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5 June 2015

Mr Matt Zema
Australian Energy Market Operator
PO Box 2008
MELBOURNE VIC 3001

Dear Mr Zema

**NATIONAL ENERGY MARKET CONSULTATION: METERING DATA PROVISION
PROCEDURES – CONSULTATION PAPER.**

Ergon Energy Corporation Limited (Ergon Energy), in its capacity as a Distribution Network Service Provider in Queensland, welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its *Metering Data Provision Procedures: Consultation Paper*.

Ergon Energy supports the provision of additional information to customers as it will enable households and businesses to better manage their energy consumption. However, there will be costs associated with providing extra information and AEMO should have regard to the economic framework when making its final decisions.

Ergon Energy also has some technical limitations that we recommend should be taken into account when developing the minimum data requirements.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

A handwritten signature in black ink, appearing to read 'Jenny Doyle'.

Yours sincerely

Jenny Doyle
Group Manager Regulatory Affairs

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Enc: Ergon Energy's submission



Submission on the *Metering Data Provision Procedures: Consultation Paper*

5 June 2015

Submission on the *Metering Data Provision Procedures: Consultation Paper*

Ergon Energy

5 June 2015

This submission, which is available for publication, is made by:

Ergon Energy Corporation Limited

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Introduction

Ergon Energy Corporation Limited (Ergon Energy) in its capacity as a Distribution Network Service Provider (DNSP) in Queensland welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its *Metering Data Provision Procedures: Consultation Paper* (Consultation Paper).

Ergon Energy is generally supportive of the framework proposed in the Consultation Paper. Improving the level of information available to customers is an important element in enabling households and businesses to manage their bills and take advantage of the new tariff structures soon to enter the market.

However, Ergon Energy has some technical limitations that will need to be managed to ensure that we are able to provide this information to customers. These are outlined in our submission and we submit the Procedures should provide sufficient flexibility to cater for these limitations.

Importantly, AEMO should have regard to the economic framework when making its final decisions, as there will be costs associated with the provision of this information and no allowance has been made for this expenditure in our 2015-2020 Distribution Determination.

Ergon Energy is a member of the Energy Networks Association (ENA), the peak national body for Australia's energy networks. Ergon Energy is fully supportive of the issues raised in the ENA's submission.

Ergon Energy is available to discuss this submission or provide further detail regarding the issues raised, should the AEMO require.

Specific Comments

Consultation Paper Feedback Question	Ergon Energy Comment
The Procedures present the minimum summary and detailed data formats. Please comment on the proposed formats and examples.	To be of benefit, customers must be able to understand the data provided. The standard formats proposed could be updated to provide clearer and more easily understood presentation styles, and should include a glossary of terms. Even concepts that could be considered to be commonly understood such as 'peak', 'shoulder' and 'read date' may not be known by all customers.
For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval metering data summary format.	<p>The Procedures should stipulate information is to be provided where available.</p> <p>Some of Ergon Energy's existing meters for 1st tier non-market customers may not have the capability to provide this information (we estimate this at around 10-20% of these customers).</p> <p>Further, Ergon Energy also has sites with multiple meters at a NMI, meaning we are unable to produce an aggregated or coincident demand figure.</p>
<p>What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?</p> <p>Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?</p>	<p>Ergon Energy does not support maximum response or sliding scale timeframes for bulk information requests as:</p> <ul style="list-style-type: none"> the detail, volume and variety of these requests cannot be forecast; there is an iterative nature to some customer requests. That is, it can take a period of time for the customer/requesting party to provide the information and evidence to enable the request to be satisfied; and this verification may require manual investigation over a high volume of data requests. <p>Ergon Energy supports the proposal in the Consultation Paper that information request timeframes should be negotiated and agreed between the parties.</p>
Is there a need to define what constitutes a customer request (for example, by phone, in writing)?	<p>Requests should be in writing to ensure customer verification and clarity around the detail of information being requested.</p> <p>Specifically the request needs to satisfy</p>

statutory privacy obligations. That is, the requesting party needs to demonstrate adequate evidence they have the legal authority to request the data for the NMI, for the period being requested.

Receiving adequate verification information is important as Ergon Energy not uncommonly experiences instances in which occupancy changes have occurred without retail account change. This can result in requests for data the party is not entitled to receive.

Further, parent companies are known to request account information for their subsidiaries operating under a different name, without providing the necessary verification information. This results in delays and additional costs to process applications.

The Procedures presents the minimum requirement for the detailed data format. Please comment on these.

Ergon Energy supports these provisions as the minimum required and would not recommend any increase over this level of information.

The provision of information should strike the right balance between benefit and cost. Overly detailed information with little practical use only creates additional costs for all customers.