

Reference number(s)	012 - Monitoring of Event Logs
Relevant clause(s)	<p>Clause 10.43 – Metering installations that are inaccurate, defective, or not fit for purpose to be investigated</p> <p>Clauses 8(5)(f) and 8(7) of Schedule 10.6 – Electronic interrogation of metering installation</p> <p>Clause 17(4) of Schedule 15.2 – Electronic meter readings and estimated readings</p>
Problem definition	<p>Clause 8 of Schedule 10.6, amongst other things, requires an MEP, when interrogating a metering installation:</p> <ul style="list-style-type: none"> a) to check the event log for evidence of malfunctioning or tampering, and if this is detected, carry out the appropriate requirements of Part 10 b) to review the event log either manually or by an automated software function which flags exceptions, and— <ul style="list-style-type: none"> i) take appropriate action where problems are apparent; and ii) pass relevant event log entries to the reconciliation participant for the metering installation. <p>Clause 17 of Schedule 15.2, amongst other things, requires the relevant reconciliation participant to check the validity of all meter readings obtained by electronic interrogation and estimated readings. Each such validity check must include a review of the meter and data storage device event log. Any event that could have affected the integrity of metering data must be investigated.</p> <p>In accordance with clause 10.43, the reconciliation participant must—</p> <ul style="list-style-type: none"> a) advise the MEP responsible for the metering installation if the reconciliation participant becomes aware of an event or circumstance that leads it to believe the metering installation is or could be— <ul style="list-style-type: none"> i) inaccurate; or ii) defective; or iii) not fit for purpose; and b) include, with the advice (if and to the extent they are known), all relevant details. <p>The Authority has received participant feedback indicating the current drafting of clause 8 of Schedule 10.6 and clause 17 of Schedule 15.2, is insufficiently clear in describing participant obligations. As a result, some participants are either not complying, or not fully complying, with their Code obligations.</p>
Proposal	<p>The Code intentionally places an obligation on both the MEP and the reconciliation participant to check the validity of a meter reading by reviewing the metering installation’s event log(s).</p> <p>The two parties have different responsibilities. An MEP is focussed on the integrity and operation of the metering installation. A reconciliation participant is focussed on ensuring it submits accurate electricity volumes</p>

	<p>to the reconciliation manager.</p> <p>The Authority proposes to clarify participants' obligations under clause 8 of Schedule 10.6 and clause 17 of Schedule 15.2, by amending the Code:</p> <ul style="list-style-type: none"> a) so that clause 8 of Schedule 10.6 requires an MEP, when interrogating a metering installation: <ul style="list-style-type: none"> i) to review event logs for any outstanding events that may affect the integrity or operation of the metering installation (eg, covers removed, loose connections, time synchronisation errors), ii) to investigate and remediate any issues identified and to advise the relevant reconciliation participant of any corrections to the raw meter data required; iii) to advise the relevant reconciliation participant of any event in the event log that it is investigating and remediating so that the reconciliation participant is aware that the raw meter data may need to be corrected; and iv) to advise the relevant reconciliation participant of any event in the event log that does not affect the integrity or operation of the metering installation but may affect the accuracy of the raw meter data so that the reconciliation participant can investigate and remediate the issue if necessary b) so that clause 17 of Schedule 15.2 requires the relevant reconciliation participant: <ul style="list-style-type: none"> i) to review event logs for any outstanding events that may affect the accuracy of the metering data, ii) to investigate and remediate any event that the MEP is not investigating; and iii) to review the metering data related to such an event—since: <ul style="list-style-type: none"> A) any event in the event log may affect the metering data, and B) it is the reconciliation participant's responsibility to ensure it submits accurate submission information to the reconciliation manager, either: <ul style="list-style-type: none"> 1. in its initial submission, or 2. in a subsequent washup if the issue is not remediated in time for the initial submission.
<p>Proposed Code amendment</p>	<p>We propose to amend clause 8 of Schedule 10.6 and clause 17 of Schedule 15.2 as follows:</p> <p>Schedule 10.6</p> <p>...</p> <p>8 Electronic interrogation of metering installation</p> <p>...</p> <p>(5) A metering equipment provider must, when interrogating a metering installation,—</p> <p>...</p> <ul style="list-style-type: none"> (e) download the event log; and (f) check the event log for <u>any event that may affect the integrity or operation of the metering installation such as evidence of</u>

	<p>malfunctioning or tampering and if this is detected, carry out the appropriate requirements of this Part.</p> <p>(5A) A metering equipment provider must, if it finds an event that may affect the integrity or operation of a metering installation,—</p> <p>(a) investigate and remediate the event; and</p> <p>(b) advise the relevant reconciliation participant that it is investigating and remediating the event; and</p> <p>(c) advise the relevant reconciliation participant of any corrections to the raw meter data required; and</p> <p>(d) advise the relevant reconciliation participant of any event that does not affect the integrity or operation of the metering installation but which may affect the accuracy of the raw meter data.</p> <p>...</p> <p>Schedule 15.2</p> <p>...</p> <p>17 Electronic meter readings and estimated readings</p> <p>(1) All meter readings obtained by electronic interrogation and estimated readings must be checked for validity by the relevant reconciliation participant.</p> <p>...</p> <p>(4) Each validity check of a meter reading obtained by electronic interrogation or an estimated reading must include the following:</p> <p>...</p> <p>(f) a review of the meter and data storage device event log; for any event that could have affected the integrity of the metering data must be investigated;</p> <p>(g) a review of the relevant metering data if there was an event that could have affected the integrity of the metering data.</p> <p>(4A) A reconciliation participant must, if it finds an event that could have affected the integrity of the metering data,—</p> <p>(a) investigate and remediate the event if the metering equipment provider responsible for the metering installation does not have responsibility for investigating and remediating the event and</p> <p>(b) advise the metering equipment provider responsible for the relevant metering installation of the event if the investigation finds that the event may affect the integrity or operation of the metering installation</p>
<p>Assessment of proposed Code amendment against section 32(1) of the</p>	<p>The proposed Code amendment is consistent with the Authority's objective, and section 32(1) of the Act, because it would make it easier for MEPs and reconciliation participants to understand their respective obligations to review metering event logs.</p>

Act	The proposed amendment is expected to have no effect on competition or reliability of supply.
Assessment against Code amendment principles	The Authority is satisfied the proposed Code amendment is consistent with the Code amendment principles, to the extent they are relevant.
Principle 1: Lawfulness.	The proposed Code amendment is 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.
Principle 2: Clearly Identified Efficiency Gain or Market or Regulatory Failure	The proposed Code amendment is consistent with principle 2 because it addresses an identified efficiency gain, which requires a Code amendment to resolve.
Principle 3: Quantitative Assessment	Please refer to the assessment of costs and benefits in section 3 of the consultation paper.
Regulatory statement	
Objectives of the proposed amendment	The objective of the proposal is to improve the efficient operation of the electricity industry by clarifying the respective obligations on MEPs and reconciliation participants to review metering event logs.
Evaluation of the costs and benefits of the proposed amendment	Please refer to the assessment of costs and benefits in section 3 of the consultation paper.
Evaluation of alternative means of achieving the objectives of the proposed amendment	The Authority has not identified an alternative means of achieving the objective of the proposed Code amendment.