

Metlogic Pty Ltd
ABN 36 637 508 840

11.2.2021

Alisa Toomey
Australian Energy Market Commission
GPO Box 2603 Sydney NSW 2000

Dear Ms Toomey,

Metlogic Pty Ltd welcomes the opportunity to contribute Australian Energy Market Commission's (AEMC's) Consultation Paper in relation to Review of the regulatory framework for metering services (project reference code EMO0040).

Metlogic is the only independent NATA accredited utility meter verification facility in Australia. Metlogic is appointed by NMI as a utility meter verifier. Metlogic is in the business of verifying utility meters imported to Australia for compliance with National Trade Measurement Regulations. Metlogic believes the POC rules resulted in volume-based metering technology rollout, limiting customer choice and innovation in metering technology.

Metering technology bias

The POC rules are biased towards traditional metering technologies. As a result of POC rules implementation, the types of metering technology available for the customers are limited to one or two. Metlogic as utility meter verifier observed new metering technologies attempting to enter NEM experiencing challenges due to the inflexible rules and MC,MP and MDP arrangements. Metlogic recommends that the metering technology requirements and MC,MP and MDP arrangements are reviewed for giving customers greater choice selecting innovative metering technology.

Barriers in introducing new technology & innovation

The metering technology has evolved significantly resulting in significantly smaller metering devices. Metlogic believes that the current POC rules are inflexible for adopting new technologies. A good example is DIN rail mount meters. These types of meters are verified by Metlogic for compliance with (NITP14) Australian trade compliance regulations. The DIN meters are approximately 12 times smaller than traditional bottom connect meters. This type of technology is the customers only choice for high-density metering installations. Metlogic recommends reviewing the barriers in service installation rules, POC rules and MC,MP and MDP rules that prevent customer-driven metering technology choice.

Metering services consolidation

The competition in metering services resulted in consolidation in metering services providers. The 5MS rules change will result in further consolidations as legacy meters are replaced with 5MS meters. Metlogic believes that the volume-based competition in metering services has resulted in reduced choice for customer when selecting a metering service provider and metering technology.

Barriers to introducing new technology & innovation -mA Current transformers

The current rules support traditional revenue-grade current transformers. These types of current transformers are originally designed to be used with electromagnetic meters to provide the power to move the magnetic needles or power protective relays. However, due to the relatively large current requirement (5A), these CTs require a larger, heavier core, and a larger wire gauge. This translates to a larger, heavier and higher cost CTs. Moreover, these CTs can be extremely dangerous and require CT chambers because of the large voltages that induced when the CT secondaries are not short circuited.

The mA CT's work under the same principle as a 5A CT, the number of secondary windings is increased to effectively lower the secondary output current. Because the output current is lower, the core and the winding wire may be significantly smaller, less expensive and significantly safer. Accuracy, including linearity and phase shift, can generally exceed the revenue-grade 5A output CTs. As an example, mA CTs are used in Canada for revenue metering applications since 2010. The Canadian accuracy requirements specify accuracy class 0.15 and 0.3 for mA CTs. Metlogic has verified mA current transformers technology with (NITP14) National Trade Measurement Regulations compliance. However, there is no provision in-service installation rules, POC rules and MC,MP and MDP rules for mA current transformers. This resulted in challenges for customers adopting innovation in technology. Metlogic recommends technological review of rules to eliminate barriers for introducing mA current transformers to NEM.

DER metering

Metlogic believes the regulatory framework for metering services provide no coverage for the embedded metering devices used in distributed energy resources. The embedded metering devices are used to aggregate DER for NEM participation. A financial credit provided to the customer for participating in the aggregate DER schemes. Metlogic believes this arrangement is in breach of the National Trade Measurement Regulations. Metlogic recommends regulatory coverage these embedded metering devices for compliance with National Trade Measurement Regulations. Metlogic believes the embedded metering devices need to be verified by a utility meter verifier. Metlogic believes existing MC,MP and MDP arrangement is restrictive for customers to participate in peer to peer energy trading and aggregate

DER participation in NEM. Metlogic believes metering data that comply to trade regulations should be readily available to customers to participate in peer to peer energy trading and aggregate DER participation in NEM.

Metlogic appreciates the opportunity to contribute to the review of the regulatory framework for metering services. If you would like to discuss any aspects of our submission please contact Prabath Kamalasena prabath@metlogic.com.au or 02 - 80045122.

Yours sincerely

(signed for electronic transmission)

Prabath Kamalasena

Managing Director Metlogic Pty Ltd.