



CitiPower Pty  
ACN 064 651 056  
www.citipower.com.au

Head Office: 40 Market Street Melbourne Victoria  
Telephone: (03) 9683 4444 Facsimile: (03) 9683 4499 DX 433 Melbourne  
Postal address: Locked Bag 14090 Melbourne Victoria 8001 Australia

Powercor Australia Ltd  
ACN 064 651 109  
www.powercor.com.au

13 December, 2007

Dr John Tamblyn  
Chairman  
Australian Energy Market Commission  
Level 16, 1 Margaret Street  
Sydney NSW 2000

Email: [submissions@aemc.gov.au](mailto:submissions@aemc.gov.au)

Dear Dr Tamblyn

**Draft National Electricity Amendment  
Integration of NEM Metrology Requirements Rule 2007**

Thank you for the opportunity to comment on the Draft Rule Determination – Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 released on the 18 October 2007.

CitiPower and Powercor Australia (Powercor) are Victorian electricity distributors who are registered by NEMMCO as Network Service Providers and will be directly affected by the outcomes arising from this proposal.

CitiPower and Powercor support the general intention of the proposed Rule changes provided that the associated jurisdictional regulations are withdrawn to ensure there is not duplication of regulatory obligations. However, there are a number of concerns about the details of the Draft Rule determination which are set out in the attached table for your consideration.

CitiPower and Powercor also note that the Commission has proposed a considerable number of drafting amendments for clarity. This objective has the support of CitiPower and Powercor but the Commission should keep in mind that the drafting suggestions put forward by NEMMCO have been subject to considerable discussion with Industry participants and clarification should be made only with a full understanding of the purpose of the amendment and its interaction with other provisions and relevant subsidiary instruments. The process of

amending the Rules might be improved if the Commission could engage with an appropriate working group from Industry before making clarifying changes in a draft determination.

Please do not hesitate to give me a call on (03) 9683 42982 or email to [rherrmann@powercor.com.au](mailto:rherrmann@powercor.com.au) if you require any further information in relation to this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Rolf H.', with a long horizontal flourish extending to the right.

Rolf Herrmann  
Manager regulation

<p align="center"><b>Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 18 October 2007</b></p>	<p align="center"><b>CitiPower and Powercor Comments</b></p>
<p><b>4.2 Rule Change Proposal Number 2 – Incorporate first tier metrology requirements into the NEM – grandfathering of existing first tier requirements</b></p>	<p>The Commission seeks comments on whether the 30 June 2008 is an appropriate date for the grandfathering of first tier metering installations. CitiPower and Powercor agree this date is appropriate.</p> <p>The Commission also seeks comment on whether transitional provisions are required in the Rules in relation to metering installations which are not compliant with the current jurisdictional arrangements. Such a provision seems unnecessary, the installation could either be brought into compliance with the jurisdictional rules or the National Rules, whichever is the more cost effective, and the issue would be further addressed by the review of type 5 and type 6 metering to be conducted by the Ministers of participating jurisdictions by 30 June 2009.</p>
<p><b>4.3 Rule Change Proposal No. 3 – Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – Jurisdictional variations in the election of the responsible person</b></p>	<p>The Commission sought comments on whether an end date was required for the grandfathering provisions applying to the Victorian jurisdiction set out in clause 11.X.4.</p> <p>At this stage an end date seems unnecessary because there will be a natural reduction in such cases as meters are replaced because customers switch to other retailers or metering obsolescence.</p>
<p><b>4.5 Rule Change Proposal no. 5 - Consequential change to harmonise jurisdictional metrology requirements - data storage capacity of type 6 metering installations.</b></p>	<p>The drafting amendment proposed by the Commission differs from the NEMMCO proposal. The Commission may have missed the issue NEMMCO was trying to address which relates to the capacity of the meter to display the consumption without exceeding the capacity of the display. For example, a 3 digit register would be limited to a maximum reading of 999. If the consumption since the last reading causes the display to rollover then the actual consumption becomes uncertain unless there is confidence that the display has rolled over</p>

<p align="center"><b>Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 18 October 2007</b></p>	<p align="center"><b>CitiPower and Powercor Comments</b></p>
	<p>only once. It is therefore necessary to specify a register capacity to avoid the risk that the readings will be uncertain, NEMMCO chose a consumption over 12 months which seems reasonable for meters that are generally read quarterly but may be read less frequently where there are access difficulties. Consider reverting to NEMMCO's drafting.</p>
<p><b>4.6 Rule Change Proposal no. 6 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – management of losses between connection point and metering point</b></p>	<p>CitiPower and Powercor agree with the Commissions analysis and treatment of this proposal in not adopting the proposed Rule change as expressed at 4.6.4 of the draft National Electricity Amendment (Integration of NEM Metrology Requirements) Rule 2007. However, it is noted that 4.6.5 is inconsistent with this decision as it refers to adopting the NEMMCO proposal, presumably 4.6.5 includes a typographical error.</p>
<p><b>4.7 Rule Change Proposal no. 7 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – metering standards for non-market generation</b></p>	<p>The Commission seeks comments on the need for an upper limit for accumulation meters to be set by jurisdictions.</p> <p>It is not obvious why the current requirements of S7.2.3 are not satisfactory and therefore there is no obvious benefit in establishing an additional "r" value to be set by jurisdictions in the metrology procedure.</p> <p>The new section in clause 7.3.1 dealing with Requirements for metering installations for non-market generation units includes in sections (i)(3)(i), (i)(4)(i) and (i)(5)(i) the words "a type 3 metering installation; or" which seem to be redundant given that the next provision (ii) in each case provides "the type of metering installation appropriate to that connection point;". Consider deleting 7.3.1(i)(3)(i), 7.3.1(i)(4)(i) and 7.3.1(i)(5)(i)</p>

<p align="center"><b>Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 18 October 2007</b></p>	<p align="center"><b>CitiPower and Powercor Comments</b></p>
<p><b>4.8 Rule Change Proposal no. 8 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – process for the conduct of a participant requested meter test</b></p>	<p>In the Commissions analysis it has stated “In a practical sense however the Commission considers that smaller end use consumers would liaise with their retailer who would then contact NEMMCO or the responsible person for a meter test.” Whilst this assessment may often be correct, it may not be valid in some circumstances, for example where the customer is in dispute with the retailer.</p> <p>Clause 7.6.1(e) makes reference to “(c)” which is not the appropriate reference. The reference should be” (b)”.</p> <p>Clause 7.6.1(i) is redundant and should be deleted. NEMMCO already has obligations for the accreditation and registration of metering providers under clause 7.4.2 that cover this issue.</p>
<p><b>4.9 Rule Change Proposal no. 9 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – record keeping</b></p> <p>The proposed drafting provides:</p> <p><b>7.9.1 Metering databases</b></p> <p>(a) <i>NEMMCO</i> must create, maintain and administer a <i>metering database</i> (either directly or under a contract for provision of the database) containing information for each <i>metering installation</i> registered with <i>NEMMCO</i>.</p> <p>(b) <i>NEMMCO</i> may use <i>agency metering databases</i> to form part of the <i>metering data base</i>.</p> <p>(b1) A person engaged by <i>NEMMCO</i> to provide <i>agency data collection systems</i> and <i>agency metering databases</i> must meet and comply with the service level requirements and any other criteria that <i>NEMMCO</i> establishes from time to time in relation to those</p>	<p>Clause 7.9.1 does not clearly allocate responsibilities between NEMMCO and the responsible person.</p> <p>In relation to metering types 1-4 NEMMCO should be responsible for the metering data and for types 5-6 the responsibility for metering data should fall to the responsible person. This affects clauses 7.9.1(f) and (g) which should be re-drafted to include NEMMCO.</p> <p>The reference to “the person” in clause 7.9.1(i) may cause confusion because the “responsible person” also has the obligation to retain the metering data under clause 7.9.1(f). Also, “metering data” is defined to include substituted energy data which is referred to under clause 7.9.1(g) as a responsibility of the “responsible person”. This in effect means that both the “responsible person” and “the person” who is required to collect the metering data are responsible for keeping the data for the prescribed periods.</p>

<p style="text-align: center;"><b>Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 18 October 2007</b></p>	<p style="text-align: center;"><b>CifiPower and Powercor Comments</b></p>
<p>functions, including accreditation requirements.</p> <p>(c) The <i>metering database</i> must have the capacity for electronic access by relevant <i>Market Participants</i> and <i>Network Service Providers</i>.</p> <p>(d) The <i>metering database</i> must include original <i>energy</i> readings and, where relevant, <i>metering data</i> and <i>settlements ready data</i>.</p> <p>(e) Rights of access to data held within the <i>metering database</i> are set out in clause 7.7.</p> <p>(f) The <i>responsible person</i> must ensure that <i>metering data</i> in respect of a <i>metering installation</i> is retained for a period of 7 years in the form in which it was collected.</p> <p>(g) The <i>responsible person</i> must ensure that a separate record of each adjustment or substitution to <i>metering data</i> in respect of a <i>metering installation</i> is retained for a period of 7 years.</p> <p>(h) For all types of <i>metering installations</i>, the <i>metering database</i> must contain <i>metering data</i> that is retained:</p> <ul style="list-style-type: none"> <li>(1) online for 13 months in accessible format; and</li> <li>(2) following the retention under subparagraph (1), in archive in a form that is accessible independently of the format which the data is stored for a period of 5 years and 11 months.</li> </ul> <p>(i) The person who is required under this Chapter 7 to collect the <i>metering data</i> from the <i>metering installation</i> for the purpose of <i>settlements</i> must ensure the data is stored separately in the form that it was collected for the period of time specified in paragraphs (g) and (h).</p>	<p>It may be better to replace the reference to “responsible person” in clauses 7.9.1(f) and(g) with a reference to “the person who is required under this Chapter 7 to collect and process the metering data for the purposes of settlements” and delete 7.9.1(i). It would also seem possible to combine clauses 7.9.1(f) and (g)</p>
<p><b>4.10 Rule Change Proposal no. 10 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – rights of access to metering data</b></p>	<p>The Commission seeks the views of interested stakeholders as to whether jurisdictional regulators should be provided with access to metering data.</p>

<p align="center"><b>Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 18 October 2007</b></p>	<p align="center"><b>CifiPower and Powercor Comments</b></p>
<p><b>4.12 Rule Change Proposal no. 12 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – metering databases</b></p>	<p>It is not obvious why the economic regulator would need access to this data. Any disputes arising in relation to metering data would be handled by the Ombudsman. Consider deleting 7.7(a)(6).</p> <p>The proposed definition of “metering data” does not clearly include the measured electrical units read from registers in the meter, otherwise defined as “energy data”. However, it could be inferred that “energy data” is a subset of “metering data” because it emanates from the meter which is part of the “metering installation”. It should be made clear whether or not “energy data” is included within the definition of “metering data” or not. If it is not to be included then revision should be considered for clause 7.9.1 to ensure that energy data is collected and stored for the prescribed period, currently these provisions only apply to “metering data”.</p> <p>The proposed definition of substituted energy data refers to metering data substituted in accordance with the metrology procedure. This is counter intuitive and it would be more appropriate for the definition to be for “substituted metering data” since it refers to metering data. Similarly the proposed definition for “estimated energy data” would be more intuitive if it referred to estimated metering data.</p>
<p><b>4.13 Rule Change Proposal no. 13 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – metering installation malfunctions</b></p>	<p>The proposed amendment includes the requirement in clause 7.1.2(a)(1) and (2) that a malfunction must be repaired within a prescribed number of business days “after the malfunction was detected or ought reasonably to have been detected”.</p> <p>It is not possible to initiate remedial action until the malfunction has actually been detected so the reference to “ought reasonably to have been detected” should be deleted in each of the provisions.</p>

<p align="center"><b>Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 18 October 2007</b></p>	<p align="center"><b>CitiPower and Powercor Comments</b></p>
<p><b>4.14 Rule Change Proposal no. 14 - Consequential change to harmonise jurisdictional metrology requirements with existing NEM requirements – security seals</b></p>	<p>The Commission seeks comments from interested stakeholders as to whether it is necessary to clarify clause 7.8.1(f). Clause 7.8.1 (f) seems to be sufficiently clear.</p>
<p><b>4.19 Rule Change Proposal no. 19 – Address NEM efficiencies – time setting</b></p>	<p>The provisions of clause 7.12(a) and (d) seem to place the same obligations on both the responsible person and NEMMCO in relation to the accuracy of the “<i>metering installation</i>” clocks. It would be appropriate to amend 7.12(d) to oblige NEMMCO to maintain the accuracy of the “<i>metering database</i>” clock instead of the “<i>metering installation database clock</i>”</p>
<p><b>4.21 Rule Change Proposal no. 21 – Address NEM efficiencies – Recognition of International Laboratory Accreditation Cooperation (ILAC)</b></p>	<p>In relation to a point raised by Ergon about the literal interpretation that requires a metering provider to obtain a test certificate for all “reference/calibration equipment”, the Commission seeks comment from interested stakeholders in relation to</p> <ul style="list-style-type: none"> <li>• why in-house calibration systems processes are used and what quality control surrounds these processes; and</li> <li>• whether the phrase “reference/calibrated equipment” should relate to ALL test devices or only to “reference standards”</li> </ul> <p>CitiPower and Powercor agree with the concern raised by Ergon and the drafting amendment proposed by Ergon. It is important to note that NEMMCO takes particular interest in the processes and procedures around calibration and certification of test equipment in the process of accrediting metering providers and approving asset management plans and would presumably refuse accreditation or approval of the asset management plan if appropriately calibrated test equipment was not assured.</p>



<p align="center"><b>Draft National Electricity Amendment Integration of NEM Metrology Requirements Rule 2007 18 October 2007</b></p>	<p align="center"><b>CitiPower and Powercor Comments</b></p>
<p><b>4.22 Rule Change Proposal no. 22 – Address NEM efficiencies timeframes for inspection and testing of various metering installation types</b></p>	<p>The Commission seeks comments from interested stakeholders on whether principles to guide NEMMCO in approving an asset management strategy should be identified in the Rules.</p> <p>CitiPower and Powercor believe this is unnecessary at this time and note that NEMMCO have published their criteria for approving such plans.</p>
<p><b>4.25 Rule Change Proposal no. 25 – Address audit issue – NEMMCO audit of meter ‘test results’</b></p>	<p>The proposed drafting of clause 7.6.1(a)(2) refers to “the inspection and testing requirements set out in schedule.” which does not completely describe the relevant Schedule. The words “S7.3” should be appended to this provision.</p>

