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Dear Alex,

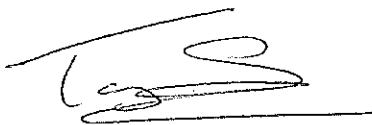
**Amendments to the Electricity Industry Metering Code 2005 – Issues Paper**

Thank you for the opportunity to provide a submission on the Issues Paper relating to Amendments to the Electricity Industry Metering Code 2005.

We have detailed our submission in the attached table, where we have re-stated each element of each part of the code, and provided our view for each of those items.

Please do not hesitate to contact me if you have any questions about any item of our submission.

Yours sincerely



Tony Shanahan  
Branch Manager Metering

Section	Proposed Amendments	Western Power Response
Part 1 - Preliminary	<p>1. Are there definitions under clause 1.3 of the Code that are inadequate or incorrect? What amendments are required to those definitions (see Appendix A for a detailed list of Code definitions that are potentially inaccurate or inconsistent with definitions in documents approved under the Code by the Authority)?</p>	<p>Yes, the following existing definitions require re-wording;</p> <ul style="list-style-type: none"> <li>• “metering installation” (a) at one boundary, a metering point – should be specific to the point of boundary within the metering point and not extend upstream or outside the metering point.</li> <li>• “good electricity industry practice” – this is a non specific definition which could benefit from further clarification.</li> <li>• “meter” &amp; “revenue meter” to be reworded into one definition of “revenue meter” clearly stating the metering point as the location. Also, clearly excluding sub meters. This means one definition for a “revenue meter” and one definition for “check meter”.</li> <li>• Proposed definition of “Revenue Meter” is – means, subject to clause 3.13(5), a device complying with this <i>Code</i> which measures and records electricity production and/or consumption and is the source of <i>energy data</i> at a <i>metering point</i>. This does not include a <i>prepayment meter</i> or <i>sub meter</i>.</li> <li>• “NMI” – agree this definition should be consistent with the NMI Allocation Procedure</li> <li>• “Metropolitan Area” – agree Code should adopt the Customer Code definition.</li> <li>• “metering database” – agree it should include reference to the registry.</li> <li>• “Code of Conduct” – agree it should be updated</li> </ul> <p>The following terms requires definition;</p> <ul style="list-style-type: none"> <li>• “meter reading” – means collection of <i>energy data</i> by physical observation or remote communications by the Network Operator (including its service provider), or a <i>Customer</i>.</li> <li>• “sub meter” – means a meter connected on the customer’s installation, but not at the <i>metering point</i> and does not form part of the <i>metering installation</i>. A sub meter is not a <i>Revenue Meter</i>.</li> </ul>
	<p>2. Whether the meaning of “publish” should be expanded to require a document approved under the Code to be maintained on the person’s website once it has been published; i.e. to be updated to include any amendments?</p>	<p>Agree</p>
	<p>3. Whether revised documents should be required to be published and maintained on the person’s website?</p>	<p>Agree they should</p>

	4. Whether the Customer Transfer Code should require a network operator to publish and maintain its approved Communication Rules (and any revisions to those Rules) on its website?	Agree they should
	5. Any other matters relating to Part 1 of the Code.	Further consideration is required to determine which code takes precedence for the definition of “day” <ul style="list-style-type: none"> <li>• “day” – the definition in the Metering Code is different to the Customer Transfer Codes “trading day” definition. We propose the current Metering Code definition remain, and the Customer Transfer Code adopt the Metering Code definition of “day”.</li> </ul>
<b>Part 2 – Code Objectives &amp; Arms-Length Treatment</b>	1. Any matters relating to this Part 2 of the Code.	Western Power understands this Part was put in place to handle the pre-aggregation of Western Power. Further input should be obtained to determine the need for the section on Arms Length Treatment.
<b>Part 3 – Meters &amp; Metering Installations</b>	1. Whether a Type 6 accumulation meter on which interval data is being collected needs to display “Time of Use” or “all time” registers?	Propose that there is no obligation on the Network Operator to provide “Time of Use” registers. Only obligation for accumulation meters where interval data is being collected is for “all time registers”.
	2. Whether “accumulated electricity production” in clause 3.2(1) needs clarifying in relation to bi-directional metering?	For bi-directional metering, accumulated electricity production means ‘net accumulated <i>electricity</i> production to the network when production exceeds consumption’.
	3. Whether the Code should be amended to clarify who owns a sub-meter?	Yes, believe this can be accommodated by amending definitions of “meter” and adding a definition for “sub meter”. Refer response in Part 1.  Propose the following clause is included in an appropriate part of the Code; <ul style="list-style-type: none"> <li>• Nothing in this Code applies in connection with a <i>sub meter</i>.</li> </ul> Note: Current sub meters owned by Western Power are in the metering registry. Any sub meter not in Western Power’s meter registry are not owned or maintained by Western Power. Western Power reserves the right to develop its policy on the future direction of its sub meters.

	<p>4. Whether the Code should clarify that the user or customer is responsible for maintaining metering equipment that it owns but the network operator determines maintenance and testing requirements? And whether provision should be made to give a network operator the authority to ensure metering equipment that it does not own is compliant with relevant rules and standards?</p>	<p>Yes – needs clarification. Suggest clause 3.5 (7) to be re-worded. Suggestion below;  Unless otherwise agreed, a <i>network operator</i> is not required to <i>maintain any metering equipment owned by user or user’s customer</i>. However, the <i>network operator</i> shall be responsible for the maintenance and testing requirements under a SLA between the <i>user or user’s customer</i></p> <p>{For example: Equipment owned by the user or its customer might include <i>CTs, meter panels and secondary wiring installed as part of a switchboard</i>. It will be the <i>network operator’s</i> responsibility to publish on its website an approved transformer asset management system, and that the <i>user or user’s customer’s</i> are aware of their obligation to comply with it}</p>
	<p>5. Whether clause 3.5 should be expanded to include the meter itself?</p>	<p>Yes, suggest the following;</p> <p><b>3.5</b>  {Note: A <i>metering installation</i> may consist of various combinations of <i>metering equipment</i> including:</p> <ul style="list-style-type: none"> <li>• <i>CTs, for the exclusive use of the metering point where the metering installation is installed;</i></li> <li>• <i>VTs, for the exclusive use of the metering point where the metering installation is installed, , unless check metering installation is also installed.</i></li> </ul> <p><b>3.5 (2)</b>  Unless it is a <i>Type 7 metering installation</i>, a <i>metering installation</i> must:</p> <ol style="list-style-type: none"> <li>(a) contain revenue meter(s); and</li> <li>(b) contain a device which has a visible or otherwise accessible display as detailed in clause 3.2(1); and</li> <li>(c) have a <i>measurement element(s)</i> for <i>active energy</i>; and</li> <li>(d) if required by Table 3 in Appendix 1, have a <i>measurement element(s)</i> for <i>reactive energy</i>; and</li> <li>(e) permit collection of data at the level of accuracy required by clause 3.9.</li> </ol>

	6. Whether clause 3.5(9)(b) should be amended to provide the network operator with a specific timeframe to correct a non-compliant metering installation or whether this is an issue that should be addressed by a service level agreement between the network operator and retailer?	Timeframes should be addressed by a service level agreement
	7. Whether clause 3.11(1) is sufficiently clear on the requirements of the metering installation to record data?	Western Power considers this clause is clear.
	8. Whether clause 3.14 should be amended to allow for a metering installation not to have to be changed if the meter does not comply with the Code's requirements because it is over specification?	If any individual component fails to meet its accuracy requirement then it should be replaced. That is why we included the specification limits in the Metrology Procedure
	9. Whether the Code should be amended to clarify the inconsistency between it and the Market Rules regarding who provides the "Notional Wholesale Meter" value?	Yes, we believe the requirement under the Metrology Procedure for the Network Operator to provide the Notional Wholesale Meter value should be removed.
	10. Whether the Code should clarify that where communication links are required on Types 5 and 6 metering installations because of restricted access to the meter, the retailer is liable for the costs associated with the links?	<p>Yes it should. Suggest wording; The network operator has the right to install a communications link on Type 5 and 6 metering installations where access restrictions prevent energy data being collected for a period of greater than 12 months. The retailer shall be liable for the costs associated with providing the link.</p> <p>{e.g. access restrictions can include, but not limited to a fierce dog on premises, locked gate or security systems}</p>
	11. Comment is sought on the appropriate amendments to the Code to enable it to effectively facilitate the operation of the Customer Code in relation to the operation of pre-payment meters.	<p>Suggest a clause that states any prepayment meter requested by a retailer will be installed and operated by the Network Operator in accordance with the Customer Code.</p> <p>Also suggest inclusion of pre-payment meters in Table 3 Appendix 1.</p>
	12. Question 1 on page 31 asks whether Table 3 in Appendix 1 should be updated to include new metering installation types. If new metering installation types should be included in Table 3, what amendments, if any, would be required to Part 3 of the Code?	<p>Clearly amendments are required for Table 3. Amendments are dependant on responses to the Issues Paper. Western Power is happy to offer to draft a new Table 3 once outcomes of this review are known. Examples of missing elements are the treatment of Smart Meters on remote communications, and pre-payment meters.</p>
	13. Whether the Code should be amended to clarify who determines the type of metering installation that must be installed?	Network Operator should determine this. Refer response to 12. (above.)

	<p>14. Whether provision should be made in the Code for meters capable of separately measuring imported and exported energy; and if a customer wishes to export energy into the network their meter must be capable of separately measuring imported and exported energy?</p>	<p>Suggest the following is inserted in 3.2 (4) and 3.3 (4)</p> <p>If bi-directional <i>electricity</i> flows occurs, be capable of separately registering for the total <i>metering installation</i>;</p> <ul style="list-style-type: none"> <li>• energy flow from the network (export), and;</li> <li>• energy flow imported to the network (import) when it exceeds consumption</li> </ul>
	<p>15. Whether the Code should specify that meters are not permitted to run backwards?</p>	<p>Yes – suggest new wording in 3.5 (2) (e).</p> <p>If bi-directional <i>electricity</i> flows occurs, be capable of separately registering for the total <i>metering installation</i>;</p> <ul style="list-style-type: none"> <li>• energy flow from the network (export), and;</li> <li>• energy flow imported to the network (import) when it exceeds consumption</li> </ul> <p>{Note: The <i>Customer</i> is required to pay any costs incurred by the Network Operator to ensure the meter is capable of recording bi-directional <i>electricity</i> flow}</p>
	<p>16. Whether the Code should specify that generating plants must have an appropriate metering installation for the import and export of electricity?</p>	<p>Yes – suggest new sub clause added as 3.16(1) (d) to affect this.</p> <p><i>Note: Below is a description of the issue identified by Western Power to assist your understanding when drafting an appropriate clause;</i></p> <p>For generating plants, the metering installations are designed based on the maximum generating capacity of the plant. When the generating plant is offline (shutdown), the plant electricity consumption from the network should be measured accurately. These electricity consumptions are not enough to be measured accurately by the existing metering installations, hence, a requirement for separate metering installations to be installed to record the plant electricity consumption, which should be located as close as practicable to the connection point.</p>

	17. Any other matters relating to Part 3 of the Code.	<p>Other changes to Part 3 as below;</p> <ol style="list-style-type: none"> <li>1. Proposed changes to clause 3.12 (d) - if a VT is required as part of a metering installation and only one secondary winding is provided from it, then the voltage supply to the metering point must be separately fused and located in an accessible position as near as practicable to the VT secondary winding;</li> <li>2. Clause 3.16(3). We publish data in the 30 minute trading interval, but we collect in 15 minute intervals at the meter then aggregate to 30 minutes in MBS (Metering Registry). We suggest this clause is not required and be removed to allow the Network Operator to record at 15 minute intervals at the meter without requiring the agreement of a code participant.</li> <li>3. Typo Error in Code clause 3.16 (1) (a) 'has electronic data recording facilities to measure and record <u>internal</u> energy data; and should be <u>interval</u>.'</li> <li>4. Clause 3.4 Ownership of meters and communications links – there are currently AMR (Automated Meter Reading) systems installed that are not Western Power owned. These need to be exempt from this clause.</li> </ol>
<b>Part 4 – The Metering Database</b>	1. Whether non-metering items should be removed from Table 2 of clause 4.3(1)?	<p>Yes, under Table 2 of clause 4.3(1) the following items should be removed;</p> <ol style="list-style-type: none"> <li>2. substation name</li> <li>3. the length of network between the metering point and substation</li> <li>5. distribution loss factor</li> <li>6. network tariff description</li> <li>9. whether or not the customer associated with the metering point is a contestable customer</li> </ol>
	2. Any other matters relating to Part 4 of the Code.	Nil

<b>Part 5 – Metering Services</b>	1. Whether clause 5.4 should be amended so the provision it makes for accumulation meters is also made for interval meters?	Agree, the same provision should be made for Type 5 interval meters.
	2. Whether the term “reasonable endeavours” in clauses 5.4(1) and 5.4(2) should be defined in the Code? If so, how should it be defined?	Western Power agrees with “best endeavours” term. Refer below
	3. Whether the term “reasonable endeavours” in clauses 5.4(1) and 5.4(2) should be replaced with the term “best endeavours”?	Yes, but does still require further definition for clarification. An improvement would be to state that a customer must make available at all times access to their meter. The Code would also have to give authority to the Network Operator to legally enforce this. See also our response in Part 8.
	4. Whether there should be an absolute requirement on a network operator to undertake a meter reading that provides an actual value at least once in any twelve month period?	No, a Network Operator would not be able to fully comply with an absolute requirement without significant and disproportionate cost to benefit for the customer and/or retailer.  Note: An absolute requirement would be achievable under the proposed definition of an actual value (refer issue 6 below).
	5. Whether a network operator should be required to undertake a meter reading that provides an actual value more than once in any 12 month period?	No, a Network Operator would not be able to comply without significant and disproportionate cost to benefit for the customer and/or retailer.  Note: Our understanding is there would be no benefit to this as current readings provided to Synergy are not used for billing purposes.



	<p>6. Whether the term “actual value” in relation to taking a meter reading should be defined? If so, how should it be defined?</p>	<p>Currently an “actual value” is interpreted to be a physical site visit by Western Power to read the meter. This includes approx 40,000 geographically remote sites (ie. Isolated rural locations). Customers on these sites currently provide their own readings via Western Power’s self-read card process. Western Power has the view that these readings provided by Customers should be considered an Actual Value as they are validated prior to publishing to market. The costs to obtain a physical read each year at these sites are disproportionate to any benefit that may be gained by this current obligation.</p> <p>An “actual value” should be defined as below;</p> <p><i>Energy data</i> derived by physical observation or remote communications by the Network Operator (including its service provider/s), or a <i>Customer</i>.</p> <p>{Note: A <i>Customer</i> supplied meter reading may include, but not limited to self-read card or electronic submission}</p>
	<p>7. Whether the Code should be amended to require a network operator to provide energy data to the IMO in accordance with the Market Rules?</p>	<p>Western Power would have no issue with an amendment as long as the Code and Market Rules do not conflicting.</p>
	<p>8. Whether clause 5.16 should be amended to provide a user with more time to provide energy data that it has collected to a network operator?</p>	<p>We do not see any need for a user to provide energy data that it has collected to the Network Operator. This requirement should be removed.</p>
	<p>9. Whether provision should be made to specify that data that has been replaced by better data should be retained in the metering database in accordance with the timeframes and conditions prescribed in clause 4.9?</p>	<p>Western Power currently complies with this and would have no objection to this proposal.</p>
	<p>10. Whether it should be clarified that a network operator, who has elected to appoint the Electricity Networks Corporation as its metering data agent, is still required to comply with its documents and submit them to the Authority for approval?</p>	<p>Yes clarification should be provided.</p>

	<p>11. Whether the Code should require a network operator (referred to as “distributor” in the Customer Code) to compensate the retailer for losses incurred under clauses 4.18 and 4.19 of the Customer Code due to an act or omission by the network operator?</p>	<p>We believe this issue should be dealt with in a clause placed in the Customer Code, Model SLA or the SLA with the User, and not the Metering Code.</p>
	<p>12. Any other matters relating to Part 5 of the Code.</p>	<p>Division 5.4 – Currently does not allow for the instance where another Network Operator (ie Horizon Power) stops using Western Power as its metering data agent. We believe that whenever Horizon Power stop using Western Power, they forgo any automatic future right to elect Western Power as their metering data agent without Western Power agreement. This impacts resourcing, system capabilities and other processes.</p>
<p><b>Part 6 – Documentation</b></p>	<p>1. Whether the documents that constitute the Build Pack should be submitted by the network operator to the Authority for approval or the Code should clarify how the Communication Rules may incorporate a Build Pack concept?</p>	<p>The documents that constitute the Build Pack should be incorporated within the Communications Rules so one document is submitted by the network operator to the Authority for approval. However, it would make sense that there is a quick process to amend the Build Pack rather than ERA approval in every instance.</p>
	<p>2. Whether the Code should be amended to require network operators to prepare and publish performance reports on metering service levels?</p>	<p>This should not be a Metering Code obligation as the only parties interested in specific metering services are retailers. Metering service levels are not described in the Metering Code and therefore performance reports should form part of the Retailers SLA with Western Power and can be structured to accommodate individual retailer’s needs.</p>

	<p>3. Whether clause 6.8(d) should be amended to add a requirement for the systematic treatment of populations of meters in accordance with Australian Standard AS 1284.13:2002 “Electricity metering – In-service compliance testing”?</p>	<p>Proposed rewording of 6.8 (d);</p> <p>be consistent with the approved asset management system required by section 14 of the Act by ensuring there is a systematic treatment of populations of meters in accordance with Australian Standards AS 1284 . 13:2002 “<i>Electricity metering – In- service compliance testing</i>’.</p> <p>We propose to retain the Metering Management Plan as part of the Metrology Procedure. We agree that the approval of the Metering Management Plan shall be made by the Authority and that regulation 9 of the Supply Standards Regulations be repealed.</p>
	<p>4. Whether clause 6.9 requires clarification, to address uncertainty with the operation of clauses 3.27 and 3.28, that a network operator “must” establish a registration process?</p>	<p>We currently have a scheme (Service Connect) which has registered meter installers. Western Power has a registration process of this scheme which is not approved by the Authority. We question the need for the registration process to be approved by the Authority so we suggested the following change to 6.9 (1);</p> <ul style="list-style-type: none"> <li>• A network operator must establish a registration process</li> </ul>
	<p>5. Whether provision should be made to allow the Authority more time to determine whether a document should be approved or not?</p>	<p>We feel the current provisions of 6 weeks and scope for a further 6 weeks is a suitable timeframe. We would not oppose a clause to allow for a reasonable submission for an extended time period agreed by the parties.</p>
	<p>6. Whether clause 6.17 should be amended to clarify the process that must be followed if a network operator fails to submit an amended document to the Authority (or the Authority does not approve the amended document) in cases where the Authority is not explicitly permitted to draft and approve its own document?</p>	<p>Assuming this question refers to a proposed registration process, metrology procedure or mandatory link criteria, then we propose the solution is to delete 6.17 (1) to allow the authority to draft its own document and approve it.</p>
	<p>7. Whether provision should be made to allow the Authority to extend a deadline under clause 6.20?</p>	<p>We feel the current timeframes are suitable. We would not oppose a clause to allow for a reasonable submission for an extended time period agreed by the parties.</p>
	<p>8. Any other matters relating to Part 6 of the Code.</p>	<p>Nil</p>

<b>Part 7 – Notices &amp; Confidential Information</b>	1. Whether clauses 7.4, 7.5 and 7.6 should be amended to allow Code participants greater flexibility in the use of “confidential information” by allowing the disclosure of metering data to a third party, providing the customer consents to the disclosure?	Agree with the intent, although the wording needs to be clear and specific about the process of gaining consent from the retailer and/or customer and data can only be provided from the Network Operators meter registry, and not from the metering installation.
	2. Any other matters relating to Part 7 of the Code.	Nil
<b>Part 8 – Dispute Resolution</b>	1. Whether the Authority should be replaced as the arbitrator of disputes under the Code? If so, who should replace the Authority?	Western Power believes the ultimate decision should remain with the Authority.
	2. Any other matters relating to Part 8 of the Code.	We believe it is worth considering that the Code gives authority to a Network Operator to enforce customers and users to comply with the Code requirements ie if a Network Operator advises a customer/user that they need to take action to comply with the Code then the customer/user is bound to comply with the Network Operators direction and/or decision. And also specify any consequences for a customer/user if they knowingly go against the direction of the Network Operator.
<b>Part 9 – Code Amendment &amp; Review</b>	1. Any matters relating to this Part of the Code.	Western Power believes amendments could have been made since the inception in 2005. We suggest a co-ordinated working group be established to meet annually to consider any code amendments raised by Code participants.
<b>Appendices (1-5)</b>	1. Whether Table 3 in Appendix 1 should be updated to include new metering installation types? If so, what should the new types and accuracy requirements be?	Clearly amendments are required for Table 3. Amendments are dependant on responses to the Issues Paper. Western Power is happy to offer to draft a new Table 3 once outcomes of this review are known. One example of a missing element is the treatment of Smart Meters on remote communications.
	2. Whether the metering installation types in Table 3 in Appendix 1 should be based on capacity or throughput?	Western Power views installation types should be based on capacity at the connection point due to the possible fluctuations in throughput of a connection point after the metering installation has been established.
	3. Whether Appendix 5 should be removed from the Code?	Yes this should be removed as the Metering Code Model SLA is now in place.
	4. Any other matters relating to the Code’s appendices.	Nil