



# Bulletins

Category: <b>GENERAL</b>	Bulletin: <b>GEN-43</b>	Page: <b>1 of 7</b>
Document(s): <b><i>Electricity and Gas Inspection Act and Regulations</i></b>	Issue Date: <b>2016-04-18</b>	Effective Date: <b>2016-04-18</b>
	Supersedes: <b>P-EG-01</b>	

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## Policy for electricity and gas measurement dispute investigations

### 1.0 Purpose

The purpose of this bulletin is to provide Measurement Canada's (MC) policy and requirements for conducting measurement dispute investigations pursuant to section 23 of the *Electricity and Gas Inspection Act*.

### 2.0 Scope

This document is applicable to measurement dispute investigations of electricity or gas meters.

### 3.0 Background

MC had previously issued the subject dispute procedures under P-EG-01: *Electricity and Gas Dispute Investigation Procedures*, which have been revoked. These procedures underwent a detailed review and update to address additional directives that have been issued to MC inspection personnel. It was also determined that there was a need to separate the policies and directives pertinent to electricity and gas contractors from those specifically required for MC inspection personnel. The policies and directives for electricity and gas contractors are contained in this document, whereas those for MC inspection personnel have been published in a new internal procedure.

### 4.0 Terminology

For the purpose of this document, reference can be made to the definitions of the [Electricity and Gas Inspection Act](#)<sup>[link 1]</sup> and the [Electricity and Gas Inspection Regulations](#).<sup>[link 2]</sup>

Category: <b>GENERAL</b>	Bulletin: <b>GEN-43</b>	Page: <b>2 of 7</b>
Document(s): <b><i>Electricity and Gas Inspection Act and Regulations</i></b>	Issue Date: <b>2016-04-18</b>	Effective Date: <b>2016-04-18</b>
	Supersedes: <b>P-EG-01</b>	

## 5.0 Policy

To be considered for a measurement dispute investigation as per subsection 23(1) of the Act, a concern must be identified by either the contractor or purchaser with one or more of the following:

- a) performance of the meter;
- b) condition of the meter;
- c) registration of the meter;
- d) registration of the metering installation.

MC will only process a request from a purchaser after the purchaser has contacted their contractor.

In order to make a complaint, a purchaser may submit a completed [Statement of Complaint](#)<sup>[link 3]</sup> form.

If the contractor has a concern about the performance or condition of a meter, a request may be made directly to MC.

MC's mandate under the Act limits its investigation to the accuracy of electricity meters and to the quantity of electricity declared to have been delivered as established through the meter registrations.

The Agency's mandate does not include the use of estimation practices or errors found during the review of billing that are not specific to the declared measurement values.

### 5.1 Administrative review

On receipt of a complaint, MC will assess whether the reasons for dissatisfaction correspond to the criteria set forth in clause 5.0.

A contractor shall not modify any metering equipment in an installation that is subject to a measurement dispute investigation.

Subject to the previous paragraph, if the reasons for dissatisfaction correspond to the criteria set forth in 5.0, MC will issue a Notice of Measurement Dispute Investigation (IC-3191) to both the contractor and the purchaser, and request all applicable records from the contractor (refer to appendix T-1).

Category: <b>GENERAL</b>	Bulletin: <b>GEN-43</b>	Page: <b>3 of 7</b>
Document(s): <b><i>Electricity and Gas Inspection Act and Regulations</i></b>	Issue Date: <b>2016-04-18</b>	Effective Date: <b>2016-04-18</b>
	Supersedes: <b>P-EG-01</b>	

## 5.2 Measurement dispute investigation

The purchaser may indicate their preference to witness any testing scheduled for the subject meter.

MC will conduct an inspection of the installation in accordance with established procedures and practices. Where an installation inspection is not required, MC may proceed directly to meter testing.

The contractor shall replace the disputed meter(s) removed for dispute testing where an investigation of the meter's performance and accuracy is deemed necessary by MC.

MC will conduct dynamic testing of the subject meter according to established procedures and practices, as applicable.

## 5.3 Report of findings

Upon completion of the investigation, MC will complete a Certificate of Measurement Dispute Investigation Findings (IC3191) and distribute copies to the purchaser (customer), contractor and meter owner (if not the same as the contractor).

MC will review all findings of non-compliance with any legal requirements for consideration of a need for a corrective/enforcement action.

## 5.4 Settlement of inequity

MC will report any measurement errors and the duration of the error discovered during the investigation. However, the Agency will not order or arbitrate a settlement of any inequities. MC may verify the calculation of any adjustment or rebate only if requested to do so by either interested party, or if considered necessary due to complexity of findings.

## 5.5 Findings contested

Any dissatisfaction with the findings of the Certificate of Measurement Dispute Investigation Findings shall be expressed by the recipient within 30 days from the receipt of the certificate.

As a first step, MC will answer any questions or concerns from the disputant. MC may perform a complete review of the file, including any new findings and information provided by the objecting party.

If the concerns of the dissatisfied party are not resolved, MC will proceed to section 5.6 Appeal Process, which is a last recourse.

If the concerns of the dissatisfied party have been addressed, MC will close the investigation.

Category: <b>GENERAL</b>	Bulletin: <b>GEN-43</b>	Page: <b>4 of 7</b>
Document(s): <b><i>Electricity and Gas Inspection Act and Regulations</i></b>	Issue Date: <b>2016-04-18</b>	Effective Date: <b>2016-04-18</b>
	Supersedes: <b>P-EG-01</b>	

## 5.6 Appeal process

The process of re-consideration of the investigation findings by the President is carried out under the authority of subsection 23(3) of the *Electricity and Gas Inspection Act*.

MC will instruct the appellant to submit the reasons for the dissatisfaction in writing to the MC district office within 30 days.

If no written statement is received within the 30-day period, MC will close the investigation.

If the written statement is received, the President will issue a notice to all recipients of the Certificate of Measurement Dispute Investigation Findings.

MC will review all case file information and will prepare a preliminary report with recommended actions for the President's consideration.

The President will review the appeal findings and issue the decision to all parties identified in the initial notice.

The President's decision is final and conclusive.

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[link 1] <http://laws.justice.gc.ca/eng/acts/E-4/>

[link 2] <http://laws-lois.justice.gc.ca/eng/regulations/SOR-86-131/>

[link 3] [http://www.ic.gc.ca/eic/site/mc-mc.nsf/eng/h\\_lm00007.html](http://www.ic.gc.ca/eic/site/mc-mc.nsf/eng/h_lm00007.html)

Category: <b>GENERAL</b>	Bulletin: <b>GEN-43</b>	Page: <b>5 of 7</b>
Document(s): <b><i>Electricity and Gas Inspection Act and Regulations</i></b>	Issue Date: <b>2016-04-18</b>	Effective Date: <b>2016-04-18</b>
	Supersedes: <b>P-EG-01</b>	

### **Appendix T-1 Contractor's records and information required for the investigation**

Pursuant to paragraph 29(1)(b) of the Regulations, when requested by the MC district office, the contractor shall provide records containing all applicable information, as follows:

- 1) Reason for request:
  - i) contractor's interpretation of purchaser's dissatisfaction,
  - ii) description of measurement/billing error in excess of legal limit detected by the contractor's representative,
  - iii) description of detected or suspected legal infraction.
  
- 2) Summary of contractor's efforts to resolve the above, as applicable:
  - i) summary of communication with the customer,
  - ii) list of information provided to the customer,
  - iii) results of the examination of the customer's billing records,
  - iv) list of recent service calls at the service involved, including the date of and reason for the service call, tests and other tasks performed and their results,
  - v) results of a load survey and analysis,
  - vi) results of comparison with check meter,
  - vii) results of any metering installation examination,
  - viii) description of any implemented or scheduled corrective actions,
  - ix) any other actions in attempt to resolve concerns,
  - x) any other information relevant to the matter,
  - xi) name(s) of the contractor's representative(s) involved in the tasks above.
  
- 3) Contractor information:
  - i) name and address of contractor,
  - ii) registration number,
  - iii) name and telephone number of representative assigned to this investigation.
  
- 4) Dispute service charges: where applicable, state what service charges will be applied to customer's account as a result of this investigation, and under what circumstances.
  
- 5) Meter data (for each meter and auxiliary device):
  - i) approval number,
  - ii) inspection number (assigned by contractor),
  - iii) manufacturer,
  - iv) manufacturer's serial number,
  - v) manufacturer's type designation,
  - vi) meter configuration,
  - vii) meter's operational parameters,

Category: <b>GENERAL</b>	Bulletin: <b>GEN-43</b>	Page: <b>6 of 7</b>
Document(s): <b><i>Electricity and Gas Inspection Act and Regulations</i></b>	Issue Date: <b>2016-04-18</b>	Effective Date: <b>2016-04-18</b>
	Supersedes: <b>P-EG-01</b>	

- viii) software/firmware version,
- ix) internal and external multiplier(s),
- x) date of last (re-)verification,
- xi) initial verification year,
- xii) compliance lot number,
- xiii) inspection certificate number,
- xiv) seal year and expiry date,
- xv) seal origin (MC or accredited meter verifier),
- xvi) latest inspection certificate (upon request),
- xvii) maintenance and calibration records.

6) Installation data:

- i) installation number,
- ii) location,
- iii) initial and last verification date,
- iv) maintenance and calibration records,
- v) printout of available event logs (on request),
- vi) installation-specific multipliers,
- vii) operational parameters/factors, i.e.
  - actual pressures, factor, gas quality information, etc.
  - service voltage, current capacity, software, etc.

7) Billing data (for a period of two years or longer if requested by MC):

- i) customer's name,
- ii) account number,
- iii) mailing address and service address, if different,
- iv) applicable rate schedules,
- v) install and removal date,
- vi) install and removal readings of the disputed meter,
- vii) reading provided by the customer,
- viii) all available approved primary display readings between installation and removal if requested by MC,
- ix) if requested by the inspector, explanation of all billing algorithms used to calculate the charges,
- x) billing factors,

Category: <b>GENERAL</b>	Bulletin: <b>GEN-43</b>	Page: <b>7 of 7</b>
Document(s): <b><i>Electricity and Gas Inspection Act and Regulations</i></b>	Issue Date: <b>2016-04-18</b>	Effective Date: <b>2016-04-18</b>
	Supersedes: <b>P-EG-01</b>	

- xi) meter readings and billing amounts in units and dollars for each billing period,
  - xii) particulars of any recent (manual) billing adjustments,
  - xiii) explanation of any codes used in billing documentation,
  - xiv) other charges with explanation.
- 8) Other pertinent information needed for the investigation, as requested by MC.