



11 September 2000

Mr Michael Rawstron
General Manager
Regulatory Affairs – Electricity
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

Dear Mr Rawstron

National Electricity Code Changes – Full Retail Competition Request for Submissions

I refer to the your invitation for comments on the proposed amendments to the Code in regard to full retail competition.

A review of the proposed Code change submission has revealed several editorial issues. NEMMCO has become aware of these issues from its own detailed review of the Code changes and from information provided by Code Participants. Although the issues are minor in nature, it is considered that their correction would improve the interpretation of the Code.

Following discussion with NECA, these issues are submitted for your consideration:

- (a) Clause 7.3.1(a)(8) – In the submission to NECA, the word “communicating” was replaced by “delivering data”. In the submission to the ACCC, the word “delivering” was replaced by “recording”. The final text “...be capable of recording data from the site of the metering installation to the metering database...” does not appear to imply a logical action. The original purpose of this phrase was to introduce the performance requirements as specified in clause 7.11. Hence, the phrase should be performance oriented.

Accordingly, it is **recommended** that the clause be altered to read:

“...be capable of delivering data from the site of the metering installation to the metering database...”.

- (b) Clause 7.3.1(da) – This clause was separated out from clause 7.3.1(d) in the current version of the Code. The separation was made for the purpose of highlighting individual accountability. However, to ensure that the original intention is maintained and that any doubt as to its application is removed, a reference to “responsible person” should be inserted.

Accordingly, it is **recommended** that the clause be altered to read:

“The *Local Network Service Provider* shall issue to the *responsible person* for each *metering installation* a unique *NMI*”.

- (c) Clause 7.3.4(d). The term “methodology” should be replaced by “metrology”.
- (d) Clause 7.9.1(d) regarding data included in the metering database. This clause was altered in the ACCC submission to “...original energy readings where relevant...”.

It is not clear how to interpret “...where relevant...”. The ‘original energy’ reading was introduced as a requirement for the purpose of metrology. That is, if there was a question raised about the integrity of the metering data an audit could be carried out using the original data. It would appear that this requirement will be necessary for every metering installation. Hence, the qualifier “where relevant” conveys a meaning that is substantially different from the original intention. If relaxation of this requirement is considered helpful, then it is suggested that it be a matter for industry consultation.

Further, this change has brought into question the term “energy readings”. For the purpose of standardisation, this term could be changed to the Glossary term “energy data” without the loss or alteration of meaning.

Accordingly, it is **recommended** that the clause be altered to read:

“The *metering database* must include the original *energy data*, *metering data* and *settlements ready data*”.

- (e) Clause 7.12(aa) regarding access for remote time synchronisation. This clause was transferred from clause 7.8.2 and in doing so the implications of the word “remote” for types 5 to 7 metering installations were not fully considered. Remote electronic access to time clocks would only be available for types 1 to 4 metering installations. Remote access to the time clocks for type 5, 6 and 7 metering installations would depend on the design of the metering installation and would not always be available.

For types 5 to 7 metering installations, when remote access wasn’t available, it would be the responsible person who would set the time function of the data logger (as directed in the metrology procedure). When remote access was available it would be to the metering installation database (as the data logger) and it was not intended that NEMMCO be responsible for setting the time function of the metering installation database – again, it was intended that this be allocated to the responsible person in the metrology procedure. Notes 3a and 4a of table S7.2.3.1 in schedule 7.2 prescribe this intention.

A change to restrict this clause to types 1 to 4 metering installations would clarify the interpretation of this clause and restore the clause to its original intention.

Accordingly, it is **recommended** that the clause be altered to read:

“The responsible person must provide to NEMMCO suitable remote data access to set the time function of the metering installation for metering installation types 1 to 4 as identified in schedule 7.2”.

- (f) Schedule S7.2.3.1 Note 1 – the phrase “...it is acceptable to use direct connected *meters*...” has not been amended. It is noted that the following amendment was included in the submission to NECA “...it is acceptable to use whole-current (direct connected) *meters*...”. This amendment was made to recognise the situation where the

terms “whole current” was favoured by industry over “direct connected”. It is noted that the term “whole current’ is used in other parts of the Chapter, as follows:

- Reference is made to “whole current” for types 4 and 5 in the Table S7.2.3.1;
- Reference is made to “whole current” in Table S7.3.2 “Maximum Period Between Tests”.

The use of “whole current” in this instance would assist in the clarification of the clause and be consistent with its use in other parts of the Chapter.

Accordingly, it is **recommended** that the clause be altered to read:

“...it is acceptable to use whole current (direct connected) *meters*...”.

- (g) Schedule S7.2.6(f) and (g) – the clause refers to “...under the National Measurements Act”. It is noted that the National Measurement Act is singular. This is a historical error that requires correction. Its correction at this time would assist in the clarification of the Code.

Accordingly, it is **recommended** that the clause be altered to read:

“...under the National Measurement Act.”

The editorial corrections presented are not intended to change the interpretation or intent of the original clause. Rather they are intended to assist Cope Participants in their interpretation of the Code. Accordingly, I bring these alterations to your attention at this time.

Please contact me (ph: 03 9648 8728) should further clarification of the above points be required.

Yours sincerely

Mike Robson
Head of Metering