

Matrix of Comments to the Draft Rules and Procedures for the Test and Maintenance of Electric Meters of DUs

Draft Provision	Comments	ERC's Remarks
<p>General Harmonization of ERC Rules and Regulations pertaining to the Statistical Sampling of Meter Testing as Compliance to the 2-year Meter Testing Requirement.</p>	<p><u>MERALCO</u> In view of the intent of the draft Rules and Procedures for the Test and maintenance of Electric Meters of DUs to have statistical sampling of meter testing as a replacement to the testing of all meters once every two years, we respectfully ask that the ERC adjust correspondingly its other rules namely the IRR of RA 7832, Magna Carta, and the DSOAR to reflect such intent. Specifically, we request that the draft Rules' repealing clause should expressly state that Rule VII, Section 2 of the IRR of RA 7832, in so far as it mandates the calibration of meters to be done once every two (2) years, be amended considering its operational and cost implications.</p>	
<p>General Traceability of Watt-hour Meter Standards to National Institute of Standards and Technology (NIST)</p>	<p><u>MERALCO</u> We propose that the ERC, as the chief regulator of the electric industry and for purposes of economies of scale, be the logical entity to maintain the highest reference standard traceable to the NIST or its equivalent. All DUs will therefore only need to send their reference standard to ERC for traceability.</p>	

<p>General</p> <p>Fee for Acceptance Testing</p>	<p><u>MERALCO</u></p> <p>We would like to seek a clarification on the rationale behind the necessity to pay for fees for every meter in a sample lot when only several meters in the lot are subject to testing as shown in the table of fees and charges. We respectfully recommend that the fee for acceptance testing for conforming meters be charged only to the total number of meters in the sample in a given lot and not the total number of meters in the population.</p>	
<p>General</p> <p>Fees to be charged by Third-Party Test Facility</p>	<p><u>MERALCO</u></p> <p>We would like to seek clarification if the fees to be charged by the Third-Party Test facility for services it renders be regulated by the ERC?</p> <p>We believe that this business should be made competitive and therefore the ERC should not regulate the rates.</p>	
<p>General</p>	<p><u>NASECORE</u></p> <p>Believes that after installation, maintenance of the meter should be done regularly by the DUs. Likewise, meter performance should regularly be observed so that the DUs may know if the meter is still in good condition. Thus;</p>	

Article V shall be read as follows:

ARICLE IV
METER RECORDS, MAINTENANCE
AND PERFORMANCE
DETERMINATION

4.1 Meter records

Utilities shall maintain record of each meter until its retirement. This record shall contain the identification number, manufacturers name, type and rating, each test, adjustment and repair, date and cost of purchase, location, date of installation and removal from service. Utilities shall keep records of the last meter test for every meter. At a minimum, the records shall identify the meter, the date, the location of and reason for the test, the name of the person or organization making the test, and the test results and submit the same to the ERC on a monthly basis.

4.2 Maintenance of Meters.

All DUs must provide a monthly checklist on all meters currently installed. Upon reading the meter, this checklist will be filled-up by the assigned meter reader.

4.3 Determination of Meter performance

	<p>Meter reader shall inspect during the meter reading itinerary to determine the following:</p> <p>4.3.1 Meter Consumption registration shall be considered “indeterminate” when there is any doubt as to whether the accuracy of the registration can be determined if two successive readings taken at each load fail to agree within the specified maximum error of the meter.</p> <p>4.3.2 A meter shall be reported as “Damaged” when it’s reading incorrectly due to tampering, incorrect connections, overload or damaged originating from external sources.</p> <p>4.3.3 A meter shall be reported as “not registering” if for any reason it is found not registering at both the light load and heavy load test points.</p> <p>4.3.4 Meter accuracy may be specified as that which is measured at a single test point or as a combined accuracy based on tests taken at multiple load points. Only one method of determining performance may be used for any meter type.</p>	
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	DUs shall within twenty-four (24) hours take appropriate action to the findings and report of its meter reader.	
General	<p><u>NASECORE</u></p> <p>Any matter related to Meter Shop be deleted in the draft Rules and all words Meter Shop be changed to Metering Department</p>	
General	<p><u>CEPALCO</u></p> <p>The proposed rules will definitely increase the required budget needed to meet the proposed ERC rules. During the budget preparation for the current regulatory period, a budget was proposed which could cater to the two-year meter-testing interval requirement. However, upon ERC's advice, this budget provision was deleted from the proposed budget. If this two-year testing requirement will be implemented, we propose that implementation should only be started during the next regulatory period so that the required budget can be provided. This is also to provide ample time for the DU to make the necessary adjustments on the required IT hardware and software systems will track and monitor the DU's metering database.</p>	

<p>1.1 Objective</p> <p>The objective of these Rules and procedures is to promote the public interest by providing guidance to Distribution Utilities in the test and maintenance of electric meters in order to ensure the highest level of confidence of the consumers on the accuracy of their watt-hour meters.</p>	<p><u>VECO</u></p> <p>Insert “instrument transformers”, in addition to electric meters, in order to be consistent with Article VIII – Instrument Transformer Test</p>	
<p>1.2 Guiding Principle</p> <p>The DU should ensure that all electric meters it puts in service are tested and sealed by the ERC; in addition while these meters are already in service, the same should be tested at least once every two (2) years.</p>	<p><u>DECORP</u></p> <p>Suggests that meters already in service be tested once in five (5) years.</p> <p><u>MERALCO</u></p> <p>This connotes that <u>all meters</u> should be tested once every 2 years when in fact the Honorable Commission has already proposed a statistical sampling method in this draft Rule.</p> <p>We propose: The DU should ensure that all electric meters it puts in service are tested and sealed by the ERC; in addition, while these meters are already in service, the same should be tested periodically in accordance with a statistical sampling program approved by the ERC.</p>	

	<p><u>DMC</u></p> <p>Suggested Revision:</p> <p>The DU should ensure that all electric meters it puts in service are tested and sealed by the DU, however, the reference meter standard shall have traceability to that of ERC; in addition, while these meters are already in service, the same should be tested in accordance with a statistical sampling program approved by the ERC.</p>	
<p>Article I 1.4 Definition of Terms</p> <p>Meter Shop. A place where meters are inspected, repaired, tested, and adjusted.</p>	<p><u>VECO</u></p> <p>Same with the comment to Section 1.1</p> <p><u>NASECORE</u></p> <p>Proposes to change Meter Shop to Metering Department.</p> <p>Metering Department – a distribution utility department where meters are inspected, repaired, tested, and adjusted.</p>	

<p>Article I</p> <p>1.3 Definition of Terms</p> <p>Acceptable Quality Level (AQL) A small percentage of defects in a lot that the sampling plan will accept.</p>	<p><u>MERALCO/DMC</u></p> <p>Suggested Revision:</p> <p>Acceptable Quality Level (AQL) - A small percentage of non-conformity in a lot that the sampling plan will accept.</p> <p><u>NASECORE</u></p> <p>Recommends that a definition of NIST be included in the definition of terms.</p>	
<p>Article II</p> <p>Section 2.1 Requirement to maintain a Meter Shop</p> <p>Each DU providing metered electric service shall, unless specifically exempted by the ERC, maintain a Meter Shop which shall be responsible for the routine testing, repair, and calibration of electric meters and other auxiliary devices and equipment essential to the metering of electric power and</p>	<p><u>ILPI</u></p> <p>Second paragraph of Section 2.1 should be read as “x x x available for inspection during office hours x x x”</p> <p><u>MERALCO</u></p> <p>It is not practical to allow inspection “at all times”. This is too broad a timetable. The schedule for inspection should be limited to reasonable hours.</p>	

<p>energy.</p> <p>The Meter Shop shall maintain equipment that are available for inspection at all times by an authorized ERC representative.</p> <p>Section 2.2 Exemption from Maintaining a Meter Shop</p> <p>DUs with proofs to show that it is more feasible to engage the services of another Meter Shop than to maintain their own Meter Shops may file with the ERC formal applications for exemptions. The applications should include requests for the issuance by the ERC of an authorization to allow the DUs to have their electric meters tested and calibrated by the ERC approved Meter Shop.</p>	<p>Recommendation:</p> <p>The Meter Shop shall maintain equipment that are available for inspection during business hours by an authorized ERC representative.</p> <p><u>LEYECO II</u></p> <p>Allow the ECs to form a sort of “communal Meter Shop”</p> <p>Suggestion:</p> <p>Insert the following paragraph in “2.1”: <i>“That contiguous ECs within one geographical location or within a region may establish a “communal” meter shop for their use. Said meter shop shall be managed and operated by the selected EC, and all other ECs included in said group need not apply for exemption and requests for the issuance by the ERC of an authorization to allow the DU to have their electric meters tested and calibrated by the ERC approved Meter Shop. The cost of establishing and other ERC charges for its continued operation shall be equally shared by the member ECs.”</i> REASON: This is to minimize the cost of establishing and</p>	
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	<p>operating a meter shop. In line with our intention of delivering affordable electric service to our member-consumers.</p> <p><u>NASECORE</u></p> <p>In the current set-up there is no meter shop that exists, so why form a new entity.</p> <p>NASECORE` proposes the creation of METERING DEPARTMENT in each particular DU rather than a third-party Meter Shop because DUs are the ones acquiring and installing the electric meters. Thus, the title of Article II shall read as follows:</p> <p style="text-align: center;">ARTICLE II METERING DEPARTMENT</p> <p>2.1 All distribution utilities shall have a department that shall be tasked to regularly inspect and test, repair and calibrate, if necessary, meters found to be defective, in the presence of an ERC representative from the Consumer Affairs Service Department.</p>	<p>The draft Rules require the DU to maintain and operate its own Meter Shop. But, similar to other Rules, there is also an exemption to this Rule.</p> <p>Therefore, to accommodate these DUs who are exempted from the requirement of</p>
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ABRECO

1. In lieu of a Meter Shop maintained solely for our DU (Article 2.1), we propose a consortium among the contiguous ECs; i.e., ABRECO, ISECO, INECO, and LUELCO, for the establishment of a one-stop facility with full compliments of testing, repair and maintenance technical personnel, equipment and devices.
2. Relative to this, it will be more feasible for the ERC surveillance teams to inspect meter shops such as this proposed above than in the present set-up where calibrated and/or reconditioned electric meters have been stockpiled at the warehouses pending the availability of ERC inspectors to seal the same for each of the requesting DUs for at least once in two years.
3. To ensure the quality of electric meters put to use by DUs, the ERC should pre-qualify and test the product standards of

	<p>imported devices, in coordination with DTI and the Bureau of Customs, before local distributors could place these said items in the local; market.</p> <ol style="list-style-type: none"> 4. Normal test measures generally applied to DUs and Meter Shops, which are tightened or reduced as the need arises, should also be made applicable to importers and local distributors of electric meters to make meter testing more comprehensive and effective. 5. Lastly, we pray for ample time to disseminate these Rules and procedures to our member consumers before implementation. 	
<p>Article III Meter Shop Accreditation Requirement and Procedures</p>	<p><u>NASECORE</u> Proposes to delete this Article.</p>	

NSTSOEC/PHILATMEC VI

Additional provision to be added that the third party meter shop will not be allowed to engaged in business in franchise area of a DU with own meter shop.

VECO/DLPC

The validity period be changed to five (5) years instead of three (3) years.

SORECO I

Distribution utilities have already a significant number of reportorial and compliance requirements that are both cost sensitive.

In addition, stringent procedures and standards were already designed for meter testing (Article 5.4). The efficiency of the meter lab is shown alongside the meter standard testing results.

Suggestion:
Validity period of five (5) years

<p>3.1 Certificate of Authority</p> <p>All DUs and Third-Party Test Facilities shall be required to apply for a Certificate of Authority (CA) to maintain a Meter Shop. Upon showing that all requirements have been complied with, the ERC shall issue a CA with a validity period of three (3) years, renewable at the end of every term but subject to the ERC's assessment of the Meter Shop's performance of the preceding three (3) years.</p>	<p><u>LEYECO II</u></p> <p>Amend the provision, to read as follows:</p> <p><i><u>"All DUs and Third-Party Test Facilities, except those ECs exempt by ERC under 2.2 hereof, and those ECs already a member or has the intention of joining a "communal Meter Shop" under 2.1 hereof, shall be required to apply for x x x.</u></i></p> <p><u>DECORP</u></p> <p>Why is there a need to apply for a Certificate of Authority to maintain a Meter Shop when metering is an essential/necessary function of a DU?</p> <p><u>RECA I</u></p> <p>The practice of calibrating and testing of kwh meters prior to sealing by the ERC has been implemented several years back. This draft rules and procedures will give the DU's Certificate of Authority. As such, may we know any additional benefit, the DUs shall obtain with this, especially the PhP 10,000.00</p>	
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	<p>which can not be recovered from the metering charges?</p> <p>ERC to recommend internationally acceptable kwh meters may have good objectives. However, due to commercialization of equipment and materials, there are good brands, but manufacturing from different location of the globe will not guarantee its acceptability. Experience dictates that sample materials submitted for testing are good, but deliveries are mass manufactured and may have some defects.</p> <p>Better yet, ERC should guide the DUs on the testing and evaluation of kwh meters for them to make proper selection.</p>	
<p>3.2.5.1 The name of the Meter Shop Head who preferably, has a Bachelor's degree in Electrical Engineering and has an adequate relevant experience in the area of metering analysis.</p>	<p><u>DMC</u></p> <p>The Meter Shop Head should be a licensed Electrical Engineer (Registered or Professional Electrical Engineer) not just a graduate of Bachelor's degree of Electrical Engineering. This will give him authority to function as personnel who deals with Electrical Engineering.</p>	

<p>Article III, Section 3.2.6 Meter Shop Category</p>	<p><u>CEPALCO</u></p> <p>What is the advantage of a meter shop being classified as Category A?</p> <p>The only difference between a Category A Meter Shop and a Category B Meter Shop is that the Category A meter Shop shall have one (1) reference electronic watt-hour meter standard which is directly or indirectly traceable to the National Institute of Standards and Technology (NIST). It may be used for no other purpose than for checking working watt-hour meter standards.</p> <p>Logically, the reference watt-hour standard will require a higher degree of accuracy than that of the working standards. Will mean that this equipment is more expensive than the working standards. Yet, as aforementioned, the instrument will only be used for checking the working standards.</p> <p>In both categories, the working standards will still be subjected to the required annual ERC checking. Thus, what is the point in striving to attain meter shop Category A when its working standards will still be subjected</p>	
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	<p>to the annual ERC checking?</p> <p><u>VECO</u></p> <p>What is the limitation or scope of Category A Meter Shop? Category B?</p>	
<p>3.2.6.1 ITS Category & Equipment</p>	<p><u>DLPC</u></p> <p>We suggest that it must be NIST or its local equivalent.</p>	
<p>3.4 Payment of Fees</p> <p>An Applicant shall pay an application fee of Three Thousand Pesos (PhP 3,000,000.00) upon filing of its application for new or renewal of a CA. An applicant shall likewise</p>	<p><u>LEYECO II</u></p> <p>Fees should be limited to that reasonable amount in the case of ECs considering that they are non-profit and non-stock utilities. Renewal period should be longer for ECs since Surveillance Assessment is conducted annually under 3.5 thereof.</p> <p>Recommendation:</p> <p>Amend the Application Fee to P1,000 for ECs for new CA and P500 for renewal; and P1,500 for License Fee which shall be done once every 5 years.</p>	
<p>3.5 Surveillance Assessment</p> <p>The ERC shall conduct at least once a year on-site inspection or surveillance assessment of</p>	<p><u>DMC</u></p> <p>As per international audit practice, surveillance visit shall be properly coordinated with the auditee in advance</p>	

<p>authorized meter shops for verification of their continued compliance with the CA requirements and with these Rules.</p>	<p>and an audit plan shall be agreed between parties.</p> <p>Suggested Revision:</p> <p>The ERC shall conduct at least once a year scheduled on-site inspection or surveillance assessment of authorized meter shops for verification of their continued compliance with the CA requirements and with these Rules.</p>	
<p>4.1 Certificate of Calibration The certificate of calibration or test report issued by the ERC for inspected equipment shall be permanently displayed in a conspicuous place inside the meter shop.</p>	<p><u>DMC</u> The original copy of the Certificate of Calibration is usually filed in a secured cabinet. For display purposes, a photocopy of the original copy should be allowed.</p> <p>Suggested proposal: The certificate of calibration or test report (or a copy of which) issued by the ERC for inspected equipment shall be permanently displayed in a conspicuous place inside the meter shop.</p>	
<p>Article V 5.1 Accuracy Performance Criteria</p>	<p><u>NSTSOEC/PHILATMEC</u></p> <p>We suggested to maintain the +/- 0.5% error for electronic meters and add a new provision for electro-mechanical meters to have an allowable +/- 2% error.</p>	

CLPC

It is hard to comply with electro-mechanical meters.

MERALCO

The tolerance limit of plus or minus five-tenths percent ($\pm 0.5\%$) is a tall order for all DUs.

The requirement is applicable for electronic meters only but for electro-mechanical meters, the recommended tolerance limit should be plus or minus 1 percent. This may result to possible retirement of all electro-mechanical meters should the $\pm 0.5\%$ tolerance limit be implemented. As of 2008, the number of electro-mechanical meter is approximately 3M, replacement of which to electronic meters would amount to P4.5B (unit cost of electronic meter is P1,500).

Therefore, in such case, will the honorable Commission allow the DUs to recover the cost of replacement? This will be too costly for the DUs.

	<p>We propose:</p> <p>All new and reconditioned or repaired meters shall be calibrated and adjusted by a DU or a Third-Party Test Facility to as closely as possible to zero error. To allow for the necessary variations, meters shall be calibrated or adjusted not to exceed the average error of plus or minus one percent (±1%) at the following test load points: xxx</p> <p><u>DMC</u></p> <p>The calibration or adjusted error of plus and minus five-tenths percent ($\pm 0.5\%$) is very stringent and not realistic.</p> <p>We should align this to the provisions of the Magna Carta and change to a more realistic value of plus and minus 2 percent ($\pm 2\%$).</p>	
<p>5.1.1 Test load points for single phase meters</p> <p>5.1.1.1 Light load at unity power factor</p> <p>5.1.1.2 Full load at unity power factor</p>	<p><u>DMC</u></p> <p>The test load points for single phase meters should be at the actual point of application. Actual service condition and load profile should also be considered in determining the test load points.</p>	

<p>5.1.2.2 Full load at 50% lagging power factor</p>	<p><u>DMC</u></p> <p>The 50% provision is not aligned to the provisions of the PDC.</p> <p>Recommendation: Change 50% to 80%</p>	
<p>5.1.2.4 The stators should be balance within two percent (2%), at full load unity power factor and full load fifty percent (50%) lagging power factor.</p>	<p><u>DMC</u></p> <p>Stators should be balanced within one-tenths percent (0.1%) and not two (2%) assuming mechanical meters.</p>	
<p>5.1.4 Light load</p> <p>5.1.4.1 The light load for self-contained meters shall mean to be the test load point of between five percent (5%) and ten percent (10%) of its “ampere rating” or “test amperes”.</p> <p>5.1.4.2 The light load for transformer rated meters shall mean to be the test load point of approximately ten percent (10%) of the secondary rating of the</p>	<p><u>DMC</u></p> <p>The light load for self-contained meters shall mean five percent (5%) not ten (10%) of its “ampere rating” or “test amperes” to be sensitive and realistic enough to detect light loads.</p>	

<p>current transformers or its “test amperes”.</p>		
<p>5.2 Acceptance Testing by the ERC</p>	<p><u>MERALCO/DMC</u></p> <p>For reconditioned or repaired meters, adding the date in the label will be an additional activity in our process. The meter will only be installed if it passes the acceptance testing. The date when the meter was repaired is already recorded in the meter records.</p> <p>Furthermore, if the meters or transformers would be labeled as “rebuilt” or “repaired”, its accuracy may be questioned by the customers.</p> <p>We propose: “x x x</p> <p>The reconditioned or repaired electric meters referred by the DU to the ERC for acceptance testing shall be recorded as rebuilt or repaired by the concerned Meter Shop where the meters have been rebuilt, repaired and calibrated, and shall be dated accordingly. Any modifications made on</p>	

	a meter that do not conform to the original manufacturer’s specifications shall be indicated in the certification.”	
5.3 Criteria for Acceptance testing	<p><u>VECO</u> Who will select the meter samples, the ERC or the Meter Shop technician? Also, where is the sample to be tested, at the meter shop or at the ERC laboratory?</p> <p><u>DLPC</u> We recommend that the testing should be done at the DU’s meter shop.</p>	
5.3.2.2 Request for sample testing becomes irregular.	<p><u>MERALCO</u> This section refers to a “request”, but there is no reference to the mechanics of filing said request anywhere else in these Rules (e.g., who is to file the request and when). That being so, it is unclear when the ERC may declare that the filing of such request has become irregular. We therefore would like to ask clarification on this matter.</p>	

<p>5.4.2 Reduced to Normal Inspection</p>	<p><u>VECO</u></p> <p>Is the DU to apply for the reverting back to normal inspection after satisfying the conditions or the ERC will automatically revert?</p> <p>The conditions are unclear, not like in 5.4.1, 5.4.3 and 5.4.4. We seek clarification on this item.</p> <p><u>DLPC</u></p> <p>Recommendation:</p> <p>If the DU has passed the ten (10) lots acceptance test, the DU will be granted an automatic reduced acceptance test?</p>	
<p>5.4.5 Suspension of Certificate of Authority</p>	<p><u>VECO</u></p> <p>What are the conditions or requirements in order for the Meter Shop be given back the Certificate of Authority. If the Certificate of Authority of the Meter Shop is under suspension-so therefore the DU cannot test anymore their meters-can a DU be allowed to get other Meter Shop or Third-Party Test Facilities to test the meters while under suspension?</p>	

<p>5.5.7 Sample meters in the lot that passed the acceptance test which were found not conforming shall be calibrated to the acceptable accuracy limit before they are returned to the lot.</p>	<p><u>MERALCO/DMC</u></p> <p>We propose:</p> <p>5.5.7 Non-conforming meters belonging to the lot where samples were taken shall be calibrated to the acceptable accuracy limit before they are returned to the lot.</p>	<p>Reword as follows:</p> <p>Non-conforming sample meters taken from a lot that passes the acceptance test shall be calibrated to the acceptable accuracy limit before they are returned to the lot.</p>
<p>Article VI In-Service Testing</p>	<p><u>CEPALCO</u></p> <p>If the DU finds the prescribed sampling method difficult and costly to implement in terms of hardware, software, manpower and other resources-particularly for in-service meters – will the DU be allowed to propose other means to achieve the same objective?</p>	
<p>6.1 Statistical Sampling Program for In-service Meters</p>	<p><u>MERALCO/DMC</u></p> <p>We request the Honorable Commission not to limit the sampling plan to ANSI Z1.4-1993, “Sampling Procedures and Tables for Inspection by Attribute”, but to consider also ANSI Z1.9-1993, “Sampling Procedures and Tables for Inspection by Variable” which is more applicable for DUs with bigger service areas.</p>	

<p>6.2.2 Sampling Testing Plan Application (Lot Sizes)</p>	<p><u>VECO</u></p> <p>We recommend that lot sizes be classified according by area or geographic location.</p>	
<p>6.2.4 Statement from the DU, whether or not the lot applied for sampling inspections were previously subjected to sampling inspections; and</p>	<p><u>MERALCO</u></p> <p>For clarity, we respectfully proposed wording to be as follows:</p> <p>“Statement from the DU regarding whether or not the lot applied for sampling inspections was previously subjected to sampling inspections; and”</p>	
<p>6.3.3 The sub-segments shall further be divided into lot sizes containing a minimum of 281 meters and a maximum of 35,000 meters categorized by types and brands and on the basis of location.</p>	<p><u>MERALCO/DMC</u></p> <p>The 35,000 maximum limit of lot size is not applicable for a DU having a total meter population of 4 million like Meralco.</p> <p>We propose:</p> <p>6.3.3 The sub-segments shall further be divided into lot sizes containing a minimum of 281 meters and a maximum of 35,000 meters. For huge number of meters, DUs may propose to the ERC a methodology in coming up with the sub-segments which may be</p>	

	<p>based on ANSI Z1.4 or Z1.9. The meters shall be categorized by brand, type, year acquired, location or other factors which may be disclosed by analyzing the test records to have an effect on performance.</p>	
<p>6.3 Sampling Inspection Procedures for In-service Meters</p> <p>6.3.4 Take samples from each lot at random using a table of random numbers or some equivalent mechanical or numerical procedure in order that every meter in the lot will have an equal chance to be drawn.</p>	<p><u>CLPC</u></p> <p>Sampling of meters and testing should be done on a per area/location basis to maximize the time of testing.</p>	
<p>6.3.6 Conduct field tests on the sample meters at the customer's premises.</p>	<p><u>CLPC</u></p> <p>For safety/security reasons, sample meters installed in security-risk areas should be tested at meter shops.</p> <p><u>MERALCO</u></p> <p>Conducting meter testing at the customer's premises may not always be feasible or wise. Hence, we propose that the DU be given leeway to come up with its own program of meter testing. For this purpose, the DU may be asked</p>	

	<p>to include in its Sample Testing Plan Application a reference to the manner of meter testing it is to adopt.</p> <p>It is proposed that the manner of meter testing be based on a DU's ERC-approved sample plan.</p> <p>We respectfully recommend:</p> <p>“x x x</p> <p>6.3.7 Conduct testing in accordance with the proposed sample testing by the DU.</p>	
<p>6.3.8 Retain in service all of the meters in the accepted lot without further accuracy adjustments. Sample meters in the lot may be adjusted to the acceptable accuracy and returned to the lot with new ERC seal.</p>	<p><u>CLPC</u></p> <p>This is time consuming. Inaccurate sample meters should be replaced and accuracy adjustment should be done at the meter shop.</p> <p><u>MERALCO/DMC</u></p> <p>The procedure required in Section 6.3.8, to return the removed sample meters to the lot, will be difficult to comply with and will require substantial resources.</p>	

	<p>We propose:</p> <p>6.3.8 Retain in service all of the meters in the accepted lot without further accuracy adjustments. Sample meters in the lot may be adjusted to the acceptable accuracy.</p>	
<p>6.3.9 Remove all meters comprising the rejected lot and replace them with new or reconditioned meters within six (6) months after the end of the sample testing year. All meters removed from service shall either be reconditioned or permanently be retired.</p>	<p><u>CLPC</u></p> <p>Time frame should consider total volume of meters of all rejected lots to be replaced.</p> <p><u>MERALCO/DMC</u></p> <p>Removal and replacement of meters comprising the rejected lot will be too expensive and impossible to complete in 6 months, especially for lots with huge number of meters.</p> <p>We propose:</p> <p>6.3.9 For meters comprising a rejected lot, corrective actions shall be undertaken based on the ERC approved sampling plan submitted by the DU. Corrective actions may include the</p>	

	<p>following:</p> <ul style="list-style-type: none"> • Splitting the rejected lot into 2 or more groups to identify the problem such as batch related, location specific, weather related, etc. • Accelerated test program 	
<p>6.4 ERC Evaluation of Sample Testing Program</p>	<p><u>DLPC</u></p> <p>What are the conditions whether to increase or reduce the validity period for each type of meter?</p>	
<p>6.5 Extension of the Validity</p> <p>Period of Meter Certification An ERC authorized representative shall be assigned to attach ERC colorcoded stickers on the glass covers of all meters in lots found acceptable as proof of its approval to extend the validity of the meter certifications for another two (2) years.</p>	<p><u>MERALCO</u></p> <p>For the case of Meralco, the total count of electric meters within our franchise is approximately 4.5M. We would like to seek clarification whether this number will have an attached ERC color-coded sticker?</p>	
<p>Article VII Customer requested test</p>	<p><u>ILPI</u></p> <p>It is recommended that the ERC shall furnish the DU standard pro-forma test report for uniform DU submission and easy evaluation by the ERC.</p>	

	<p><u>VECO</u></p> <p>If the test is found to be normal or within standard accuracy, we recommend to reiterate the provision that the DU charge the customer for testing fee, in accordance/consistent with the Magna Carta and the DSOAR.</p>	
<p>7.2.3 Investigation Procedures</p>	<p><u>VECO</u></p> <p>If after inspection, there is irregularity found in the ERC seal or wiring connection, what procedure are we going to follow, are we going to proceed to 7.3 – Referee Test?</p>	
<p>7.2.4 Test the meter for creep with all the meter’s potential coils energized and all of the meter’s current coils disconnected from the circuit.</p>	<p><u>MERALCO/DMC</u></p> <p>The procedure required in Section 7.2.4 will result in longer interruption time to the customer. This procedure is applicable only to electro-mechanical meters.</p> <p>7.2.4 Test the electro-mechanical meter for creep with all of the meter’s potential coils energized and all of the meter’s current coils disconnected from the circuit.</p>	
<p>7.2.7 Report the results of the meter test within a reasonable time after the completion of the test.</p>	<p><u>MERALCO</u></p> <p>It is recommended that instead of</p>	

<p>The report, copy furnished the customer, shall give the name of the customer requesting the test, the date of the request, the location of the premises where the meter is installed, the type, make, voltage and ampere ratings, serial and/or company number of the meter, the date tested, and the result of the test.</p>	<p>making the enumeration part of one sentence, the data to be included in the report be enumerated as bullet-points.</p>	
<p>7.3 Referee test</p>	<p><u>VECO</u></p> <p>What about if the DU found out that there is an irregularity of tampering during testing or inspection of the meter, the 5 working days is not applicable. This result to VOC.</p>	
<p>Article VIII Instrument Transformer Test 8.1</p>	<p><u>CEPALCO</u></p> <p>What is the required testing standard to follow (ANSI, IEC, etc)? This is important so that future orders of instrument transformers can be specified to comply with the standards.</p> <p>What are the limits for acceptability? Are we allowed to apply their correction factors for instrument transformers where their transformation ratios fall outside the limits of acceptability? Does this also apply to in-service instrument transformer?</p>	

	<p><u>SORECO I</u></p> <p>There are no technical criteria on the standard of testing for instrument transformers used for metering.</p> <p>It is not also clear who will conduct the testing of these instrument meters.</p> <p>Recommendation:</p> <p>Provision of technical criteria</p> <p>Provision of procedure for testing.</p>	
<p>8.2 Evidence from Outward Appearance</p> <p>An instrument transformer shall not be placed in service, or allowed to remain in service, if it shows evidence of physical damage, discoloured terminals due to overload, or change in texture or appearance of the insulation of the bushings.</p>	<p><u>MECO</u></p> <p>MECO recommends that if accuracy of the Instrument Transformer, having such outward appearance as stated above, is still within approved limit, will still be in-service and not to be removed or replaced.</p> <p><u>VECO</u></p> <p>For clarification, is it included in testing during in-service testing or in customer request test?</p>	

<p>Article IX Fees and Charges</p>	<p><u>MOELCI II</u></p> <p>It is suggested to decrease the Fees from PhP 10,000 to PhP 6,000 for a validity of three (3) years.</p> <p><u>VECO</u></p> <p>We request to retain the fees and charges, based on the existing charges.</p> <p><u>MERALCO</u></p> <p>The table on fees and charges provides that for acceptance tests, a fee be paid for every meter in the lot for every passing lot. Please clarify the reason behind the necessity to pay for fees for every meter in a lot, when only several meters in the lot are subjected to testing. While we understand that the Commission would also incur administrative costs in sealing all meters in the lot, it is submitted that the cost of sealing the meters should not be equivalent to the fees for meters that are actually tested. The same is also true with respect to in-service testing where the ERC representative would</p>	
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	<p>only attach an ERC color-coded sticker on the glass covers.</p> <p>Our only concern on this is that our customers may question our recovery of this cost when they find out that we are to pass to them the cost of in-service testing for the total number of meters in service, when we have subjected only a small number to random testing. Hence, we ask that you enlighten us on the rationale behind this charge so that we may more easily justify our recovery of said costs. we may more easily justify our recovery of said costs.</p> <p>We respectfully propose the following:</p> <ul style="list-style-type: none">- DUs shall be allowed to immediately recover (to be included in the annual verification of the MAP) all incremental fees including those which may be incurred in the implementation of sample testing plan to be submitted by the DU. <p>Furthermore, we recommend that the acceptance test fee for passed meters be charged only to the total number of meters in the sample in a given lot (as determined thru the ANSI method), and</p>	
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	<p>not the total number of meters in the population.</p> <p><u>LEYECO II</u></p> <p>Amend the fees and charges consistent with the rural electrification program of the government and nature of ECs as non-profit and non-stock. It is the consumers of ECs who actually pay for these charges because ECs are owned by them. REASON: In line with our general intention of providing affordable power services to the consumers (and applicants), charging P30 on all those meters included in the lot though only few of these were subjected to actual testing would cause additional unnecessary charges to the EC. Unnecessary in the sense that ERC do not actually incur administrative or other expenses on those meters not subjected to actual testing.</p> <p>On the acceptance tests, is this not in duplication with “Meter Calibration and Testing”?</p>	
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	<p>Recommendation:</p> <p>To have separate fees applicable only to ECs, as follows:</p> <p>CA - - - - - P 1,500.00</p> <p>Acceptance Tests - - - P 20 for each (Pass & Failed) sample meters</p> <p>Validity Extension - - - Free</p> <p>Meter Type Certification – Free</p> <p>Meter Calibration and testing for all types of meters - - - - - P 50/pcs.</p> <p><u>DMC</u></p> <p>We would like to clarify if the schedule of fees will affect the current fees being paid by DUs to the ERC.</p> <p>We would like to clarify if the Meter Shop will charge other DUs using this schedule of fees for testing their meters.</p>	
<p>Article X</p> <p>Miscellaneous Provisions</p>	<p><u>NASECORE</u></p> <p>To be consistent with their earlier proposal that a metering department shall be required for each DU, and not to allow Third-Party Test Facilities, their</p>	

	proposal is to include the reportorial requirements for meter shops to be include to the requirements for DUs.	
Section 10.1 Retention Period of Test Records	<u>ILPI</u> Does this record pertain to either electronic or manual test reports or both?	
10.2 Reportorial Requirements for a Meter Shop & 10.3 Reportorial Requirements for a DU	<u>SOCOTECO I</u> The information herein is already Incorporated in the Annual Report submitted to ERC. Recommendation: ERC to consider annual reporting <u>LEYECO II</u> While we recognize and respect the intentions and efforts of the Honorable Commission to monitor compliance to its issued orders and guidelines, it should however support simplicity and efficiency of operation. Since this is another set of documentary reports, this is another work load for the utilities. In one of the public consultations, it was	

	<p>suggested ERC would simplify and prepare a calendar of required reports. Maybe this should be incorporated in that document.</p> <p>Recommendation:</p> <p>Include this in other reports submitted to ERC by ECs.</p>	
<p style="text-align: center;">ARTICLE XI</p> <p style="text-align: center;">TRANSITORY PROVISIONS</p> <p>11.1 Every DU shall file with the ERC an application for a Certificate of Authority (CA) or an application for exemption from maintaining a Meter Shop within six (6) months from the effectivity of these Rules.</p>	<p><u>LEYECO II</u></p> <p>This provision should be reconciled with the following provision:</p> <p style="padding-left: 20px;">2.2 Exemption from Maintaining a Meter Shop</p> <p style="padding-left: 40px;">DUs with proofs to show that it is more feasible to engage the services of another Meter Shop than to maintain their own Meter Shops may file with the ERC formal applications for exemptions. The applications should include requests for the issuance by the ERC of an authorization to allow the DUs to have their electric meters tested and calibrated by the ERC approved Meter Shop.</p> <p>Another comment, there seem to be a grey area when should DUs start operating their meter shops.</p> <p>Recommendation:</p> <p>The period of 6 months is too short. SUGGESTION: Change it to <i>“1 year from effectivity”</i> to give the ECs</p>	

	sufficient time to form the “Communal Meter Shop”, establish their guidelines, procure the necessary equipments, and apply for certifications and licenses.	
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