



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

## METERING DATA PROVISION PROCEDURES PACKAGE

***Participant:*** Energy Tailors

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## 1. General Comments

Energy Tailors welcomes the opportunity to respond to the second round consultation for the Meter Data Provision Procedures. We have been engaged in this process from when the AEMC rule change ERC0171 *Customer Access to Information about their Energy Consumption* was initiated.

Unfortunately, we believe that the intentions behind the rule change ERC0171 have been neutered by a lack of standardisation and simplification in the AEMO procedures for obtaining the energy consumption information. In particular, by making it difficult and non-standardised for customers and *customer authorised representatives* to make the request, *retailers* and *DNSPs* are effectively putting up a significant barrier for those requests to be made. This is not in the long-term interests of customers and is contrary to the intent of the rule change which explicitly foresees increased involvement by *customer authorised representatives* on a customer's behalf.

Furthermore, we believe that the AEMO draft procedures are strongly weighted in favour of existing industry participants, who have a vested interest in seeing less requests for energy consumption information. As this procedure is for the benefit of customers and *customer authorised representatives*, we would have expected a much stronger emphasis to be placed on what customers and *customer authorised representatives* require.

## 2. Draft Metering Data Provision Procedures

Item	Description	Participant Comments
<b>1</b>	<b>INTRODUCTION</b>	
1.1	Purpose and scope	No comment
1.2	Definitions and interpretation	No comment
1.3	Related AEMO procedures	No comment
<b>2</b>	<b>IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES</b>	
2.1	Verifying the identity of a retail customer or customer authorised representative	Energy Tailors believes that points a) and b) of Section #2.1, which leave the verification and request process to the discretion of <i>retailers</i> and <i>DNSPs</i> render this proposed procedure unviable and hence useless for the purposes intended by the AEMC Rule Change ERC 0171 <i>Customer Access to Information about their</i>

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Item	Description	Participant Comments
		<p><i>Energy Consumption.</i></p> <p>A business model for <i>customer authorised representatives</i> such as Energy Tailors is unviable without standardisation of these procedures. In particular:</p> <ul style="list-style-type: none"> <li>a) Verification requirements should be standardised across participants</li> <li>b) All participants should allow for an electronic mode of request which is thereby able to be automated, reducing costs for customers and industry participants.</li> </ul> <p>We urge AEMO to consult with the AEMC and other relevant federal regulatory / legal bodies regarding this issue. We note that <i>retailers</i> currently request energy consumption information from <i>DNSP's</i> (e.g. via a Provide Meter Data request) without providing the <i>DNSP</i> with any customer consent information.</p>
2.2	Retail customer request	Refer below.
2.3	Customer authorised representative	<p>Energy Tailors believes that the proposed 10 business day turnaround, for an electronic request which has all required information in it, is unreasonably long and not in the best long-term interests of customers.</p> <p>We note that <i>DNSPs</i> are currently able to provide <i>retailers</i> with metering data (via a Provide Meter Data request) with an SLA of 1 business day, as per the AEMO B2B Procedures. We do not see why similar arrangements cannot be put in place for <i>customer authorised representatives</i>.</p>
<b>3</b>	<b>DATA DELIVERY METHOD</b>	
3.1	Delivering summary data	No comment
3.2	Delivering detailed data	No comment
3.3	File naming conventions	Since these procedures suggest that metering data be provided in NEM12 or NEM13 file formats (Section #4.4), with an accompanying customer guide, Energy Tailors highlights that the

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		<p>file should therefore contain a reference to who has provided the file, to enable a <i>customer authorised representative</i> to be able to interpret it. This covers the situation where a customer might obtain a file and then pass it on to a <i>customer authorised representative</i>, without the information of whom the file was received from.</p> <p>Energy Tailors suggests that this be incorporated into the file naming convention, as <i>PARTICIPANT-ID_NMI_MeteringDataStartDate_MeteringDataEndDate_FileProvisionDate_FileType.csv</i>, where <i>PARTICIPANT-ID</i> refers to the participant's ID in MSATS. Alternatively the data provider can list the ID that will be prefixed to the file naming convention in their customer reference guide.</p>
3.4	Numbering of metering data files to be provided	No comment
<b>4</b>	<b>DATA FILE CONTENT</b>	
4.1	Field details – format and unit of measure	No comment
4.2	Accumulated metering data summary	No comment
4.3	Interval metering data summary	No comment
4.4	Detailed data format	<p>Please refer to comments in Section #3.3 above. We also point out that in order for the customer guide to be understandable by customers, there should be a relatively simple relationship between the file format and its interpretation. In particular we are concerned that <i>retailers</i> may provide instructions along the lines of:</p> <p>IF you are with Distributor X, then interpretation is: A, B, C  IF you are with Distributor Y, then interpretation is: D, E, F</p> <p>As they may simply provide the NEM12 file that they receive from <i>DNSPs</i>. In our view, this does not comply with #4.4 c) to explain</p>

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		the file in an understandable manner.
4.5	Ability to offer alternative metering data formats	No comment
5	<b>OTHER COMMENTS</b>	
Appendix A	<b>ACCUMULATED METERING DATA SUMMARY FORMAT</b>	
A.1	File conditions	No comment
A.2	Example: accumulated file	No comment
A.3	Example: diagrammatic representation of energy usage	No comment
Appendix B	<b>INTERVAL METERING DATA SUMMARY FORMAT</b>	
B.1	File conditions	No comment
B.2	Example: interval file	No comment
B.3	Example: diagrammatic representation of energy usage	No comment