

21 July 2015

Australian Energy Market Operator
Metering Data Provision Procedures Consultation
Level 22, 530 Collins St
Melbourne VIC 3000

Email: MDPP@aemo.com.au

Dear Sir/Madam,

RE: Metering Data Provision Procedures (MDPP) Draft Report and Determination

The Energy Retailers Association of Australia (ERAA) welcomes the opportunity to provide comments in response to the Australian Energy Market Operator's (AEMO) Draft Report and Determination on the Metering Data Provision Procedures (the Draft Procedures).

The ERAA represents the organisations providing electricity and gas to over 10 million Australian households and businesses. Our member organisations are mostly privately owned, vary in size and operate in all areas within the National Electricity Market (NEM) and are the first point of contact for end use customers of both electricity and gas.

AEMO has published its Draft Procedures for consultation following the Australian Energy Market Commission's (AEMC) Final Rule Determination on the Customer access to information about their energy consumption rule change¹ (the Final Determination). The ERAA concerned that the Draft Procedures developed by AEMO do not reflect the primary intent of the Final Determination.

The intent of the rule change as outlined in AEMC's Final Determination is to provide customers and their authorised representatives, with access to their consumption data from both retailers and distributors. The ERAA is concerned this intent has been wrongly interpreted by AEMO. The Final Determination refers to a customer's metering data as provided to retailers by a metering data provider or distribution businesses. However, the Draft Procedures do not reflect this and appear to be focused on retail billing information which is not the intent of the AEMC's Final Determination.

The ERAA is concerned that AEMO did not adequately take into account individual retailer concerns in developing the Draft Procedures and that individual member submissions have been largely ignored to date.

As the format for detailed data must be provided by both retailers and network service providers, the ERAA supports a minimum data format based on a sub-set of the NEM12 file data. The ERAA believes that the data should be based on suffix data as this is the purest form of the data retailers receive from metering data providers. Additional data provision, which is data not contained within the metering file, should not be covered by the rule change.

¹ AEMC, Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014, 6 Nov 2014.



The ERAA believes that AEMO should be more pragmatic in its approach to the summary data format. For example, the requirement to include a statement within the summary data format on how many (data) intervals have been substituted or estimated in the two years of meter data, will require significant IT development and/or individual interrogation of the data. This development would come at significant cost and ultimately be passed on to end consumers. Alternatively, if the summary data contains identified estimated or substituted data, and where customers have concerns, they or their authorised representatives could review the specifics in the detailed data with the party responsible for providing the data.

The Draft Procedures contain mandatory requirements that are beyond the scope of the Final Determination. The Final Determination states that retailers and distribution businesses are expected to strive to achieve a shorter timeframe as technology develops. Of particular concern is the three day verification of the customer's entitlement to data, within the ten day allowed timeframe to respond to a customer. Where a customer contacts a retailer or a distribution business via telephone the verification process should be straightforward. However, where the customer makes the request in writing or electronically, there may be more time required to validate the customer. The ERAA believes that there is no reason for AEMO to place this further obligation on retailers and distribution business. The ERAA supports a seven business day timeframe to validate the customer's request.

The ERAA and its members would welcome the opportunity to work with AEMO to further develop and finalise definitions and output files that will be published in the final procedures developed by AEMO. In relation to the development and publication of a guide to the data, the ERAA would support AEMO, in consultation with industry, developing and publishing a standard guide for all customers and their authorised representatives. The development of this guide at an individual business level is not efficient and could have negative outcomes with respect to overall consumer experience.

Should you wish to discuss the details of this submission, please contact me on (02) 8241 1800 and I will be happy to facilitate such discussions with my member companies.

Yours sincerely,



Alex Fraser
Interim CEO
Energy Retailers Association of Australia