



# METERING DATA PROVISION PROCEDURES: DRAFT REPORT AND DETERMINATION AND DRAFT PROCEDURES – PARTICIPANT RESPONSE PACK

## METERING DATA PROVISION PROCEDURES PACKAGE

***Participant:*** Energy Networks Association

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## 1. Draft Metering Data Provision Procedures

Item	Description	Participant Comments
<b>1</b>	<b>INTRODUCTION</b>	
1.1	Purpose and scope	<p>The purpose should make it clear that:</p> <ul style="list-style-type: none"> <li>when referring to retail customers, the obligations on the licensed network is <u>limited to the grid connected NEMs</u> and does not apply to child connections for retail customers within an embedded network.</li> </ul>
1.2	Definitions and interpretation	<p>Accumulated metering data – summary data: delete “of daily volumes’ from “Diagrammatic representation ... for each energy type”</p> <p>Interval metering data – detailed data. ENA support the use of the NEM12 for the interval data format. Whilst the 400 fields such as data quality (A/E/S) are likely to be required in a meter data file, the ENA query the value of the reason code and reason description. The ENA also don't see the value of providing the 500 record- B2B details in a meter data file. ENA suggest that this data only be provided where it is available. Any longer term, interval metering data ware housing solution should not need these additional fields.</p>
1.3	Related AEMO procedures	
<b>2</b>	<b>IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES</b>	<p>2(a) needs to recognise the two verification/consents required –</p> <ul style="list-style-type: none"> <li>Customer verification for the time period of the request and</li> <li>customer consent to the customer authorised representative.</li> </ul> <p>There needs to be an additional clause that confirms the position that unless the consent and verification of the customer is satisfied there is no obligation to provide the data.</p>

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Item	Description	Participant Comments
2.1	Verifying the identity of a retail customer or customer authorised representative	<p>ENA welcomes the increased clarity relating to consequences of insufficient identification being provided with a request, that are included in the Draft Determination and draft procedure.</p> <p>ENA considers that Clause (c), the obligation to advise the customer or authorised representative within three business days that verification has not been possible due to insufficient information should be changed to '<b>reasonable endeavours</b>' in line with the data provision obligation.</p> <p>In addition, the 3 business days should be extended to <b>5 business days</b> to allow more time for customer verification and consent of an authorised representative.</p> <p>AEMO acknowledge in the Draft Determination that the volume of workload is unknown and the number of parties that may request, this may make the timeframe difficult to adhere to as a 'must' obligation (refer p. 22). The customer verification process is a key task and most difficult and time consuming challenge in provision of information to customers. The additional time and flexibility at this stage will enable a more practical query, follow up and assessment process to be undertaken before the request is rejected. This may enable some additional queries to be resolved expeditiously, rather than rejected.</p> <p>In addition, care should be undertaken in requiring a provision to identify precisely where information has been inadequate, as this may assist unauthorised enquirers to tailor a fraudulent request, to the detriment of customers.</p>
2.2	Retail customer request	
2.3	Customer authorised representative	<p>Although this is a 'reasonable endeavours' requirement, ENA considers that the procedure needs to acknowledge that, where a customer authorised representative seeks to take advantage of the provisions to require response to an enquiry for more than one, but less than 100 retail customers in a single request 'within 20 business days', and submits MULTIPLE single requests for up to 100 retail customers within the same short timeframe, there should be flexibility within the provisions to recognise this tactic and enable transition to the requirement to 2.3 (c) where a timeframe is negotiated.</p>

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Item	Description	Participant Comments
<b>3</b>	<b>DATA DELIVERY METHOD</b>	
3.1	Delivering summary data	
3.2	Delivering detailed data	
3.3	File naming conventions	
3.4	Numbering of metering data files to be provided	3.4 (a) should be amended to read “ <u>Subject to (b)</u> retailers and distributors must provide a single metering data file”..... Clause (b) clarifies that more than one file could also be provided.
<b>4</b>	<b>DATA FILE CONTENT</b>	
4.1	Field details – format and unit of measure	
4.2	Accumulated metering data summary	
4.3	Interval metering data summary	
4.4	Detailed data format	<p>ENA supports the use of the NEM12 file as a format for providing detailed interval metering data, but consider the inclusion of “500 records” within the NEM12 file provided for a request should be optional. The “500 records” provide information regarding B2B service orders between the retailer and service providers, not customer information.</p> <p>Further, the DNSP is the recipient of the meter data provided the MDP. If the MDP is not storing metering data on behalf of the DNSP, it would be more efficient for DNSPs to only store usage data and not the information contained in the “500 records” within the NEM12 file.</p> <p>4.4(b) The draft MDPP includes an obligation on Retailers and DNSPs to publish a customer guide to assist customers in understanding and interpreting their NEM12 file, including explaining how usage, generation or controlled load are represented and to open and load the NEM12 file. It is not efficient for each and every DNSP/retailer to provide their own customer guide on understanding NEM12 files. AEMO should work with industry to develop and publish a customer guide to the NEM12 file for the benefit of the industry.</p>

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Item	Description	Participant Comments
		4.4(c) Providing information on “how to load and open the NEM12 file” will invariably involve applications, and toolsets. Having obligations to include this in a customer guide in any more than an illustrative example seems overly onerous. This phrase should be deleted.
4.5	Ability to offer alternative metering data formats	<p>“Informed consent” should be removed in clause 4.5 (d) and replaced with ‘may agree’. “Informed consent “is a defined term and is not reasonable in this context. ENA accepts that there needs to be agreement with the customer where the data being provided is below the minimum requirements in the MDP Procedure. However there should be no need for customer consent where a data file is above the minimum requirements and seeks to provide better information to the customer. The clause should be redrafted as:</p> <p>‘A retail customer or customer authorised representative may agree to an alternative metering data file format from the retailers and distributors where that format is below the minimum requirement.’</p>
5	<b>OTHER COMMENTS</b>	
Appendix A	<b>ACCUMULATED METERING DATA SUMMARY FORMAT</b>	
A.1	File conditions	
A.2	Example: accumulated file	<p>The example provided appears to be missing the data quality flag column</p> <p>The examples provided only cover retailers’ requirements. Examples for distributors should also be provided.</p>
A.3	Example: diagrammatic representation of energy usage	
Appendix B	<b>INTERVAL METERING DATA SUMMARY FORMAT</b>	
B.1	File conditions	

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Item	Description	Participant Comments
B.2	Example: interval file	The example provided appears to be missing the data quality flag column The examples provided only cover retailers' requirements. Examples for distributors should also be provided.
B.3	Example: diagrammatic representation of energy usage	