metering installations certified using the standard must be treated as defective in accordance with Clause 10.43.

Audit observation

WEL undertakes category 1 field certification work only so has no requirement for the use of reference or working standards.

Audit commentary

WEL undertakes category 1 field certification work only so has no requirement for the use of reference or working standards.

Audit outcome

Not applicable

4.10 Measurement Traceability (Clause 6 of Schedule 10.4)

Code related audit information

An ATH must document, maintain, and comply with a system that ensures, whenever it undertakes a calibration test or measurement, the ATH can replicate the test or measurement in every respect and the results of the measurements are traceable.

Audit observation

WEL conducts tests during category 1 certification, tests are completed using multi-meters.

Audit commentary

WEL conducts tests during category 1 certification, the multi-meters used are tested every seven months to ensure the ability to replicate the tests, and traceability is ensured through the calibration

of the equipment. The next and last test dates are recorded in the WEL test equipment database. I checked and confirmed the records were up to date.

Audit outcome

Compliant

4.11 Calibration Methods (Clause 7(6) of Schedule 10.4)

Code related audit information

An ATH must only use components that have been certified by an ATH or calibration laboratory.

A Class B ATH must follow 17025 calibration methods for components.

The test points must be those listed in the relevant IEC standard.

An ATH must ensure that uncertainty of measurement does not exceed one third of the error listed in the relevant IEC standard listed in Table 5.

If a CT is to be used in a Metering Installation is certified using the selected component method, then it must be tested for errors at 5% to 120% of rated current.

An ATH must have documented instructions for calibration that match the IEC standard.

Audit observation

I checked whether WEL calibrates components in accordance with this clause.

Audit commentary

WEL does not calibrate components.

Audit outcome

Not applicable

4.12 Data Storage Device Certification (Clause 5 of Schedule 10.8)

Code related audit information

All data storage devices must be certified before they can be used in a metering installation. The ATH must ensure that the data storage devices in a metering installation have been type tested by an approved test laboratory, that the results for data storage devices are appropriate for that model and version and have a calibration report.

Audit observation

I checked the certification records for 35 metering installations to confirm compliance.

Audit commentary

The WEL ATH certifies meters with combined data storage devices and records the certification details including certification date, certification validity period and expiry date in the WEL metering database. WEL has added a 'report button' to the component certification record to enable the generation of a component certification report which can be provided as required. I checked the content of the metering component certification report and confirmed that it contained all the required information.

WEL has copies of type test reports for the data storage devices which have been provided by the meter manufacturer.

The clauses for type testing and data storage device certification require the ATH to determine a number of factors, including:

- whether the type testing is appropriate for the model and version of meter,
- that a type test report is produced that:
 - confirms the meter's technical characteristics, and
 - confirms the range of environmental conditions within which the meter has been proven accurate and reliable, and
 - confirms that the meter performs the functions for which it was designed, and
 - confirms that the meter complies with the requirements of this Part, and
 - records the tests undertaken by the approved test laboratory and the reasons why the ATH considers that they are appropriate,
- that each data storage device is installed so that onsite interrogation is possible without the need to interfere with seals, and
- that each data storage device has a dedicated power supply unless the data storage device is integrated with another metering component,
- that that each data storage device in the metering installation:
 - is compatible with each other metering component of the metering installation, and
 - is suitable for the electrical and environmental site conditions in which it is installed, and
 - has been certified under Schedule 10.8, and
 - has appropriate electrical separation between all of its outputs and inputs, and all of its outputs and inputs are rated for purpose, and
 - has no outputs that will interfere with the operation of the metering installation, and
 - records periods of data identifiable or deducible by both date and time on interrogation

It's clear that the mere availability of a type test report is insufficient to achieve compliance. There are a number of specific items that the ATH is required to check and confirm. I therefore recommend WEL develops a type test report schedule, listing all type test reports with confirmation that the items above have been checked and confirmed. Each record should have the date the checks were performed and details of who conducted the checks.

Recommendation	Description	Audited party comment	Remedial action
Type test reports	Prepare and maintain a register of type test reports detailing checks conducted, whether compliance is achieved, the date checks were conducted and who conducted them.	WEL accepts the recommendation and will move to create a register as detailed.	Identified

Clause 38(2)(b) of schedule 10.7 requires confirmation in the metering installation certification report that each data storage device in the metering installation:

- has memory capacity and functionality that is suitable for the proposed functions of the data storage device specified in the design report for the metering installation, and
- has availability of memory for a period that is suitable for the proposed functions as set out in the design report for the metering installation, and for a minimum continuous period of 15 days.

Compliance with this clause is discussed in **section 5.45**.

Audit outcome

Compliant

4.13 Metering Component Stickers (Clause 8(1) and 8(4) of Schedule 10.8)

Code related audit information

An ATH must confirm certification by attaching a metering component certification sticker to the metering component or, if not practicable, provide the sticker with the metering component.

If an ATH certifies the metering component on the same day it certifies the metering installation that the metering component is installed in, the ATH may combine the certification stickers and attach it to the metering installation in accordance with clause 41 of Schedule 10.7.

Audit observation

I checked WEL's component stickers to confirm compliance.

Audit commentary

All component stickers are compliant with this clause. I checked samples of component stickers and photos of five installations to confirm they were correctly applied.

WEL does not use combined component and installation certification stickers.

Audit outcome

Compliant

4.14 Metering Component Stickers (Clause 8(2) of Schedule 10.8)

Code related audit information

A metering component certification sticker must show:

- the name of the metering component owner (if available)
- if the metering component is a meter or a measuring transformer:
 - a) the name of the ATH or the approved calibration laboratory who calibrated the metering component
 - b) the name of the ATH who certified the metering component
 - c) the date on which the metering component was certified
 - d) the initials or other unique identifier of the person who carried out the certification of the metering component.

Audit observation

I checked WEL's component stickers to confirm compliance.

Audit commentary

I checked samples of component stickers and photos of five installations to confirm if the stickers contained the required information. The previous audit report stated that component stickers contained all the required information except for the name of the ATH or the approved calibration laboratory who calibrated the metering component. I've determined that the calibration sticker from the approved laboratory meets the requirements of this clause. Photos below show a L+G sticker and an Intellihub sticker.



Audit outcome

Compliant

4.15 Sealing and Monitoring of Seals (Clause 9 of Schedule 10.4 & Clause 47(7) of Schedule 10.7)

Code related audit information

An ATH is required to have a documented system for applying seals to a metering installation to ensure that each metering component in the metering installation that could be expected to affect the accuracy or reliability of the metering installation is sealed. The system of sealing will ensure monitoring of the integrity of the metering installation and that unauthorised access to the metering installation will be identifiable so that the MEP can be notified.

The sealing system will identify:

- the ATH who affixed the seal*
- the person (or the sealing tool) who applied the seal*
- when the seal was applied.*

Audit observation

I checked the quality documentation and a sample of 35 certification records to confirm compliance.

Audit commentary

WEL uses individually numbered plastic seals for the sealing of components. The application of seals is recorded on site via the technician's tablet and populated into the metering records and certification report. Validation occurs when the data is entered to ensure there is no duplication of seal numbers.

Audit outcome

Compliant

5. CALIBRATION AND CERTIFICATION OF METERING INSTALLATIONS

5.1 ATH must not certify Metering Installations under certain circumstances (Clause 8(1) Of Schedule 10.7)

Code related audit information

The ATH must not certify a metering installation if the installation does not comply with Part 10.

Audit observation

I checked a sample of 35 certification records to confirm compliance.

Audit commentary

All 35 metering installations complied with Part 10.

Audit outcome

Compliant

5.2 Determination of Metering Categories (Clause 5 of Schedule 10.7 & Clause 10.11)

Code related audit information

An ATH is required to determine the category of the metering installation in accordance with Table 1 of Schedule 10.1 before it certifies a metering installation.

Audit observation

I checked certification records for 35 metering installations to confirm compliance.

Audit commentary

All 35 certification reports had the metering category recorded correctly. WEL only certifies category 1 installations, this is prepopulated in the technician's tablet.

Audit outcome

Compliant

5.3 Requirement for Metering Installation Design Report (Clause 2(4) Of Schedule 10.7)

Code related audit information

The ATH must receive a design report from the MEP before installing or modifying a metering installation or a component in a metering installation.

Audit observation

I checked the current suite of design reports and the certification records for 25 metering installations.

Audit commentary

I checked the suite of design reports and confirm they are all compliant. The design report number was recorded on all certification records.

Audit outcome

Compliant

5.4 ATH Design Report Obligations (Clause 3 of Schedule 10.7)

Code related audit information

Before certifying a metering installation, the ATH must check the design report to confirm the metering installation will function as designed and that the metering installation will comply with Part 10.

The certifying ATH must update the design report with any changes and provide it to the MEP responsible for the installation within 10 days of installation certification.

Audit observation

I checked the current suite of design reports and the certification records for 25 metering installations.

Audit commentary

The design reports contain all of the required information, including configuration schemes and schematic drawings. There were no examples of changes to design reports. The design report number was recorded on all certification records.

Audit outcome

Compliant

5.5 Certification as a Lower Category (Clause 6(1) of Schedule 10.7)

Code related audit information

An ATH may determine that the metering category of a current transformer installation is lower than would otherwise be the case and certify the installation at that lower category only if:

- a protection device, like a fuse or a circuit breaker, is installed so that it limits the maximum current; or*
- the MEP provides evidence from historical data that the maximum current will be lower than the current setting of the protection device for the category that metering installation is currently certified at; or*
- the components in the metering installation will use less than 0.5 GWh in any 12-month period; or*
- the MEP provides evidence from historical data that the installation will use less than 0.5 GWh in any 12-month period.*

Audit observation

WEL has not certified any installations as a lower category.

Audit commentary

WEL has not certified any installations as a lower category.

Audit outcome

Not applicable

5.6 Use of Current Transformer Rating Lower Than Supply Capacity (Clause 6(2)(a) of Schedule 10.7)

Code related audit information

If the ATH determines the category of a current transformer metering installation is lower than would otherwise be the case and a current limiting device is used, the ATH must:

- *confirm the suitability and operational condition of the protection device*
- *record the rating and setting of the protection device in the metering records*
- *seal the protection device*
- *apply, if practicable, a warning tag or label to the seal.*

Audit observation

WEL has not certified any installations as a lower category.

Audit commentary

WEL has not certified any installations as a lower category.

Audit outcome

Not applicable

5.7 Determining Metering Installation Category at a Lower Category Using Current Transformer Rating (Clause 6(2)(b) & (d) of Schedule 10.7)

Code related audit information

The ATH may determine the metering installation category according to the metering installation's expected maximum current, if:

- *there has been a request to do so from the MEP,*
- *the MEP provides evidence from historical data that the maximum current will be lower than the current setting of the protection device for the category that metering installation is currently certified; and*
- *the ATH considers it is appropriate to do so in the circumstances.*

The MEP must obtain the maximum current that flows through the installation each month from the participant interrogating the installation. From this data the ATH can calculate the maximum current from the raw meter data by either calculation from the kVA by trading period if available or from a maximum current indicator if fitted. If the MEP does not receive the monthly report from the participant interrogating the installation or if the current exceeds the maximum calculated rating of the installation, the certification of the installation is automatically cancelled.

Audit observation

WEL has not certified any installations as a lower category.

Audit commentary

WEL has not certified any installations as a lower category.

Audit outcome

Not applicable

5.8 Suitability of Determination of a Metering Installation Category at a Lower Category using Current Transformer Rating (Clause 6(3) Of Schedule 10.7)

Code related audit information

Before the ATH determines a metering installation to be a lower category, the ATH must first visit the site of the metering installation to ensure it is suitable for the metering installation to be determined to be a lower category.

Audit observation

WEL has not certified any installations as a lower category.

Audit commentary

WEL has not certified any installations as a lower category.

Audit outcome

Not applicable

5.9 Use of Metering Installation Certification Methods (Clause 7(1) Of Schedule 10.7)

Code related audit information

When certifying a metering installation, the ATH must use either of the following methods:

- a) the selected component certification method if the metering installation is category 1, 2, or 3; or*
- b) the fully calibrated certification method.*

Audit observation

I checked certification records for 35 metering installations.

Audit commentary

WEL uses the selected component method only as all of its certification work is conducted on category 1 metering installations. The certification method is recorded on all installation certification reports.

Audit outcome

Compliant

5.10 Certification of a Metering Installation using Statistical Sampling or Comparative Recertification (Clause 7(2) Of Schedule 10.7)

Code related audit information

In addition to the selected component and fully calibrated methods, the ATH may also recertify an installation using:

- a) an approved statistical sampling process for category 1 metering installations; or*
- b) the approved comparative recertification method for a category 2 metering installation*

Audit observation

WEL has not conducted any statistical sampling or comparative recertification.

Audit commentary

WEL has not conducted any statistical sampling or comparative recertification.

Audit outcome

Not applicable

5.11 Metering Installation Certification Requirements (Clause 8(3) Of Schedule 10.7)

Code related audit information

An ATH may only certify a metering installation as category 3 or higher if the metering installation incorporates a half hour meter.

Audit observation

WEL has not conducted certification of installations above Category 2.

Audit commentary

WEL has not conducted certification of installations above Category 2.

Audit outcome

Not applicable

5.12 Certification Tests (Clause 9(1) of Schedule 10.7)

Code related audit information

An ATH, when required to carry out tests specified in Tables 3 or 4 of Schedule 10.1, must comply with the provisions of clause 9(1) of Schedule 10.7 for the following tests:

- a prevailing load test*
- an installation or component configuration test*
- a raw meter data output test.*

A prevailing load test is defined in the Code as a test that is carried out by comparing the output of the metering installation against a working standard connected to the metering installation. For a category 2 or higher metering installation, the prevailing load check must be done against a calibrated instrument (working standard). For a category 1 metering installation industry, best practice has defined a prevailing load test as a measurement of disk revolutions or pulses compared with time and current measurements. The revolutions or pulses are compared against a table or chart to validate the accuracy of the measurement. The prevailing load check is more than simply confirming that the meter operates but is only intended to identify a "gross error" like a phase missing or reversed or a significant metering error.

If the ATH carries out an installation or component configuration test on a metering installation or a metering component, it must ensure that the test equipment configuration is the same as the metering installation or component configuration recorded in the design report.

To carry out a raw meter data output test for a category 1 metering installation or category 2 metering installation, the ATH must apply a load on each phase that is:

- greater than 5% of the meter's maximum rated current for category 1 installations,*
- 10 amps on each phase for category 2 metering installations.*

In addition, the ATH must use either the working standard referred to in subclause (1)(a) or an ammeter in good working order with an accuracy range of +/-5% to measure the load applied to the metering

installation and recording the resulting increment of the meter register value over a measured period of time or recording the resulting accumulation of pulses from the load over a measured period of time.

The ATH must also ensure that the change in the meter register that occurs under subclause (ii)(A) or (ii)(B) is at least “1” in the least significant digit, or one mark if the least significant digit does not have numerical markings.

If the meter is a Ferraris disc meter, the ATH must undertake two raw meter data output tests in which the second test must have a load applied to the meter that is at least double the load applied in the first test.

To carry out a raw meter data output test for a half-hour installation, the ATH must either compare the output from a working standard to the raw meter data from the metering installation for a minimum of one trading period, or if the raw meter data is to be used for the purposes of Part 15, confirm that the MEP’s back-office processes include a comparison of:

- the increment of the accumulating meter registers, and
- the sum of the half-hour metering raw meter data for the same period.

Audit observation

I checked process documentation and 35 certification reports to confirm compliance.

Audit commentary

This clause was changed from 1st February 2021 introducing minimum load requirements for ATHs when conducting raw meter data tests. The minimum load required on each phase is:

- greater than 5% of the meter’s maximum rated current for category 1 installations
- 10 amps on each phase for category 2 metering installations.

When conducting a raw meter data test the code change also requires the ATH to record either:

- the resulting increment of the meter register value over a measured period of time, or
- the resulting accumulation of pulses from the load over a measured period of time.

Prior to this change there was no specified minimum load requirement, and the ATH was not required to record the increment of the meter register value or the resulting accumulation of pulses.

Raw meter data tests for Category 1 installations were conducted and confirmed in the metering installation certification reports via a check box, and there is additional information which is in the database but does not appear on the certification report. An example is shown below.

ICP 0081171723WE9AB									
	ICP	Job Completion Date	Device No	Voltage	Amps	Pulse Rate	Pulse Count	Meas_Second	Result
▶	0081171723WE9AB	19/03/2022 1:00 pm	10072402	237	8.40	1000	10	18.12	-0.20

This level of detail achieves compliance with the Code, but I recommend this information is also included in the “printed” certification report.

Recommendation	Description	Audited party comment	Remedial action
Raw meter data output tests	Ensure the results of the raw meter data output tests are included in the “printed” metering installation certification report.	Certification reports have been amended to include test results.	Cleared

The minimum load requirements were met for all metering installations, the WEL process requires an external load of 2kW to be connected.

Raw meter data output tests for an HHR metering installation which are category 1 or category 2 must be conducted by either:

- comparing the output from a working standard to the raw meter data from the metering installation for a minimum of one trading period, or
- confirming that the metering equipment provider’s back-office processes include a comparison of the difference in the increment of the meter registers to the half-hour metering raw meter data, if the raw meter data is to be used for the purposes of Part 15.

For category 1 installations WEL has received confirmation from the MEP that the comparison occurs.

This clause also requires that *“The ATH must also ensure that the change in the meter register that occurs under sub-clause (ii)(A) or (ii)(B) is at least “1” in the least significant digit, or one mark if the least significant digit does not have numerical markings.”* The meters used by WEL do not have decimal places, therefore the register advance test cannot be conducted. The Authority provided a memo on 29 October 2021 clarifying that a “non-numerical symbol” such as a flow direction symbol can be used in place of a register advance. The requirement is for a Class A ATH to confirm that the non-numerical element is physically and programmatically integrated into the numerical elements of the register. This confirmation is likely to be available from L+G, who is the manufacturer and a Class A ATH.

Table 3 states that for Category 1 metering installations, where recertification occurs without meter replacement, a prevailing load test must be conducted using a working standard. I identified three ICPs where a prevailing load test had not been conducted and only one meter was present. The ICPs are 0000316814WE898, 0000316859WE566 and 0004506364WE5A6.

If two meters were present the Code does not require a prevailing load test. The industry does not have a Category 1 prevailing load test capability and to establish one would cost approx. \$12,500,000 just for the working standards, then each job would take longer, which would also add to costs. I’ve raised this as an issue for the Authority to consider.

Issue	Description	Remedial action
Category 1 prevailing load tests	<p>Table 3 states that for Category 1 metering installations, where recertification occurs without meter replacement, a prevailing load test must be conducted using a working standard.</p> <p>The industry does not have a Category 1 prevailing load test capability and to establish one would cost approx. \$12,500,000 just for the working standards, then each job would take longer, which would also add to costs.</p>	I recommend the Authority changes the Code to allow recertification of single meter Category 1 installations with a raw meter data output test but not a prevailing load test.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 5.12</p> <p>With: Clause 9(1)(ii)(B) of Schedule 10.7</p> <p>From: 01-May-21</p> <p>To: 05-May-22</p>	<p>Register advance check not conducted because decimal places are not available.</p> <p>Prevailing load test not conducted for three installations recertified.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is very low because all other tests are conducted.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Register advance checks: These are being done in accordance to the EA memo of 29 Oct 21 and results are now being displayed in metering certificates.		11/05/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Prevailing Load: We strongly support the Auditors comments that the Code requires adaption in relation to Cat1 re-certifications,		Ongoing	

5.13 Raw Meter Data Test for All Metering Installations (Clause 9(1A) Of Schedule 10.7)

Code related audit information

If the ATH performs a raw meter data output test under sub-clause (1)(c) or sub-clause (1)(d), for a metering installation that will be certified for remote meter reading, the ATH must:

- a) obtain the raw meter data from the back-office system where the raw meter data is held; or*
- b) ensure that the metering equipment provider responsible for the metering installation has a process to validate a meter reading taken at the time of the metering installation certification with a meter reading from the metering equipment provider's back-office system.*

Audit observation

I checked practices and 35 certification reports to confirm compliance.

Audit commentary

For category 1 installations WEL has confirmed that the metering equipment provider has a process to validate a meter reading taken at the time of the metering installation certification with a meter reading from the metering equipment provider's back-office system.

Audit outcome

Compliant

5.14 Alternate Raw Meter Data Test for Category 1 and 2 Metering Installations (Clause 9(1)(C) Of Schedule 10.7)

Code related audit information

A raw meter data output test is carried out for a category 1 metering installation or category 2 metering installation by comparing a known load change against the increment of the sum of the meter registers.

Audit observation

Refer to **sections 5.12** and **5.13**.

Audit commentary

Refer to **sections 5.12** and **5.13**.

Audit outcome

Compliant

5.15 Raw Meter Data Output Test (Clause 9(2) And 9(3) Of Schedule 10.7)

Code related audit information

If the ATH performs a raw meter data output test that requires a comparison between two quantities, the ATH must not certify the metering installation unless the test demonstrates that the difference between the two quantities is within the applicable accuracy tolerances set out in Table 1 of Schedule 10.1.

Audit observation

I checked process documentation and records for 35 metering installations to confirm compliance.

Audit commentary

There were no examples of inaccurate or failed test results.

Audit outcome

Compliant

5.16 Test Results (Clause 10(1) & (2) of Schedule 10.7)

Code related audit information

An ATH must not certify a metering installation if the results of tests on the metering installation or any of its metering components find that:

- a metering component did not pass all the tests*
- the metering installation did not meet the requirements for certification.*

Within five business days of reviewing the tests, the ATH must advise the relevant MEP why it did not certify the metering installation.

Audit observation

I checked process documentation and records for 35 metering installations to confirm compliance.

Audit commentary

There were no examples of metering components failing tests.

Audit outcome

Compliant

5.17 Selected Component Certification (Clause 11(2) of Schedule 10.7)

Code related audit information

An ATH may only use the selected component certification method to certify a metering installation which complies with the categories and component specifications set out in Table 1 of Schedule 10.1.

Audit observation

I checked process documentation and records for 35 metering installations to confirm compliance.

Audit commentary

The process documentation is clear, and all selected component certification reports were compliant.

Audit outcome

Compliant

5.18 Selected Component - circumstances where method may be used (Clause 11(3) Of Schedule 10.7)

Code related audit information

An ATH must only use the selected component certification method to certify the metering installation if:

- the required tests in Table 3 of Schedule 10.1 are carried out
- each data storage device, meter, and measuring transformer has been calibrated and certified
- each data storage device is certified in accordance with clause 5 of Schedule 10.8
- the ATH provides a certification report for the metering installation.

Audit observation

I checked process documentation and records for 35 metering installations to confirm compliance.

Audit commentary

The process documentation is clear, and all selected component certification reports were compliant.

Audit outcome

Compliant

5.19 Comparative Recertification – circumstances where method may be used (Clause 12(2) of Schedule 10.7)

Code related audit information

An ATH may only use the comparative recertification method to recertify a category 2 metering installation if:

- the certification of the current transformers in the metering installation expire before the meter certification expiry date
- each data storage device and/or meter has been calibrated and certified.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.20 Comparative Recertification Tests (Clause 12(3) And 12(5)(A) Of Schedule 10.7)

Code related audit information

An ATH must, when recertifying the category 2 metering installation using the comparative recertification metering installation certification method, ensure that:

- the metering installation has passed the tests set out in Table 3 of Schedule 10.1 using a working standard
- the accuracy of the current measurement sensor (current transformer or high accuracy Rogowski coil) enables the metering installation to meet the specified accuracy requirements of Table 1 of Schedule 10.1
- the overall metering installation accuracy meets the requirements of Table 1 of Schedule 10.1 and
- the ATH provides a certification report for the metering installation.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.21 Fully Calibrated – Circumstances Where Method May be Used (Clause 13(3) of Schedule 10.7)

Code related audit information

An ATH must use the fully calibrated certification method to certify the metering installation:

- by carrying out the tests set out in Table 4 of Schedule 10.1

- if each of the components (the data storage device, meter, and measuring transformer) has been calibrated and certified.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.22 Fully Calibrated - Certify Each Metering Component (Clause 13(4) Of Schedule 10.7)

Code related audit information

Each individual metering component in the metering installation must have a current certification report that confirms that the metering component complies with the requirements of its accuracy class; and includes the certification date of the metering component.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.23 Fully Calibrated - Additional Metering Installation Certification Report Requirements (Clause 13(5) & (6) Of Schedule 10.7)

Code related audit information

The ATH must provide a certification report for the metering installation. The certification report must include confirmation that:

- the ATH has checked the design report of the metering installation to confirm the metering installation functions in accordance with the report
- the overall metering installation accuracy meets the requirements of Table 1 of Schedule 10.1
- the accuracy of the metering installation remains within the maximum permitted error for the relevant metering installation
- each metering component in the metering installation is used only in a permitted combination as set out in table 1 of Schedule 10.1.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.24 Fully Calibrated – Use Meter Class Accuracy (Clause 13(7) Of Schedule 10.7)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that the ATH uses the meter class accuracy, and not the actual accuracy, to calculate whether the actual error is within the maximum permitted error.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.25 Insufficient Load (Clause 14 of Schedule 10.7)

Code related audit information

Every metering installation requires a test to ensure that the installation is correctly recording the energy used at the installation. The tests required are defined in Tables 3 and 4 of Schedule 10.1. The checks range from a minimum check that the meter registers increment through to a full raw meter data output check against a working standard and a check against the back-office data for a half hour installation.

If the ATH decides to certify half hour metering installation that has insufficient load to complete a prevailing load check, the ATH must ensure that:

- it performs an additional integrity check of the metering installation wiring, and records the results of this check in the certification report

- it records in the certification report that the metering installation is certified under clause 14 of Schedule 10.7.

Once load is present and following a request from the MEP, the ATH must carry out prevailing load tests. If the tests demonstrate that the metering installation performs within the maximum permitted error, the certifying ATH must:

- update the metering installation certification report, within five business days of completing the tests, to include the results of the tests carried out
- leave the original metering installation certification expiry date unchanged.

Audit observation

WEL has not conducted insufficient load certification.

Audit commentary

WEL has not conducted insufficient load certification.

Audit outcome

Not applicable

5.26 Statistical Sampling (Clause 16 of Schedule 10.7)

Code related audit information

A group of meters can be sampled by the ATH and the results of the sample group can be extended to a larger group of the same meters. This is a process of certification by statistical sampling. The ATH must select a sample using a statistical sampling process that is:

- detailed in AS/NZS1284 (or approved and published by the Authority)
- recertify the group by recertifying each metering installation in the sample using the fully calibrated certification method
- advise the MEP as soon as reasonably practicable whether the sample passes or fails the recertification requirements.

If the ATH carries out a statistical sampling process when recertifying a group of category 1 metering installations on behalf of an MEP, it must document and record:

- the process it follows for selecting samples
- any assumptions about those samples
- the metering installations in the sample
- the metering installations in the recertified group.

An ATH that recertifies a group of metering installations using a statistical sampling process does not need to apply a certification sticker to the remainder of the metering installations in the family or group that was sample tested.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.27 Statistical Sampling - Certification Method (Clause 7(3) Of Schedule 10.7)

Code related audit information

If the ATH uses statistical sampling, it must use either the selected component method or the fully calibrated method, as applicable, to certify each metering installation in the sample.

Audit observation

WEL does not conduct certification under this clause.

Audit commentary

WEL does not conduct certification under this clause.

Audit outcome

Not applicable

5.28 Certification Validity Periods (Clause 17 of Schedule 10.7)

Code related audit information

A metering installation certification expiry date is the earliest of:

- a) the date of commissioning plus the maximum certification validity period for the relevant category of metering installation, as set out in Table 1 of Schedule 10.1; or*
- b) the earliest metering component certification expiry date; or*
- c) a date determined by the ATH if the ATH believes that the circumstances and condition of the components in a metering installation warrant deviation from Table 1 of Schedule 10.1.*

The expiry date for a metering installation in a group recertified using a statistical sampling process, is the earliest expiry date of the metering installations in the sample

Audit observation

I checked 35 metering installation certification records to confirm compliance.

Audit commentary

The commissioning date and expiry date is recorded correctly in the metering installation certification reports.

There are some installations that also contain an NGCM meter in series with the WEL meter. I have raised this matter as an issue where guidance is required from the Authority to clarify how certification and certification reports should be managed in this situation. The table below details the scenarios and the questions requiring clarification.

Scenario	Questions
NGCM is the MEP NGCM meter was installed in 2015	1. Is the WEL meter considered part of the metering installation for certification purposes?

<p>Certification date is 30/06/15 and expiry date is 30/06/30</p> <p>WEL installs their meter on 12/11/21</p> <p>NGCM remains as the MEP</p>	<ol style="list-style-type: none"> 2. Assuming the answer to question 1 is yes, does the metering installation certification expiry date stay as 30/06/30? 3. Does the ATH need to provide the 12/11/21 certification report to NGCM as the MEP? 4. Which components should be in the registry?
<p>NGCM is the MEP</p> <p>NGCM meter was installed in 2015</p> <p>Certification date is 30/06/15 and expiry date is 30/06/30</p> <p>WEL installs their meter on 12/11/21</p> <p>WEL becomes the MEP</p>	<ol style="list-style-type: none"> 1. Is the NGCM meter considered part of the metering installation for certification purposes? 2. Assuming the answer to question 1 is yes, does the metering installation certification expiry date stay as 30/06/30? 3. Which components should be in the registry?

Issue	Description	Remedial action
Multiple MEOs on category 1 installations.	As mentioned in WEL's MEP audit, clarification is required regarding how certification and certification reporting should be managed when both WEL and NGCM MEPs have meters in series in metering installations.	Authority to provide guidance.

Audit outcome

Compliant

5.29 Metering Installation Accuracy (Clause 21 of Schedule 10.7)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that the metering installation does not exceed the relevant maximum permitted error after the application of any external compensation factors.

Audit observation

I checked 25 metering installation certification records to confirm compliance.

Audit commentary

WEL has used the selected component method only. In all cases the metering components had been calibrated and certified, the correct design reports had been recorded and the tests set out in Table 3 had been completed. This confirms the installation error does not exceed the maximum permitted error.

Audit outcome

Compliant

5.30 Error Calculation (Clause 22 of Schedule 10.7)

Code related audit information

If a metering installation is certified using the comparative recertification or fully calibrated methods, the ATH must calculate and record the percentage of overall error of the metering installation. The ATH must calculate this using appropriate mathematical methods that include:

- all sources of measurement error including test instrument errors, reference standard variations when used in conditions that deviate from those in the calibration report, variations in repeated observations, the instrument resolution or discrimination threshold and any assumptions incorporated in the measurement method and procedure*
- the error calculation must include the uncertainty in the measurement at a 95% level of confidence using JCGM 100:2008*
- the error and its calculation must be recorded in the certification report.*

The ATH must not certify the metering installation if the uncertainty is greater than the maximum permitted site uncertainty or the combined error that includes the measured error and the uncertainty, is greater than the maximum permitted installation error.

Audit observation

WEL does not conduct certification using the comparative recertification or fully calibrated methods.

Audit commentary

WEL does not conduct certification using the comparative recertification or fully calibrated methods.

Audit outcome

Not applicable

5.31 Compensation Factors (Clause 24(1)(b) of Schedule 10.7)

Code related audit information

Before it certifies a metering installation that requires a compensation factor to adjust raw meter data, the ATH must:

- advise the MEP of the compensation factor*
- ensure that the compensation factor that will be applied to raw meter data external to the metering installation is applied as follows:*
 - a) for ratio compensation, on a category 1 metering installation or higher category of metering installation; or*
 - b) for error compensation, on a metering installation that quantifies electricity conveyed through a point of connection to the grid; or*
 - c) for loss compensation, only on a category 3 or higher metering installation.*

Audit observation

WEL does not certify any installations where compensation factors are required.

Audit commentary

WEL does not certify any installations where compensation factors are required. A compensation factor of 1 is recorded against all meters in the metering records.

Audit outcome

Compliant

5.32 Record Metering Installation Compensation Factor (Clause 24(2) Of Schedule 10.7)

Code related audit information

If a compensation factor is applied to a metering installation, the ATH must record in the certification report, the methodology, assumptions, measurements, calculation and details of each compensation factor that is included within the internal configuration of the metering installation and each compensation factor that must be applied to the raw meter data.

Audit observation

WEL does not certify any installations where compensation factors are required.

Audit commentary

WEL does not certify any installations where compensation factors are required.

Audit outcome

Not applicable

5.33 Installation of Metering Components (Clause 25 of Schedule 10.7)

Code related audit information

Before it certifies a metering installation, the ATH must ensure that the installation of the metering components was carried out by an ATH. However, a suitably qualified person such as a switchboard manufacturer may install the measuring transformers and any required associated burden, the test facilities, potential fuses and switchboard wiring.

Before it certifies a metering installation, the ATH must ensure that each metering component is installed in accordance with the installation design report.

Audit observation

WEL conducts category 1 certification only, all components are installed by the ATH at the time of certification.

Audit commentary

WEL conducts category 1 certification only, all components are installed by the ATH at the time of certification.

Audit outcome

Compliant

5.34 Determine Metering Installation Certification Expiry Date (Clause 27(1) & (2) Of Schedule 10.7)

Code related audit information

The ATH needs to determine the meter certification expiry date for each meter in a metering installation. The meter certification expiry date must be the earliest end date of the following periods, calculated from the date of commissioning of the metering installation:

- a) the maximum metering installation certification validity period for the relevant category of metering installation; or
- b) the maximum meter certification validity period set out in Table 2 of Schedule 10.1 for the relevant class of meter for the metering installation; or
- c) the certification period specified in the meter certification report.

Audit observation

I checked 35 certification records to confirm compliance.

Audit commentary

The selected component method was used in all the records which I checked. In all cases the installation expiry dates were calculated by applying the maximum certification validity periods from the commissioning date of the meters.

Audit outcome

Compliant

5.35 Meter Certification Shelf Life (Clause 27(4) Of Schedule 10.7)

Code related audit information

If a meter is not installed in a metering installation within 24 months of the date of the meter's certification report, the meter must be recertified before it is installed.

Audit observation

I checked 35 certification records to confirm compliance.

Audit commentary

WEL understands the requirements of this clause and ensures that all meters are certified at the time of installation.

Audit outcome

Compliant

5.36 Measuring Transformers must be Certified (Clause 28(2) Of Schedule 10.7)

Code related audit information

All measuring transformers must be certified before they can be used in a metering installation. If a measuring transformer has previously been used in another metering installation, the ATH must ensure that the measuring transformer has been recalibrated since it was removed from the previous metering installation. This must be undertaken either by an approved calibration laboratory or an ATH.

Audit observation

WEL does not conduct certification of installations containing measuring transformers.

Audit commentary

WEL does not conduct certification of installations containing measuring transformers.

Audit outcome

Not applicable

5.37 Measuring Transformers used in a Certified Metering Installation (Clause 28(4) Of Schedule 10.7)

Code related audit information

To certify any metering installation incorporating measuring transformers, the ATH must ensure that:

- the installation has certified measuring transformers
- the installation has a test facility which has provision for isolation, installed as physically close to the meter as practical in the circumstances
- the test facility is fitted with a transparent cover
- the installation has securely mounted measuring transformers which are, if practicable, in a sealed enclosure
- the maximum permitted error is calculated in accordance with clause 22 for the fully calibrated certification method or the comparative recertification method
- any voltage supplies from a voltage transformer to a meter or that other equipment in the metering installation is protected by appropriately rated fuses or circuit breakers dedicated to the supply. All fuses and circuit breakers must be suitably sealed or located in sealed enclosures,
- the measuring transformer's secondary circuit is earthed and that it is earthed at no more than one point
- the total in-service burden (magnitude and phase angle, where appropriate), complies with clause 31.

Audit observation

WEL does not conduct certification of installations containing measuring transformers.

Audit commentary

WEL does not conduct certification of installations containing measuring transformers.

Audit outcome

Not applicable

5.38 Measuring Transformer Certification Expiry Date (Clause 29 of Schedule 10.7)

Code related audit information

The ATH needs to determine the measuring transformer certification expiry date for each measuring transformer in a metering installation. The measuring transformer certification expiry must be within the validity period specified in the measuring transformer certification report.

Audit observation

WEL does not conduct certification of installations containing measuring transformers.

Audit commentary

WEL does not conduct certification of installations containing measuring transformers.

Audit outcome

Not applicable

5.39 Other Equipment Connected to Measuring Transformers (Clause 30 of Schedule 10.7)

Code related audit information

If the ATH certifies a metering installation incorporating a measuring transformer used by another metering installation, it must ensure that where voltage transformers are connected to more than one meter:

- *the meters are included in the metering installation being certified*
- *appropriate fuses or circuit breakers are provided to protect the metering circuit from short circuits or overloads affecting the other meter.*

While it is desirable that only metering equipment is connected to measuring transformers in a metering installation if, in some circumstances, the MEP connects other equipment to measuring transformers, the ATH must ensure that:

- *the accuracy of the metering installation remains within the maximum permitted error for the relevant metering installation category*
- *the metering installation certification report confirms that the accuracy of the metering installation remains within the maximum permitted error for the relevant metering installation*
- *any wiring between the equipment and any part of the metering installation is continuous*
- *the equipment is labelled appropriately, including with any de-energisation restrictions*
- *the connection details of the other equipment are recorded in the metering installation design report*
- *there are appropriate fuses or circuit breakers provided to protect the voltage transformer and metering circuit from short circuits or overloads affecting the other equipment.*

Audit observation

WEL does not conduct certification of installations containing measuring transformers.

Audit commentary

WEL does not conduct certification of installations containing measuring transformers.

Audit outcome

Not applicable

5.40 Burden & Compensation (Clause 31 of Schedule 10.7)

Code related audit information

An ATH may certify a metering installation for a POC to the grid that includes error compensation factors as an alternative to the use of burden resistors only if the ATH is satisfied the error compensation factors will provide a more accurate result than the use of burden resistors.

An ATH may change the burden on a voltage transformer, without obtaining the approval of the MEP, if the ATH confirms in the certification report that the difference between the new burden and the burden at the time of the most recent metering installation certification is:

- a) less than or equal to 1/30th of the VA rating of the voltage transformer, if the voltage transformer is rated at less than 30 VA; or*
- b) no greater than 1 VA, if the voltage transformer is rated at equal to or greater than 30 VA.*

Before it certifies a metering installation incorporating a measuring transformer:

- ensure that the in-service burden does not exceed the upper limit of the range specified for the measuring transformer, if specified in the design report for the metering installation.
- ensure that the in-service burden on the measuring transformer is within the range specified in the certification report by installing burdening resistors, if necessary,
- confirm that a class A ATH has confirmed by calibration that the accuracy of the measuring transformer will not be adversely affected by the in-service burden being less than the lowest burden test point specified in the standard, if the primary voltage of the measuring transformer is greater than 1kV,
- confirm that the measuring transformer's manufacturer has confirmed that the accuracy of the measuring transformer will not be adversely affected by the in-service burden being less than the lowest burden test point specified in the standard.

Audit observation

WEL does not conduct certification of installations containing measuring transformers.

Audit commentary

WEL does not conduct certification of installations containing measuring transformers.

Audit outcome

Not applicable

5.41 Alternative Certification (Clause 32(1) of Schedule 10.7)

Code related audit information

If the ATH cannot comply with the requirements for certifying a measuring transformer solely due to the inability to obtain physical access to test the measuring transformers, it can certify the metering installation for a period not exceeding 24 months only if:

- the measuring transformer has not previously been certified due to failure to obtain access
- the ATH is satisfied that the metering installation will comply with the applicable accuracy requirements
- the ATH has advised the MEP that the metering installation has been certified by this method
- the MEP has advised the registry of the certification.

Audit observation

WEL has not applied alternative certification.

Audit commentary

WEL has not applied alternative certification.

Audit outcome

Not applicable

5.42 Installations Incorporating Control Devices (Clause 33(2) of Schedule 10.7)

Code related audit information

Before the ATH can certify a metering installation incorporating a control device that must be certified, it must ensure:

- that the certification expiry date for each control device is the same as the metering installation certification expiry date and record that date in the installation certification report
- that the control device complies with the applicable standards listed in Table 5 of Schedule 10.1
- the control device is fit for purpose
- if the metering installation contains a control device that has previously been used in another metering installation, that the control device is still fit for service.
- that the control device is:
 - a) likely to receive control signals
 - b) correctly connected
 - c) correctly programmed.

Audit observation

I checked certification records for seven metering installations to confirm compliance.

Audit commentary

WEL is certifying control devices and correctly applying stickers. The control device certification expiry date is correctly recorded in the installation certification report. All points above are met.

Audit outcome

Compliant

5.43 Control Device Reliability (Clause 34(1) & (3) to (5) of Schedule 10.7)

Code related audit information

In order to ensure control device accuracy or the completeness of reconciliation information, the ATH must determine the likelihood of the control device not receiving control signals before it certifies a metering installation incorporating a control device.

If the ATH believes the likelihood of the control device not receiving control signals would affect the accuracy or completeness of the information for consumption reconciliation, the ATH may certify the remainder of the metering components and the installation, excluding the control device. The ATH must advise the MEP within three business days of its decision. The MEP is then responsible for advising both the reconciliation participant for the POC for the metering installation and the control signal provider of the ATH's determination.

Audit observation

I checked correspondence in relation to this matter to determine compliance.

Audit commentary

WEL is also the distributor in situations where they are the MEP and ATH. There are no signal propagation issues on the WEL network; this is checked on an annual basis.

Audit outcome

Compliant

5.44 Data Storage Devices (Clauses 36(2) of Schedule 10.7)

Code related audit information

If a data storage device has previously been used in another metering installation, the ATH must ensure that the data storage device has been recalibrated since it was removed from the previous metering installation by an approved calibration laboratory, an approved test laboratory, or an ATH.

Audit observation

I checked processes and the records for 35 metering installations to confirm compliance.

Audit commentary

All data storage devices are recertified prior to being reinstalled.

Audit outcome

Compliant

5.45 Data storage device requirements (Clause 38(1) and (2) of Schedule 10.7 and clause 5(1) of Schedule 10.8)

Code related audit information

An ATH must ensure that each data storage device in the metering installation:

- is installed so that on-site interrogation is possible without the need to interfere with seals*
- has a dedicated power supply unless the data storage device is integrated with another metering component*
- is compatible with each other metering component of the metering installation*
- is suitable for the electrical and environmental site conditions in which it is installed*
- has all of its outputs and inputs appropriately electrically isolated and rated for purpose*
- has no outputs that will interfere with the operation of the metering installation*
- records periods of data identifiable or deducible by both date and time on interrogation*
- has memory capacity and functionality that is suitable for the proposed functions of the data storage device specified in the design report for the metering installation*
- has availability of memory for a period that is suitable for the proposed functions as set out in the design report for the metering installation, and at least for a minimum continuous period of 15 days.*

The data storage device must have an event log which records the following:

- a) loss of power supply*
- b) critical internal alarms*
- c) meter phase failure if integral to the meter*
- d) software configuration changes*
- e) a record of time changes.*

Audit observation

I checked the availability of type test reports, and processes for determining environmental suitability.

Audit commentary

All of the points above are covered by the type test reports. WEL has appropriate instructions for the identification and recording of unsuitable environments.

Audit outcome

Compliant

5.46 Location of Metering Installation Certification Stickers (Clause 41(1) of Schedule 10.7)

Code related audit information

An ATH must confirm the metering installation certification by attaching a metering installation certification sticker as close as possible to the meter, while maintaining reasonable visibility of the certification sticker and the meter.

When attaching a metering installation certification sticker, the ATH must remove or obscure any invalid or expired certification stickers.

Audit observation

I checked the photos for five metering installations to confirm compliance.

Audit commentary

In all cases, the certification stickers contained the appropriate detail and were correctly applied.

The Code was changed on 1st February 2021 requiring the ATH to remove or obscure any invalid or expired certification stickers. For new connections where WEL is not the MEP the metering installation is initially certified by a technician under the Wells ATH and Wells certification stickers are applied. After completing this certification, the technician installs the WEL meter in series with the other MEPs meter and recertifies the metering installation as a contractor under the WEL ATH. A new WEL ATH metering installation sticker is then applied. Checks of the photos from five metering installations confirmed that the initial Wells certification stickers were removed or obscured.

Audit outcome

Compliant

5.47 Alternate Location of Metering Installation Certification Sticker (Clause 41(4) Of Schedule 10.7)

Code related audit information

If attaching a certification sticker is not practicable, the ATH must devise and use an alternative means of documenting the information and keep any metering component certification sticker with the documented information.

Audit observation

I checked with WEL whether this scenario had arisen.

Audit commentary

This scenario has not arisen and is unlikely to arise.

Audit outcome

Compliant

5.48 Contents of Metering Installation Certification Sticker (Clause 41(2) Of Schedule 10.7)

Code related audit information

The metering installation certification sticker must show:

- the name of the ATH who certified the metering installation*
- the certification date of the installation*
- the metering installation category*
- the ICP*
- the certification number for the metering installation.*

Audit observation

I checked the photos for five metering installations to confirm compliance.

Audit commentary

In all cases, the certification stickers contained the appropriate detail and were correctly applied.

Audit outcome

Compliant

5.49 Combining certification stickers (Clause 41(5) – Clause 41(8) of Schedule 10.7)

Code related audit information

If an ATH certifies a metering component on the same day that the ATH certifies the metering installation, the ATH may combine the metering installation certification sticker with the metering component certification sticker.

If the certification sticker is combined, the ATH must:

- ensure that the combined sticker shows all the information required by subclause (2) and clause 8(2) of Schedule 10.8,*
- meet the requirements of subclauses (1), (3) and (4), as if the combined sticker were a metering installation certification sticker.*

The combined sticker is immediately invalid if:

- the metering installation certification expiry date changes; or*
- a metering component to which the combined certification sticker relates is removed from the metering installation.*

Audit observation

WEL has not used a combined metering installation and component sticker.

Audit commentary

WEL has not used a combined metering installation and component sticker.

Audit outcome

Compliant

5.50 Enclosures (Clause 42 of Schedule 10.7)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that, if a metering component in the metering installation is housed in a separate enclosure from the meter enclosure, the enclosure is appropriate to the environment in which it is located and has a warning label attached stating that the enclosure houses a metering component.

Audit observation

I checked the photos for five metering installations to confirm compliance.

Audit commentary

Although this clause only refers to enclosures other than the metering enclosure, I have considered this clause to apply to metering enclosures as well.

The photos for five metering installations showed that all enclosures were appropriate for the environment, and the WEL certification sticker has an appropriate warning. WEL reviews photos of all installations to confirm enclosure suitability.

Audit outcome

Compliant

5.51 Metering Component Certification (Clause 43(1) of Schedule 10.7)

Code related audit information

Before certifying an installation, the ATH must ensure that each component has been certified by an ATH and has been stored appropriately since component certification.

Audit observation

I checked the processes for storage of components, and the records for 23 metering installations to confirm compliance.

Audit commentary

As mentioned in earlier sections, WEL has ensured each metering component is certified prior to certification of metering installations.

WEL has appropriate arrangements for storage and transportation.

Audit outcome

Compliant

5.52 Sealing Requirements (Clause 47(2) (3) (4) and (5) Of Schedule 10.7)

Code related audit information

Before an ATH certifies a metering installation or leaves it unattended, the ATH must ensure that each metering component that could reasonably be expected to affect the accuracy or reliability of the metering installation is sealed.

The metering components which must be sealed include:

- each part and connection of a data storage device in, or attached to, the metering installation except for a port for on-site reading that is not capable of carrying out any other function

- the main switch cover, if the main switch:

a) is on the supply side of the metering installation

b) has provision for sealing.

Audit observation

I checked process documentation, design reports and the photos for 35 metering installations to confirm compliance.

Audit commentary

The process documentation achieves compliance with all of the requirements above. Main switches are sealed where there is provision for sealing and an individually numbered sticker is applied where there is no provision for sealing. The date of application of seals and seal numbers are recorded in the metering installation certification record.

Audit outcome

Compliant

5.53 Seals for Metering Component Enclosures (Clause 47(6) Of Schedule 10.7)

Code related audit information

When applying a seal to a metering component in an enclosure, the ATH must attach a warning label in a prominent position inside the enclosure.

Audit observation

I checked process documentation, design reports and the photos for five metering installations to confirm compliance.

Audit commentary

The process documentation, design reports and the photos for five metering installations confirm compliance. The certification sticker is installed in a prominent position and includes a warning which achieves compliance with this clause.

Audit outcome

Compliant

5.54 Requirements for Sealing System (Clause 47(7) Of Schedule 10.7)

Code related audit information

An ATH must use a sealing system that enables identification of:

- the ATH who affixed the seal

- the person (or the sealing tool) who applied the seal

- when the seal was applied.

Audit observation

I checked process documentation, design reports and the photos for five metering installations to confirm compliance.

Audit commentary

WEL uses individually numbered plastic seals for the sealing of components. The application of seals is recorded on site via the technician's tablet and populated into metering records and reports. Validation occurs when the data is entered to ensure there is no duplication of seal numbers.

The photos for five metering installations confirmed that seals had been applied correctly.

Audit outcome

Compliant

5.55 Removal or Breakage of Seals (Clause 48(6) of Schedule 10.7)

Code related audit information

When the ATH investigates an unauthorised removal or breakage, it must assess the accuracy and continued integrity of the metering installation. If the ATH considers the accuracy and continued integrity is unaffected, it must replace the removed or broken seals.

If the accuracy and continued integrity is affected, the ATH must replace the removed or broken seal and advise the MEP that the metering installation is potentially inaccurate, defective, or not fit for purpose.

Audit observation

I checked the process documentation and reporting form for compliance.

Audit commentary

WEL has appropriate instructions in relation to this requirement, and there is the ability to record this information on the commissioning record for the installation. In all cases WEL recertifies the installation when a seal has been broken.

Audit outcome

Compliant

5.56 Wiring (Clause 6 of Schedule 10.8)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that all wiring in the metering installation is suitable for the environment in which the metering installation is located, fit for purpose, securely fastened, and compliant with all applicable requirements and enactments.

The ATH must ensure that the wiring between metering components in the metering installation:

- is run as directly as practicable*
- is appropriately sized and protected*
- does not, to the extent practicable, include intermediate joints for any measuring transformer circuits*
- includes conductors that are clearly and permanently identified, by the use of any one or more of the following:*

a) colour coding

b) marker ferrules

c) conductor numbering.

If it is not practicable to exclude intermediate joints for any measuring transformer circuits, the ATH must ensure that the intermediate joints are sealed or in a sealed enclosure.

Audit observation

I checked process documentation, design reports and the photos for five metering installations to confirm compliance.

Audit commentary

The process documentation, design reports and the photos for five metering installations confirm compliance. WEL ensures that wiring in a metering installation matches the requirements of the design reports. Most of these points relate to measuring transformers and WEL does not deal with installations above Category 1.

Audit outcome

Compliant

5.57 Fuses and Circuit Breakers (Clause 7 of Schedule 10.8)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that all fuses and circuit breakers that are part of the metering installation are appropriately rated for the electrical duty and discrimination required, clearly labelled and sealed or located in sealed enclosures.

Audit observation

I checked process documentation, design reports and the photos for five metering installations to confirm compliance.

Audit commentary

The checks demonstrated compliance with this requirement.

Audit outcome

Compliant

5.58 Calibration of Metering Components Where Relevant (Clause 7(1) Of Schedule 10.4)

Code related audit information

Before the ATH certifies a metering installation or metering component, it must ensure that the metering components have been calibrated by an approved calibration laboratory or an ATH with appropriate approval under Schedule 10.3.

Audit observation

I checked process documentation, design reports and 35 certification reports to confirm compliance.

Audit commentary

All certified components that are owned by the WEL MEP have been calibrated and WEL has copies of the calibration reports.

Metering installation certification for other MEPs occurs in cases where the WEL meter is installed in series with another MEPs meter and is effectively a check meter. In this situation WEL relies on the

certification of the other MEPs metering components which has been completed by another ATH.

Audit outcome

Compliant

5.59 Requirement for Calibration of Metering Components (Clause 7(2) Of Schedule 10.4)

Code related audit information

Before the ATH certifies a metering component it must ensure that the component is calibrated or adjusted under the physical and electrical conditions specified in Table 5 of schedule 10.1 and the conditions permit the calculation of uncertainties at the reference conditions.

Audit observation

I checked process documentation, design reports and 35 certification reports to confirm compliance.

Audit commentary

All certified components have been calibrated and WEL has copies of the calibration reports.

Audit outcome

Compliant

5.60 Metering Component Calibration Method (Clause 7(3) Of Schedule 10.4)

Code related audit information

A class B ATH must follow the relevant requirements of ISO17025 for calibration of components and only use methodologies that have been verified in their most recent audit.

Audit observation

WEL's Class B ATH does not calibrate components.

Audit commentary

WEL's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.61 Metering Component Calibration Test Points (Clause 7(4) Of Schedule 10.4)

Code related audit information

If the ATH calibrates a component, it must ensure that the test points that it uses are either:

- *no less than the test points in Table 5 of Schedule 10.1 or*
- *sufficient to calculate the metering installation error as defined in clause 22 of Schedule 10.7.*

Audit observation

WEL's Class B ATH does not calibrate components.

Audit commentary

WEL's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.62 Determine Metering Component Error and Record (Clause 7(5) Of Schedule 10.4)

Code related audit information

An ATH must, when calibrating a metering component:

- if necessary, adjust and document the error compensation*
- ensure that any adjustment carried out is appropriate to achieve an error as close as practicable to zero*
- ensure that the uncertainty of measurement during the calibration of the metering component does not exceed one third of the maximum permitted error in the relevant standard listed in Table 5 of Schedule 10.1.*

If the metering component is intended for a metering installation which will be certified using the selected component certification method, the ATH must ensure that the ATH records the errors of a current transformer from 5 % to 120 % of rated primary current.

Audit observation

WEL's Class B ATH does not calibrate components.

Audit commentary

WEL's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.63 Class B ATH Calibrating Metering Components (Clause 2(3) Of Schedule 10.3)

Code related audit information

If a class B ATH wishes to calibrate components (such as class 0.5 meters, class 1 meters, class 2 meters, class 0.5 current transformers, and class 1.0 current transformers) this must be carried out under the relevant provisions and methodologies of ISO 17025. The final audit report must include a list of all relevant requirements of ISO 17025 for calibrating these metering components and all relevant methodologies audited.

Audit observation

WEL's Class B ATH does not calibrate components.

Audit commentary

WEL's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.64 Meter Certification (Clause 1 of Schedule 10.8)

Code related audit information

All meters must be certified before they can be used in a metering installation. The ATH must ensure that the meters in a metering installation have been type tested by an approved test laboratory, that the results for the meter are appropriate for that meter model and version and have a calibration report.

Audit observation

I checked the certification records for 35 metering installations and WEL's database to confirm compliance.

Audit commentary

WEL certifies meters in accordance with this clause.

WEL has copies of the type test reports for the meters and has copies of calibration reports from the meter manufacturer. Meters that are returned from the field are re-calibrated by a class A ATH before being returned to use.

Audit outcome

Compliant

5.65 Meter requirements when meter is relocated (Clause 26(2) Of Schedule 10.7 and Clause 43(2) Of Schedule 10.7)

Code related audit information

If a meter has previously been used in another metering installation, the ATH must ensure that the meter has been recalibrated since it was removed from the previous metering installation by an approved calibration laboratory or an ATH unless it is less than 12 months since the meter was commissioned in the previous installation.

Audit observation

I checked the process documentation in relation to this clause.

Audit commentary

This clause is designed to allow builder's temporary supplies to be portable without the need to calibrate the meter every time. WEL ensures that all meters that are returned from the field are recalibrated by a class A ATH before being returned to use.

Audit outcome

Compliant

5.66 Measuring Transformer Error Testing (Clause 2(1)(A) & (B) Of Schedule 10.8)

Code related audit information

Before certifying a measuring transformer, an ATH must test the measuring transformer's errors at a range of primary values at their rated burdens. If the measuring transformer is a multi-tap current transformer, an ATH must carry out the calibration tests and only certify the transformer for the ratios that have been calibrated.

Audit observation

WEL has not conducted certification of measuring transformers.

Audit commentary

WEL has not conducted certification of measuring transformers.

Audit outcome

Not applicable

5.67 Measuring Transformer Certification (Clause 3 of Schedule 10.8)

Code related audit information

Before it certifies a measuring transformer, the ATH must ensure that:

- *the measuring transformer has a current calibration report issued by an approved calibration laboratory or an ATH approved to carry out calibration*
- *the measuring transformer calibration report:*
 - *confirms that the measuring transformer complies with the standards listed in Table 5 of Schedule 10.1*
 - *records any tests the ATH has performed to confirm compliance*
 - *confirms that the measuring transformer has passed the tests*
 - *records any recommendations made by the ATH on error compensation*
 - *includes any manufacturer's calibration test reports.*

The ATH is required to produce a measuring transformer certification report that includes:

- *the date on which it certified the measuring transformer*
- *the certification validity period for the measuring transformer, which must be no more than 120 months*
- *whether the certification was based on batch test certificates*
- *if the certification was based on batch test certificates, confirmation that the manufacturer's batch testing facility is, in the ATH's opinion, of an acceptable standard*
- *the range that the in-service burden must be within*

The ATH must provide confirmation that the ATH has inspected the manufacturer's test certificates, and carried out any additional tests it considers necessary, to satisfy itself that the measuring transformer meets the accuracy requirements.

Audit observation

WEL has not conducted certification of measuring transformers.

Audit commentary

WEL has not conducted certification of measuring transformers.

Audit outcome

Not applicable

5.68 Measuring Transformers in service burden range (Clause 2(1)(E) Of Schedule 10.8)

Code related audit information

Before certifying a measuring transformer, the ATH must determine the range that the in-service burden must be within to ensure the measuring transformer remains accurate, by using one or more of the following:

- *the measuring transformer's nameplate rating*
- *the calibration report for the measuring transformer*
- *the manufacturer's documentation for the measuring transformer*
- *the standard set out in Table 5 of Schedule 10.1 the measuring transformer was manufactured to.*

Audit observation

WEL does not conduct certification of installations containing measuring transformers.

Audit commentary

WEL does not conduct certification of installations containing measuring transformers.

Audit outcome

Not applicable

5.69 Measuring Transformer - Epoxy Insulated (Clause 2(2) Of Schedule 10.8)

Code related audit information

Before it certifies an epoxy insulated current transformer, the ATH must ensure that the certification tests allow for, and the metering installation certification report shows, the current transformer's age, temperature, and batch.

Audit observation

WEL does not conduct certification of installations containing measuring transformers.

Audit commentary

WEL does not conduct certification of installations containing measuring transformers.

Audit outcome

Not applicable

5.70 Control Device Certification (Clause 4 of Schedule 10.8)

Code related audit information

Before it certifies a new control device, the ATH must produce a certification report that:

- *confirms that the control device complies with the applicable standards listed in Table 5 of Schedule 10.1*
- *includes the details and results of any test that the ATH has carried out to confirm compliance under paragraph (a)*
- *confirms that the control device has passed such tests.*

Before it certifies an existing installed control device, the ATH must produce a certification report that confirms:

- *that the control device is fit for purpose*
- *the control device certification validity period that the ATH considers appropriate, which must be no more than 180 months.*

Audit observation

I checked the certification records for seven metering installations to confirm compliance.

Audit commentary

WEL certifies control devices in accordance with these clauses. Following a recommendation in the last audit WEL has added a 'report button' to the component certification record to enable the generation of a component certification report which can be provided as required. I checked the content of the metering component certification report and confirmed that it contained all the required information.

Audit outcome

Compliant

5.71 Data Storage Devices (Clause 36(2) Of Schedule 10.7)

Code related audit information

If a data storage device has previously been used in another metering installation, the ATH must ensure that the data storage device has been recalibrated since it was removed from the previous metering installation by an approved calibration laboratory, an approved test laboratory, or an ATH.

Audit observation

I checked the process documentation to confirm compliance.

Audit commentary

The process documentation confirmed that data storage devices that are returned from the field are re-calibrated by a class A ATH before being returned to use.

Audit outcome

Compliant

5.72 On-site Calibration and Certification (Clause 9(1) of Schedule 10.8)

Code related audit information

An ATH may only calibrate a metering component on site in the metering component's normal environment by measuring the influence of all on-site variables and including their estimated effects in the uncertainty calculation. An ATH must ensure that:

- *the effects of any departures from the reference conditions can accurately and reliably be calculated*
- *the metering installation, in which the metering component is incorporated, is within the applicable accuracy tolerances set out in Table 1 of Schedule 10.1 after taking into account all known influences including temperature and temperature co-efficient measurements.*

Audit observation

WEL does not conduct on site calibration of metering components.

Audit commentary

WEL does not conduct on site calibration of metering components.

Audit outcome

Not applicable

5.73 On Site Metering Component Calibration (Clause 9(2) Of Schedule 10.8)

Code related audit information

If the ATH calibrates a metering component on site using manual methods, computers, or automated equipment for the capture, processing, manipulation, recording, reporting, storage, or retrieval of calibration data, it must ensure that its computer software:

- *is documented in the ATH's procedures*
- *can manipulate the variables that affect the performance of the metering component in a manner that will produce results that would correctly indicate the level of compliance of the metering component with this Code.*

Audit observation

WEL does not conduct on site calibration of metering components.

Audit commentary

WEL does not conduct on site calibration of metering components.

Audit outcome

Not applicable

5.74 On site metering component calibration records (Clause 9(3) of Schedule 10.8)

Code related audit information

An ATH that certifies a metering component on site must include confirmation in the metering component certification report that:

- *it has calculated the uncertainty of measurement taking into account all environmental factors for both the metering component being calibrated and the working standards*
- *the calculation of the uncertainty comprises all uncertainties in the chain of calibration*
- *the ATH has used a calibration procedure to calibrate the metering component that was included in the ATH's most recent audit and is appropriate for on-site calibration.*

Audit observation

WEL does not conduct on site calibration of metering components.

Audit commentary

WEL does not conduct on site calibration of metering components.

Audit outcome

Not applicable

5.75 Data Storage Device Certification Expiry Date (Clause 37 of Schedule 10.7)

Code related audit information

Before certifying a meter installation which incorporates a data storage device, the ATH must determine the expiry date of the data storage device. The ATH must record the expiry date in the certification report for the metering installation and the certification report for the data storage device.

Audit observation

I checked the records for 35 metering installations to confirm compliance.

Audit commentary

WEL is correctly applying certification in accordance with this clause.

Audit outcome

Compliant

5.76 All functions and activities must be completed (Clause 10.42(2))

Code related audit information

Where Part 10 requires the ATH to complete a function or activity before a metering installation is certified, the ATH must complete that function or activity as part of the process for certifying the metering installation.

Audit observation

I checked the records for 35 metering installations to confirm compliance.

Audit commentary

There was no evidence of incomplete functions.

Audit outcome

Compliant

6. INSPECTION OF METERING INSTALLATIONS

6.1 General Inspection Requirements (Clause 44 (1) (a) to (e) of Schedule 10.7)

Code related audit information

When carrying out an inspection of a metering installation, the ATH must:

- *check and confirm that the data storage device in the metering installation operates as required*
- *check and confirm that the expected remaining lifetime of each battery in the metering installation will be reasonably likely to meet or exceed the metering installation certification expiry date*
- *ensure that no modifications have been made to the metering installation without the change having been documented and certification requirements satisfied*
- *visually inspect all seals, enclosures, metering components, and wiring of the metering installation for evidence of damage, deterioration, or tampering*
- *ensure that the metering installation and its metering components carry appropriate certification stickers.*

Audit observation

I checked the inspection process and five completed inspection reports to confirm compliance.

Audit commentary

The previous audit report recorded that the following two points were not included in inspection reports:

- confirmation that the data storage device in the metering installation operates as required, and
- confirmation that the expected remaining lifetime of each battery in the metering installation will be reasonably likely to meet or exceed the metering installation certification expiry date.

The remaining battery life is now included, and confirmation that the data storage device operates as required is included by recording in the inspection results:

- that there are no events recorded which could affect the operation of the data storage device, and
- date of the last sum-check and confirmation that it passed.

Audit outcome

Compliant

6.2 Raw Meter Data Test (Clause 44(1)(F) Of Schedule 10.7)

Code related audit information

When carrying out an inspection of a category 1 metering installation, the ATH must also check and confirm there is no difference between the volume of electricity recorded by the master accumulation register of a data storage device, and the sum of the meter registers.

Audit observation

I checked the inspection process and five completed inspection reports to confirm compliance.

Audit commentary

WEL conducted inspections of AMI metered Category 1 installations, which contain data storage devices for the WEL MEP. The standard Category 1 process now include a check of the master accumulation register and the sum of the meter registers. This is conducted by confirming that the most recent “sum-check” has passed and recording this in the inspection results.

Audit outcome

Compliant

6.3 Prepare Inspection Report (Clause 44(2) Of Schedule 10.7)

Code related audit information

An ATH must prepare an inspection report for each inspection of a metering installation that it carries out, which includes the following:

- *details of the checks carried out, the results, and the installation certification expiry date*
- *the serial numbers of all components in the metering installation*
- *any non-compliances and the action taken to remedy the non-compliance*
- *the name of the inspector and the date on the inspection.*

Audit observation

I checked the inspection process and five completed inspection reports to confirm compliance.

Audit commentary

The completed WEL inspection reports included all of the above points.

Audit outcome

Compliant

6.4 Provide Inspection Report To MEP (Clause 44(3) Of Schedule 10.7)

Code related audit information

The ATH must, within 10 business days of carrying out the inspection, provide the inspection report to the MEP.

Audit observation

I checked the timeframes for sending inspection reports to MEPS.

Audit commentary

As WEL is also the MEP they will have the records as soon as the inspection is complete. No inspections were conducted for other MEPS.

Audit outcome

Compliant

6.5 Inspections for Category 2 & Above Installations (Clause 46(2) of Schedule 10.7)

Code related audit information

When carrying out an inspection of a category 2 or higher metering installation, the ATH must also conduct the following additional checks:

- a visual inspection of each metering component in the metering installation for damage, tampering, or defect
- if the current transformer can be safely accessed, check the position of the current transformer tap to ensure it is still appropriate for the expected maximum current for the metering installation
- check for the presence of appropriate voltages at the metering installation
- check the voltage circuit alarms and fault indicators.

Audit observation

WEL does not conduct Category 2 or above inspections.

Audit commentary

WEL does not conduct Category 2 or above inspections.

Audit outcome

Not applicable

7. PROCESS FOR HANDLING FAULTY METERING INSTALLATIONS

7.1 Investigation of Faulty Metering Installations (Clause 10.43(3) of Part 10)

Code related audit information

As a participant, the ATH must inform the MEP if it believes a metering installation is faulty, inaccurate, defective, or not fit for purpose.

Audit observation

I checked WEL's process documentation and one example of a potentially faulty metering installation.

Audit commentary

WEL has a process which is compliant with the Code. The content of reporting includes all relevant detail. The report from site is passed on to the WEL MEP for installations where WEL is the MEP. For other MEPs WEL includes the appropriate details in the reports provided when recertification occurs. I checked an example where the MEP had requested an investigation into potentially faulty meter at the request of the trader. The meter was replaced and sent for testing. The WEL ATH provided details of the results of testing which confirmed the meter was accurate. There were no examples of faulty metering installations found by the WEL ATH.

Audit outcome

Compliant

7.2 Testing of Faulty Metering Installations (Clause 10.44 of Part 10)

Code related audit information

When advised by an MEP that a metering installation is faulty, inaccurate, defective, or not fit for purpose, the ATH must test the metering installation as soon as practical and provide a statement of situation.

Audit observation

I checked WEL's process documentation and reporting forms.

Audit commentary

WEL has a process which is compliant with the Code. The content of reporting includes all relevant detail. I checked an example where the MEP had requested an investigation into potentially faulty meter at the request of the trader. The meter was replaced and sent for testing. The WEL ATH provided details of the results of testing which confirmed the meter was accurate. The reporting provided met the requirement for a statement of situation.

Audit outcome

Compliant

7.3 Statement of Situation (Clause 10.46(1) of Part 10)

Code related audit information

The ATH must include the following in the statement of situation:

- *the details and results of the tests carried out*
- *a conclusion, with reasons, as to whether or not the metering installation is faulty*
- *an assessment of the risk to the completeness and accuracy of the raw meter data*
- *the remedial action proposed or undertaken*
- *any correction factors to apply to raw meter data to ensure that the volume information is accurate*
- *the period over which the correction factor must be applied to the raw meter data.*

Audit observation

I checked WEL's process documentation and reporting forms.

Audit commentary

WEL has a process which is compliant with the Code. The content of reporting includes all relevant detail. I checked an example where the MEP had requested an investigation into potentially faulty meter at the request of the trader. The meter was replaced and sent for testing. The WEL ATH provided details of the results of testing which confirmed the meter was accurate. The reporting provided met the requirement for a statement of situation.

Audit outcome

Compliant

7.4 ATH to keep records of modifications to correct defects (Clause 10.47 of Part 10)

Code related audit information

When taking action to remedy an inaccuracy or defect within a metering installation, the ATH must ensure that records of any modifications that are carried out to the metering installation are kept for each metering component of the metering installation in the metering records and in a manner reasonable in the circumstances to ensure that further investigation can be carried out.

Audit observation

I checked WEL's process documentation and reporting forms.

Audit commentary

WEL has a process which is compliant with the Code. The content of reporting includes all relevant detail. All records are stored indefinitely in the metering database.

Audit outcome

Compliant

8. Conclusions

The audit was conducted in accordance with the ATH Audit Guidelines V1.3 produced by the Electricity Authority.

The audit found two non-compliances and makes three recommendations. All of the nine non-compliances from the previous audit were cleared.

In general, compliance is of a high standard. The issues identified are as follows:

- some late updates of certification records to the MEP,
- register advance checks not conducted because meters do not have decimal places; it is likely WEL can use a “non-numerical symbol” to confirm the register advance, provided a Class A ATH approves this method, and
- the inspection process does not confirm the operation of the data storage device.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table below provides some guidance on this matter and recommends a next audit frequency of 36 months. WEL demonstrated a strong willingness to achieve compliance by resolving all nine issues from the previous audit. I have confidence the two issues identified during this audit will also be resolved. I agree with the 36-month recommendation.

9. WEL Response

As the two non-compliances have been resolved at time of writing the report or already have strong controls in place, and neither has had any discernible impact on the industry or other participants, we agree with the risk rating indicative audit frequency of 36 months.