

Draft Findings of the Review of the Metrology Procedure for Metering Installations on the Western Power Network

Submitted by Western Power

March 2015

Economic Regulation Authority

WESTERN AUSTRALIA

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Economic Regulation Authority
Perth, Western Australia
Phone: (08) 6557 7900

Contents

Draft Findings	1
Invitation to make submissions	2
Reasons	3
Code Requirements	3
Western Power's Amendments	7
Public Consultation	7
Authority's Considerations	7
Matters raised by Synergy	7
Matters Raised by Community Electricity	11
Other Amendments	13

Draft Findings

Western Power's Metrology Procedure for Metering Installations on the Western Power Network (**Metrology Procedure**) was first approved in September 2006 under the *Electricity Industry (Metering) Code 2005*.

On 5 September 2014, Western Power submitted to the Authority an updated Metrology Procedure to align this document with the requirements of the *Electricity Industry (Metering) Code 2012 (Code)*.

Western Power requested that the Authority, pursuant to clause 6.20(2) of the Code, initiate a review of its updated Metrology Procedure. Western Power further agreed to amend its updated Metrology Procedure in accordance with the Authority's recommendations, prior to publishing the document.

Western Power's Metrology Procedure provides guidance on the correct provision, installation and maintenance of metering installations in line with the principles of the Code. The Metrology Procedure also provides guidance to interested third parties as to the requirements for metering within the Western Power Network.

An initial review of Western Power's updated Metrology Procedure identified a number of matters which needed clarification and amendment. Following discussions with Western Power, it provided an amended updated Metrology Procedure clarifying the matters raised and a document which compared differences between the updated Metrology Procedure and its 2006 Metrology Procedure.

On 27 October 2014, the Authority published a notice initiating its Review together with Western Power's updated Metrology Procedure and a document comparing the differences between the 2006 Metrology Procedure and Western Power's updated Metrology Procedure. The review was to be undertaken pursuant to Clause 6.20 of the Code which sets out the procedure the Authority must follow in reviewing and amending a network operator's document under the Code.

The notice indicated that the Authority was initiating its Review of Western Power's updated Metrology Procedure by seeking public submissions from code participants and interested parties. Any submissions received would then be provided to Western Power for its consideration which should include discussion as needed with relevant code participants and interested parties. Western Power would then be requested to submit an amended updated Metrology Procedure to the Authority containing any changes made after consideration of the submissions. In addition, Western Power was requested to submit a report to the Authority detailing the changes that had been made to the updated Metrology Procedure and indicating where changes proposed in submissions had not been agreed to by Western Power.

The public consultation period closed on 1 December 2014. Submissions were received from Synergy and Community Electricity. The Authority published a notice on 18 December 2014 indicating that Western Power had been requested to engage with code participants to resolve the issues raised in the submissions and submit a report back to the Authority by 30 January 2015 detailing how these issues had been addressed together with an amended updated Metrology Procedure.

On 30 January 2015, Western Power submitted to the Authority an amended updated Metrology Procedure and a report detailing the changes made following considerations of these submissions and identifying issues raised in submissions that could not be agreed to

by Western Power. This report also included additional minor changes which had resulted from discussions with Synergy but which had not been included in Synergy's submission to the Authority.

Following detailed consideration of Western Power's amended updated Metrology Procedure and the submissions from code participants, the Authority's draft findings are that Western Power's Metrology Procedure for Metering Installations on the Western Power Network complies with clauses 6.5 and 6.8 of the Code.

The public consultation process is an important element in determining whether the Metrology Procedure is compliant with the Code. The Authority welcomes feedback in relation to these draft findings from all interested parties, particularly those with practical experience of the application of the Metrology Procedure.

Invitation to make submissions

Pursuant to clause 6.20(3)(b), the Authority now invites code participants and interested parties to make submissions on the Authority's draft findings by **4:00 pm (WST) Monday, 13 April 2015** via:

Email address: publicsubmissions@erawa.com.au

Postal address: PO Box 8469, PERTH BC WA 6849

Office address: Level 4, Albert Facey House, 469 Wellington Street, Perth WA 6000

Fax: 61 8 6557 7999

CONFIDENTIALITY

In general, all submissions from code participants and interested parties will be treated as being in the public domain and placed on the Authority's website. Where a code participant or an interested party wishes to make a submission in confidence, it should clearly indicate the parts of the submission for which confidentiality is claimed, and specify in reasonable detail the basis for the claim. Any claim of confidentiality will be considered in accordance with the provisions of the *Economic Regulation Act 2003*.

The publication of a submission on the Authority's website shall not be taken as indicating that the Authority has knowledge either actual or constructive of the contents of a particular submission and, in particular, whether the submission in whole or part contains information of a confidential nature and no duty of confidence will arise for the Authority.

General Enquiries

Elizabeth Walters
Economic Regulation Authority
Ph: 08 6557 7900
records@erawa.com.au

Media Enquiries

Richard Taylor
Riley Mathewson Public Relations
Ph: 61 8 9381 2144
admin@rmp.com.au

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Reasons

Code Requirements

Part 6 of the Code specifies the approval procedure for documents submitted by a network operator. More specifically, Clause 6.20 of the Code sets out the procedure the Authority must follow in reviewing and amending a network operator's document.

6.20 Review and amendment of network operator's documents (other than communication rules)

- (1A) This clause 6.20 does not apply in respect of *communication rules*.
- (1) The *Authority* may in its absolute discretion:
- (a) of its own initiative; or
 - (b) upon request by a *Code participant*,
- require or permit a *network operator*¹ to amend a *document* provided that the *document* as amended must comply with this *Code*.
- (2) Before requiring or permitting an amendment to a *document* under this clause 6.20, the *Authority* must initiate a review of the *document* under clause 6.20(3), which review may be of the whole *document* or only that part of the *document* for which the amendment is proposed.
- (3) The *Authority* must, if it undertakes a review under this clause 6.20:
- (a) within 50 *business days* after initiating the review:
 - (i) *publish* its draft findings in relation to the review; and
 - (ii) *notify* the *network operator*² of its draft findings;
 and
 - (b) allow a period of at least 20 *business days* after *publication* of the draft findings for persons to make submissions in relation to the draft findings; and
 - (c) within 10 *business days* after the end of the period in 6.20(3)(b):
 - (i) *publish* its final findings in relation to the review (which must detail any amendments required to the *document*) together with any submissions made under clause 6.20(3)(b) in relation to the review; and
 - (ii) *notify* the *network operator*³ of its final findings.

¹ If clause 5.30(3) applies, read "*network operator*" as "*network operator or the metering data agent, as applicable,*".

² If clause 5.30(3) applies, read "*network operator*" as "*network operator or metering data agent*".

³ If clause 5.30(3) applies, read "*network operator*" as "*network operator or metering data agent*".

- (3A) The *Authority* may on one or more occasions extend the time limits specified in clauses 6.20(3)(a) and 6.20(3)(c) for a period determined by the *Authority*.
- (3B) The *Authority* must not exercise the power in clause 6.20(3A) to extend the time limits specified in clauses 6.20(3)(a) and 6.20(3)(c) unless, before the day on which the time would otherwise have expired, it *publishes* notice of, and reasons for, its decision to extend the time limit.
- (4) The *network operator*⁴ must amend any *document* in accordance with the *Authority's* final findings.
- (5) The *network operator*⁵ must *publish* any *document* that has been amended under clause 6.20(4).
- (6) If a *network operator* fails to amend a *document* as required under clause 6.20(4), the *Authority* may *publish* the amendment, and the *document* has effect as amended by the *published* amendment, from the time of *publication* or such other time as is stated in the *publication*.

Clause 14 of the Code states that the Authority must not approve a proposed document unless it satisfies the criteria set out in clauses 6.5 and 6.8 of the Code. Clause 6.5 of the Code states the requirements for all documents and clause 6.8 sets out the requirements for a metrology procedure.

6.5 Requirements for all documents

{Note: References in this clause 6.5 to “*document*” include the *communication rules*.}

A *document* must:

- (a) comply with this *Code*; and
- (b) not impose inappropriate barriers to entry to a market; and
- (c) be consistent with *good electricity industry practice*; and
- (d) be reasonable; and
- (e) be consistent with the *Code objectives*; and
- (f) be consistent with the *market rules*; and
- (g) unless this *Code* requires otherwise, be consistent with other enactments.

{Example: Other enactments, such as section 39 of the *Electricity Act 1945* impact upon a *model service level agreement*. At the time this *Code* was made, section 39 provided:

“ the supply authority shall owe a duty to the consumer to keep any meter let on hire to him at all times in proper order for correctly registering the quantity of electricity supplied to the consumer; and if the supply authority fails, and while it continues to fail in the discharge of that duty, the consumer shall

⁴ If clause 5.30(3) applies, read “*network operator*” as “*network operator or metering data agent*”.

⁵ If clause 5.30(3) applies, read “*network operator*” as “*network operator or metering data agent*”.

not be liable to pay rent or other consideration for the use of such meter.”}

6.8 Requirements for a metrology procedure

A *metrology procedure* must at least:

- (a) as a minimum, contain information on the *devices* and *methods* that are used by the *network operator*⁶ to:
 - (i) measure, or determine by means other than a *device*, *electricity* produced and consumed at a *metering point*; and
 - (ii) convey the measured or determined information to other *devices* using *communications links*; and
 - (iii) prepare the information using *devices* or *methods* to form *energy data*; and
 - (iv) provide access to the *energy data* from a telecommunications network;

and
- (b) specify the minimum requirements for *meters* and *metering installations*, including:
 - (i) *accumulation meters*; and
 - (ii) interfaces that allow *interval energy data* to be downloaded; and
 - (iii) direct connected *meters* for *Type 4* to *Type 6 metering installations*; and
 - (iv) *CTs* and *VTs*; and
 - (v) programmable settings under clause 3.10.
- (c) specify the procedures for *estimating*, *substituting* and *validating energy data* under this *Code*; and
- (ca) provide for the sampling and testing of *meters* for the purposes of and in accordance with clause 3.11A(1); and
- (d) [not used]
- (e) specify the date from which the *metrology procedure* takes effect which must be no less than 3 months after it is *published*.

{Note: Without limiting clause 6.8, a *network operator's metrology procedure* must, at least:

- (a) specify the technical parameters for the provision, installation, operation and *maintenance* of *metering installations*

⁶ If clause 5.29(b) applies, read “*network operator*” as “*network operator* and its *metering data agent*”.

- under clause 3.5(1) which are consistent with this *Code*; and
- (b) specify the methods for determining the accuracy of *estimated energy data* under clause 5.25(a); and
 - (c) specify test and audit procedures under clause 5.21; and
 - (d) [not used]
 - (e) specify the *devices* and methods to ensure the accuracy of *data* relating to each *metering point* by the application of appropriate *CT* or *VT* ratios and pulses in accordance with clause 5.25(b); and
 - (f) specify what the *network operator* must do to comply with clause 5.20(4); and
 - (g) specify the methods for comparing *market generator interval energy data* against *SCADA data* for the purposes of A2.6(2)(b).}

Western Power's Amendments

Western Power's updated Metrology Procedure has made significant changes to the format of the document when compared to the current approved Metrology Procedure. These changes streamline the structure of the document and improve its readability by combining some of the complex tables. In addition, Western Power has made key changes in a number of areas including:

- inclusion of additional requirements around accumulation meters, bi-directional electricity flows, meter type determination and reliability of metering installations;
- clarification of the calculation of trading intervals;
- clarification of the requirements to provide notice to users of changes to standing data;
- inclusion of pre-payment meter requirements;
- clarification of ownership, security and rights of access to data;
- inclusion of requirements for annual meter reads, customer directions for data provision and charges for the provision of data; and
- inclusion of requirements for provision of information by a user.

A network operator's documents produced as a requirement of the Code are of critical importance to retailers and generators that operate under access agreements or service level agreements with a network operator. As such it is the Authority's view that such documents need to be the subject of detailed consultation by the parties concerned as their day-to-day operational relationship relies on such documents, contractual agreements and understandings resulting in a workable relationship.

Public Consultation

Public submissions were received from two code participants, Synergy and Community Electricity. The matters raised by each party, together with how Western Power responded are included in the Authority's considerations below.

Authority's Considerations

The Authority has considered the amended updated Metrology Procedure against the approval criteria set out in clauses 6.5 and 6.8 of the Code. The Authority has also considered the submissions from Synergy and Community Electricity and the report from Western Power setting out its considerations of these submissions and the changes made as a result of these considerations. The Authority has also considered the changes made to the amended updated Metrology Procedure following the discussions between Western Power and Synergy which were not part of Synergy's submission to the Authority.

Matters raised by Synergy

In its submission, Synergy raised four matters of concern over Western Power's updated Metrology Procedure (detailed in section 2.2.2 of Western Power's Report on Amendments to the Western Australian Electricity Market Metrology Procedure for Metering Installations).

Type 7 Connection Points – Transitional arrangements for calculating energy data

The Metering Code subclause 3.9(2) defines Type 7 connection points as follows:

A connection point is Type 7 if it is associated with one or more of the following loads:

- (a) street, traffic, park, community, or security lighting; or
- (b) ticket issuing machines, parking meters, or community watering systems; or
- (c) telephone service requirements; or

{Example: Telephone service requirements may include telephone boxes, fibre optic cable routers and *devices* that connect pay television services.}

- (d) *loads* consuming less than the starting electric current of a *meter*; or
- (e) other *loads* of a similar nature.

Synergy was concerned that the updated Metrology Procedure did not reflect the agreement in place between retailers and Western Power as at June 2006 with regard to calculating energy data for Type 7 Meters. In addition, Synergy, was concerned that clause 4.6(1)(c) under the Code of Conduct for the Supply of Electricity to Small Users (Code of Conduct) requires that a retailer must base a customer's bill, for a Type 7 connection point, on the procedure set out in the metrology procedure or Code. Synergy considered that the updated Metrology Procedure did not have regard to this existing agreement and appears to terminate these arrangements which is likely to have significant cost and compliance implications for all retailers who are currently operating under these agreements.

Western Power has agreed to amend the updated Metrology Procedure with a new section being added at 3.5.4 and 9.1.2 which states:

Nothing in this Metrology Procedure requires Western Power to modify or change Type 7 meter consumption calculations agreed between Western Power and Synergy on 16 May 2013. Type 7 meter consumption will continue to be made by the methods and systems in place on that date. The agreed method is substitution method 74 under the Code and this Metrology Procedure.

The metering installation and metering database associated with each Type 7 meter are those in use as at 16 May 2013, unless otherwise agreed between Synergy, its Type 7 metering installations customers and Western Power.

Synergy's submission referred to the agreement in place between retailers and Western Power as at June 2006. Western Power has advised the Authority that neither Synergy nor Western Power was able to locate a copy of the original agreement from 2006. However a subsequent letter confirming the arrangements was prepared by Synergy and signed by both organisations on 16 May 2013. Consequently, Western Power has referred to this date in the amended Metrology Procedure and has advised the Authority that Synergy was satisfied with the amendment.

Type 7 Connection Points – Method of calculating energy data

Synergy stated that clause 6.8(a)(i) of the Code requires that the metrology procedure must at least contain information to determine by means other than a device, electricity produced and consumed at a Type 7 connection point. Synergy indicated that the method for detailing the energy data for Type 7 connection points was not detailed in the updated Metrology Procedure and that it contemplates that the methods for calculation may be contained in the Streetlights and UMS Data File Specification or the Communication Rules. Synergy noted the Communication Rules do not contain the method for determining the energy data

for Type 7 connection points, which in any case would be contrary to the Code. Synergy suggested that the method Western Power uses to calculate the energy data should be made transparent to all retailers and customers. Synergy also pointed out that the Code of Conduct requires a retailer to base a customer's bill for a Type 7 connection point on the procedure set out in the metrology procedure or Code. Synergy concluded that it would be reasonable and consistent with good electricity industry practice for the updated Metrology Procedure to detail the specification and method for calculating energy data.

Western Power has agreed to amend section 3.5.5 of its updated Metrology Procedure to provide an explanation of how energy data is estimated for street lighting and all UMS installations that are Type 7 connection points. Section 3.5.5 now also includes a statement that Western Power will ensure that for Type 7 metering installations, energy data will be calculated on a monthly or bi-monthly basis in accordance with the Communication Rules Build Pack and specifically, the Streetlights and UMS Data CSV File Specification documents included in the Build Pack.

Bi-Directional flows – estimating energy data

The Metering Code requires a network operator to validate the data from meter readings and where necessary, substitute and estimate energy data. Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted. Bi-directional meters, which are associated with domestic PV installation, measure both the energy flowing in and out of a property. Applying the Code requirements to bi-directional meters has been identified as an issue.

Synergy indicated that the updated Metrology Procedure defines energy data as the production or consumption of electricity at a metering point; however, it does not make clear the methods that will be used to estimate or substitute the production of energy in relation to bi-directional flows for connection points which are not classed as a generator. Further, clause 5.22(1)(b) of the Code requires that the network operator must, where necessary substitute and estimate data by applying, as a minimum, the rules and procedures as set out in Appendix 3 of the Code. In Synergy's view, the updated Metrology Procedure cannot be consistent with the Code or the operation of the Code of Conduct. Synergy indicated it therefore assumed that the substitution or estimation method detailed in items 7 and 8 of the updated Metrology Procedure must apply to bi-directional flows. If this was not the case, Synergy recommended that the updated Metrology Procedure describe the alternative methods for substitution and estimation that must be applied to bi-directional flows including how these alternative methods comply with the Code and with the Code of Conduct.

Western Power, in response, advised that it understands that at present, there are no defined estimation or substitution methods for bi-directional connection points which are not classed as a generator under the Code within the Australian energy market. This was primarily due to the difficulty in determining accurate values for the variables (such as rated capacity, location, efficiency and weather) involved with estimating energy produced by solar PV installations. Western Power's current practice is to apply substitution Method 64, with zero generation value, to Type 6 bi-directional accumulation meters. This practice relates to a small number of meters where access to the meter has not been provided or self-read cards had not been returned to Western Power. For 2014 of the scheduled bi-directional meter readings only 1.7% were required to be substituted.

Western Power agreed to engage with Synergy to ascertain ways of improving its access to all meters including bi-directional accumulation meters. Western Power has added the following section at section 8.4.4f) to reflect the current practice:

For metering points that contain bi-directional flows, Western Power will apply a substitute reading that will equal zero generation over the schedule reading period for the import channels. Export channels will be substituted in accordance with section 8.4 of the Metrology Procedure. Western Power under clause 5.24(4) of the Code, must consider a reasonable request from a retailer to replace a substituted value for bi-directional flows for an import channel as outlined in clause 5.22(5)(a) and (c) of the Code.

Publishing Energy Data – frequency of providing energy data

Synergy was concerned that the proposed amendment to section 3.2.3 of the updated Metrology Procedure suggests that Western Power may, contrary to any service level agreement, or the Code, publish energy data to retailer billing systems at a frequency or schedule of their choosing. In Synergy's view, depending on the design of the retailer's billing system, such a practice may cause a retailer to breach its billing obligations under the Code. In Synergy's view the operation of the proposed amendment to section 3.2.3 needs to be, consistent with the code objectives, subject to consultation with the affected retailer and should not be contrary to services contemplated under clauses 5.1(1) and (3) of the Code.

Western Power responded by advising that the intention of the changes proposed to section 3.2.3 of the updated Metrology Procedure was not for Western Power to publish energy data to retailer billing systems at a frequency or a schedule of its choosing, contrary to any service level agreement or the Code. To clarify this matter section 3.2.3 has been amended as follows:

Notwithstanding sections 3.1.3 and 3.1.4, Western Power and the code participant may chose, by agreement, to disseminate the energy data for metering installation Types 1-5 more frequently. Under these circumstances the published meter reading schedule, substitution and other deadlines will not be affected.

In addition to the matters raised in its submission, Synergy raised seven other matters in discussions with Western Power on its updated Metrology Procedure (these matters are detailed in section 2.2.1 of Western Power's Report on Amendments to the Western Australian Electricity Market Metrology Procedure for Metering Installations). Discussion on these matters resulted in a number of minor changes to the updated Metrology Procedure being agreed to by Western Power and Synergy as follows:

- the need for a new definition covering metering data alarms and data statuses to be included in the updated Metrology Procedure;
- a minor amendment to section 2.2.8 of the updated Metrology Procedure to delete the word "installation" from the term metering installation database;
- an amendment to section 3.2.1 specifying that the scheduled dates for reading each metering installation are in accordance with clauses 5.3 and 5.4 of the Code or such time specified in the applicable service level agreement;
- a minor amendment to section 4.2.3 b) to change the reference to metering statuses to "metering data alarms and data statuses";
- An amendment to section 4.2.4 to specify that the results of a test or audit described in section 4.2.1 are made available to the code participant in accordance with clause 5.20(4) of the Code or as specified in the applicable service level agreement;
- A minor amendment to section 9.2.7 to replace the word "must" by "may" flag all calculated metering data substitutions as final (F);

- An amendment to section 10.1.1 relating to metering data alarms when these are provided in the meter as per the Code. The amendment is to ensure consistency with section 10.2 of the updated Metrology Procedure.

The Authority has considered the matters raised by Synergy in its submission to the Authority and in discussions with Western Power and Western Power's response to the matters raised. The Authority considers the amendments proposed to the updated Metrology Procedure are in accordance with the Code. The Authority notes that all matters raised by Synergy were addressed by Western Power with appropriate changes to the updated Metrology Procedure with the exception of the issue relating to estimating energy data for bi-directional flows. In relation to this issue, Western Power has agreed to engage with Synergy to ascertain ways of improving its access to all meters, including bi-directional accumulation meters. The Authority agrees with this approach but considers that further research is required on methods for estimating energy data for bi-directional meters.

Matters Raised by Community Electricity

Community Electricity raised four matters of concern over Western Power's updated Metrology Procedure (detailed in section 2.2.3 of Western Power's Report on Amendments to the Western Australian Electricity Market Metrology Procedure for Metering Installations).

Substitution of Meter Data

Community Electricity noted that accurate and stable meter data were important to retailers, Western Power and the IMO. Consequently, it was important that Western Power has regard to the timeliness when substituting data and should reasonably seek to get it right, including delay of issuing data where it considers that the final solution is not going to be unreasonably delayed. In particular, when substituted data is revised or replaced by actual data, unnecessary revision of all three sets of invoices might be triggered. Community Electricity suggested that if retailers have a need to invoice their customers in order to sustain cash flow, they can themselves estimate the data. Community Electricity suggested that Western Power should be prohibited from substituting data for the purpose of expediting its invoices; if that is its intention, this should be facilitated without unnecessary disturbance to the market.

Western Power responded by indicating that the Code recognises issues relating to temporary unavailability or failures in the validation process. In such circumstances data substitution and estimation is allowed by the Code under clause 5.22 and Appendix 3. Also clause 5.24 of the Code specifies the procedure a network operator must follow in using actual or deemed values for energy data and the use of estimated or substituted values.

The Authority notes that it is the Code that specifies that it is the network operator which has the responsibility for energy data validation, substitution and estimation.

New Section 2.2.6 – Type 6 meter treated as an accumulation meter

Community Electricity indicates that section 2.2.6 (incorrectly referenced as 2.4.6 in its submission) provides for an accumulation meter to be treated as an interval meter unless the retailer objects. Community Electricity submits that this can only refer to Synergy and this treatment confers a commercial advantage via the implied inclusion of the meter in the Notional Wholesale Meter and the commensurate advantageous capacity prices. Community Electricity suggests where interval data is available it be sent to the market.

Western Power points out that clause 3.2(2) of the Code allows Western Power to install a meter with interval data storage capacity and other enhanced features but (by recording it

as an accumulation meter in the registry) declare it to be an accumulation meter and only record the accumulation energy registered by the meter. Division 3.4 of the Code also allows for the enhanced features to be provided by agreement with the individual code participants. Western Power uses interval capable meters as accumulation meters for Type 6 metering installations, and it is Western Power's obligation under the Code to only provide accumulation/basic data to the market for this type of installation.

New Section 3.6.5 – restriction of meter data access

Western Power have inserted a new section which states that the only persons entitled to have local access and/or remote access, using a read only password provided by Western Power to the energy data from a metering installation are a user who is a retailer or generator of the connection point with which the metering installation is associated.

In its submission to the Authority, Community Electricity notes that customers themselves (as opposed to their retailer) frequently wish to have access and may also require access to be given to a consultant or other third party. Community Electricity notes its understanding is that Western Power usually denies such requests and thereby forces the customer to duplicate Western Power's metering at unnecessary expense and inconvenience. Community Electricity suggests that customers and their consultants should have the right of access.

Western Power's response is that clause 4.8(3) of the Code restricts access to a meter to only retailers and generators. Western Power notes third parties or electricity consumers are not given direct access to the metering equipment as this may jeopardise the security and integrity of metering installations.

The Authority notes that clause 4.8(3) of the Code states that a network operator must allow a user who is a retailer or a generator to have local and (where a suitable communications link is installed) remote access to the energy data held in its metering installation for metering points at its associated connection points, using a password provided by the network operator which provides "read only" access. As set out above, Western Power have interpreted this clause as restricting access to only retailers and generators.

Whilst the Authority does not consider the Code restricts Western Power from providing direct access to the meter to other parties, it notes that the Code only requires Western Power to provide such access to generators and retailers.

In relation to third parties being able to obtain metering data, the Authority notes that clause 5.17A of the Metering Code requires a network operator to provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so. This includes allowing the nominated recipient to have access to the data by means of a website or some other form of remote access using a password which provides "read only" access. Section 3.6.2 of Western Power's Metrology Procedure states that, where Western Power receives a request from a user's customer or third party to provide energy data or standing data, Western Power will provide such data in accordance with clause 5.17A of the Code.

On the basis that the proposed new section 3.6.5 meets the minimum requirement of clause 4.8(3) of the Code, the Authority considers it is compliant with the Code.

The Authority notes the Metrology Procedures includes provision for providing third parties (where the relevant customer makes such a request) with metering data in accordance with clause 5.17A of the Code. The Authority recognises that this data may not be adequate (particularly in relation to timeliness) to enable customers to take full advantage of products

in the market which assist customers with their energy management. As Community Electricity notes, this may result in customers duplicating metering assets. The Authority would encourage Western Power to meet its customers' needs as far as possible. In a competitive metering environment, it is likely that such requirements would be better addressed.

Changes to Section 2.2.4 – determination of metering installation types

Community Electricity proposes that section 2.2.4 be referenced to clause 5.1 of the Code rather than section 3.9(3a) of the Code.

Western Power has agreed to add a reference to clause 5.1 of the Code to section 2.2.4 of the updated Metrology Procedure.

The Authority has considered the matters raised by Community Electricity in its submission to the Authority and Western Power's response to the matters raised. The Authority considers the amendments proposed by Western Power to the updated Metrology Procedure are in accordance with the Code. The Authority notes that a number of the issues raised by Community Electricity would require Code changes and cannot be addressed in the current context of considering amendments to Western Power's updated Metrology Procedure.

Other Amendments

Finally, the Authority has considered all the other changes proposed by Western Power in its updated Metrology Procedure and its draft finding is that these changes comply with clauses 6.5 and 6.8 of the Code. The Authority has also considered the Comparison Document contained in Section 3 of Western Power's Report on Amendments to the Western Australian Electricity Market Metrology Procedure for Metering Installations and the references to the amendments made in relation to the requirements of the Code and its draft finding is that these amendments comply with the Code.