

Our Ref: DMS# 8290344
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Dear Peter,

Submission on the Metering Code Recommendations Report

Thank you for the opportunity to provide a submission on the Recommendations Report concerning amendments to the Electricity Industry Metering Code 2005.

Our submission only comments on recommendations that we do not support or where we have comments to make. For the purpose of our submission please note that all other recommendations are accepted by Western Power.

Recommendation 1

"metropolitan area" definition should also include the list of townsites as detailed in the definition of the Code of Conduct for the Supply of Electricity to Small Use Customers. This will ensure consistency.

Recommendation 7

Whilst we accept the recommendation, we would prefer that the term "net metering" is defined more clearly in the Code.

Recommendation 14

Our view on clause 3.14 (grandfathering) is that after a certain date (propose 6 months after the Code review changes are gazetted), if any part of a metering installation is changed, modified or upgraded for any reason, then the whole of that metering installation must then comply with the Metering Code from the date of that change.

Recommendation 15

We strongly suggest that the Code makes clear provision for the need for a generator to be accountable for their consumption from the network as well as the generation to it. As a minimum we propose that there is a timetable for the IMO and OOE to conduct the analysis, and that it is clear this analysis will result in a recommendation.

Recommendation 22

We maintain our position that these items are not required as metering standing data.

Recommendation 23

This recommendation to provide a users' customer with the right to access energy data from the metering point poses an extreme risk to network operators, particularly with the likely roll out of smart meters in Western Australia. Direct meter access will widen the exposure of Western Power metering systems, IT systems including the Network Operation Control Centre, and in a smart meter environment there is potential for access via remote wireless communication systems to our whole network. This risk exists now as we have over 10,000 smart meters deployed and operational as part of the Perth Solar Cities Program. Western Power also has concerns about our ability to comply with our obligations for the confidentiality of meter data.

It is considered good electricity industry practice across Australia and overseas for the network operator to impose tight control and security over direct access to data held in its meters. Once any end customer can have right to that access then there would be no control possible. The Code of Conduct for Small Use Customers currently provides customers access to metering data.

Western Power believes there are other ways to broaden the customer's access to their energy data and the Perth Solar City trial includes initiatives to provide this.

We have also given considerable effort to enter into commercial arrangements with "third parties" for example Demand Side Management Aggregators to allow access under strict controls. This proposed amendment will weaken these arrangements in the future.

We strongly urge the removal of this recommendation, or at very least a decision to conduct an analysis and review with Code Participants, taking into account the future long term direction of the smart grid.

Recommendation 38

We agree that clauses 6.3 and 6.4 should be removed.

Recommendation 39

Western Power questions the value of providing such a report. We believe this is a matter covered under the Model SLA or any other SLA between a Network operator and Retailer or other user.

Recommendation 46

We agree that the WA market needs a mechanism to deal with the growing demand for energy data by organisations on behalf of end use customers. The wording of the recommendation is not sufficient in detail, For example we would want to ensure that if network operators provide such information that it is provided in current market defined file formats, otherwise there would be extensive and expensive system changes to allow individual data requests. Also we would expect there to be a transitional arrangement to ensure that network operator data systems, IT and customer processes are implemented to be able to manage these requests. There would also need to be consideration to charges for such services.

We are uncomfortable about accepting this change until the exact wording is provided.

Recommendation 47

We are surprised by this recommendation, and whilst we understand the argument for the removal, it will leave an inconsistency with other Code's that do have a disputes process. It also means that the Model SLA will need to be reworded as this document adopts the disputes process from the Code.

Recommendation 49

We welcome the audit of changes after 12 months, and in addition we would propose that a review committee is appointed on an ongoing basis to consider proposals from participants on future amendments.

Recommendation 50

Since our original submission we have now considered this matter more fully and propose that there are some minor changes that need to be made to accommodate the introduction of smart meters. These items were detailed in a letter to the OOE from Lisa Cunningham of Western Power dated 27th April 2011, and specifically:

- annual electricity throughput for type 5 meter installation in the Code be amended to allow all installations up to but not including 300 MWh to facilitate introduction of smart meters into residential installations where interval data is deemed a requirement
- inclusion of clock error ± 20 (seconds per month) for type 6 meter installation in the Code be amended to facilitate the introduction of smart meters into residential installations where basic data is deemed a requirement and a Time of Use tariff arrangements is required

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