

Reference number(s)	025 - MEP updates of HHR/NHH and AMI flags
Relevant clause(s)	<p>Clause 10 of Schedule 10.4 – Services access interface</p> <p>Clause 8 of Schedule 10.6 – Electronic interrogation of metering installation</p> <p>Clause 8 of schedule 10.7 – Metering installation certification requirements</p> <p>Clause 11.3 – Metering equipment provider to advise registry manager of changes to registry metering records</p> <p>Clause 3 of Schedule 11.4 – Metering equipment provider to advise registry manager of changes to registry metering records</p>
Problem definition	<p>Clause 10 of Schedule 10.4 requires an ATH, when preparing a metering installation certification report, to determine and record the services access interface in the certification report. However, the services access interface for an AMI meter will probably change if the meter stops communicating with an MEP’s back-office systems.</p> <p>Under clause 8(2) of Schedule 10.7 an ATH, when certifying a metering installation, must specify in the certification report whether the metering installation is NHH or HHR. However, a metering installation with AMI metering may be both NHH and HHR. In such cases, the reconciliation participant chooses whether to submit NHH or HHR submission information from the metering installation to the reconciliation manager.¹</p> <p>Clause 11.2 of the Code requires a participant to take all practicable steps to ensure that information the participant must provide to any person under Part 11 is—</p> <ul style="list-style-type: none"> a) complete and accurate; and b) not misleading or deceptive; and c) not likely to mislead or deceive. <p>The certification type of a metering installation depends on different factors (eg, where the data from a metering installation can be accessed—from the metering installation or from the MEP’s back office).</p> <p>ATHs are responsible for certifying metering installations, including the preparation of any supporting information required under the Code (metering records). MEPs are responsible for entering these metering records into the registry. As a result, an ATH’s records dictate what metering records an MEP can load into the registry to comply with clause 11.2.</p> <p>A metering installation may initially be certified with an AMI meter that provides HHR data. In this case, the metering records in the registry would show the certified metering installation with an AMI flag of “Y” and a certification type of “HHR”. However, the AMI meter may, at some point, stop communicating with the MEP’s back office. If this happened, the metering installation would no longer be AMI. The metering installation may also be subject to manual readings of the NHH register(s), which</p>

¹ Refer to clause 9(ea) of Schedule 11.1.

	<p>would mean it was no longer HHR.</p> <p>Currently, the Code is unclear as to whether an MEP is permitted to change the AMI flag, because there is no explicit link between the services access interface and the AMI flag. In addition, an MEP is unable to change the “HHR” indicator flag in the registry to reflect a change in a metering installation’s capability, unless the ATH:</p> <ul style="list-style-type: none"> a) updates its records; or b) recertifies the metering installation (in the case of a meter no longer communicating with the MEP’s back office). <p>In addition, the Code does not have a mandated timeframe for:</p> <ul style="list-style-type: none"> a) updating the AMI flag in the registry when an AMI meter ceases to communicate with an MEP’s back-office systems b) resolving communication issues between a metering installation and an MEP’s back-office systems. <p>The current Code arrangements do not promote the timely resolution of communication failures between meters and MEPs’ back-office systems. This can have an adverse effect on retailers’ service offerings to their customers.</p> <p>In addition, for some retailers it is important to know the metering services that are available at an ICP, before deciding whether to compete for the customer or embedded generator at the ICP. Some retailers’ service offerings are entirely dependent on a particular type of metering being operational at the ICP. Therefore, it is important for the registry to reflect the metering services available at an ICP as soon as possible after a change, provided these services are within the metering installation’s certification parameters, as determined by an ATH.</p>
<p>Proposal</p>	<p>The Authority proposes to amend the Code as follows:</p> <ul style="list-style-type: none"> a) Amend clause 10 of Schedule 10.4 to require an ATH to specify: <ul style="list-style-type: none"> i) all possible services access interfaces for a metering installation, and ii) the conditions under which each services access interface may be used. b) Amend clause 8 of Schedule 10.6 to require an MEP to investigate any communication failure between a metering installation and the MEP’s back-office systems, and: <ul style="list-style-type: none"> i) restore communications and download raw meter data by the earlier of: <ul style="list-style-type: none"> (A) the number of full days that equate to 25 % of the maximum interrogation cycle for the metering installation; and (B) 30 days from the date of the last successful interrogation; or ii) update the registry metering records to indicate that the metering component is no longer an AMI device. c) Amend clause 8(2)(b) of Schedule 10.7 to enable an ATH, when certifying a metering installation, to specify in the certification report that the metering installation is “half hour <u>and</u> non half hour”. d) Amend clause 8(2)(c) of Schedule 10.7 to require an ATH, when certifying a metering installation, to specify all possible services access interfaces and the conditions under which they may be

	<p>used.</p> <p>e) Amend clause 3 of Schedule 11.4 to specify when an MEP must update the registry metering records in situations where there has been a communication failure between a metering installation and the MEP's back-office systems.</p> <p>f) Amend row 6 of Table 1 of Schedule 11.4 to require an MEP to select whether a metering installation is half hour <u>or</u> non half hour, in the instance where an ATH has certified the metering installation as being half hour <u>and</u> non half hour.</p> <p>g) Amend row 18 of Table 1 of Schedule 11.4 to clarify that the AMI flag also indicates the MEP's back office is the services access interface.</p>
<p>Proposed Code amendment</p>	<p>Schedule 10.4</p> <p>...</p> <p>10 Services access interface</p> <p>An ATH must, when preparing a metering installation certification report, determine, and record in the certification report,—</p> <p>(a) <u>all the services access interfaces; and</u></p> <p>(b) <u>the conditions under which each services access interface may be used.</u></p> <p>...</p> <p>Schedule 10.6</p> <p>8 Electronic interrogation of metering installation</p> <p>...</p> <p>(10) <u>If an electronic interrogation of a metering installation by a metering equipment provider does not download all of the raw meter data as part of the interrogation, the metering equipment provider must:</u></p> <p>(a) <u>investigate the reasons for the failure, restore communications, and download all of the raw meter data as soon as possible and no later than the time specified in subclause (11); or</u></p> <p>(b) <u>in accordance with clause 3(a) of Schedule 11.4, update the registry metering records to show that the metering component is no longer an advanced metering infrastructure device.</u></p> <p>(11) <u>If a metering equipment provider decides to take the actions specified in subclause (10)(a), the metering equipment provider must complete those actions by the earlier of—</u></p> <p>(a) <u>the number of full days that equate to no more than 25% of the maximum interrogation cycle for the metering installation from the date of the last successful interrogation; and</u></p>

(b) 30 days from the date of the last successful **interrogation**.

(12) If the **metering equipment provider** does not complete the investigation, restoration of communications and downloading of all of the **raw meter data** in accordance with subclause (10)(a) within the time specified in subclause (11) or determines at any time during the time period specified in subclause (11) that it will not be able to complete those tasks within that time frame, the **metering equipment provider** must update the **registry metering records** in accordance with clause 3(b) of Schedule 11.4, to show that the **metering component** is no longer an advanced metering infrastructure device.

Schedule 10.7

...

8 Metering installation certification requirements

...

- (2) An **ATH** must, when **certifying** a **metering installation**,—
- (a) prepare a **certification report** for the **metering installation**; and
 - (b) specify in the **certification report** whether the **metering installation** is either—
 - (i) **half hour**; or
 - (ii) non **half hour**; or
 - (iii) **half hour** and non **half hour**; and
 - (c) determine the **services access interfaces** for the **metering installation** under clause 10 of Schedule 10.4 and record ~~it~~ in the **metering installation certification report**:
 - (i) each **services access interface**; and
 - (ii) the conditions under which each **services access interface** may be used; and
 - (d) ensure that each **metering component** in the **metering installation** functions correctly.

...

Schedule 11.4

...

3 Metering equipment provider to advise registry manager of changes to registry metering records

A **metering equipment provider** must advise the **registry manager** of the **registry metering records**, or any change to the **registry metering records**, for a **metering installation** for which it

is responsible no later than ~~10 business~~ days following:

- ~~(a) the **electrical connection** of an **ICP** that is not also an **NSP**:~~
- ~~(b) any subsequent change in any matter covered by the **metering records**.~~
- (a) 3 **business days** following the most recent unsuccessful **interrogation**, if updating the **registry metering records** in accordance with clause 8(10)(b) of Schedule 10.6; or
- (b) 3 **business days** following the expiry of the time period under clause 8(11) of Schedule 10.6 or the date on which the **metering equipment provider** determines in an investigation under clause 8(10)(a) of Schedule 10.6 that it cannot restore communications or fully download the **raw meter data**, if updating the **registry metering records** in accordance with clause 8(12) of Schedule 10.6; or
- (c) in all other cases, 10 **business days** following:
 - (i) the **electrical connection** of an **ICP** that is not also an **NSP**; or
 - (ii) any subsequent change in any matter covered by the **metering records** other than a change to which subparagraphs (a) and (b) apply..

Schedule 11.4 – Table 1: Registry metering records

The following table sets out the **registry metering records**:

No	Registry term	Description	Fully certified metering installation	Interim certified metering installation
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...

For each metering installation for an ICP

...

	6	metering installation certification type	the certification type of the metering installation which may must be either half hour or non half hour <u>as identified in the metering installation certification report or, where both half hour and non half hour are specified as the certification type in the metering installation certification report, must be one of those certification types.</u>	Required	Required
	...				
	The following details for each metering component in the metering installation for each ICP				
	18	AMI type	an identifier to identify if the metering component is an advanced metering infrastructure device <u>and the MEP's back office is the services access interface</u>	Required for meter or data storage device . Optional for all other metering components	Required for meter or data storage device . Optional for all other metering components
	...				
	The proposed Code amendment is consistent with the Authority's objective, and section 32(1)(c) of the Act, because it would:				
Assessment of proposed Code amendment against section 32(1) of the Act	<ul style="list-style-type: none"> a) promote competition in the electricity industry by reducing the transaction costs that a retailer may face in determining whether it can offer services to a potential customer at an ICP b) promote the efficient operation of the electricity industry by: <ul style="list-style-type: none"> i) establishing clear requirements in the Code around the 				

	<p>restoration of communications between an AMI meter and an MEP's back office</p> <p>ii) making the Code easier to understand and comply with.</p> <p>The proposed amendment is expected to have no effect on reliability of supply.</p>
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	Please refer to the assessment of costs and benefits in section 3 of the consultation paper.
Regulatory statement	
Objectives of the proposed amendment	<p>The objective of the proposal is to promote competition and efficiency in the electricity industry by:</p> <ul style="list-style-type: none"> a) establishing clear requirements in the Code around the restoration of communications between an AMI meter and an MEP's back office b) making it easier for potential retailers to assess if they can supply the service a prospective customer is asking for c) making it easier for MEPs to understand their obligations around keeping registry metering records up to date.
Evaluation of the costs and benefits of the proposed amendment	Please refer to the assessment of costs and benefits in section 3 of the consultation paper.
Evaluation of alternative means of achieving the objectives of the proposed amendment	<p>The Authority has identified the status quo as an alternative means of achieving the objectives of the proposed Code amendment. However the Authority has assessed this alternative as unsuitable because:</p> <ul style="list-style-type: none"> 1) the current process for changing the metering type and/or the services access interface requires the ATH to amend the certification report. The cost of managing this process would exceed the proposal's cost of requiring the ATH to specify all possible metering types and service access interfaces at the time they certify the metering installation. 2) the current timeframes for updating the registry whenever there is a change to the AMI status of the metering installation is 10 business days. There is no current timeframe for determining when the AMI status has changed, and the fact that communication interruptions may be intermittent means there may be no easily identifiable trigger for the process. Different MEPs have taken different

	<p>approaches to resolving this issue. The cost to MEPs of standardising the investigation requirement is assessed as being minimal, as they are already managing this process. These costs are offset by the benefits to retailers of standardisation and certainty over the AMI status of the metering installation.</p>
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