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## Submission on Proposed Amendments to the Electricity (General) Regulations 2012 and Gas Regulations 2012

### Introduction

1. This is Vector Metering's submission on the Department of Energy and Mining's (DEM) consultation paper on proposed amendments to South Australia's *Electricity (General) Regulations 2012* and *Gas Regulations 2012*, circulated to stakeholders on 20 April 2023.
2. Vector's Australian and New Zealand advanced metering business – Vector Metering – is an accredited Metering Provider and Metering Data Provider, and a registered Metering Coordinator, in Australia's National Electricity Market (NEM) and the equivalent in New Zealand. Vector Metering provides a cost-effective end-to-end suite of energy metering and control services to energy retailers, distributors, and consumers.<sup>1</sup>
3. Our submission focuses on DEM's proposed amendments to regulation 54(3) and new regulation 76A. We set out our comments on these proposals below.

### Proposed amendments to regulation 54(3) and new regulation 76A

4. Vector supports the proposals to amend regulation 54(3) and introduce regulation 76A which obligate Metering Providers to produce documents that:
  - describe the Metering Provider's methods of installation, testing and commissioning of smart meters, demonstrating that safe work practices are used, and technical requirements related to the metering work are being met, and
  - provide requirements to support the orderly, timely and efficient installation of a smart meter without delay to the customer.
5. However, it is our view that the singular use of the term "metering installation rules" in both regulations 54(3) and 76A is confusing as the intent of these regulations serve different purposes. We therefore suggest that these regulations each refer to a document that better describes their intent.
6. Under section 54 of the *Electricity Regulations – Connection Testing and Inspection procedures*, regulation 54(3) is intended to support section 59.1(g) of the South Australia *Electricity Act* which requires, in summary, that the person who is installing or replacing a

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<sup>1</sup> In December 2022, Vector announced that it has selected QIC Private Capital Pty Limited as preferred partner for Vector Metering joint venture, following conclusion of a strategic review. Vector has entered into a conditional agreement with QIC, under which the parties expect to finalise arrangements in the first quarter of 2023 for the sale of a 50% interest in Vector Metering to investment vehicles managed and advised by QIC.

In April 2023, Vector confirmed that definitive sale documentation has been executed and the condition relating to finalisation of third-party financing arrangements has now been satisfied. Assuming the required regulatory approvals are obtained, completion of the sale is expected to occur in Q2 2023.

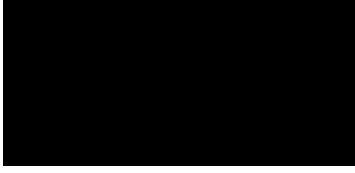
meter do so in a manner that meets safety and technical requirements. This clause is clearly directed at the Metering Provider, who is the only party authorised under the *National Electricity Rules* (NER) to perform metering work. Regulation 54(3) requires that the Metering Provider provides a document that describes the approach the Metering Provider takes during the installation process to meet the requirements in the legislation. This document is referred to as the 'metering installation rules' in the DEM's proposed draft amendment regulations.


7. In addition, the newly proposed regulation 76A requires these "metering installation rules", the same documents referenced in regulation 54(3), to be published and made publicly available. It is not clear why a document that describes how a Metering Provider meets the requirements of the legislation during the installation of a meter – a task that can only be undertaken by the Metering Provider and will not impact other parties – is required to be made publicly available.
8. We believe the intent of new regulation 76A should be to require Metering Providers to publish their *requirements* of the customer's electrical installation that are required to be in place before the Metering Provider can install the smart meter. It is our view that it is these requirements that should be made publicly available/accessible so that customers and electrical contractors can ensure that a smart meter can be installed in a timely, orderly, and efficient manner when the customer requests it through their retailer, and not the documents also referenced in regulation 54(3). For the majority of Metering Providers, including Vector Metering, these requirements have been documented in the Contestable Metering Industry Group's *National Metering Installation Requirements* (CMIG MIRs). Version 2.0 of this document is about to be subject to consultation as part of Energy Queensland's review of its Connections Manual, with the intention of replacing Energy Queensland's current metering manual with the CMIG MIRs. This reflects the transfer of responsibility for metering from the distribution network service providers (DNSPs) to the contestable Metering Providers.
9. The CMIG MIRs provide a standard, nationally consistent approach to metering requirements, and allows for specific jurisdictional variations, where required. We encourage the adoption of these standards in South Australia via the proposed changes to the state's electricity regulations. We attach a draft copy of the CMIG MIRs to this submission to provide some context. CMIG would be happy to release Version 2 of the CMIG MIRs in South Australia for broader review, feedback, and acceptance from South Australian stakeholders.
10. In summary, we believe the term "metering installation rules" in regulation 54(3) should be replaced with the Metering Provider's Meter Connection and Testing Procedures, and the term "metering installation rules" in regulation 76A should be replaced with the Metering Provider's Metering Installation Requirements. This will distinguish and more accurately reflect the purpose of each document and avoid potential confusion.
11. Furthermore, to avoid doubt under proposed regulation 76A, we suggest that all references to "metering installation rules" or "rules" under this regulation, including in the title and clauses 76(a) to (d), be amended to "metering installation requirements".
12. We support the proposed regulations requiring the Metering Provider to obtain approval from DEM's Office of the Technical Regulator for either of the above documents.

### Concluding comments

13. We are happy to discuss our submission with DEM officials. Please contact me at [REDACTED] or [REDACTED] in the first instance.
14. No part of this submission is confidential, and we are happy for DEM to publish it in its entirety.

Yours sincerely



  
Industry Development Australia  
Vector Metering