

Reference number(s)	014 - HHR Certification and Interrogation Cycles
Relevant clause(s)	<p>Clause 8 of Schedule 10.6 – Electronic interrogation of metering installation</p> <p>Clause 9 of Schedule 10.7 – Certification tests</p> <p>Clause 20 of Schedule 10.7 – Cancellation of certification of metering installations</p>
Problem definition	<p>Clause 8(2)(b) of Schedule 10.6 requires an MEP to interrogate a metering installation for which it is responsible at least once in each maximum interrogation cycle in the registry. This is to ensure data is not lost when the meter runs out of memory and overwrites previous data.</p> <p>Clause 8(9) of Schedule 10.6 requires the MEP to ensure that each electronic interrogation of a metering installation that retrieves half hour metering information compares the sum of that information against the increment of the metering installation’s accumulating meter registers for the same period. This comparison check ensures both the half hour and the non-half hour parts of the metering installation are recording the same amount of electricity for the same time period.</p> <p>An ATH must perform a raw meter data output test when certifying a category 1 or category 2 metering installation as a half hour metering installation. If an ATH does so, then clause 9(1)(d) of Schedule 10.7 requires the ATH to either:</p> <ul style="list-style-type: none"> a) compare the output from a working standard to the raw meter data from the metering installation for a minimum of 1 trading period; or b) if the raw meter data is to be used for the purposes of Part 15 of the Code, confirm that the MEP’s back-office processes compare: <ul style="list-style-type: none"> i) the increment of the (accumulating) meter registers, with ii) (the sum of) the half-hour metering raw meter data (for the same period). <p>Note: the words in brackets have been added to make clear the intent of the Code wording. This ambiguity in the Code drafting is an issue we wish to address.</p> <p>Under clause 9(1)(d) of Schedule 10.7, an ATH assesses an MEP’s compliance with the obligation under clause 8 of Schedule 10.6 by determining whether the MEP’s back office system <u>is capable of</u> performing the comparison check. However, the ATH does not determine whether the back office system <u>actually</u> interrogates the meter and performs the comparison check.</p> <p>Sometimes, the MEP cannot perform a comparison check because the MEP cannot get a meter read from the meter. If an MEP’s back office system is unable to perform a comparison check, because the MEP cannot interrogate the meter, the metering installation should not be certified as a half hour metering installation. This is because the MEP cannot verify the accuracy of the metering installation’s half hour data. However, currently the Code does not state that a half hour metering</p>

	<p>installation should lose its certification in such instances.</p> <p>In addition, the Code does not specify what is an acceptable result for a comparison check.</p>
<p>Proposal</p>	<p>The Authority proposes to amend the Code:</p> <ul style="list-style-type: none"> a) to clarify clause 8(8) and (9) of Schedule 10.6 and clause 9(1) of Schedule 10.7, to say that if raw meter data is to be used for the purposes of Part 15, an MEP’s back-office processes must compare: <ul style="list-style-type: none"> i) the increment of the accumulating meter registers, to ii) the sum of the half-hour metering raw meter data for the same period. b) to amend clause 20 of Schedule 10.7 to state that a half-hour metering installation’s certification is automatically cancelled if an MEP: <ul style="list-style-type: none"> i) does not read each meter within the meter’s maximum interrogation cycle; or ii) reads each meter within the meter’s maximum interrogation cycle but— <ul style="list-style-type: none"> A) does not perform a comparison check; or B) performs a comparison check that shows the difference between the half hour metering information and the increment of the metering installation’s accumulating meter registers is greater than one kilowatt hour.
<p>Proposed Code amendment</p>	<p>Schedule 10.6</p> <p>...</p> <p>8 Electronic interrogation of metering installation</p> <p>...</p> <p>(8) Subclause (9) applies when—</p> <ul style="list-style-type: none"> (a) a metering equipment provider interrogates a half-hour metering installation which is a category 1 metering installation or a category 2 metering installation; and (b) the certifying ATH confirmed, as a part of the metering installation’s most recent certification, that the metering equipment provider’s back office processes include, for each interrogation cycle, a comparison of: <ul style="list-style-type: none"> (i) <u>the difference in the increment of the accumulating meter registers; to and</u> (ii) <u>the sum of the half-hour metering raw meter data for the same period.</u> <p>(9) When this subclause applies, the metering equipment provider must ensure that each electronic interrogation of the metering installation that retrieves half hour raw metering information data compares <u>the sum of that data</u> information against the</p>

increment of the **metering installation's** accumulating **meter registers** for the same period.

...

Schedule 10.7

...

9 Certification tests

(1) An **ATH**, when carrying out a test set out in Table 3 or 4 of Schedule 10.1,—

...

(d) to carry out a **raw meter data** output test for a **half-hour metering installation** which is a **category 1 metering installation** or for a **half-hour metering installation** which is a **category 2 metering installation**, must either—

(i) compare the output from a **working standard** to the **raw meter data** from the **metering installation** for a minimum of 1 **trading period**; or

(ii) if the **raw meter data** is to be used for the purposes of Part 15, confirm that the **metering equipment provider's back office** processes include a comparison of:

(A) the difference in the increment of the **accumulating meter registers**; to and

(B) the sum of the **half-hour metering raw meter data** for the same period, if the **raw meter data** is to be used for the purposes of Part 15:

...

20 Cancellation of certification of metering installations

(1) The **certification** of a **metering installation** is automatically cancelled on the date on which any 1 of the following events takes place:

...

(i) if the **metering installation** is a **half-hour metering installation** and was **certified** after 29 August 2013, at the end of any **interrogation cycle** in which a **metering equipment provider's back office** processes within that **interrogation cycle**—

(i) fail to perform any electronic **interrogation** of the **metering installation** that retrieves **half-hour metering information**; or

(ii) perform an electronic **interrogation** of the **metering installation** and the difference between the sum of the **half-hour metering information** and the increment of the **metering installation's** accumulating **meter registers** for the same period is greater than one kilowatt

	<p style="text-align: center;"><u>hour.</u></p> <p>(2) A metering equipment provider must, within 10 business days of becoming aware that 1 of the events in subclause (1) has occurred in relation to a metering installation for which it is responsible;</p> <p style="padding-left: 40px;">(a) <u>update the metering installation’s certification expiry date in the registry; and</u></p> <p style="padding-left: 40px;">(b) <u>if either of the events in subclause (1)(j) has occurred, update the metering installation’s AMI flag to “N” in the registry.</u></p> <p>(3) <u>The obligations in subclause (2) do not apply if the metering installation has been recertified within the 10 business days.</u></p>
Assessment of proposed Code amendment against section 32(1) of the Act	<p>The 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 ensuring a check to validate the accuracy of volume information provided to the reconciliation manager is performed, which in turn would promote accurate wholesale market settlement and accurate consumer invoicing.</p> <p>The proposed amendment is expected to have little effect on competition or reliability of supply.</p>
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 this proposal is to ensure that raw meter data from half hour metering installations is validated as part of an MEPs interrogation and shown to be accurate.
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	The Authority has not identified any alternatives to the proposed Code amendment that would meet the objectives of the proposal.

proposed amendment

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