

This proposed change however, does not apply to the meter reading information for New Meters. That is, the Draft Rule Change Report proposes to keep the reference month for meter reading input for New Meters at “month n-3” (rather than changing it to “month n” – as in the case for the meter ownership input).

Contrary to the position in the Draft Rule Change Report, Bluewaters considers changing the meter reading reference month for New Meters to “month n” provides a more robust case for promoting economic efficiency which in turn promotes the Wholesale Market Objectives. Section 2 of this submission discusses this in further details.

The positions in regards to meter referencing for IRCR calculations are summarised in Table 1 below.

Table 1: Summary - input information of IRCR calculations

Information used for IRCR calculation	Current arrangement	Rule Change Proposal position	Draft Rule Report position	Bluewaters’ position on proposed change
Meter ownership (New and Existing Meters)	Based on information in month n-3	Based on information in month n. This can compromise the accuracy of the input information. This is proposed to be addressed by recalculation of IRCRs in the settlement adjustment process.		Agree

Meter reading (Existing Meters)	Based on the 12 peak intervals in the last Hot Season	Agree
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2. Please provide an assessment whether the change will better facilitate the achievement of the Wholesale Market Objectives.

New Meters are expected to get “free IRCR” in their first three months of operation as a result of the combined effect of:

“While the Rule change Panel agrees that using n-3 as the meter data reference month is not ideal, it does not consider that moving the meter data reference month to n, as

to month n because the IRCR is determined by the share of consumption during the 4 peak