



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

METER DATA PROVISION PROCEDURES PACKAGE

Participant: Energy Tailors

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Prepared by: Dom Mendonca

CEO, Energy Tailors

dom.mendonca@energytailors.com.au

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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.	See Section #2.
2	For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval metering data summary format.	Since demand is a key component of electricity usage for large retail customers, it would seem a requirement for it to be included in this format.
3	What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?	<p>Energy Tailors believes that a key principle behind this Rule Change and indeed of the Power of Choice reforms is for customers to have easy access to their own data.</p> <p>We do not believe that in the 21st century, a 10-day delay could be considered easy access. The only possible reason for any delay would be manual effort involved in customer verification and processing. We believe that participants should have simple, automated processes for providing meter data, which would thereby circumvent any delay. In fact many of the Victorian distributors do have automated processes via their own smart meter data portals, which are not aligned to the AEMC PIR rule change. We believe it would be a very simple matter to enhance their portals to align to the rule change and allow customer authorised representatives to access data on their customers' behalf.</p>
4	Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?	As mentioned above, with automated procedures this becomes a moot point.
5	Is there a need to define what constitutes a customer request (for example, by phone, in writing)?	We believe that the MDPP procedures require a communications protocol (which does not need to be as sophisticated as the current Retail and Metering B2B procedures), but which are nonetheless a well-defined mechanism for customers and customer authorised representatives to interact with meter data

Item	Question	Participant Comments
		<p>providers.</p> <p>This removes the likelihood of a multitude of different procedures being developed by each participant, and allows for further standardisation as we become more advanced.</p>
6	The Procedures presents the minimum requirement for the detailed data format. Please comment on these in Section 2.	

2. Strawman Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	<p>Whilst we understand that these Procedures to not cover the retailer and DNSP processes to verify the identity of a retail customer nor its customer authorised representative, we believe that the whole intent of this procedure and rule change is neutered if in practical terms, customers are strongly discouraged from accessing their meter data.</p> <p>A well-defined format for meter data (i.e. the outcome of this consultation) is redundant if customers have no reasonable mechanism to request it. Therefore we strongly recommend that AEMO pursue this issue urgently, in order to comply with the intent of the AEMC Rule Change and so that these procedures become useful to customers.</p>
1.2	Definitions and interpretation	We propose that Network Tariff Code be included in this glossary.
1.3	Related AEMO procedures	No comment.
2	OBJECTIVE	
3	DATA FORMATS	In developing standardised procedures such as a meter data

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Item	Description	Participant Comments
		<p>format, we believe that the experience of the energy industry to date shows that very structured, unambiguous definitions and sample files are required. Without these, participants can interpret formats slightly differently, inhibiting standardisation and the usage of these files by third parties.</p> <p>Therefore we suggest that AEMO publish an .xls file with formulas and validation in it, which can be used by participants to check that their file formats comply.</p>
3.1	General National Energy Retail Rules requirements	No comment
3.2	Field details – format and unit of measure	No comment
3.3	Summary data format	We do not have a firm view of the summary formats suggested by AEMO and by CUAC respectively. Ultimately the information should be simple, easy-to-understand and reveal the key points that consumers are interested in. We believe that in the absence of direct consumer engagement and testing, consumer groups are the best proxy for identifying what customers may want.
3.4	Detailed data format	<p>We believe that the purpose of providing energy data is to understand the <i>times</i> at which energy is being consumed and to match those against the <i>times</i> at which prices are charged. Therefore we believe that the Network Tariff Code, which is part of the NMI standing data for a site, is known by both retailers and distributors, and is published on MSATS, should also be provided as a reference in this file.</p> <p>We suggest that this be included in the detailed data format after the Meter Serial Number column, and in the summary data format also after the Meter Serial Number column.</p>
4	DELIVERY TIMEFRAMES	Refer to our response to Question #3 in previous table. Even with procedures in their current state (i.e. with manual verification required), we do not believe that 10 days is an appropriate timeframe to provide meter data to a requestor.

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Item	Description	Participant Comments
		<p>We note that the rule already contains the words “use reasonable endeavours”, which in our view provides more than sufficient cover for participants in the event of extraordinary circumstances which might delay the provision of that data. We strongly recommend that a 24 hour maximum timeframe be included in the procedure – i.e.:</p> <p>“Retailers and DNSPs must use reasonable endeavours to deliver a retail customer’s requested metering data within one business day. This delivery timeframe commences from the date the request is received by the retailer or DNSP.”</p>
5	DELIVERY METHOD	
5.1	Summary data format	No comment
5.2	Detailed data format	No comment
Appendix A	ACCUMULATION METERING DATA SUMMARY FORMAT	
A.1	File conditions	Network Tariff Code should be included in this list
A.2	Example: accumulation file	Network Tariff Code should be included in this example
A.3	Example: diagrammatic representation of energy usage	No comment
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	File conditions	No comment
B.2	Example: interval file	No comment
B.3	Example: diagrammatic representation of energy usage	No comment
Appendix C	INTERVAL METERING DATA SUMMARY FORMAT	
C.1	File conditions	Network Tariff Code should be included in this list

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Item	Description	Participant Comments
C.2	Example: 30-minute interval file	Network Tariff Code should be included in this example
C.3	Example: 15-minute interval file	Network Tariff Code should be included in this example