

July 31, 2018

Comments on NCWM S&T Items Block 2
Submitted by Seraphin Test Measure Company
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1. The proposed term “field standard reference meter” is a new term for what is proposed to be a field standard or a transfer standard. The term is unnecessary and conflicts with what OWM has proposed in the Block 4 items. There is no need to add a new definition for meters that are proposed to be either field standards or transfer standards.
2. The proposed changes to the tolerances when using transfer standards simply change the terminology when referring to transfer standards and leaves in place the expanded tolerance when transfer standards are used to test meters. This concept conflict with the submitter’s proposals for LPG-3 and MFM-5. Why are the proposals different with respect to the tolerance that should be applied? No explanation has been provided.
3. Guidelines are needed as to how to determine the standard deviation of the “field reference standard meter” that is intended to be used as the reference meter.
4. The sizes of the test drafts specified in the three codes (CLM, CDL and HGM) are not affected by the proposed changes for the term “field reference standard meter.” If the proposed “field reference standard meters” do not need an additional tolerance under the LPG and MFM codes, why should the “field reference standard meters” have larger tolerances under these three codes?
5. No data have been provided to demonstrate that the proposed “field reference standard meters” perform at a level to be appropriate reference standards.
6. Until all of the related S&T issues dealing with field standards and transfer standards are resolved, these items should remain developing.