



ABN 20 009 454 111

## Rottnest Island Metrology Procedure Report on Development and Consultation Process

**August 2017**

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## 1 INTRODUCTION

Following the 2015 Performance Audit of Rottneest Island a post audit implementation plan was developed to record the audit recommendations and the proposed corrective actions. Under recommendation 17, the Rottneest Island Authority (**RIA**) had to confirm with the Economic Regulation Authority (**Authority**) the options available for the adoption of a pre-approved metrology procedure. This has now been done and the RIA is proceeding with the preparation of the metrology procedure in accordance with Division 6.2 of the “Electricity Metering Code, 2012 (**Code**) which specifies the approval procedure.

Under the Clause 6.11(3) of the Code, prior to the submission of the metrology procedure the network operator (RIA) must provide a report to the Authority which describes the process followed for its preparation and provides details of the consultation process with stakeholders leading to the submission of the metrology procedure.

## 2 REPORT CONTENT

This Report has been prepared in accordance with the Code. The applicable Code requirements are noted below:

Clause 6.11(2) of the Code requires that:

“Before submitting a proposed document to the Authority under clause 6.2 or..., a network operator must:

- (a) give Code participants a reasonable opportunity to make submissions to the network operator concerning the proposed document; and
- (b) take into account any submissions received from Code participants in developing the proposed document.”

Clause 6.11(3) of the Code requires that:

“Before submitting a proposed document to the Authority under clause 6.2 or ..., a network operator must provide a **report** to the Authority that:

- (a) identifies the process through which the proposed document was developed, including details of consultation with Code participants under this clause 6.11; and

- (b) describes how the proposed document complies with the criteria set out in clauses 6.5 to 6.9 (as applicable); and
- (c) describes how the network operator took into account any submissions received from Code participants; and
- (d) includes copies of submissions received by the network operator from Code participants.

(3A) The network operator must publish the report it provides to the Authority under clause 6.11(3).”

As per clause 6.11(3)(b), clauses 6.5 to 6.9 refer to:

- [6.5] Compliance of document with requirements which among others include compliance with the Code, no imposition of inappropriate barriers to entry to a market, consistency with good electricity industry practice, being reasonable and consistency with the Code objectives;
- [6.6] Requirements for model service level agreement;
- [6.7] Requirements for communication rules;
- [6.8] Requirements for a metrology procedure;
- [6.9] Network operator may establish a registration process.

Clause 6.8 requires:

“A metrology procedure must at least:

- (a) as a minimum, contain information on the devices and methods that are used by the network operator 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. data under this Code; and
- (c) specify the procedures for estimating, substituting and validating energy
- (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.”

### **3 PROCESS OF PREPARATION, CONSULTATION AND APPROVAL**

As per Clause 6.11(3)(a)<sup>1</sup> of the Code the process of preparation and approval of the RIA Metrology Procedure followed these steps:

**Table 1: Process of Preparation and Approval of Metrology Procedure**

<b>Step</b>	<b>Responsibility</b>
<p>1. At the start of the process the process of preparation and approval of the metrology procedure was documented; it included a consultative process involving Code Participants (users), review and submission to the Authority. The process:</p> <ul style="list-style-type: none"> <li>1.1. gave users a reasonable opportunity to make submissions to the network operator concerning the proposed document;</li> <li>1.2. took into account any submissions received from users in developing the proposed document.</li> </ul>	-
2. The draft metrology procedure was prepared and submitted to the RIA for first review.	Consultant
3. Users were nominated for involvement in the consultation process.	RIA
4. RIA reviewed the draft metrology procedure.	RIA

<sup>1</sup> see also section 4, Details of Consultation Process

<b>Step</b>	<b>Responsibility</b>
5. Metrology procedure was updated and reissued.	Consultant
6. Metrology procedure was issued to the users for their comments.	RIA
7. Users' submissions on the proposed metrology procedure provided to the RIA.	Users
8. Draft metrology procedure updated with the users' comments and submitted to the RIA for review and approval.	Consultant
9. RIA reviewed and approved the updated metrology procedure.	RIA
<p>10. Report prepared and submitted to the Authority in accordance with Code; the report includes:</p> <p>10.1. identification of the process through which the proposed document is developed, including details of consultation with users under clause 6.11 of the Code;</p> <p>10.2. description of how the proposed metrology procedure complies with the criteria set out in clauses 6.5 to 6.9 of the Code (as applicable);</p> <p>10.3. description of how the network operator takes into account any submissions received from users;</p> <p>10.4. copies of submissions received by the network operator from users.</p>	Consultant
11. After RIA's approval, the metrology procedure will then be submitted to the Authority for comments/ approval.	Consultant
12. Authority's review of report and metrology procedure.	Authority
13. Relevant comments from the Authority to be incorporated in the final version of the metrology procedure. Final document issued to RIA.	Consultant
14. RIA to issue the final version of the metrology procedure.	RIA
15. RIA to publish the metrology procedure and the report on its web pages if required by the Authority.	RIA

## 4 DETAILS OF CONSULTATION PROCESS

As per the Code Clause 6.11(3)(a), (c) and (d), this section:

- “(c) Describes how the network operator took into account any submissions received from Code participants; and
- (d) Includes copies of submissions received by the network operator from Code participants.”

The consultation process was designed to involve the stakeholders of the network operator’s operation which included:

- the Rottnest Island Business Community (Rottnest Island Chamber of Commerce (**RICC**)).

The consultation process followed these steps:

- The Rottnest Island Commercial Property Managers were given the task of circulating the draft metrology procedure to the RICC members for comments and to collect the responses.
- The RICC members were sent a copy of the draft metrology procedure with a cover letter requesting comments, a sample of the cover letter is provided in the Appendix.
- One response was received to the consultation request from Mr Glenn Evans, Chairman of the RICC.
- A clarification was provided by the RIA through the Commercial Property Managers and the matter was concluded.

A copy of the submission and response is included in the Appendix.

- As there were no other responses and there were no changes requested to the metrology procedure the consultation process was concluded and the metrology procedure was finalised.

## 5 CONFORMANCE OF METROLOGY PROCEDURE

As per Clause 6.11(3)(b) of the Code this section describes how the proposed metrology procedure complies with the criteria set out in clauses 6.5 to 6.9 of the Code (as applicable):

Clauses 6.5 to 6.9 refer to:

- [6.5] Compliance of document with requirements which among others include



compliance with the Code, no imposition of inappropriate barriers to entry to a market, consistency with good electricity industry practice, being reasonable and consistency with the Code objectives;

- [6.6] Requirements for model service level agreement;
- [6.7] Requirements for communication rules;
- [6.8] Requirements for a metrology procedure;
- [6.9] Network operator may establish a registration process.

## 5.1 COMPLIANCE WITH REQUIREMENTS FOR ALL DOCUMENTS (CLAUSE 6.5 OF CODE)

Clause 6.5 of the Code requires that:

“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.”

Following the Authority’s recommendation for RIA to adopt a pre-approved metrology procedure, the Horizon Power’s pre-approved procedure was used as the model for the Rottnest Island document.

In order to reflect the devices and communication methods in use at Rottnest Island the pre-approved Horizon Power metrology procedure was reviewed and, where applicable, updated to reflect Rottnest Island’s operation.

The procedure reflects the type of equipment and systems that RIA have in place at present, or plan to instal in future, based on available information.

As the “Rottnest Island Metrology Procedure” is based on the pre-approved “Western Australia Electricity Market Metrology Procedure for Metering Installations”, similarly with that procedure it complies with the Code and with all other requirements noted in clause 6.5 of the Code.

## 5.2 COMPLIANCE WITH CLAUSES 6.6 – 6.7 AND 6.9 OF CODE

Clauses 6.6, 6.7 and 6.9 of the Code refer to:

- [6.6] Requirements for model service level agreement;
- [6.7] Requirements for communication rules;
- [6.9] Network operator may establish a registration process.

These requirements are separate and not part of the metrology procedure and are not applicable.

## 5.3 COMPLIANCE WITH REQUIREMENTS FOR A METROLOGY PROCEDURE (CLAUSE 6.8 OF CODE)

Clause 6.8 of the Code requires:

“A metrology procedure must at least:

- (a) as a minimum, contain information on the devices and methods that are used by the network operator 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. data under this Code; and
- (c) specify the procedures for estimating, substituting and validating energy
- (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.”

The following table lists each of the requirements of clause 6.8 of the Code and the applicable sections of the metrology procedure that address that requirement:

<b><i>Requirements for Metrology Procedure</i></b>	<b><i>Where in RIA's Metrology Procedure</i></b>
(a) as a minimum, contain information on the devices and methods that are used by the network operator to:	
(i) measure, or determine by means other than a device, electricity produced and consumed at a metering point;	information on the devices and methods that are used by the network operator to measure or determine by a device or other means electricity produced or consumed at a metering point is covered in various sections of the metrology procedure particularly in: <ul style="list-style-type: none"> <li>• section 3</li> <li>• schedules 1 to 6</li> </ul>
(ii) convey the measured or determined information to other devices using communications links; and	<ul style="list-style-type: none"> <li>• section 4</li> <li>• schedules 4 to 6</li> </ul>
(iii) prepare the information using devices or methods to form energy data; and	<ul style="list-style-type: none"> <li>• section 4</li> <li>• schedules 4 to 6</li> </ul>
(iv) provide access to the energy data from a telecommunications network;	<ul style="list-style-type: none"> <li>• section 4</li> <li>• schedules 4 to 6</li> </ul>
(b) specify the minimum requirements for meters and metering installations, including: <ul style="list-style-type: none"> <li>(i) accumulation meters; and</li> </ul>	<ul style="list-style-type: none"> <li>• schedules 1 and 3</li> </ul>

<b>Requirements for Metrology Procedure</b>	<b>Where in RIA's Metrology Procedure</b>
(ii) interfaces that allow interval energy data to be downloaded;	<ul style="list-style-type: none"> <li>• section 4</li> <li>• schedules 4 to 6</li> </ul>
(iii) direct connected meters for Type 4 to Type 6 metering installations;	<ul style="list-style-type: none"> <li>• schedules 1 to 3</li> </ul>
(iv) CTs and VTs;	<ul style="list-style-type: none"> <li>• schedules 1 to 2</li> </ul>
(v) programmable settings under clause 3.10. data under this Code;	<ul style="list-style-type: none"> <li>• schedule 5</li> </ul>
(c) specify the procedures for estimating, substituting and validating energy	<ul style="list-style-type: none"> <li>• schedules 7 to 11</li> </ul>
(e) specify the date from which the metrology procedure takes effect which must be no less than 3 months after it is published.	<ul style="list-style-type: none"> <li>• section 1.5</li> </ul>

## *APPENDIX A*

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1. Cover Letter to Stakeholders Participating in Consultation Process
2. Response from Stakeholders

Your Ref:  
Our Ref: 48/11od1705



Overdrive Holdings P/L t/a Qualeng  
ACN 009 454 111  
ABN 20 009 454 111

31 May 2017

Qualeng  
PO Box 2085, Marmion WA 6020  
E-M [planning@qualeng.net](mailto:planning@qualeng.net)

To Whom It May Concern

## **CONSULTATION ROTTNEST ISLAND METROLOGY PROCEDURE**

Attached is the first issue of the draft of the Rottnest Island Metrology Procedure (the Procedure). This draft document is issued to the Rottnest Island stakeholders in accordance with the requirements of the Economic Regulation Authority. The Procedure provides guidance on the correct provision, installation and maintenance of electricity metering installations.

Under the Electricity Industry (Metering) Code 2012 (the Code) consultation needs to be undertaken with affected parties prior to the approval of the Procedure. In accordance with the Code the draft Procedure is being provided to enable stakeholders to review and comment on the draft.

Comments should be provided by close of business on the:

19 June 2017

Submissions should be marked for the attention of the Rottnest Island Authority and sent to:

Postal address:           Tiarne Wyatt  
                                  Property Manager  
                                  McGees Property  
                                  Level 2, 26 Clive Street, West Perth, WA 6005

E-mail address:

Yours sincerely,

Mike Zammit  
Projects Director

/Enc

## Tiarne Wyatt

---

**From:** Tiarne Wyatt  
**Sent:** Monday, 19 June 2017 1:45 PM  
**To:** Glenn Evans  
**Cc:**

**Subject:** RE: Rottnest Island Metrology Procedure - Consultation Process for Stakeholders

Hi Glenn,

Further to my email below the RIA has comeback with the following overview:

“The RIA is the Network Operator, Retailer and Generator of electricity on Rottnest Island and therefore must comply with the Electricity (Industry) Metering Code and its Electricity Integrated Regional Licence under the Economic Regulation Authority (ERA).

All other Western Australia’s electricity suppliers fall under the same regulations , i.e. Western Power and Horizon Power.

It is a requirement under the Electricity (Industry) Metering Code that the network operator (RIA) submits a Metrology Procedure to the ERA. Before submitting this document to the ERA, code participants (users) must be given the opportunity to make submissions to the network operator.

The Metrology Procedure contains information on electrical devices and methods used by the network operator to –

- measure electricity produced and consumed at a metering point
- specify the minimum requirements for meters and metering installations
- specify procedures for estimating, substituting and validating energy data
- provide sampling and testing of meters.

In a nutshell, it gives users information on how electrical meters are being read, installed, validated and tested on Rottnest Island.”

The RIA has assured that there is no reason for concern and there are no implications at all for the RICC.

Should you require anything further, please let us know.

Best regards,

---

**From:** Tiarne Wyatt  
**Sent:** Sunday, 18 June 2017 2:27 PM  
**To:** Glenn Evans

**Subject:** Re: Rottnest Island Metrology Procedure - Consultation Process for Stakeholders

Hi Glenn,

Thank you for your email.

As detailed in the letter provided, the draft Rottnest Island Metrology Procedure is required to be issued to all stakeholders for review and comment prior to approval in accordance with the Code and provides guidance on the correct provision, installation and maintenance on electricity meter installations.

I will have to liaise with the RIA and the RIA consultants, Qualeng, to provide further information and will request they provide an overview as detailed in your email below.

I hope to get back to you by Monday afternoon with the requested information and will keep you updated.

Best regards,

Tiarne Wyatt  
Property Manager  
McGees Property

On 18 Jun 2017, at 2:43 pm, Glenn Evans

wrote:

Dear Tiarne

I am a bit disconcerted by all this.

1. As a cited stakeholder along with a member of the RICC, which is referenced within the document, I have not heard of nor been introduced to the relevance of this document or process.
2. The provided document is 110 pages long and on face value is a highly technical and detailed review – at the very least an overview / synopsis is required so we may understand the intent of the document and the implications it has to the “affected parties”.
3. Is it reasonable to expect that we may review such in a responsible way, given 1 and 2?

If you could please provide some insight.

Kind regards,

Glenn Evans  
Chairman, Rottnest Chamber of Commerce Inc. (RICC)  
[admin@ricc.org.au](mailto:admin@ricc.org.au)  
[www.ricc.org.au](http://www.ricc.org.au) <<http://www.ricc.org.au>>

<image002.jpg>