

Matrix of Comments on the Draft Rules Governing the Type Approval of Meter Products to be Used in Revenue Metering by Distribution Utilities

Provision	Comments	ERC Staff Remarks
<p>Sec. 1.1 - OBJECTIVE</p> <p>“To ensure that all electric watt-hour meters installed by a Distribution Utility (DU) conform to <u>international standards and requirements adopted by the ERC</u> in order to guarantee the proper functioning of the meters <u>under normal working conditions</u>”</p>	<p><u>MERALCO</u></p> <p>Comment: The objective of this set of Rules is to ensure conformance of all electric watt-hour meters with international standards.</p> <p>However, the American National Standards Institute (ANSI) is not considered as an “international standard.” And since reference to the standards of the ANSI is to be used, as provided in the subject draft Rules, it is respectfully proposed that this set of standards be explicitly stated together with the IEC.</p> <p>On the other hand, the Rules also aim to “guarantee the proper functioning of the meters under normal working conditions.” However, this statement may be too generic or vague. Some meter manufacturers may claim that their product operates well “<i>under normal working condition,</i>” but, when subjected to Philippine specific environmental conditions, may actually fail. Therefore, for clarity, we respectfully propose that it should instead be under local normal working conditions.</p>	

	<p>Recommendation: We respectfully recommend the following revision:</p> <p>“To ensure that all electric watt-hour meters installed by a Distribution Utility (DU) conform to international standards and requirements adopted by the ERC in order to guarantee the proper functioning of the meters <u>under local normal working conditions.</u>”</p> <p>And to clarify “international standards,” we hereby propose the definition of such to:</p> <p>“International Standards shall refer to IEC, ANSI or its equivalent accepted technical standard in other countries.</p>	
<p>1.2 Scope Sec. 1.2.1.1 New types of meter products intended for use as billing meters by a DU under the jurisdiction of the ERC;</p>	<p><u>MERALCO</u></p> <p>Comments: The Rules covers, among other things, “New types of meter products intended for use as billing meters by a DU.”</p> <p>Since these Rules intend to protect consumers, then for clarity, we recommend the inclusion of “customer billing meters” as the billing meters being referred to by the Rules.</p>	

	<p>Recommendation: For clarity, we respectfully recommend:</p> <p>“New types of meter products intended for use as customer billing meters by a DU.”</p>	
<p>Article I, Scope Section 1.2.1.2 Reconditioned or repaired meters owned by a DU intended for reinstallation as revenue meters</p> <p>Sec. 1.2.2 These Rules shall not apply to all meters that are already in service before the effectivity of these Rules.</p>	<p><u>CLPC</u></p> <p>Comment: Can ERC expound further of what reconditioned meters cover? Will recalibration, retesting and resealing be considered reconditioning?</p> <p>Recommendation: Do not consider recalibration, retesting and resealing of meters as reconditioned meters.</p> <p><u>PHILRECA</u></p> <p>Comment: It must be clearly stated in the rules when a meter is classified as reconditioned or repaired to avoid confusion in the interpretation.</p> <p>Recommendation: Include reconditioned and/or repaired meters in the definition of terms.</p>	

	<p><u>CEPALCO</u></p> <p>Comment: This seems to be in conflict with 1.2.2 which states “These Rules <u>shall not apply to all meters</u> that are already in service before the effectivity of these Rules.” Reconditioned or repaired meters owned by a DU are supposed to have been in service with the DU prior to reconditioning and repair.</p> <p>Also, the word ‘reinstallation’ in 1.2.1.2 seems to connote that even though the meter was already in service, but was pulled out for regular maintenance such as cleaning and calibration adjustments, it still has to undergo type approval prior to installation.</p> <p>Recommendation: The terms ‘reconditioned’ and ‘repair’ should be explicitly defined and properly differentiated from the terms ‘recalibrate’, ‘adjust’ ‘maintain’ and ‘service’.</p> <p><u>MERALCO</u></p> <p>Comments: It was clarified on the 14 January 2010 ERC Expository Presentation that the purpose of this proposed Rules is to type approve meters,</p>	
--	--	--

which are: **(1)** New and to be introduced to the market, and **(2)** Reconditioned/Repaired **with modifications to their original design.** Accuracy testing of in-service meters would still be taken care of, by default, by the “Test and Maintenance of Electric Meters of Distribution Utilities” (Resolution No. 12, series of 2009).

It was further explained during the expository presentation by the ERC-CAS that for reconditioned/repared meters, **type approval would only be necessary if modifications (from the original design) are incorporated in to the said meters.** However, the Rules, particularly Article 3.1.2, does not state this matter clearly leaving the impression that type approval would apply to all reconditioned/repared meters even if no modifications are incorporated to the said meters.

We believe that type testing for reconditioned/repared meters for reuse by DUs is unnecessary. This is because normally, when a DU performs recalibration and repair of its meters, no modifications to the meter are performed, and necessary replacement of parts are done using original parts from the manufacturer of the meters (hence, the ‘type’ of the meter is essentially the same). In fact, by definition, type approval, is only applicable to

	<p>new product brands or types of newly improved/designed products and not to reconditioned or repaired ones.</p> <p>We believe that the intention of this set of Rules is to safeguard DUs from acquiring and using meters, whose type can be substandard in nature, which would result to unsatisfactory performance, ultimately to the disadvantage of consumers.</p> <p>Therefore, it is respectfully submitted that Article 3.1.2 of this set of Rules be modified so that it would be clearly understood that the type approval for reconditioned/ repaired meters are just intended for those wherein modifications to the original designs are made.</p> <p>Recommendation: We respectfully propose the following rewordings:</p> <p>“1.2.1 These Rules shall apply to the following: xxx 1.2.1.2 Reconditioned or repaired meters owned by a DU, with modifications to their original design, intended for reinstallation as revenue meters; xxx”</p>	
--	--	--

	<p>and</p> <p>“3.1 General Requirements xxx 3.1.2 A DU may recondition or repair its own meters, provided, that they are only intended for reinstallation in its own services, and provided further, that type approval by the ERC of such meters, if modifications to the original designs were incorporated on such meters, is obtained before their installation”</p> <p>xxx”</p>	<p>To differentiate ‘Reconditioning or Repairing of meters’ from ‘maintenance of meters’, we are recommending the inclusion in Sec. 1.4 Definition of Terms a definition of “Reconditioned or Repaired Meter’ as follows:</p> <p><i>‘Reconditioned or Repaired Meter – An ERC approved type of meter product that has been modified or changed in a manner that it no longer conform to its original design or specifications.’</i></p>
<p>GENERAL PROVISIONS, SCOPE “1.2.2 These rules shall not Apply To All Meters That Are Already In Service Before The Effectivity Of These Rules.”</p>	<p><u>MERALCO</u></p> <p>Comments: It is highly probable that DUs have spare meters which, even before the time this rule was conceptualized, were already allowed by the ERC for billing purposes since all meters intended to be placed in service are tested and sealed by the Commission. For clarity, we propose that a section should be added to explicitly state that these stock meters, would not need type approval from the Commission and hence can still be utilized by DUs.</p>	

	<p>Recommendation: For clarity, we respectfully propose the following modifications to section 1.2.2:</p> <p>“1.2.2 These Rules shall not apply to the following:</p> <p>1.2.2.1 All meters that are already in service before the effectivity of these Rules,</p> <p>1.2.2.2 All meters intended for billing purposes which are not yet in service and are intended as spares, whether already in stock or still for delivery, and whose accuracies already conform to ERC’s standards before the effectivity of these Rules.</p>	
<p>Sec. 1.3 Guiding Principles</p> <p>1.3.1 Only those types of meters with prior approval from the ERC are eligible for use in revenue metering.</p> <p>1.3.2The ERC shall acknowledge certification tests on meter products issued by PAO or any internationally recognized testing laboratory, and use such certifications as its basis in the approval of the new types of meter products.</p>	<p><u>PHILRECA</u></p> <p><u>Comment:</u> Does ERC have the necessary equipment to perform the tests as provided in the certification in order to check the veracity of the tests results? Is it not sufficient for the authorized dealer or manufacturer to give a copy of such certification to the DU intending to use such meters? If the certification submitted to the ERC turned to be “forged or counterfeit” after it has type approved the meter, what will be the consequences? Will ERC rescind the Approval? And what will happen to the meters purchased</p>	

<p>1.3.3 The ERC may approve or reject reconditioned or repaired meters on the basis of tests required by these Rules.</p>	<p>by the DU?</p> <p>Recommendation: Deeper analysis should be made on this provision.</p>	
<p>1.4 Definition of Terms</p>	<p><u>PHILRECA</u></p> <p>Recommendation: Include in the definition of terms the following:</p> <ol style="list-style-type: none"> 1. Type of meter 2. Reconditioned or repaired meters <p>This is to clear interpretation of what is meant by it.</p>	<p>The following term is recommended for inclusion in Sec. 1.4 Definition of Terms:</p> <p><i>“Type – The designation assigned to a meter by the manufacturer for the purpose of distinguishing its particular design and construction from other designs, models or patterns. Such type designation shall embrace only those ranges and ratings that are essentially similar in appearance.”</i></p>
<p>Article II, Section 2.1 Type Approval Application Any DU may file an application in writing with the ERC for the approval of a new type of meter product intended for use as billing meter. A manufacturer or its authorized dealer may also apply,</p>	<p><u>NEECO II</u></p> <p>Comment: The supplier must bear the burden of seeking the approval of DTI or ERC prior to the circulation of their product which happens to be a kwhr meter. DUs will only require from the supplier proof of approval of their product before</p>	

<p>provided the application is accompanied by a statement from a DU certifying that it intends to use such type of meter for revenue metering.</p>	<p>purchasing it.</p> <p><u>CEPALCO</u></p> <p>Comments: For new meter products, we believe it should be the sole responsibility of the meter manufacturer or supplier to secure type approval for meters it intends to introduce and sell to DUs and end users. The DU should not be bothered with the hassles of the process of type approval. The DU will simply not buy a new meter type without the proper type approval.</p> <p>Also, a statement from the DU certifying that it intends to use a meter type for revenue metering may be construed as a commitment to purchase.</p> <p>Recommendation: We suggest to reword Article II, Section 2.1 as follows: “Any meter manufacturer or its authorized dealer may file an application in writing with the ERC for the approval of a new type of meter product intended for use as billing/revenue meter.”</p>	<p>We recommend revision of Sec. 2.1 as follows:</p> <p><i>“A manufacturer or its authorized dealer may file an application in writing with the ERC for the approval of a new type of meter product that it intends to offer to DUs as revenue meters.”</i></p>
--	---	---

	<p><u>PHILRECA</u></p> <p>Comments:</p> <p>Does it mean that any meter manufacturer or authorized dealer has the option to offer its products freely to possible clients with or without the type approval of ERC? What happens if the said product has already passed the approval of DTI? Further, if the manufacturer or authorized dealer seeks for the approval of its meters, a statement from a DU should not be a requirement. If no DU will use said type approved meter, we feel that it is the technology and marketing risk of the manufacturer or dealer. Furthermore, costs for the type approval should not be at the expense of the DU.</p> <p>Recommendation:</p> <p>It seems that the process would be too circuitous. It is therefore recommended that: “Prior to the deployment in the market of any type of meter, the manufacturer or its authorized dealer must seek first type approval of such meters with the ERC. The DUs are directed not to entertain for possible use as revenue metering such types of meters without ERC’s type approval.”</p>	
--	---	--

	<p><u>PHILRECA</u></p> <p><u>Comment:</u> It is very important that a timeframe for the type approval of meters by the ERC be provided to avoid unnecessary delays which may impact to the operation of the DU.</p> <p><u>Recommendation:</u></p> <p>“Within thirty (30) days from the complete submission of the complete documents as required under Article II, Section 2.1, the ERC shall issue an order on the application for the type approval of meters. Should the ERC fail to issue an Order, such application for the type approval of meter shall be deemed approved.”</p> <p><u>MERALCO</u></p> <p><u>Comment:</u> The Rules also provide that:</p> <p>“Any DU may file an application in writing with the ERC for the approval of a new type of meter product intended for use as billing meter.”</p> <p>Since these Rules intend to protect consumers, then for clarity, as mentioned earlier in Article</p>	
--	--	--

	<p>1.2.1.1, we again recommend the inclusion of “customer billing meters” as the billing meters being referred to by the Rules.</p> <p>Recommendation:</p> <p>Again for clarity, we respectfully recommend:</p> <p>“Any DU may file an application in writing with the ERC for the approval of a new type of meter product intended for use as customer billing meter.”</p>	
<p>2.1.4 & 3.2.5 TYPE APPROVAL APPLICATION AND PRODUCT APPROVAL APPLICATION</p> <p>“The following shall be included in the application:</p> <p>Xxx</p> <p>Meter brand, type, voltage and ampere ratings, size, shape, and a brief description of the general and physical characteristics of the meter product.”</p>	<p><u>MERALCO</u></p> <p>Comment:</p> <p>The “size and shape” of the meter are included in the required information in the application to be filed by the DU. However, we believe that this information on the meter’s size and shape does not have any significant impact on the choice of revenue metering by the DU.</p> <p>For clarity, we recommend that “size and shape” be clearly defined.</p> <p>Recommendation:</p> <p>Thus, we respectfully recommend that:</p> <p>“Meter brand, type, voltage and ampere ratings,</p>	

	wiring form (FM1S, FM1A, FM2S, etc.), mounting arrangement (i.e., either S-type or A-base);”	
<p>Type Approval Application</p> <p>2.1.6.1 Statement that all tests have been conducted _____ by <u>personnel who have thorough practical and _____ theoretical knowledge of the meters</u> and adequate training in making precision measurements;”</p>	<p><u>MERALCO</u></p> <p>Comment: We would like to seek clarification from the Honorable Commission as to how it would validate the capabilities of the personnel assigned to perform the said tests.</p> <p>For clarity, we recommend a restatement of “thorough practical and theoretical knowledge of the meters” to a verifiable and measurable statement.</p> <p>Recommendation: We respectfully recommend:</p> <p>“Statement that all tests have been conducted by technically qualified personnel in meter testing x x x”</p>	

<p>“2.1.6.3 Statement that the accuracy of the test equipment has been established by comparison with standards whose accuracy is traceable to the <u>National Institute of Standards and Technology (NIST), or its equivalent;</u></p>	<p><u>MERALCO</u></p> <p>Comment: We believe that the Rules should not be limited to the standards of the NIST as there are other international measurement standards that are equivalent to the NIST. Furthermore, to accurately capture the possibility of other equivalent National Standards who may perform traceability tests, we recommend that the proposed provision be revised.</p> <p>Recommendation: We respectfully propose that the provision be reworded as follows for clarity:</p> <p>“Statement that the accuracy of the test equipment has been established by comparison with standards whose accuracy is traceable to the National Institute of Standards and Technology (NIST) or other equivalent National Standard Institutes whose measurement standards are recognized by NIST;”</p>	
<p>Article III, Sec. 3.1.2 A DU may recondition or repair its own meters, provided, that they are only intended for reinstallation in its own services, and provided further, that before their installation they should have been type approved by the ERC.</p>	<p><u>PHILRECA</u></p> <p>Comments: Will it still be type approved by ERC even if such type was already previously approved?</p>	

	<p>Recommendation: Such process would be too costly for the DUs considering that the recondition or repair of meters is not based on meter type but in its working condition.</p> <p><u>CEPALCO</u></p> <p>Comment/Recommendation: Same comment and recommendation as in 1.2.1.2</p>	
<p>3.1.3 “Reconditioned or repaired meter products shall be <u>labeled as repaired</u>, and by whom, and dated accordingly.”</p>	<p><u>MERALCO</u></p> <p>Comment: If anything, we believe that labeling would only invite questions from the customers as to the accuracy of the reconditioned/repared electric meters, when in reality, no such cause for concern exists.</p> <p>In particular, this requirement will cause uneasiness on the part of the customers and will pose problems on the DU field personnel. It should be noted that any meter used by the DU for its customers, whether new or old, have underwent stringent testing process to ensure the interest of both the DU and the customer. Therefore, putting distinguishing labels on reconditioned or repaired meters will only introduce a negative perception on customers.</p>	

	<p>Moreover, given that there is no substantial difference between new and reconditioned/repaired electric meters, we respectfully submit there is no necessity to label reconditioned/repaired electric meters as there will be no clear value added to this activity. Once these meters, whether new, reconditioned/repaired are type tested this would only mean that their quality is assured. Hence, there is no need for such differentiation. Furthermore, because of the volume of meters reconditioned or repaired, adding a label that they are such will be a significant increase of activity in our process.</p> <p>In any case, all DUs should maintain a record of all the meters they reconditioned or repaired and, if required by the Honorable Commission, provide the ERC a copy of those meters.</p> <p>Recommendation: We respectfully recommend to delete the requirement of labeling and in lieu thereof, the following provision be adopted:</p> <p>“A DU shall maintain a record of the reconditioned or repaired meter products which will be available upon request by the ERC. Repair date and who performed the repair shall form part of the record.”</p>	
--	--	--

<p>3.2 Product Approval Application</p>	<p><u>PHILRECA</u></p> <p><u>Comment:</u> It is very important that a timeframe for the type approval of meters by the ERC be provided to avoid unnecessary delays which may impact to the operation of the DU.</p> <p><u>Recommendation:</u></p> <p>“Within thirty (30) days from the complete submission of the complete documents as required under Article II, Section 2.1, the ERC shall issue an order on the application for the type approval of meters. Should the ERC fail to issue an Order, such application for the type approval of meter shall be deemed approved.”</p>	
<p>Article III, Section 3.3 Required Tests</p>	<p><u>CEPALCO</u></p> <p><u>Recommendation:</u> We suggest the following tests to be added:</p> <ul style="list-style-type: none"> • Temperature-rise Test • Effect of Temperature Overloads on Accuracy • Shock Test <p><u>MERALCO</u></p> <p><u>Comment:</u> In order to effectively realize the intention of the</p>	

	<p>proposed rule, which is to safeguard the DUs and their customers against substandard meters that may be issued by manufacturers, we believe that a more complete and rigorous type testing set of procedures should be performed. We believe that the ten (10) tests enumerated in the draft guidelines are not enough; furthermore, it is just a subset of the ANSI C12.1, a foreign accepted standard for type testing, which lists 38 procedures. The IEC 62052 and 62053 (European) standards also require more testing procedures, each with 20 more tests.</p> <p>If the ten tests enumerated in the rules will be the only ones required, it may be interpreted by vendor starters as a minimum requirement and will result to a locally approved, yet possibly poor in quality meter product.</p> <p>Further, the customers may interpret the Rules to mean that any other technical requirement of DUs not found in the Rules is the reason for the higher purchase cost of meters. While the truth of the matter is, the DUs do require other technical specifications to ensure accurate performance of the meters over its installed life in Philippine specific environment and conditions.</p>	
--	---	--

	<p>Recommendation: We respectfully recommend:</p> <ul style="list-style-type: none"> i. For a more complete and rigorous type testing set of procedures, the ERC should require certification copies of “Type Approval” tests performed on the new meter products based on ANSI C12.1 or IEC 62052 or 62053 from the vendors. The number of tests to be conducted should include not only the initial ten (10) tests identified by ERC but also other more relevant tests (e.g.: the effect of high voltage line surges, external magnetic field, variation of ambient temperature, temporary overloads, superimposed signals, fast transient/burst, etc) to effectively filter poor quality meter products. ERC has the option to witness the actual qualification tests at the manufacturer’s factory. ii. To ensure that DUs acquire <u>high quality reconditioned or repaired meters</u>, the ERC should require manufacturers that the samples for type testing should pass not only the initial ten (10) tests originally identified by the rules but also other relevant tests of ANSI C12.1 or IEC 62052 or 62053. Furthermore, the Commission should require DUs who acquired such reconditioned or repaired meters to submit 	<p>It should be noted that this requirement is for reconditioned and repaired meters. And these meters before their modifications were once subjected and to have been certified to have passed all the 40 required tests. Therefore, it is no longer necessary to subject these meters to all the 40 tests all over again. Our concern now is to determine whether or not there was an effect on the meters on the changes or modifications made on them.</p> <p>So from these 40 tests, we only selected 10 tests that we find necessary to qualify whether or</p>
--	---	--

	<p>the robust testing process done on the acquired meter products. It is also recommended that special tests other than the initial ten (10) should be agreed upon between Meter Shops accredited by PAO to perform type testing.</p>	
<p>Article IV, Sec. 4.1.1</p>	<p><u>CLPC</u></p> <p>Comment: Why is it that only Category A meter Shop can certify reconditioned or repaired meters?</p> <p>Recommendation: Allow Category B meter shop to certify the testing of reconditioned or repaired meters.</p>	
<p>ADJUSTMENTS PRIOR TO TESTS FOR ELECTRO-MECHANICAL SINGLE PHASE METERS</p> <p>“4.2.1.2 for electro-mechanical single phase meters:</p> <p>a) Not to exceed the error of plus or minus one percent ($\pm 1\%$) at light load test and seven and one half-tenths</p> <p>b) Not to exceed the error of plus or minus five-tenths</p>	<p><u>MERALCO</u></p> <p>Comment: The error tolerance limit of (+/-) 0.5% at specified load points is too stringent, and may junk reconditioned electromechanical meters, which are by international standards still accurate and are probably well within their economic lives.</p> <p>The primary objective of this set of Rules is to ensure good quality meters based on international standards. If this is the case,</p>	

<p>percent ($\pm 0.5\%$) at specified test load points starting July 12, 2012.”</p>	<p>then the parameters set for meter testing should necessarily follow international standards. Hence, since international standards provide a meter tolerance limit of $\pm 1\%$, the Rules should then strictly comply with such.</p> <p>Recommendation: We respectfully suggest for the widening of the band of accuracy limits to an internationally accepted error value of (\pm) 1% for Full and Light Loads.</p>	
<p>EQUALITY OF CURRENT CIRCUITS</p> <p>- Table 10</p>	<p><u>MERALCO</u></p> <p>Comment: Under Table 10, Current Class 20 Amperes, for “Both Circuits” the Current in Amperes is 0.2. However from the original ANSI C12.1, the current in amperes is 0.25.</p> <p>We would like to seek clarification from the Honorable Commission as to the rationale for deviating (lowering to 0.2) from the established test points from the ANSI.</p> <p>Recommendation: We respectfully recommend that the standards set forth in the Rules be harmonized with the existing standards of the ANSI and IEC.</p>	<p>There was a typographical error. Thanks for the correction.</p>

<p>Article VI, Section 6.1 Rescission of Approvals</p> <p>The ERC reserves the right, when it deems necessary, to rescind approvals made in accordance with these Rules.</p>	<p><u>CEPALCO</u></p> <p>Recommendation: We suggest the grounds which necessitate the cancellation of approvals be properly enumerated.</p> <p><u>PHILRECA</u></p> <p>Comment: This provision should be properly explained as it may cause a lot of problems later.</p> <p>What will be the effect of such rescission if the DUs have used such type of meters?</p> <p>Recommendation: Specify possible causes of rescission of approval and the effects to the DUs that used such type of meters.</p>	
---	---	--

<p>General</p>	<p><u>DECORP</u></p> <p>Comment: DECORP subscribes to the proposal raised during the expository presentation to simplify the process wherein ERC will come out with list of internationally certified and tested types of electric watt-hour meters and DUs will just choose from among the list the type of electric meter it intends to use.</p> <p><u>DMC</u></p> <p>Comment: Request ERC for the rationale of the proposed rules. Since the rules will impose new requirements and corresponding costs on utilities (and eventually consumers and taxpayers), it should be incumbent upon the ERC to identify the need that the rules will address. The rules may seem superfluous if there is lack of awareness of a problem that the ERC is trying to solve that is not already addressed by existing rules.</p> <p>The selection of meters and meter vendors should be the primary lookout of the DUs. DUs may have already procedures in place to ensure a good match between the DUs' needs and vendors' offerings.</p>	<p>We recommend to include under Article II, as Section 2.2 the following provision:</p> <p>“2.2 Posting of Approved Types of Meter Products After every review and approval by the ERC of a particular type of meter product, the ERC shall include it in the list of approved types of meter products posted on its web site.”</p>
-----------------------	--	---

	<p>If the ERC promulgates the rules, the question then becomes: is this a responsibility that ERC should take over for DUs? Could this be extended, using the same rationale, to other common DU purchases, like DT/PT/CT's, poles, wires, computers, software systems, etc.? Would following the ERC rules free DUs from incurring certain costs, e.g. would DUs stop vendor and meter evaluations and testing?</p> <p>Are there other solutions, short of new regulations, available and (maybe) more effective? Vendor evaluation is not new to some DUs. Maybe coops can band together to have a common evaluation of suppliers. Maybe NEA can do this for them.</p> <p>Maybe they could adopt other DUs evaluation procedures. As a principle, new regulations should be a last resort.</p>	
<p>General Comment</p>	<p><u>MERALCO</u> Comment: Since both the Rules and Procedures for the Test and Maintenance of Electric Meters of DUs and this Draft Rules Governing the Type Approval of Meter Products commonly aim to ensure all electric watt-hour meters installed by DUs are accurate and properly operating under normal working conditions, thus protecting</p>	

	<p>consumers, it is respectfully proposed that these two Rules be put together under one Rule concerning all types of meter testing, for simplicity.</p> <p>Moreover, if there are several rules on the same subject matter, in this case, meter testing, more so, if the relationships between these rules are not clearly defined, this may cause confusion on the part of the distribution utilities (DUs), manufacturers and consumers. Hence, as a result, compliance to these rules may be compromised.</p> <p>Recommendation: We respectfully recommend that this proposed rule, together with the “Rules and Procedures for the Test and Maintenance of Electric Meters of Distribution Utilities” (Resolution No. 12, series of 2009) be put together under one Rule concerning all types of meter testing, for simplicity</p> <p><u>MERALCO</u> Comment: There may be cases when due to oversight, a DU’s meter may have been installed without having been previously type-approved by ERC. In these cases, the DU should be allowed to bill the customer in accordance with the provisions under the DSOAR (Article 3.5.7 – Adjustment for</p>	<p>Acceding to this recommendation diminishes the muscle of these Rules.</p>
--	---	--

	<p>Billing) or RA 7832 in case of tampering or illegal connection without prejudice to the application of penalties to the concerned DUs in accordance with the ERC's Guidelines to Govern the Imposition of Administrative Sanctions in the Form of Fines and Penalties.</p> <p>Recommendation: We respectfully propose an additional section to state the following:</p> <p>“In the event that a meter in service is found to be not type-approved, the DU shall be allowed to bill the customer in accordance with the provisions on the Adjustment for Billing under Article 3.5.7 of the Distribution Services and Open Access Rules (DSOAR) or Republic Act No. 7832 – Anti-Pilferage Act, whichever is applicable, without prejudice to the application of penalties to the concerned DUs in accordance with the ERC's Guidelines to Govern the Imposition of Administrative Sanctions in the Form of Fines and Penalties.</p>	
<p>General Comment</p>	<p><u>DLPC</u> Comment: If a certain model of a meter which is already type approved comes out with a minimal revision which doesn't really differ much from the previous like just a firmware upgrade, would it be that the new model be type approved automatically?</p>	

	<p>Recommendation: Allow new models with very minimal revisions which don't really affect the metering features of their type approved predecessor to be type approved automatically.</p>	
--	--	--