Reference number(s)	**015 - Comparative Recertification**
Relevant clause(s)	Clause 12 of Schedule 10.7 – Comparative recertification
Problem definition	Comparartive recertification is a type of recertification used only for category 2 metering installations. Comparative recertification uses an in-situ test, which relies on a working standard[1] that includes calibrated test current transformers (CTs).[2] Meter data from the working standard is compared against meter data obtained from the on-site meter to determine if the on-site metering installation (CTs, meter(s) and the connecting wiring) is measuring electricity accurately. The actual load of the site is used as long as it is above the minimum test point. Comparative recertification was originally permitted under the Code to cater for instances when in-situ current transformers could not be disconnected for calibration purposes. Comparative recertification has allowed for category 2 metering installations with inaccessible CTs (eg, behind a wall) to be recertified with minimal cost/adverse effect on the metering installation site. <u>Problem 1</u> Modern metering installations should not be built in a manner that restricts access to metering components. The Authority has received suggestions that comparative recertification is no longer relevant and therefore no longer necessary. However comparative recertification has become an important tool for ATHs to use where CTs cannot easily be replaced. <u>Problem 2</u> It is unclear from the wording of clause 12(2) of Schedule 10.7 that comparative recertification: a) can be used for only category 2 metering installations b) can be used if the component certification of the CTs at a category 2 metering installation has expired c) can only be used for a category 2 metering installation if the meter and data storage device have been recertified as part of the comparative recertification process. This is usually done by installing a new meter and data stroage device.
Proposal	<u>Problem 1</u> The Authority considers that comparative recertification has become an important tool for ATHs to use in instances when CTs cannot be easily replaced. Therefore, we propose to retain the Code provisions permitting the use of comparative recertification. <u>Problem 2</u> The Authority proposes to amend the Code to make it clear that

[1] Part 1 of the Code defines "working standard" to mean a measuring instrument that has been calibrated by an approved calibration laboratory or an ATH, which is used routinely for the calibration of metering installations and metering components.

[2] The test CTs can usually be clamped to the mains cables at the metering installation being tested.

	comparative recertification can by used: a) only for category 2 metering installations, and b) where the certification of the CTs at a category 2 metering installation has expired.
Proposed Code amendment	**12 Comparative recertification** (1) This clause only applies when an **ATH** uses the **comparative recertification** method. (1A) An **ATH** may use the **comparative recertification** method to **recertify** only a **category 2 metering installation**. (2) An **ATH** may ~~only~~ use the **comparative recertification** method to **recertify** a **category 2 metering installation** in accordance with this Part if— (a) the **certification** of the current transformers in the **metering installation** expires before the **meter certification** expiry date; and (b) each of the following **metering components** in the **metering installation** has been **certified** in accordance with Schedule 10.8 as part of the **comparative recertification** method: (i) **data storage device**: (ii) **meter**. (2A) For the avoidance of doubt, an **ATH** may use the **comparative recertification** method to **recertify** a **category 2 metering installation** in accordance with this Part if the **certification** of the current transformers in the **metering installation** has expired. (3) An **ATH** must, when **recertifying** a **category 2 metering installation** under this clause, ensure that— (a) the **metering installation** has passed the tests set out in Table 3 of Schedule 10.1, using a **working standard** connected to the **metering installation**; and (b) the current measurement sensor connected around the cables or bus-bars adjacent to the **metering installation** is sufficiently accurate so that the sum of the measured **metering installation** accuracy, the **uncertainty** of the **metering installation**, and the **uncertainty** of the current measurement sensor does not exceed the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of the **metering installation**; and (c) the overall **metering installation** accuracy meets the requirements of Table 1 of Schedule 10.1. (4) An **ATH** must, before it uses the **comparative recertification** method— (a) check the design report of the **metering installation** to—

	(i) confirm the **metering installation** functions in accordance with the design report; and (ii) ensure the **metering installation** complies with this Part; and (b) check and confirm that the **metering installation** is correctly wired in accordance with all applicable requirements and enactments; and (c) carry out any tests and checks required to confirm the integrity of the **metering installation** and record these and their results in the **metering installation certification report**. (5) An **ATH** must, for each **metering installation** it **certifies** under this clause,— (a) prepare a **certification report**; and (b) ensure that each **metering component** in the **metering installation** is fit for purpose.
Assessment of proposed Code amendment against section 32(1) of the Act	The proposed Code amendment is consistent with the Authority's objective, and section 32(1)(c) of the Act, because it will contribute to the efficient operation of the electricity industry. Clarifying the Code obligations relating to comparative recertification will: a) make it easier for participants to understand the testing requirements for category 2 metering installations, and b) help ensure that metering installations are not inadvertently certified incorrectly. The proposed Code 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 in that 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 clarify when an ATH may use comparative recertification to recertify a metering installation.

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 objectives of the proposed Code amendment.