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Energy Transformation Implementation Unit
Energy Policy WA
Level 1, 66 St Georges Terrace
PERTH WA 6000

Via email: energytransformation@energy.wa.gov.au

Bentley Office

18 Brodie Hall Drive
Technology Park
Bentley WA 6102

PO Box 1066 Bentley DC WA 6983

Telephone (08) 6310 1000

Facsimile (08) 6310 1010

www.horizonpower.com.au



Dear Sir/Madam,

SUBMISSION: PROPOSED METERING CODE CHANGES

As Western Australia's regional energy provider, Horizon Power is committed to delivering sustainable and affordable energy solutions that harness the very latest in renewable technologies providing more choice to customers and supplying more affordable electricity to drive regional growth and to develop vibrant communities.

I refer to the Energy Policy WA's consultation paper *Energy Transformation Strategy: Proposed Changes to the Electricity Industry (Metering) Code 2012, November 2020*, and note that the Minister for Energy has invited public comment on the proposed changes.

Horizon Power understands the proposed changes have been primarily designed to implement changes to the *Wholesale Electricity Market Rules*. The business encloses comment regarding impacts and/or where an alignment with other instruments such as the *National Electrical Rules* could be achieved.

Further, additional comments are provided on other improvements to *the Electricity Industry (Metering) Code 2012* and where particular requirements are unsuitable.

Thank you for the opportunity to provide comment on the proposed changes.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Greg Will", is written over a faint, larger signature.

Greg Will

Metering Services Manager

Encl. Horizon Power comment

Attachment

Proposed amendments to *the Electricity Industry (Metering) Code 2012*

Horizon Power provides the following comment regarding the proposed changes to the Electricity Industry (Metering) Code 2012 (the Code).

Clause 1.3 – Definitions

1. The definitions below should be changed to “5-minute” to align with the ‘5MS Meter’ and the then following “30-minute” definitions.
 - five-minute interval energy data;
 - five-minute interval meter ;
 - five-minute metering interval; and
 - five-minute settlement commencement.
2. “Throughput” is used in the Code in relation to the accuracy requirements of a metering installation and the requirement to have, (or not) a check meter. Whilst not defined in the past, it has been used to calculate the design requirements for new connections and connection upgrades. The proposed definition does not allow for the design requirements. If there is a requirement to define “throughput”, noting that the *National Electrical Rules* (NER) also has no definition for throughput, then the current method used by Horizon Power and Western Power would be useable for existing connections and for new connections. That calculation is based on the capacity of the connections assets at maximum load with a diversity factor based on “good electricity industry practice” for the type of connection where applicable, to determine the likely energy to be transferred over a year.
3. As well, the proposed definition requires the electricity production and electricity consumption to be summed, which could inflate the capacity of the network connection. If it’s the intent that one of those transfers is to be negative, then that would reduce the required capacity. Given energy can usually only flow one way at any point in time, these two flows should not be added.

Clause 3.3 (3) – Interval Meters

This clause provides requirements for a communications link and limits the device to a modem. Given the fast changing technology world, and the devices already available to a network operator other than a modem, the communications device should be “any form of electronic communication that meet the security and data privacy requirements of this Code”.

Clause 3.3C – Metering of bi-directional flows

1. The proposed definition removes the specific reference to “net” electricity transferred.
2. The proposed definition can enable “gross” metering in some instances such as when a single phase inverter is connected on one phase and all other customer apparatus is connected on the other two phases. In that particular configuration, energy would flow to the network on one phase and to the customer on the remaining phases.
3. These situations are already in the Western Australian networks and the billing data is managed by the meter which nets the two flows. Without the reference to “net” as in the previous definition, then a grossing meter becomes an acceptable option.

Division 3.3 – Metering Requirements for the Wholesale Electricity Market and Customer Transfer

Clause 3.15 – Application of this Division 3.3

The clause specifically excludes all networks other than the South West Interconnected Network (SWIN), which it always has. However, given the Pilbara Network becomes subject to open access on the 1 July 2021, then this clause should be reviewed to enable the customer transfer provisions it contains to be a regulatory obligation of Horizon Power.

If Energy Policy WA's concern regarded the ability of Horizon Power to comply with this requirement, then that should not stand in the way of making this clause for all covered networks because Horizon Power can comply now.

Clause 3.19A – Bi-directional capability is an enhanced technology feature.

This Clause should be removed because the Bi-directional capability is standard in all new Australian National Measurement Institute (NMI) pattern approved meters.

Clause 4.8 – Ownership, security and rights to access data

Clause 4.8 (3) requires a network operator to allow a "User" under the Code to have local and remote access to the energy data held in its metering installation ...". This clause would require the Network Operator to allow other Users to have access to Corporate Metering Private Networks which is in conflict with Clause 3.8, "...a network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorised access to the metering installation and enable unauthorised access to be detected...".

This clause should be deleted, as this access would allow a User access to the Corporate Metering Virtual Private Network of the Network Operator and particularly as clause 4.8 (3A) which requires the Network Operator to allow access to data which is and can be delivered through daily data deliveries in line with appropriate metering service level agreements.

Clause 5.21 – Test and audit requests

Clause 5.21 (9) requires that the MSLA, must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code. Some parts of a metering installation are owned by the network operator, the meter and the fuse link, and other parts are owned by the customer, the instrument transformer, cabling etc.

Therefore, where the parts of the metering installation that fail are owned by the customer, the cost should be chargeable.

The Code is clear regarding the ownership of the Meter and any Communications Links, Clause 3.4 refers.

Clause 3.5 (7), allows ownership of other parts of the Metering Installation by the customer, and excuses the Network Operator from maintaining those assets.

The body of "Electricity Legislation" in WA and particularly *the Electricity Distribution Regulations 1997*, Part 5 – Technical regulation, Clause 28, provides the head of power for the network operator Technical Code and underlying that is the network operator's standards and requirements for connection which are contained in the *Western Australian Distribution Connection manual*, (WADCM). Section 11 Clause 11.13.1 – General, of the WADCM refers.

Based on the above Clause 5.21 (9) needs refining to reflect that the cost of testing can be charged if the failing component is not owned by the network operator.

Appendix 2 – Validation of Data in the Metering Database

Clause A2.5 and 2.6 requires the network operator to compare the data held in the revenue and check meters for validation purposes. In some cases, the network operator may install check metering for its own purposes, (such as in remote installations), check metering that is not required under Clause 3.13, Requirements for check metering installations. In these cases, the network operator could be exempt from this validation.