

Reference number(s)	006 - Metering Issue Resolution Timing
Relevant clause(s)	<p>Clause 10.43 – Metering installations that are inaccurate, defective, or not fit for purpose to be investigated</p> <p>Clause 10.47 – Correction of defects and inaccuracies in metering installation</p>
Problem definition	<p><u>Problem 1</u></p> <p>Clause 10.43 provides that when an MEP becomes aware that a metering installation for which it is responsible is either inaccurate, defective, or not fit for purpose, the MEP must investigate the metering installation and provide a report to all affected participants. The timeframe for the MEP's investigation and report is set out in subclause (5).</p> <p>The MEP's obligation to investigate and report is not affected if the metering installation's certification is cancelled under clause 20 of Schedule 10.7.</p> <p>Some participants are misinterpreting clause 10.43(5). They read it as setting the timeframe for an MEP to <u>resolve</u> the underlying metering issue, when in fact it is only specifying the timeframe for the MEP to complete the investigation and report.</p> <p><u>Problem 2</u></p> <p>From its heading, clause 10.47 appears to relate to correcting defective or inaccurate metering installations. However it only addresses what records an ATH must keep when it corrects defects or inaccuracies in a metering installation.</p> <p>The heading of this clause does not reflect its contents.</p>
Proposal	<p><u>Problem 1</u></p> <p>To address the first problem identified above, the Authority proposes to add a new clause 10.46A to the Code. This clause would require an MEP to use its best endeavours to resolve a metering issue within 25 business days.</p> <p>This will make it clear that the timeframe in clause 10.43 is for investigating and reporting on a metering issue, while the timeframe in the proposed new clause would be for resolving the issue.</p> <p>The Authority acknowledges it is inappropriate to impose an absolute obligation on MEPs to resolve a metering issue within a certain timeframe. Each metering installation is different and may have different problems associated with correcting it. Some issues can be complex and it can take time to arrange the shutdown of, and access to, a metering installation. Having said this, the Authority notes that MEPs often resolve a metering issue as part of the investigation process.</p>

	<p>The Authority considers a Code amendment setting out a timeframe for resolving metering issues is appropriate, and would reduce confusion for participants, provided the obligation on MEPs is a ‘best endeavours’ requirement.</p> <p><u>Problem 2</u></p> <p>To address the second issue identified above, the Authority proposes to amend the heading of clause 10.47, so that it more accurately reflects the contents of the clause.</p>
<p>Proposed Code amendment</p>	<p><u>10.46A Timeframe for correcting defects and inaccuracies in metering installation</u></p> <p>(1) <u>This clause applies to a metering equipment provider that becomes aware, or is advised under clause 10.43, that a metering installation for which it is responsible, is—</u></p> <p>(a) <u>inaccurate; or</u></p> <p>(b) <u>defective; or</u></p> <p>(c) <u>not fit for purpose.</u></p> <p>(2) <u>A metering equipment provider to which this clause applies—</u></p> <p>(a) <u>must undertake remedial action to make the metering installation—</u></p> <p>(i) <u>accurate;</u></p> <p>(ii) <u>not defective;</u></p> <p>(iii) <u>fit for purpose;</u></p> <p>(b) <u>must use its best endeavours to complete the remedial action under paragraph (a) no later than 25 business days after the date on which it is required to provide a report to all affected participants under clause 10.43(4)(c).</u></p> <p>10.47 <u>ATH to keep records of modifications to correct</u>Correction of defects and inaccuracies in metering installation</p> <p>An ATH must, when taking action to remedy an inaccuracy or defect within a metering installation, 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.</p>
<p>Assessment of proposed Code amendment against section</p>	<p>The first proposed Code amendment is consistent with the Authority’s objective, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry.</p> <p>It would do this by promoting the timely resolution of metering issues,</p>

32(1) of the Act	<p>thereby minimising:</p> <ul style="list-style-type: none"> a) adverse effects on customers b) unaccounted for electricity in the wholesale electricity market. <p>The first proposed Code amendment is expected to have no effect on competition or reliability of supply.</p> <p>The change to the heading of clause 10.47 is technical and non-controversial. As with the first proposed amendment, it is also consistent with the Authority's objective, and section 32(1)(c) of the Act, because it would contribute to the efficient operation of the electricity industry. It would do this by making the Code easier to understand and thereby easier to comply with.</p> <p>This second proposed Code amendment would have no effect on competition or reliability of supply.</p>
Assessment against Code amendment principles	<p>The Authority is satisfied the proposed Code amendments are consistent with the Code amendment principles, to the extent they are relevant.</p>
Principle 1: Lawfulness.	<p>The proposed Code amendments are consistent with the Act, as discussed above in relation to the Authority's statutory objective and the requirements set out in section 32(1) of the Act.</p>
Principle 2: Clearly Identified Efficiency Gain or Market or Regulatory Failure	<p>The proposed Code amendments are consistent with principle 2 in that they address an identified efficiency gain, which requires a Code amendment to resolve.</p>
Principle 3: Quantitative Assessment	<p>Please refer to the assessment of costs and benefits in section 3 of the consultation paper.</p>
Regulatory statement	
Objectives of the proposed amendment	<p>The objective of the first proposal is to ensure that any issues with metering installations that are inaccurate, defective, or not fit for purpose are remedied within a reasonable timeframe.</p> <p>The objective of the second proposal is to make the Code easier to understand and thereby easier to comply with.</p>
Evaluation of the costs and benefits of the proposed amendment	<p>Please refer to the assessment of costs and benefits in section 3 of the consultation paper.</p>
Evaluation of alternative means of achieving the objectives of the proposed	<p>The Authority has not identified an alternative means of achieving the objectives of the proposed Code amendments.</p>

amendment	
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