Appendix B Code amendment proposals that are technical and non-controversial

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Reference number(s)	029 - Reconciliation Manager File Format Specifications
Relevant clause(s)	Clause 10.16 – Metering data exchange timing and formats
	Clause 10.25(2) – Responsibility for ensuring there is metering installation for NSP that is not point of connection to grid
	Clause 10.26(7) – Responsibility for ensuring there is metering installation for point of connection to grid
Problem definition	Clause 10.25 provides that a distributor must, if it proposes the creation of a new network supply point (NSP) that is not a point of connection to the grid, advise the reconciliation manager of certain information under subclause (2)(b) and (c).
	Similarly, clause 10.26 requires a participant that is responsible for providing a metering installation for a point of connection to the grid to advise the reconciliation manager of certain information under subclause (7)(a) and (c).Relevant participants must submit to the reconciliation manager the information required under clauses 10.25 and 10.26 in accordance with the timeframes set out in these clauses.
	Clause 10.16(1)(b) requires the participant to provide the metering data to the reconciliation manager "in the format notified to participants from time to time by the Authority". This format is not specified in the Code.
	Some participants have advised the Authority they are concerned the reconciliation manager may change the format without due consideration to the cost on participants. While considering this concern, we have noticed clause 10.16 contains typographical errors—in three places the word "notified" is bolded, when this is no longer a defined term.
Proposal	The Authority proposes only to correct the typographical errors in clause 10.16.
	We propose to make no change to the Code in response to the concerns raised by participants over the reconciliation manager changing the format under clause 10.16. Clause 10.16 requires the Authority to notify participants of the format (subclause (1)(b)), and to provide notice of any changes to the format (subclause (2)).
	As part of this process the Authority, via the reconciliation manager, will always consult with participants on any proposed change to the format to ensure we are aware of the effect on participants. We consider this approach to be consistent with section 4 of Part 2 of the Authority's consultation charter, as well as general administrative law principles.
Proposed Code	We propose to amend clause 10.16 as follows:
amendment	 10.16 Metering data exchange timing and formats (1) A participant (other than a market operation service provider) must, if it is under an obligation to provide metering data under this Part, provide the metering data to the relevant person— (a) in the absence of any timeframe specified in this Code, within a reasonable timeframe notified by the Authority; and

	 (b) in the format notified notified to participants from time to time by the Authority. (2) The Authority must provide reasonable notice of any changes to the format notified notified under subclause (1)(b). (3) Despite subclause (1)(b), a participant may provide the metering data in an alternative format if it has an arrangement with the recipient to use the alternative format. (4) Despite subclause (3), the participant must be able to comply with any format requirements notified notified by the Authority under subclause (1)(b), within 1 business day of ceasing to have an arrangement with the recipient under subclause (3). (5) Despite using an alternative format under subclause (3), a participant must still comply with all other obligations in this Code.
Grounds for not consulting	The Authority is satisfied the nature of the proposed Code amendment is technical and non-controversial in accordance with section 39(3)(a) of the Act. This is because the proposed amendment will have no effect on current practice. Rather, the proposed amendment would remove the possibility of any confusion, caused by inaccurate language in the Code.
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) of the Act, because it would contribute to the efficient operation of the electricity industry. It would do this by clarifying the Code, to make it easier for participants to interpret the Code. 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 a regulatory failure that is leading to a market inefficiency, and which requires a Code amendment to resolve.
Principle 3: Quantitative Assessment	It is not practicable to quantify the benefits of the proposed Code amendment. Accordingly, a quantitative analysis has not been undertaken.

Reference number(s)	030 - Distributor notifying reconciliation manager of new NSPs
Relevant Clause(s)	Clause 10.30 – When distributor or embedded network owner may connect NSP that is not point of connection to grid
Problem definition	Under clause 10.30(2), a distributor must, within five business days of connecting an NSP, advise the reconciliation manager of the following information:
	a) the NSP that has been connected; and
	b) the connection date; and
	 the participant identifier of the metering equipment provider for each metering installation for the NSP; and
	 d) the certification expiry date of each metering installation for the NSP.
	The policy intent of clause 10.30(2) is for the distributor that initiates the creation and connection of the NSP under clause 10.30(1A) or (1B) to advise the reconciliation manager of the information listed above.
	However, in a situation where two distributors are involved in the connection of an NSP under clause 10.30(1A) or (1B), each distributor may interpret clause 10.30(2) as requiring it to advise the reconciliation manager.
	This imposes unnecessary transaction costs on the distributor that does not have to advise the reconciliation manager.
Proposal	The Authority proposes amending clause 10.30 to clarify that the distributor that initiates the connection of an NSP in accordance with clause 10.30(1A) and (1B) is responsible for notifying the reconciliation manager of the information listed in clause 10.30(2).
Proposed Code amendment	10.30 When distributor or embedded network owner may connect NSP that is not point of connection to grid
	(1A) Only a distributor that initiates, under Part 11, the creation of an NSP on the distributor's network that is not a point of connection to the grid may connect the NSP to—
	 (a) an embedded network, if the embedded network owner has agreed to the connection; or
	(b) a local network, if the local network owner has agreed to the connection.
	(1B) Only an embedded network owner that initiates, under Part 11, the creation of an NSP on its embedded network —
	(a) may connect the NSP to another embedded network ; but
	(b) can only do so if the other embedded network owner has agreed to the connection.
	(1) Despite subclause (1A), a distributor must not connect an NSP on its network that is not a point of connection to the grid unless

	requested to do so by the reconciliation participant responsible for ensuring there is a metering installation for the point of connection .
	(2) A distributor that initiates, under Part 11, the creation of an NSP on the distributor's network, being a local network or an embedded network and which the distributor connects in accordance with subclause (1A) and (1B), must, within 5 business days of connecting an the NSP, advise the reconciliation manager of the following:
	(a) the NSP that has been connected; and
	(b) the connection date; and
	(c) the participant identifier of the metering equipment provider for each metering installation for the NSP; and
	(d) the certification expiry date of each metering installation for the NSP .
Grounds for not consulting	The Authority is satisfied the nature of the proposed Code amendment is technical and non-controversial in accordance with section 39(3)(a) of the Act.
	This is because the proposed amendment will have no effect on current practice. Rather, the proposed amendment would remove the possibility of any confusion, caused by inaccurate language in the Code.
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 would contribute to the efficient operation of the electricity industry.
	It would do this by clarifying the Code, to make it easier for participants to know who must advise the reconciliation manager of the information required under clause 10.30(2) of the Code.
	This will remove the possibility of unnecessary transaction costs associated with the wrong participant advising the reconciliation manager.
	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 a regulatory failure that is leading to a market inefficiency, and which requires a Code amendment to resolve.
Principle 3: Quantitative	It is not practicable to quantify the benefits of the proposed amendment.

Assessment	Accordingly, a quantitative analysis has not been undertaken.
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Reference number(s)	031 - Content of Interrogation Logs
Relevant clause(s)	Clause 8 of Schedule 10.6 – Electronic interrogation of metering installation
Problem definition	Clause 8(3) of Schedule 10.6 requires an MEP to record in the interrogation and processing system logs of each metering installation the MEP is responsible for the:
	a) time
	b) date
	c) extent of any change in the internal clock setting in the metering installation.
	The requirement in clause 8(3) of Schedule 10.6 for an MEP to record the date and time in an interrogation log is a repeat of the obligation as set out in clause 8(7) of Schedule 10.6.
Proposal	The Authority proposes to:
	a) delete the reference to "interrogation log" from clause 8(3) of Schedule 10.6
	b) amend clause 8(7)(c) of Schedule 10.6 to include the current obligation in clause 8(3) of Schedule 10.6 for an MEP to record "the extent of any change to the internal clock setting" in a metering installation's interrogation log.
Proposed Code amendment	8 Electronic interrogation of metering installation
amenument	(3) A metering equipment provider must, for each metering installation for which it is responsible, record in the interrogation and processing system logs, the time, the date, and the extent of any change in the internal clock setting in the metering installation.
	(7) A metering equipment provider must, when interrogating a metering installation,—
	(c) ensure that the interrogation log forms part of the interrogation audit trail and contains the following as a minimum:
	(i) the date of interrogation ; and
	(ii) the time of commencement of interrogation ; and
	(iii) the operator of the interrogation system identification (where available); and
	(iv) the unique identifier of the data storage device being interrogated; and
	(v) any clock errors outside the range specified in Table 1 of subclause (5) and the extent of any change in the

	internal clock setting; and
	(vi) the method of interrogation ; and
	(vii) the identifier of the reading device used for interrogation (if applicable).
Grounds for not consulting	The Authority is satisfied the nature of the proposed Code amendment is technical and non-controversial in accordance with section 39(3)(a) of the Act.
Assessment of proposed Code amendment against	The proposed Code amendment is consistent with the Authority's objective, and section 32(1) of the Act, because it would contribute to the efficient operation of the electricity industry.
section 32(1) of the Act	It would do this by clarifying the Code, to make it easier for participants to interpret the Code.
	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 a regulatory failure that is leading to a market inefficiency, and which requires a Code amendment to resolve.
Principle 3: Quantitative Assessment	A regulatory statement is not required for a technical and non-controversial Code amendment, meaning a quantitative assessment is not required.

Reference number(s)	032 - Automatic Cancellation of Metering Certification
Relevant clause(s)	Clause 6 of Schedule 10.7 – Determination of metering installation incorporating current transformer to be lower category
	Clause 20 of Schedule 10.7 – Cancellation of certification of metering installations
Problem definition	Clause 20 of Schedule 10.7 lists the triggers for a metering installation's certification to be automatically cancelled.
	However, clause 20 omits the cancellation provision in clause 6 of Schedule 10.7 that relates to a metering equipment provider (MEP) not receiving, in any month, a report detailing the maximum current conveyed through a point of connection for the prior month.
	In addition, it is not clear that certification for a metering installation that had its category determined under clause 6 can be cancelled.
Proposal	The Authority proposes to amend:
	 a) clause 20 of Schedule 10.7 to include the missing event that causes automatic cancellation of a metering installation's certification that is contained in clause 6 of Schedule 10.7 b) clause 6 of Schedule 10.7 to clarify the meaning of the clause and, in particular, to clarify that: (i) an ATH determines the category of a metering installation as part of the process associated with certifying the metering installation, and so (ii) the certification of a metering installation with its category determined under clause 6 of Schedule 10.7 can be cancelled automatically.
Proposed Code amendment	Schedule 10.7
unionament	5 Determination of metering installation category An ATH must, before it certifies a metering installation, determine the
	category of the metering installation in accordance with the following:
	(a) subject to clause 6, if the metering installation incorporates a current transformer, its category must be determined according to the primary current rating of the current transformer and the connected voltage set out in Table 1 of Schedule 10.1:
	(b) if the metering installation does not incorporate a current transformer and the quantity of electricity conveyed is measured by a meter , it must be category 1.
	6 Determin <u>ingation of metering installation incorporating current</u> transformer to be lower category
	(1) An ATH may, wWhen determining the category of a metering installation under clause 5(a), an ATH may-determine under subclause (2) determine that the category of a metering installation to be is lower than would otherwise be the case under clause 5(a), only in 1 of the following circumstances:
	(a) if a protection device, including a fuse or a circuit breaker, is

- installed that limits the maximum current of the **metering** installation: or
- (b) if the metering equipment provider, acting reasonably on the basis of historical metering data, believes that the maximum current to be conveyed through the point of connection will, at all times during the intended certification period, be lower than the current setting of the protection device for the category for which the metering installation—
 - (i) is **certified**; or
 - (ii) is required to be **certified** by this Code; or
- (c) if the **metering installation** uses less than 0.5 GWh in any 12 month period; or
- (d) if the metering equipment provider, acting reasonably on the basis of historical metering data, believes that the metering installation (including, for example, a metering installation for an emergency fire pump or flood pump) will use less than 0.5 GWh in any 12 month period.
- (2) If anAn ATH may determines the category of a metering installation to be lower than would otherwise be the case under clause 5(a), provided that—
 - (a) <u>if the circumstance in subclause (1)(a) applies</u>, the **ATH** must, when **certifying** the **metering installation**, determine the category of the **metering installation** by reference to the maximum current setting of the protection device. The **ATH** must, and when doing so—
 - (i) confirm the suitability and operational condition of the protection device; and
 - (ii) record, in the **metering records**, the rating and setting of the protection device; and
 - (iii) seal the protection device under clause 47; and
 - (iv) apply, if practicable, a warning tag to the seal under clause 47(6):
 - (b) <u>if the circumstance in subclause (1)(b) applies</u>, the **ATH** may must, only if it considers it appropriate in the circumstances, at the request of the metering equipment provider, when certifying the metering installation, determine the metering installation category according to the metering installation's expected maximum current but only.—
 - (i) at the request of the **metering equipment provider**; and
 - (ii) if the ATH considers it appropriate in the circumstances:

If the **ATH** determines the category of a **metering installation** under this clause, then—

(i) the metering equipment provider responsible for the metering installation must, each month, obtain a report from the participant interrogating the metering installation, detailing the maximum current conveyed through the point of connection for the prior month. For the purposes of this subparagraph, the metering equipment provider must determine the maximum

- current from raw meter data from the metering installation by either calculation from the kVA by trading period if available, or from a maximum current indicator if fitted in the metering installation; and
- the report in any month, or the report demonstrates that the maximum current conveyed through the point of connection, at any time during the previous month, exceeded the maximum permitted current for the metering installation category as certified, certification for the metering installation is automatically cancelled from the date on which the metering equipment provider should have received the report, or the date on which the metering equipment provider received the report.
- (c) <u>if the circumstance in subclause (1)(c) or subclause (1)(d) applies, then when **certifying** a **metering installation**, if the primary voltage is—</u>
 - (i) if the primary voltage is—
 - (A) less than 1kV, the **ATH** must determine the metering installation as category 2; or
 - (B) greater than or equal to 1kV, the **ATH** must determine the **metering installation** as category 3; and
 - (ia) less than 1 kV, the **ATH** must determine the **metering** installation as category 2; or
 - (ib) greater than or equal to 1 kV, the **ATH** must determine the **metering installation** as category 3.
 - (ii) the metering equipment provider responsible for the metering installation must, each month during the certification period, obtain a report from the participant interrogating the metering installation detailing the total kWh consumption of the metering installation for the prior 12 months:
- (d) subclause (1)(d), if the metering equipment provider does not receive the report in any month, or the report identifies that the electricity conveyed through the point of connection exceeded 0.5 GWh during the previous 12 month period, the certification for the metering installation is automatically cancelled from the date on which the metering equipment provider should have received the report or the date on which the metering equipment provider received the report.
- (2A) If, when **certifying** a **metering installation**, an **ATH** determines the category of a **metering installation** under—
 - (a) subclause (2)(b), then the metering equipment provider responsible for the metering installation must, each month, obtain a report from the participant interrogating the metering installation, detailing the maximum current conveyed through the metering installation for the prior month. For the purposes of this subclause, the metering equipment provider must determine the maximum current from raw meter data from the metering installation by either

- calculation from the kVA by **trading period** if available or from a maximum current indicator, if fitted in the **metering installation**; and
- (b) subclause (2)(c), then the metering equipment provider responsible for the metering installation must, each month during the certification period, obtain a report from the participant interrogating the metering installation detailing the total kWh consumption of the metering installation for the prior 12 months.
- (2B) If a metering equipment provider does not receive the report under subclause (2A)(a) in any month, or the report demonstrates that the maximum current conveyed through the point of connection, at any time during the previous month, exceeded the maximum permitted current for the metering installation category as certified, certification for the metering installation to which the report relates is automatically cancelled from:
 - (a) the date on which the **metering equipment provider** should have received the report; or
 - (b) the date on which the **metering equipment provider** received the report, if earlier:
- (2C) If a metering equipment provider does not receive the report under subclause (2A)(b) in any month, or the report identifies that the electricity conveyed through the point of connection exceeded 0.5 GWh during the previous 12 month period, the certification for the metering installation to which the report relates is automatically cancelled from:
 - (a) the date on which the **metering equipment provider** should have received the report; or
 - (b) the date on which the **metering equipment provider** received the report, if earlier.
- (3) The **ATH** must, before it determines a **metering installation** to be a lower category under this clause, visit the site of the **metering installation** to ensure that the installation is suitable for the **metering installation** to be determined to be a lower category.
- (4) If an **ATH** determines a **metering installation** to be a lower category under this clause the **metering installation certification report** must include all information required to demonstrate, as at the **certification** date, compliance with this clause.

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:
 - (a) the **metering installation** is modified otherwise than under clause 19(3), 19(3A), or 19(6):
 - (b) the **metering installation** is classed as outside the applicable accuracy tolerances set out in Table 1 of Schedule 10.1, defective, or not fit for purpose under—
 - (i) this Part: or

- (ii) any audit:
- (c) an **ATH** advises the **metering equipment provider** responsible for the **metering installation** of—
 - a reference standard or working standard used to certify the metering installation not being compliant with this Part when it was used to certify the metering installation; or
 - (ii) the failure of a group of **meters** in the statistical sampling **recertification** process for the **metering installation**; or
 - (iii) the failure of a **certification** test for the **metering** installation:
- (d) the manufacturer of a metering component in the metering installation determines that the metering component does not comply with the standards to which the metering component was tested:
- (e) an inspection of the **metering installation**, that is required under this Part, is not carried out in accordance with the relevant clauses of this Part:
- (f) if, under clause 6(2) the metering installation has been determined to be a lower category, under clause 6-and—the maximum current conveyed through the metering installation at any time exceeds the current rating of its metering installation category as set out in Table 1 of Schedule 10.1
 - (i) the metering equipment provider has not received, in any month, the report referred to in clause 6(2A)(a); or
 - (ii) the report referred to in clause 6(2A)(a) demonstrates that the maximum current conveyed through the metering installation, at any time during the previous month, exceeded the maximum permitted current for the metering installation category as certified; or
 - (iii) the metering equipment provider has not received, in any month, the report referred to in clause 6(2A)(b); or
 - (iv) the report referred to in clause 6(2A)(b) identifies that the electricity conveyed through the point of connection exceeded 0.5 GWh during the previous 12 month period:
- (g) the metering installation—
 - (i) is **certified** under clause 14 and sufficient load is available for full **certification** testing; and
 - (ii) has not been retested under clause 14(4):
- (h) a **control device** in the **metering installation certification** is, and remains for a period of at least 10 **business days**, bridged out under clause 35(1):
- (i) the **metering equipment provider** responsible for the **metering installation** is advised by an **ATH** under clause 48(6)(b) that a seal has been removed or broken and the accuracy and continued integrity of the **metering installation** has been affected.
- (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, update the metering installation's certification expiry date in the registry .
Grounds for not consulting	The Authority is satisfied the nature of the proposed Code amendment is technical and non-controversial in accordance with section 39(3)(a) of the Act.
	This is because the proposed amendment will have no effect on current practice. Rather, the proposed amendment would remove the possibility of any confusion, caused by inaccurate language in the Code.
Assessment of proposed Code amendment against	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 by clarifying the Code.
section 32(1) of the 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 provides an identifiable efficiency gain, which requires a Code amendment to resolve.
Principle 3: Quantitative Assessment	It is not practicable to quantify the benefits of the proposed amendment. Accordingly, a quantitative analysis has not been undertaken.

Reference number(s)	033 - Measuring Transformer Terminology
Relevant clause(s)	Clause 31(7)(b)(ii) of Schedule 10.7 – Measuring transformer burden and compensation requirements
Problem definition	Clause 31(7)(b)(ii) of Schedule 10.7 of the Code incorrectly uses the term "metering transformer" instead of "measuring transformer".
Proposal	The Authority proposes to replace the term "metering transformer" in clause 31(7)(b)(ii) of Schedule 10.7 with the term "measuring transformer".
Proposed Code	Schedule 10.7
amendment	31 Measuring transformer burden and compensation requirements
	(7) An ATH must, before it certifies a measuring transformer , if the inservice burden is less than the lowest burden test point specified in a standard set out in Table 5 of Schedule 10.1,—
	(b) confirm that—
	(i) a class A ATH has confirmed by calibration that the accuracy of the measuring transformer will not be adversely affected by the in-service burden being less than the lowest burden test point specified in the standard; or
	(ii) the measuring transformer's manufacturer has confirmed that the accuracy of the metering measuring transformer will not be adversely affected by the inservice burden being less than the lowest burden test point specified in the standard.
Grounds for not consulting	The Authority is satisfied the nature of the proposed Code amendment is technical and non-controversial in accordance with section 39(3)(a) of the Act.
	This is because the proposed amendment will have no effect on current practice. Rather, the proposed amendment would remove the possibility of any confusion caused by inaccurate language in the Code.
Assessment of proposed Code amendment against	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 by clarifying the Code.
section 32(1) of the 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	It is not practicable to quantify the benefits of the proposed amendment. Accordingly, a quantitative analysis has not been undertaken.