

QUESTION 1.

Are the existing practices, processes, standards and specifications for meters sound and do they provide for satisfactory meter provision services?

No, the existing practices, processes, standards and specifications are inadequate for providing protection to either the consumer or the water provider.

They leave much to be desired and need urgent improvement to bring them up to date and in line with OIML R49 (2013).

STANDARDS AND SPECIFICATIONS:

Potable water is arguably the **most essential element of life** and the cost of supplying it in Australia is escalating. Yet consumers' rights to fair and equitable 'user pays' billing is all too frequently ignored.

All consumers, whether in houses or units, deserve to have individual metering of their water consumption.

Consumers also deserve to be able to rely on the accuracy of the meters used to measure the water for which they are billed.

The current requirement that only meters measuring less than 4m³/h need to be pattern approved and verified is unsatisfactory and the cause of great dissatisfaction among the general public.

The current exemption for water meters of between 4m³/h and 16m³/h is proposed to be lifted effective 1 July 2014, but meters larger than 16m³/h will still be exempt.

- ALL water meters used in Australia need to be treated the same way i.e. only used for billing if pattern approved and verified in Australia.
- Furthermore, in the interests of accuracy, all water meters in Australia need to be subject to mandatory periodic verification and replacement of the measurement capsules if necessary, to comply with the MPE's of the National Trade Measurement Regulations Division 11 Table 17.
- The R=200 rule in the current NMI R-49 is relevant only to meters with a flow-rate of $\pm 4M^3/h$ and should not be applied to larger or smaller meters.
- The recently published, OIML R49 (2013) should be adopted by the NMI, without change or additions. This will ensure that applicable standards are applied to meters of all flow rates/sizes.

If not dropped in its entirety, it is essential that the R=200 rule is relaxed for smaller meters and enhanced for larger meters to bring it in line with the application of the R ratio as stated in the OIML R49.

PRACTICES AND PROCESSES:

The existing practices and processes (e.g. the practice of installing "Grenade-type" inline water meters for residential dwellings) are antiquated, onerous and expensive.

- Installed in ground, soil movement or temperature variations cause leaks at the gaskets either side of the meter necessary to facilitate replacement.
- These leaks often go undetected for extended periods.

- Replacement/repair of these meters is hampered by the confined space, thus time-consuming and costly.
- Installed above ground, the grenade-type meter is at risk of freezing, theft, vandalism or damage by traffic.

These inefficiencies affect consumers and water suppliers alike and lead to ever-rising water prices to cover supply costs.

Alternative to Grenade-type meters - Concentric Meters

Concentric or manifold meters are installed onto a base or manifold that forms an **integral part of the pipework** and remains intact during meter replacement/repair and is not affected by soil movement.

Benefits of concentric meters:

- Reduced risk of leaks at points of installation
- A recommended replacement cycle of 5 to 10 years ensures accurate billing for all stakeholders
- The high cost of testing to determine end of life is not incurred
- Replacement of the measuring capsule is possible within minutes
- Old measuring capsules can be re-manufactured to new standard at reduced costs to the consumer and benefits to the environment
- Suppliers can plan for the meter replacements (e.g. 10% annual replacement for meters with a 10 year life span).
- Consumers are assured of a regulated, equitable and accurate billing system and can budget to pay for the water they use.

QUESTION 2.

Do the current metering arrangements provide adequate customer protections in keeping with the Commission's primary objective of protecting the long-term interests of consumers?

No.

- Accuracy needs to be addressed by using meters that can be cost-effectively maintained
- A fair and equitable "user pays" system needs to be introduced to unit occupants, most of whom at present have no access to this basic consumer right.
- Meters that can be easily and inexpensively **retrofitted** to all existing unit blocks in Australia are available and the NMI needs to facilitate their approval as soon as possible. This will give each and every unit in Australia the advantage of individual metering.
- At present, unit occupiers are disadvantaged in that the bulk water bill is usually divvied up according to size of unit, unit entitlement, or some other such arbitrary method - NOT ON ACTUAL WATER USE.
- This needs urgent attention by the Commission because it is not fair and equitable and disadvantages some consumers to the benefit of others. At

present, the disadvantaged consumers have no recourse regarding unfair water bills.

- **It is as ludicrous as a hybrid vehicle and a fuel guzzling vehicle pulling up together to refuel and the combined bill being charged on a 50/50 basis.**

Question 3.

If not, does a strong case exist to introduce a Water Metering Code?

ABSOLUTELY! The sooner the better!

Question 4.

What additional benefits to customers (and retailers) would be realised by the introduction of a code?

A code would give all parties confidence and peace of mind.

Both retailers and customers would rest assured that

- the quality of metering equipment is up to standard,
- the readings can be relied upon as accurate,
- billing is based on actual water used and
- undetected leaks are minimized.
- All consumers are empowered to be responsible users of water.
- This will save the country billions in unnecessary water infra-structure and
- result in significant benefits to the environment.

Question 5.

If introduced, what other aspects of metering should be included in a Water Metering Code?

The Code must include measures to ensure fair water billing for all.

This will only become a reality when **ALL consumers** have access to **individual water meters**.

It remains a pipe dream to the vast number of people who live in units in Australia where bulk water costs are shared according to unit entitlement, number of bedrooms, size of unit or some other arbitrary means.

A NEW CODE MUST INCLUDE FOR MANDATORY WATER SUB-METERING OF ALL UNITS, NEW AND OLD BY MEANS OF RETRO-FITTABLE CONCENTRIC METERS AS USED WIDELY IN THE EUROPEAN UNION AND OTHER PARTS OF THE MODERN WORLD.

Approval by the NMI of this type of meter is now possible, with the publication of the new OIML R49 (2013) on 26 May 2014, providing that the NMI makes the R-ratio relevant to the size of the meter.

Question 6.

/ cont.

Question 6.

What metering information should be provided to customers and how should it be conveyed?

Each customer is entitled to be provided with a transparent, accurate record of exactly how much water they have used over any billing period and detail the cost thereof, plus any service and supply fees.