

## Appendix 2: Form of Submission

**Name of submitter: Alastair Brookes – Energy Manager Manukau City Council**

	Question	Comment
Question 1	The Commission seeks comments on the guiding principles for the part D review project. Please give reasons for your view.	
Question 2	The Commission seeks comments on the proposed definitions for metering and metering infrastructure. Please give reasons for your views.	Territorial Local Authorities are currently working on reducing their street lighting loads. As they are unmetered we are going through an audit process, with monthly updates provided to the energy suppliers. However whilst new ballasts/lamps may reduce the load there is no way for us to meter reduced loads. New technology allows remote monitoring and control of streetlamps so that they can be dimmed. The control gear is sophisticated and can give accurate readings of the load, however as they are not physical meters they cannot be used for billing purposes. The Commission needs to investigate these technologies and put in place appropriate provision for use of these systems for billing purposes to help incentivise TLA's to reduce their street lighting load
Question 3	The Commission seeks comments on the responsibilities for provision of metering installations and responsibility for compliance with codes of practice. Please give reasons for your views.	

	<b>Question</b>	<b>Comment</b>
Question 4	Is there a need to have a more transparent market system so that reconciliation participants trading an installation can gain information on certification and meter attributes to the meter register level? If so, should these records be maintained by metering equipment owners? Please give reasons for your views.	
Question 5	There are already a large number of meter equipment owners that may not realise that they have obligations under the Rules, e.g. customers who own their own CTs etc. Do you see split (multiple parties) meter equipment ownership at a metering installation as an issue? The Commission seeks comments on the structure of meter equipment ownership, please give reasons for your views.	
Question 6	The Commission seeks comments on the demarcation between the metering installation and the reconciliation participant's "back office". Please give reasons for your views.	

	<b>Question</b>	<b>Comment</b>
Question 7	Is there a need to develop a new code of practice to cover the security standards required for metering installations and for metering infrastructure? Please give reasons for your views.	
Question 8	The Commission seeks comments on access to metering systems. Please give reasons for your views.	
Question 9	The Commission seeks comments on the certification of load control devices. Please give reasons for your views.	
Question 10	The Commission seeks comments on ownership of data from metering installations. Please give reasons for your views.	
Question 11	The Commission seeks comments on updating the Codes of Practice. Please give reasons for your views.	
Question 12	The Commission seeks comments on audit of meter equipment owners to ensure that rule obligations are being met.	

	<b>Question</b>	<b>Comment</b>
Question 13	The Commission seeks comments on the outstanding rule change amendments from the AMI policy. Please give reasons for your views.	
Question 14	Are there any other issues related to metering that you would like to raise? If yes, please provide examples and possible solutions.	.