

21 July 2015

Mr Matt Zema
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne Victoria 3000



Dear Mr Zema

Metering Data Provision Procedures

Energex appreciates the opportunity to provide a submission on the Australian Energy Market Operator's (AEMO's) draft report and determination on the Metering Data Povision Procedures (the Procedures).

Energex generally supports AEMO's proposed amendments to its initial draft Procedures, particularly those amendments relating to identification and verification of customers and removal of the requirement for Distribution Network Service Providers (DNSPs) to provide retail tariff information. However, Energex does not agree with AEMO's decision not to mandate a standardised format for retailers and DNSPs to deliver accumulation and interval metering data to retail customers or customer authorised representatives.

Energex remains firmly of the view that it is important, from a customer service perspective, that data provided to customers or their authorised representatives should be presented in a format that is nationally consistent, easy to interpret and understand and that facilitates further analysis of metering data for market comparison purposes. A non-standard approach to data formatting would potentially increase the likelihood of confusion and misinterpretation and would make market comparison by customers or their authorised representatives more difficult.

Furthermore, while it is appreciated that some retailers and DNSPs are already providing this metering information to customers and that changes to their current formatting may therefore be necessary if a standard format is imposed, Energex considers that it would be more efficient and less costly to implement a standardised data format at this time rather than introduce such a requirement at a later date.

If you have any questions in relation to this submission, please do not hesitate to contact Nicola Roscoe, Acting Network Regulation Manager on (07) 3664 5891.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Neil G. Andersen', is written over the typed name.

Neil Andersen
Group Manager Regulation & Pricing

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