



EnergyAustralia

METERING DATA PROVISION PROCEDURES CONSULTATION PAPER AND STRAWMAN PROCEDURES – PARTICIPANT RESPONSE PACK

METER DATA PROVISION PROCEDURES PACKAGE

Participant: EnergyAustralia

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Table of Contents

1. RESPONSES TO QUESTIONS IN THE CONSULTATION PAPER	3
2. STRAWMAN PROCEDURES	5

1. Responses to Consultation Paper Questions

Item	Question	Participant Comments
1	The Procedures presents the minimum summary and detailed data formats. Please comment on the proposed formats and examples in Section 2.	<p>EnergyAustralia supports assisting customers to effectively manage and understand their electricity consumption by outlining a minimum standard. However care is needed to ensure this is kept in alignment with the policy intent of a minimum requirement procedure to ensure retailers can continue to innovate to respond to customer needs in an ever changing market.</p> <p>The language of this procedure leads to mixed intent around provision of a file for the customer to utilise in a third party comparator website or for a household to use to better understand their energy consumption. If it is for both then the current ambiguity needs to be further clarified. Further details to this are provided in section 2.</p>
2	For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval metering data summary format.	<p>EnergyAustralia does not support including demand in the diagrammatic representation for interval metering data format. This is surpassing the key principle that this Procedure is to outline minimum requirements. Overprescribing this procedure adds cost and stifles competition.</p>
3	What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?	<p>EnergyAustralia is of the opinion that there are too many variables to provide maximum timeframes for customer authorised representatives such as:</p> <ul style="list-style-type: none"> • It is unknown how many authorised representatives could approach EnergyAustralia on any given day. • If each authorised representative requested more than one customer it could become untenable for all involved <p>EnergyAustralia believes the best outcome is for these requests to be by negotiation between the parties.</p> <p>By negotiation also allows discussion if there is a debt owing for past data provided to the authorised representative.</p>

Meter Data Provision Procedures Package

Item	Question	Participant Comments
4	Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?	<p>Sliding scale doesn't provide any benefits, given above points still apply.</p> <p>Where requests are for more than one customer the delivery timeframe must be agreed between the retailer or DB and the customer authorised representative.</p>
5	Is there a need to define what constitutes a customer request (for example, by phone, in writing)?	<p>EnergyAustralia does not support defining what constitutes a request for data for a retail customer; this is over prescriptive for a procedure that is outlining the minimum. There is also possibility that this could lead to a poor customer interaction if the customer calls only to be told they have to submit in writing.</p> <p>For the customer authorised representatives EnergyAustralia suggests the following need to be defined:</p> <ul style="list-style-type: none"> • Ensure customer has provided authorisation (e.g. explicit informed consent); • Should clearly define who the requesting authorised party is; • Provide enough information for verification of customer by either retailer or DB; and • Provide a clear statement on how long the authorisation is valid with clear start and end periods defined (i.e. a single request or a month).
6	The Procedures presents the minimum requirement for the detailed data format. Please comment on these in Section 2.	<p>EnergyAustralia supports assisting customers to effectively manage and understand their electricity consumption by outlining a minimum standard. However care is needed to ensure this is kept in alignment with the policy intent of a minimum requirement procedure to ensure retailers can continue to innovate to deliver customer needs in an ever changing market.</p> <p>The language of this procedure leads to mixed intent around provision of a file for the customer to utilise in a third party comparator website or for a household to use to better understand their energy consumption. If it is for both then the current ambiguity needs to be further clarified. Further details to this are provided in section 2.</p>

2. Strawman Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	<p>Various terms need to be in italics though out section:</p> <ul style="list-style-type: none"> • Retail customer • Customer authorised representatives • Metering data • Metering installation
1.2	Definitions and interpretation	
1.3	Related AEMO procedures	
2	OBJECTIVE	
3	DATA FORMATS	
3.1	General National Energy Retail Rules requirements	<p>(b) Where a <i>retail customer</i> has been with a <i>retailer</i> for less than two years, a <i>retail customer</i> or <i>customer authorised representative</i> may request their <i>metering data</i> from a previous <i>retailer</i>. The previous <i>retailer</i> must provide the requested information and can charge a reasonable fee for providing the service.</p> <p>Inclusion of 'previous' to ensure clarity that this is in relation to the previous retailers obligations.</p>
3.2	Field details – format and unit of measure	<p>Unit of Measure is defined in various AEMO procedures. There needs to be consistency given this could have system implications.</p> <p>The Meter Data File Format has VarChar (5) where it appears this procedure is allowing only 3.</p>
3.3	Summary data format	<p>The overriding principle for this procedure should be to define a minimum requirement in line with the policy intent. EnergyAustralia believes AEMOs proposal goes further than minimum for the summary data.</p> <p>The summary should not include:</p>

Meter Data Provision Procedures Package

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		<ul style="list-style-type: none"> Energy flow types: retailers and DBs could have the customer set up on different configurations, such as peak/off peak, dependant on customer choice. If the customer requested data from both parties this could cause considerable confusion. EnergyAustralia does not agree with a minimum procedure outlining that diagrams are to be provided for summary accumulation. Rule clauses for interval only (7.16 (c) (2) (iii)). This also removes issues of CSV not supporting diagrams. <p>There are a number of issues around metrology changes at customer sites that result in the condition 'files must not contain any blank rows or columns' being unachievable. Consideration needs to be given to the period of two year where things can change at a home such as inclusion of solar, removal of electric hot water, batteries, meter changes to smart meters etc.</p>
3.4	Detailed data format	<p>EnergyAustralia has concerns having categories of Energy flow types which can cause confusion or a different outcome dependant on if the customer went to the retailers or the DBs to request data.</p> <p>Retailers and DBs may not have the same configuration for peak off peak, dependant on customer choice of product. If the customer requested data from both parties this could cause considerable confusion. EnergyAustralia believes the simpler form of data available at register or meter level with an energy direction would be a better outcome.</p> <p>There are a number of issues around metrology changes at customer sites that result in the condition 'files must not contain any blank rows or columns' being unachievable. Consideration needs to be given to the period of two years where things can change at a home such as inclusion of solar, removal of electric hot water, batteries, meter changes to smart meters etc.</p>
4	DELIVERY TIMEFRAMES	<p><i>Retailers and DNSPs must use reasonable endeavours to deliver a retail customer's requested metering data within 10 business days. This delivery timeframe commences from the date the</i></p>

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		<p>completed request is received by the <i>retailer</i> or <i>DNSP</i>.</p> <p>EnergyAustralia suggested the word 'completed' is included.</p>
5	DELIVERY METHOD	
5.1	Summary data format	<p>The <i>retailer</i> or <i>DNSP</i> must provide the summary data format electronically and/or physically to the <i>retail customer</i> or <i>customer authorised representative</i>.</p> <p>EnergyAustralia suggests removing 'and/or physically', this is being over prescriptive for minimum requirements. For interval summary data this could be a considerable number of pages. If the customer doesn't have access to electronic versions the discussion about how best to meet the customers' requirements is better handled between the customer and retailer or DB.</p> <p>Providing physical summary formats to the customer authorised representative for multiple customers is a poor outcome for all involved.</p> <p>Clarity is sort on the following sentence for summary interval format:</p> <p>This must be able to be offered in a Portable Document Format (PDF) and/or Comma Separated Values (CSV) format, unless otherwise agreed with the <i>retail customer</i> or <i>customer authorised representative</i>.</p> <p>If a customer is requesting CSV to utilise in a third party comparison web site will the retailer or DB be classed as non-compliant given this won't include the diagrams? Or will the retailer/ DB have to provide both CSV and PDF for all interval summary formats even if the customer doesn't want diagrams?</p> <p>This section requires clarity for the intent of this procedure, if the data is to be used for a third party comparator or for customers own visual comparison and gives rise for different files to support each use.</p>
5.2	Detailed data format	

Meter Data Provision Procedures Package

Item	Description	Participant Comments
Appendix A	ACCUMULATION METERING DATA SUMMARY FORMAT	
A.1	File conditions	UOM only lists kWh. Please clarify if this is should include all the permitted values in 3.2 Data Quality: suggest this is Actual Y or N, not estimated.
A.2	Example: accumulation file	
A.3	Example: diagrammatic representation of energy usage	EnergyAustralia does not agree with a minimum procedure outlining that diagrams are to be provided for summary accumulation format. Rule clauses outline this is for interval only 7.16 (c) (2) (iii). This also removes issues of CSV not supporting diagrams.
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	File conditions	UoM: Please clarify if this is should include all the permitted values in 3.2
B.2	Example: interval file	
B.3	Example: diagrammatic representation of energy usage	
Appendix C	INTERVAL METERING DATA SUMMARY FORMAT	
C.1	File conditions	UoM only lists kWh. Please clarify if this is should include all the permitted values in 3.2 The Header Record has a 'read date' and a 'consumption date' what is the difference between these dates? Which one is the date as outlined by C.1 File Conditions? Data Quality: suggest this is Actual Y or N, not estimated. Is there a duplication of the following line: Metering data estimated? Y or N. Note this is the plain English use of the term estimate.
C.2	Example: 30-minute interval file	

Meter Data Provision Procedures Package

Item	Description	Participant Comments
C.3	Example: 15-minute interval file	