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Submissions
Electricity Authority
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Sent by email to: submissions@ea.govt.nz

Submission on MEP Guidelines

1. Vector welcomes the opportunity to respond to the Electricity Authority's ("Authority") consultation paper entitled *Part 10 Implementation – Proposed Guideline for Metering Equipment Providers*, dated 30 April 2012.
2. Vector's contact person for this submission is:
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3. Vector supports the Authority's aim of providing guidelines to explain the requirements of Part 10 in plain English, with paraphrasing to avoid the use of "legalese". This should assist parties to understand the new rules. Overall, Vector considers that the Guidelines document could do more to achieve this aim as in some places the Code requirements are just repeated, rather than explained, and a fair amount of legalese remains in the guidelines.
4. Vector's responses to the questions in the consultation paper are set out in Appendix A.

Yours sincerely,

A handwritten signature in blue ink that reads "B Girdwood".

Bruce Girdwood
Manager Regulatory Affairs

Appendix A: Responses to specific questions

Section title	Questions	Response
<p>Metering information</p>	<p>is this section understandable?</p>	<p>We find the diagram to be rather unclear. It is headed “Definition Tree” but shows information exchanges. It is also unclear what information will flow from the Registry to the consumer invoice. We note that the information flow between ATH and the MEP should be two-way.</p>
	<p>is more detail required or is there too much detail?</p>	<p>As noted above, more information is required.</p>
	<p>are any issues left out?</p>	<p>Yes, Metering Equipment Owner should be included in the diagram.</p>
	<p>what additional information would assist you as an MEP to develop your Code compliance procedures?</p>	
<p>Role of the MEP</p>	<p>is this section understandable?</p>	<p>Yes, except for paragraph 10(b) which could be more clearly expressed.</p> <p>The Guideline’s use of the word “person” appears to be the legal definition. It would be helpful if this and similar terms were replaced with plain English, where possible.</p>
	<p>is more detail required or is there too much detail?</p>	
	<p>are any issues left out?</p>	<p>Yes, the issues of maintaining data records and obtaining network approval of designs should be included.</p>

Section title	Questions	Response
	what additional information would assist you as an MEP to develop your Code compliance procedures?	Paragraph 9(b) implies that an MEP can displace another meter owner's advanced meter even if it meets the advanced meter guidelines and all requirements. Is this intended?
Role of the reconciliation participant in metering	is this section understandable?	Yes.
	is more detail required or is there too much detail?	
	are any issues left out?	
	what additional information would assist you as an MEP to develop your Code compliance procedures?	
Role of the ATH in metering	is this section understandable?	Yes.
	is more detail required or is there too much detail?	
	are any issues left out?	Yes, maintaining records of certification, inspections etc should be included.
	what additional information would assist you as an MEP to develop your Code compliance procedures?	

Section title	Questions	Response
When a participant becomes an MEP	is this section understandable?	<p>Generally, yes.</p> <p>Paragraph 27(b): It is unclear why a consumer is mentioned separately. Do they have different rights from any other participant described in sub-paragraph (a)?</p> <p>Paragraph 28(b): This could be clearer. Vector is unsure why the reference to the NSP mapping is required.</p>
	is more detail required or is there too much detail?	
	are any issues left out?	
	what additional information would assist you as an MEP to develop your Code compliance procedures?	<p>It would be useful if the following two issues were addressed:</p> <p>What happens if the meter owner on the Registry has not applied to be a MEP on 6 June?</p> <p>Who is the MEP if an MEP fails an audit or ceases to be a MEP?</p>
New MEP or change of MEP at a POC	is this section understandable?	Paragraph 32(b) is not clear. Vector is unsure why it is relevant to specify who is reading the meter at this point.
	is more detail required or is there too much detail?	
	are any issues left out?	Yes, clause 10.22(2) should be discussed (the clause relating to the gaining MEP paying the losing MEP for remaining compliance).

Section title	Questions	Response
	<p>what additional information would assist you as an MEP to develop your Code compliance procedures?</p>	<p>An explanation of the timing issues related to paragraph 37(k) would be useful. For example, we would like to see a clearer statement of when the obligations for MEPs begin. Also, it is not clear whether “update metering records” refers to the metering records or to the MEP’s start date.</p>
<p>MEP obligations when a metering installation is installed or modified</p>	<p>is this section understandable?</p>	<p>Paragraph 45(b) is complex and we consider that a better explanation is needed.</p> <p>Paragraph 48 could be simplified. In particular, does “...at a POC, other than a POC to the grid, or modified at a POC other than a POC to the grid” simply mean “at an ICP”?</p>
	<p>is more detail required or is there too much detail?</p>	
	<p>are any issues left out?</p>	
	<p>what additional information would assist you as an MEP to develop your Code compliance procedures?</p>	
<p>MEP must be audited and provide its audit to the Authority</p>	<p>is this section understandable?</p>	<p>Yes.</p>
	<p>is more detail required or is there too much detail?</p>	<p>Paragraph 56(b) should clarify what is meant by “within at least 3 months”.</p>
	<p>are any issues left out?</p>	
	<p>what additional information would assist you as an MEP to develop your Code compliance procedures?</p>	

Section title	Questions	Response
Faulty metering installations	is this section understandable?	An explanation of what “faulty” means would be useful; i.e. which types of faults need to be reported and which types of faults do not?
	is more detail required or is there too much detail?	
	are any issues left out?	
	what additional information would assist you as an MEP to develop your Code compliance procedures?	
EIEP transfer	is this section understandable?	Yes.
	is more detail required or is there too much detail?	
	are any issues left out?	
	what additional information would assist you as an MEP to develop your Code compliance procedures?	
Access to raw meter data or metering installations	is this section understandable?	Yes, but it is not clear why paragraph 95 is necessary. Access and restrictions are already explained elsewhere.
	is more detail required or is there too much detail?	
	are any issues left out?	
	what additional information would assist you as an MEP to develop your Code compliance procedures?	

Section title	Questions	Response
Provision of raw meter data from an MEP's back office	is this section understandable?	Generally yes. However, it is not clear that paragraph 110(a) only applies if the trader is responsible for interrogation.
	is more detail required or is there too much detail?	
	are any issues left out?	
	what additional information would assist you as an MEP to develop your Code compliance procedures?	
Records	is this section understandable?	
	is more detail required or is there too much detail?	An explanation is required about how an MEP would give access to metering records held by a contracted third party (e.g. ATH).
	are any issues left out?	
	what additional information would assist you as an MEP to develop your Code compliance procedures?	
Ensuring the accuracy of metering installations	is this section understandable?	Yes, generally.
	is more detail required or is there too much detail?	We consider that a more detailed explanation is necessary regarding clause 148 and the references to Part 15 of the Code. In particular it would be useful to further clarify the situations where it is necessary to certify a control device.

Section title	Questions	Response
	are any issues left out?	<p>Yes, paragraph 139 reads “where an ATH has determined”. This should read “when an ATH has determined”. Overall the paragraph should be expanded to fully explain the process that is required to monitor the maximum current and consumption.</p> <p>Also, there should be an explanation of how the inspection periods apply. For example, if an inspection is carried out prior to inspection window rather than in it, does this mean verification is cancelled at the end of the window because the inspection did not take place in the window?</p>
	what additional information would assist you as an MEP to develop your Code compliance procedures?	We request an explanation of how the seal requirements could be met in a practical way, especially with regard to reporting. The code, if followed strictly, is very difficult to comply with as seals can be broken by many parties and determining who removed them would be an onerous task for a MEP.
Transition provisions		There is no mention of COP10.5 approvals. Is this intentional?

Section title	Questions	Response
General	Explanation of terms	<p>A plain English explanation of terms like POC, NSP, reconciliation participant, trader etc and when they apply would be helpful in this document. The legal definitions are sometimes difficult to locate and understand.</p> <p>The document wording is often a repeat of the wording in the codes. The Guidelines would achieve their aim more effectively if simple language was used in some parts rather than the legal phasing.</p>
	Variations	<p>An explanation would be useful of how and for what variations from requirements can be granted.</p> <p>Also useful would be an explanation of how situations which are currently dealt with under a COP10.5 approval could be approved under the new rules.</p>