

5 June 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 in relation to the development of the Metering Data Provision Procedures (the Procedures). Energex supports the policy objective of providing customers improved access to consumption data and has been actively engaged in the AEMC's Power of Choice Review and subsequent rule changes. Energex supports AEMO's cautious approach to the development of the Procedures, to ensure significant changes are not required to be made in an environment of uncertainty.

#### *Disclosure requirements*

Energex has two key concerns with respect to the effectiveness of these Procedures. Firstly, the limited ability for distribution network service providers (DNSPs) to accurately verify the identity of a retail customer due to insufficient customer details. Secondly, the likelihood that the industry will develop an inconsistent approach to data requests.

With respect to the first concern, the Procedures should state that unless the DNSP can satisfy existing legal requirements and confidently verify the customer then they are not required to provide the meter data. And whilst DNSPs must meet existing privacy and confidentiality obligations, Energex suggests that to address the second concern, the Procedure should include a standard data request format that would simplify the process and ensure a consistent outcome for customers. This standard data request format would suggest that requests for metering data should be in writing but this decision may be best deferred to the individual DNSP or retailer depending on their record keeping and business practices.

#### *File formats*

AEMO has requested feedback in relation to the minimum summary and detailed data formats that are to be presented in the Procedures. Energex strongly believes that the format must be simple and easy to understand for the audience but the DNSP must be capable of providing the requested information.

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In the Procedure's strawman, Appendix B Interval Metering Data Summary Format, the file format requires information to be provided on "Energy Flow Type: Peak, shoulder, off-peak, controlled load, generation energy flows and Demand". It further specifies that "Time of use (peak, shoulder, off-peak) are as per the retail tariff definition". Based on the current drafting it is highly unlikely that DNSPs would be aware of the retail tariff assignment and would have difficulty in providing this information. An alternative may be that if the customer requests data from the network then the data is to be presented in the appropriate network tariff components and if requested from the retailer in the retail tariff components.

Energex also notes that the proposed format for accumulation metering data is the same as for interval metering data, which is inappropriate due to the data limitations for accumulation meters.

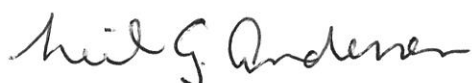
#### *Response timeframes*

Energex has previously suggested that a time limitation for requests should apply of up to 7 years, as AEMO requires Meter Data Providers to store data for 7 years before archiving or deleting it. Therefore, it may be difficult for DNSPs to retrieve relevant data beyond a 7 year timeframe.

With respect to requests from authorised representatives for more than one retail customer (whether it is submitted one customer at a time or in bulk), Energex supports the proposal for both parties to agree on a suitable delivery timeframe rather than a sliding scale. The ability to negotiate a timeframe provides the necessary flexibility depending on the number and the circumstances of the requests involved.

Energex looks forward to further engaging with AEMO on the development of these Procedures but in the meantime if you have any questions in relation to this submission please do not hesitate to contact Ms Rachel Leaver, Network Regulation Manager on (07) 3664 4115.

Yours sincerely



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