

Q & A: part D industry forum

30 September 2009

Question no	Question	Response
<p>Key area 1, Issue 1: Responsible party for the provision of a metering installation (page 26 of the consultation document)</p>		
1.	<p>Is there a difference between a compliant metering installation and a certified metering installation?</p>	<p>A compliant metering installation is a certified metering installation.</p>
2.	<p>How can you get a certified metering installation without first being livened and vice versa?</p>	<p>This issue will be dealt with within the drafting of the rules. A test house may have been able to perform some tests but not all tests. There will be allowance for variations within the Rules.</p>
3.	<p>This option will have a significant cost implication to metering equipment owners. Has this been considered within the cost benefit analysis, as it would double the cost of installation?</p> <p>Especially around rural networks.</p>	<p>Question from Commission: Would you see this is more an issue where you have metering installations that are more complex?</p> <p>Answer: No.</p> <p>Request from commission: please include this in your submission – the additional costs that you see applicable to metering equipment owners.</p>
4.	<p>I understand the model use of system agreement provides for the retailer to authorise the livening. In light of the recommended option will you change the model contracts?</p>	<p>Traders would continue to authorise the distributor to liven under the proposed principles,</p>
5.	<p>Will this mean there will be no instance of unmetered load going forward?</p>	<p>We are quite aware that some of the unmetered load issues don't work as well as they should be. Rule 3.2 of part D specifies 3000kWh per annum, however we also aware that there have been several requests for an exemption from this rule. We will be looking at the particulars of unmetered load in more detail further down the process.</p>
<p>Key area 1, Issue 2: Responsible party for compliance of a metering installation (page 29 of the consultation document)</p>		
6.	<p>There was the 3rd option for sub-issue 1: leave things as they are. Has it been</p>	<p>No – there hasn't, we are just looking at</p>

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	established that there is actually an issue here?	formalising this within the Rules.
7.	Who do you envisage will pay the metering participant for their services?	<p>The trader = switchable ICP</p> <p>Connection point between two networks (NP or NSP) = person initiating the connection point.</p>
8.	When you refer to the central database, do you potentially mean the registry?	The registry is the preferred option.
9.	Being the central database – will there be some form of compliant information in it so the trader knows the site is compliant?	<p>We will list the fields a bit further in the forum. There is a minimum amount of information that will be required to be in the central database. Serial no, certification dates, multipliers for each meter.</p> <p>With this, there will be changes to the obligations of other participants.</p>
10.	Does the new framework contemplate that the metering participant could be nominated by the customer?	<p>Only if the customer were the trader for that ICP. Under the current Rules, the party who is the primary metering contact for a site is nominated by the trader for an ICP.</p> <p>In the case of a customer wanting to nominate a metering participant, the customer would need to notify the trader. However, sole discretion under the Rules is still with the trader.</p>
11.	Are there any obligations on the metering component owner for the ability to enforce compliance? There are many metering component owners with some installations.	We were considering whether or not the trader for that ICP becomes the default metering component owner. Their contract is directly with the customer and will be able to enforce compliance (more commercial leverage).
12.	Do you envisage that a metering component owner could avoid being a metering participant altogether?	There would be nothing to preclude a metering partner from being a metering participant. The metering participant would be co-ordinating the metering component owners and would hold the obligations under the Rules.

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13.	Will there be a switch process for meters?	Yes – there is a process for switching for the metering participant. This can be found in the flow diagram called: 'Meter installation – change of metering participant' (available on the commission's website).
14.	What if we can't get to the metering installation to have it certified?	There already should be appropriate contracts in place between the customer and the trader that allows access and between the trader and the metering participant. If the customer won't give access to the metering installation, the metering participant should go to the trader to have this rectified.
15.	If you are going to put the responsibility back on to the trader (who causes the majority of the problems), what's the point of making the change at all?	It is proposed that obligations are on the trader to trade rules compliant information, and that obligations are proposed to be placed on the metering participant to maintain the certification of a metering installation.
16.	For clarity, the metering participant would be the only party billing for metering installation assets regardless of whether they own the metering installation or not?	We think that the metering participant could receive an invoice from the metering component owner's, and will bundle those costs into their own invoice. The metering participant will decide how they on-invoice.
17.	Aren't you crossing over into the commercial world? Why would you want to get into this area?	We will be careful about non participant agreements for information. The way that technology is moving, is there is potentially a relationship with many users and only part of the information from a metering installation will relate to participants. The rest of the information will be for other purposes.
Key area 1, Issue 3: Responsibility for metering infrastructure (page 36 of the consultation document)		
18.	Are we saying that where a network or distributor actually owns a separate load control device (not on the meter board), that the metering participant is	Correct. Where the device is located within a meter or on the meter board is where this will apply.

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	not responsible (sub issue 1 this does not apply)?	
<p>Key area 2, Issue 2: Should the Rules include reactive energy metering (page 41 of the consultation document)</p>		
19.	<p>The references to half hour meter devices. If the device is being used for a different purpose, does it apply? e.g. – half hour metering installation being used for non half hour settlement.</p>	<p>If the metering installation is certified as a non half hour metering installation, it wouldn't apply.</p> <p>With regard to hybrid metering: if a metering installation is certified for half hour it is considered a half hour device, regardless of how the data is settled. E.g. A half hour metering installation settled as non half hour data will still be considered a half hour metering installation and must be certified as such.</p> <p>If it is certified as non half hour, it can only be used in a manner compliant with the non half hour Rules.</p>
20.	<p>From a distributor's point of view: we are interested in real load, but in terms of reactive power we are only interested in load (Q1 information). We wouldn't need the Q4 information.</p>	<p>There are some metering installations that add Q1 and Q4 together, which is the reason for the recommendation. You could be overcharging if you do not have directional indications.</p> <p>If you decided that you did not require Q4, you could simply ask not to receive it from the trader.</p>
<p>Key area 2, Issue 3: Should requirements be imposed on retailers in relation to the operation of pre-payment features on AMI meters (page 45 of the consultation document)</p>		
21.	<p>Doesn't this recommendation remove the whole meaning of prepay meters? Prepay meters give the consumer the control of what happens – so if they do not pay, it is disconnected. Why is there a need for these impositions (other than the medically dependant and vulnerable persons)?</p>	<p>The original intent was that a consumer should not have a prepay metering installation if the consumer could not put credit into the meter.</p> <p>We'd like to put this recommendation into the Guidelines to take advantage of the benefits of AMI meters – e.g. remote disconnection. This is an opportunity for AMI software to provide benefits to vulnerable consumers and, if the correct infrastructure is in place, may be more economical for traders to</p>

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		<p>operate a prepay metering installation.</p> <p>We saw the advantages for innovation and believe that legislation could curb this innovation. This is why we would like to put the recommendations in the Guidelines and not in part D.</p>
22.	<p>Have you given any thought to load limiting metering installations?</p>	<p>There is a potential for prepay to have a level of load set, but we have not included that. It would be a very good innovation for a trader to add this type of modification.</p> <p>We want to ensure that the Rules do not preclude this type of innovation.</p>
<p>Key area 2, Issue 5: Should control devices be certified (page 51 of the consultation document)</p>		
23.	<p><u>Clarification: which load control devices are to be certified</u></p> <p>The intent is that all control devices that may be used for settlement purposes should be certified. The options should have been more clearly stated as:</p> <ul style="list-style-type: none"> • Certify the devices that are being used for settlement purposes; or • Certify all devices that may (or could) be used for settlement purposes. <p>The preferred option is to certify all the devices that may be used for settlement purposes.</p>	
24.	<p>Would that include the load control devices for streetlights (in terms of certifying load control devices)?</p>	<p>Yes – the operation of that device is important.</p>
25.	<p>Would that then mean distributed unmetered load should be moved to part D (from part J)?</p>	<p>No – the responsibility for the distributed unmetered load database in part J is with the trader, who may require the customer to provide this.</p>
26.	<p>How would you certify these load controlling devices?</p>	<p>There is a provision for standards for ripple control – that will be a starting point.</p> <p>Where there is already a load control device, as part of a metering installation, there are already existing requirements under the Rules for the</p>

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		<p>device to be certified where the device controls information that will be used in settlement. We will just be extending this to cover all load control devices.</p> <p>Examples for certifying could include signal strength, sealing the device, ensuring the device is approved to operate on the channel it is operating on, and recording appropriate information about the device.</p> <p>We would be looking at requiring certification of these load control devices as part of the re-certification of the metering installation.</p>
27.	Will certification apply to all existing load control devices? Or only new?	We would be looking at a transitional period, where over time as a metering installation comes up for re-certification that any load control devices are also certified at that time.
28.	Where do you intent to draw the boundary? Will it certification of load control devices include the wiring or just the device itself?	There are two items: component certification and site certification. We would expect that the metering installation would check continuity of wiring and security connections in the same manner as meters.
29.	Given that the distributors are critical in the ability to ensure that the site of a ripple control device is certified, what obligations will be placed on them to ensure that ripple control is maintained?	<p>As far as components within the metering installation goes, that equipment must be certified eg the receiver. It is not proposed to require certification of ripple control injection plant.</p> <p>The distributor would be a component owner, the proposed metering participant for the metering installation would be required to ensure that the component retains certification.</p>
30.	Would only a test house now have the ability under the Rules to repair the ripple control on a hot water cylinder? Currently a fault man can do this.	This is already an issue under the current rules, in instances where the ripple controlled load is reconciled under a controlled load profile. There should be existing processes to this effect. Approved test houses could possibly subcontract activities to fault

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		staff.
31.	Have you given any thought to what defines a load control device? In some situations a customer will own the load control device, e.g. a device that does not affect settlement, but will affect how much electricity the customer may use.	<p>If it is a consumer device that is just switching load, no it does not. The meter will be capturing this information within the meter.</p> <p>We are referring to the measurement back at the meter – whether the trader uses it for settlement or not. If it affects the measurement then it should be certified regardless of whether the trader uses it for settlement.</p>
<p>Key area 3, Issue 1: :How can metering information and data be made more transparent (page 57 of the consultation document)</p>		
32.	Some ICPs have multiple installations. How would the certification dates be logged?	It is proposed to identify meters in the central database with location codes, and apply the certification date to the meter.
33.	How will you ensure data integrity? There is great difficulty in identifying this information now.	There will be rule obligations that would require metering participants to maintain accuracy.
34.	Will CT or VT ratios be included?	A meter multiplier will only be shown where the multiplier must be applied to meter readings. Where a multiplier is internal to a meter. The central database will not record the multiplier.
35.	One observation: serial numbers are not always unique.	Correct. If you did a search on serial numbers, it would return all that match. The meter serial number in conjunction with the location address field should provide unique identification.
36.	Is there room to add certification documents to the registry?	No, we have not considered extending the registry to that extent. If everyone thinks it is of benefit, please include it in your submissions.
37.	Going back to relays: we have old relays and new AMI load control devices. Will the registry provide fields	We will be looking at the ability to provide both in the registry.

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	for both?	
38.	You can have multiple sites and channels on one meter. Will there be the functionality to have this in the registry?	This has not been provided for at the moment. Please include this information in your submission.
39.	Is there a useful field that will allow the traders to see what the metering installation will cost?	This has not been provided for at the moment. You can include this in your submission if you think it is a good idea.
40.	Is the metering installation data in the registry intended to be the vital data that the traders need, but not a replacement for metering participant total databases? That any unusual data will still need to be requested from the metering participant?	<p>Correct. The central database is meant to be used as a summary and an automatic trigger that will notify the affected parties when a change is made to the metering installation.</p> <p>The metering participant is still expected to maintain databases that contain the full information on the metering installation.</p>
41.	Will the information in the registry for meter registers be for all meter registers (e.g. should it include billing registers)?	If it is within the one device, it should be all registers. If it is a check meter for a site, it should not be within the registry.
42.	Are you thinking of putting something in that will identify the profile channels?	This will be discussed when we get down to the further detail – when the registry functional specification is being consulted on.
<p>Key area 4, certification, audit, and technical issues (page 73 of the consultation document)</p> <ul style="list-style-type: none"> <i>Greater scrutiny of metering participants</i> 		
43.	ISO 9001, to clarify – by systems what do you mean? Are you talking about the metering participant's software?	No, it is not our intention that the software involved would need to pass scrutiny. It would need to fit into their business processes though.
<ul style="list-style-type: none"> <i>Codes of practice: review of scrutiny of test houses</i> 		
44.	I am not certain what aspect of fieldwork can not be covered by an	We would be clarifying that ISO 9001 would be required where the class A

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	ISO 17025 accreditation.	test house is using sub-contractors to perform the field work.
<ul style="list-style-type: none"> <i>Codes of practice: setting an audit cycle</i> 		
45.	Can we apply this recommendation to reconciliation participants?	Not within the part D project. We will be interested to see how it progresses and there is potential to apply this to reconciliation participants at a later date.
<ul style="list-style-type: none"> <i>Codes of practice: scrutiny of metering installations</i> 		
46.	Categories 5 and 6, given the metering installation are replaced every 3 years – isn't that sufficient? Is an inspection required every 1.5 years?	We are open to the possibility, but we would be keen to see what the value of inspections are. Please include this information in your submission.
47.	Category 3 is not in the recommendation.	We are recommending no change to category 3, status quo will remain.
General discussion/comments		
48.	Page 104, sub-issue 8: there may be some issues with allowing class B test houses to do calibration of class 0.5 meters. This is not something that can really be done under ISO 9001.	Please include this in your submission
49.	There is a proposal that main switches be sealed as part of the metering installation – will the situation where there is a high percentage of rural customers occur where we need to ascertain what the reason the electricity is out. The main seal may need to be broken and then the certification is null.	No – this situation has not been considered, but we look forward to receiving more information via submission.
50.	Is there still an obligation on each metering participant to ensure that each metering component owner is compliant? Or will the obligation be transferred to the trader?	<p>This will need to be managed through the commercial contract with the consumer.</p> <p>The metering participant has the rules obligation if a metering component owner fails to meet the certification</p>

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		<p>requirements. The metering participant could elect to replace the components if necessary to meet certification.</p> <p>Where we talked about the transfer of responsibility was where the consumer owns the components, then the obligation is transferred to the trader.</p>
51.	To confirm: collection and presentation of ripple relay switching times will not form part of the part D rules?	Correct, but if you are using switching times in a profile, the trader has the obligation to present this information to the RM and ensure that the time keeping is appropriate for the profile approval.
52.	Any guidance or thoughts on how much of a re-certification you have to do perform once you find that seals are broken (possibly through an inspection) on an approved/certified site?	<p>This would be up the test house to determine in their opinion what is necessary for re-certification.</p> <p>The inspection, especially with category 1, is a much lower level of inspection.</p>