

Community Electricity

Submission in Response to ERA Public Consultation

Review of Western Power's Metrology Procedure for Metering Installations on the Western Power Network

Standing

Community Electricity is a licensed electricity retailer and a member of the ERA's Technical Rules Committee and the IMO's Market Advisory Committee

Assessment

Substitution of Meter Data

It should be noted that accurate and stable meter data are important for, amongst other things:

- a) retailers to invoice their customers;
- b) Western Power to invoice its customers; and
- c) The IMO to settle the wholesale market;

On this basis, it is important that Western Power has regard to the timeliness when substituting data and should reasonably seek to 'get it right first time', including delay of issuing data where it reasonably 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. From the IMO perspective, it operates according to a Meter Data cut-off date that is substantially delayed relative to read dates and would not be impeded by a reasonable delay. If retailers have a need to invoice their customer in order to sustain cash flow, they can themselves estimate the data. We suggest 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.

New Section 2.4.6

This provides for Western Power to treat as an accumulation meter an interval meter unless the retailer objects. We submit that the retailer can only be Synergy and this treatment confers on Synergy a commercial advantage via the implied inclusion of the meter in the Notional Wholesale Meter and the commensurate advantageous capacity prices. We suggest that where interval data is available it should be sent to the market.

New Section 3.6.5

This restricts meter data access to retailers and generators. In practice, customers themselves frequently wish to have access and may also require access to be given to their consultants. We understand that Western Power usually denies such requests and thereby forces the customer to duplicate Western Power's metering at unnecessary

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expense and inconvenience. We suggest that customers and their consultants should have the right of access.

Changes to Section 2.2.4

We suggest that this should refer to section 5.1 of the Code (Western Power's obligation to be reasonable) rather than section 3.9 (3A) (Western Power's right to make the determination).

Contact

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