



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

METER DATA PROVISION PROCEDURES PACKAGE

Participant: *[RedEnergy/LumoEnergy]*

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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.	<p>The AEMC has made this Rule change to: <i>make it easier for customers to access their electricity consumption data so that... .. customers will be able to make better and more informed choices about energy products and services.</i></p> <p>Lumo Energy and Red Energy support the provision of accurate, useful information to customers to enable them to effectively manage their electricity consumption.</p> <p>It is our preference that AEMO develop a standard for the provision of the customers metering data and that this should be kept as simple as possible at all times and not be overly prescriptive. There is a risk that if the standard is overly prescriptive then it may impinge on the level of innovation in presenting this information by a retailer to their customers. Retailers may want to use their quality and type of data provision as a means of differentiation from other retailers, and as a source of competitive advantage.</p> <p>If the format of the data is to be prescribed, then AEMO MUST prescribe the 7 existing data formats that have been developed, agreed and implemented for Victoria. We do not believe that every retailer should tailor their systems at a cost for all consumers for the ease of use to third parties.</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>The interval metering data summary format must, at minimum, include:</p> <ul style="list-style-type: none"> I. The nature and extent of energy usage for daily time periods II. Usage or load profile over a specified period III. A diagrammatic representation of the information referred to in subparagraph (i). <p>Clause 7.16(2) of the NER states that the diagrammatic representation of the nature and extent of energy usage for daily time periods.</p> <p>The existing drafting of clause 3.3.2 of the draft MDPP expands</p>

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Item	Question	Participant Comments
		<p>the diagrammatic representation to include usage or load profile over a specified period.</p> <p>It is our view that the diagrammatic representation should not include demand.</p>
3	What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?	<p>It is our view that the element of interpretation should be removed from the Procedure. The timeframe applicable to a request commences from the date that all completed information and payment (if applicable) is received from the customer authorised representative. The inclusion of this item will ensure that any ambiguity is removed from the obligation.</p> <p>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 that a completed request, and if applicable, payment of a reasonable fee is received by the retailer or DNSP.</p> <p>Where a customer authorised representative requests more than one retail customer's metering data, the delivery timeframe must be agreed between the retailer or DNSP and the customer authorised representative.</p> <p>We note that summary information can have a physical delivery method. The NERR considers that a Notice is received on the date two business days after it is posted. Whilst we do not support this as a delivery method, if it is to remain and the delivery method is physical then the two business days should be in addition to the 10 business days.</p>
4	Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?	<p>Lumo Energy and Red Energy do not support the concept of a sliding scale timeframe for the delivery of requests from a customer authorised representative. It is our view that the timeframe to complete these requests should be by negotiation, and agree that it is up to parties to be reasonable or else third parties will simply split requests.</p>
5	Is there a need to define what constitutes a customer request (for example, by phone, in writing)?	<p>The consultation paper (section 4.2 Customer Authorised Representatives) asks if there is a need to define a customer request. Lumo Energy and Red Energy have taken this question</p>

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		<p>to be related to customer requests made by authorised representatives, rather than a direct request from a customer to a retailer or distributor.</p> <p>For requests made by a Customers Authorised Agents, key consideration to:</p> <ul style="list-style-type: none"> • ensure that the customer has provided authorisation (e.g. explicit informed consent); • provide suitable information to allow verification of that customer by multiple parties (i.e. retailer, distributor, ombudsman); • should clearly identify the agent; • be retained by the Customers Authorised Agent for a specific period of time; • be retrievable upon request; and • provide a period of time that the authorisation is valid (e.g. a single request or a maximum period of time of 12 months) <p>It should also ensure that the authorisation is customer and NMI/MIRN specific.</p> <p>However, if AEMO is seeking clarity on what constitutes a customer request directly to a retailer then we provide the following commentary.</p> <p>A retailer receives many customer requests. A customers request ranges from the provision of the sale of energy to a premises to arranging for a special read to be performed. Under the existing regulations it is not necessary to define what constitutes a customer request (by phone, in writing, etc.). There is potential that if the term is defined, then this may restrict the mechanism by which the customer can complete their request.</p> <p>In addition, we are happy to work with industry to develop a generic authorisation form for third parties. However, fundamentally we believe that privacy is an obligation for each individual company to manage.</p>

Item	Question	Participant Comments
6	The Procedures presents the minimum requirement for the detailed data format. Please comment on these in Section 2.	We agree that a minimum standard is required. However, if AEMO must prescribe the minimum format of the detailed data format, then AEMO should allow for the agreed 7 Victorian AMI formats. The minimum standard should allow retailers to compete on a customer service basis and provide flexibility for innovative new and exciting offerings to our customers.

2. Strawman Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	<p>Please amend the formatting as suggested below:</p> <p>These Procedures must specify the:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Manner and form in which the retail customer's metering data must be provided, including: <ul style="list-style-type: none"> o For interval metering data, a detailed data format and summary data format and o For accumulation metering data, a summary data format. <input type="checkbox"/> Timeframes for retailers and DNSPs to respond to requests made by a: <ul style="list-style-type: none"> o Retail customer or o Customer authorised representatives. <p>These Procedures do not cover retailer and DNSP processes to comply with the Privacy Act 1988 (Commonwealth) including processes to verify the identity of a <u>retail customer</u> or its <u>customer</u></p>

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		<p><u><i>authorised representative.</i></u></p> <p>Please italicise the following defined terms '<i>retail customer</i>' and '<i>customer authorised representative</i>' in the above sentence.</p>
1.2	Definitions and interpretation	<p>Definition</p> <p>UOM - The following AEMO documents may need to be amended to italicise 'Unit of Measure':</p> <ul style="list-style-type: none"> • METER DATA FILE FORMAT SPECIFICATION NEM12 & NEM13; • B2B PROCEDURE TECHNICAL GUIDELINES FOR B2B PROCEDURES; • B2B Mapping to aseXML (formally the Electricity B2B Build Pack 2013); and • METROLOGY PROCEDURE: PART B: METERING DATA VALIDATION, SUBSTITUTION AND ESTIMATION PROCEDURE FOR METERING TYPES 1 – 7. <p>In addition, Unit of Measure is already defined in the MSATS PROCEDURES: CATS PROCEDURE PRINCIPLES AND OBLIGATIONS and MSATS PROCEDURES: PROCEDURE FOR THE MANAGEMENT OF WHOLESALE, INTERCONNECTOR, GENERATOR AND SAMPLE (WIGS) NMIS as:</p> <p style="padding-left: 40px;">A code to identify the Unit of Measure (UOM) for data held in this register.</p> <p>Will this information need to be incorporated into the newly defined term <UOM> contain within the Metering Data Provisions Procedures?</p>
1.3	Related AEMO procedures	<p>The following two AEMO documents should also be considered into this section:</p> <ul style="list-style-type: none"> • B2B PROCEDURE TECHNICAL GUIDELINES FOR B2B PROCEDURES; and • B2B Mapping to aseXML (formally the Electricity B2B Build Pack 2013)

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Item	Description	Participant Comments
2	OBJECTIVE	
3	DATA FORMATS	
3.1	General National Energy Retail Rules requirements	<p>3.1 (b) Where a retail customer has been with a retailer for less than two years, a retail customer or customer authorised representative may request their metering data from a previous retailer.</p> <p>The previous retailer must provide the requested information and can charge a reasonable fee for providing the service</p> <p>Please insert 'previous' into the above sentence. It is not clear that a reasonable fee can be charged by the previous retailer if it is greater than the forth request received within a 12 month period from the retail customer or the customer authorised representative. It is our view that any ambiguity will be removed by the inclusion of 'previous'.</p>
3.2	Field details – format and unit of measure	<p>Can AEMO advise if the permitted fields for UnitOfMeasure be incorporated into the enumerated list or updated into the B2B PROCEDURE Technical Guidelines for B2B Procedures?</p> <p>In addition, the B2B Mapping to aseXML (formally the Electricity B2B Build Pack 2013) lists UnitOfMeasure as aseXML typsection 5.151 Type ase: MeterUnitOfMeasure as the MSATS Data Model Column – UnitOfMeasure, with <xsd:string> and aseLML node restrictions maxLength value ="5".</p> <p>The introduction of an additional definition for UnitOfMeasure data field may cause some system issues for participants.</p> <p>In addition, Appendix A, B and C has the file condition for UOM as KWh . However, MWh an allowable UOM in 3.2?</p> <p>Alternatively, is it meant to state kWh or MWh in the file condition?</p>
3.3	Summary data format	3.3.2. Interval metering data summary format

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		<p>The interval metering data summary format must, at minimum, include:</p> <ul style="list-style-type: none"> I. The nature and extent of energy usage for daily time periods II. Usage or load profile over a specified period III. A diagrammatic representation of the information referred to in subparagraph (i). <p>Clause 7.16(2) of the NER states that the diagrammatic representation of the nature and extent of energy usage for daily time periods.</p> <p>The existing drafting of clause 3.3.2 of the draft MDPP expands the diagrammatic representation to include usage or load profile over a specified period.</p>
3.4	Detailed data format	
4	DELIVERY TIMEFRAMES	<p>It is our preference that any element of interpretation in relation delivery timeframes should be removed from the Procedure. It is our view that that a request starts from the day a complete request is made. This will ensure that any ambiguity is removed from the obligation.</p> <p style="padding-left: 40px;">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 that a completed request is received by the retailer or DNSP.</p>
5	DELIVERY METHOD	
5.1	Summary data format	<p>The NERR considers that a Notice is received on the date two business days after it is posted. If the delivery method is physical, is the two business days in addition to the ten business days and should section 4 be adjusted accordingly?</p>
5.2	Detailed data format	<p>The drafting of the following clause is potentially limiting the delivery mechanism of the detailed data format to electronically</p>

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		only. Not all consumers are able to receive information electronically. This is restricting the consumer's ability to request and receive the detailed information.
Appendix A	ACCUMULATION METERING DATA SUMMARY FORMAT	
A.1	File conditions	Appendix A, B and C has the file condition for UOM as KWh . However, MWh an allowable UOM in 3.2? Alternatively, is it meant to state kWh or MWh in the file condition?
A.2	Example: accumulation file	
A.3	Example: diagrammatic representation of energy usage	
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	As stated in section 3.3.2. Interval metering data summary format The interval metering data summary format must, at minimum, include: I. The nature and extent of energy usage for daily time periods II. Usage or load profile over a specified period III. A diagrammatic representation of the information referred to in subparagraph (i). Clause 7.16(2) of the NER states that the diagrammatic representation of the nature and extent of energy usage for daily time periods. The existing drafting of clause 3.3.2 of the draft MDPP expands the diagrammatic representation to include usage or load profile over a specified period.
B.1	File conditions	Appendix A, B and C has the file condition for UOM as KWh . However, MWh an allowable UOM in 3.2? Alternatively, is it meant to state kWh or MWh in the file condition?
B.2	Example: interval file	
B.3	Example: diagrammatic representation of energy usage	
Appendix C	INTERVAL METERING DATA SUMMARY FORMAT	

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Item	Description	Participant Comments
C.1	File conditions	<p>The File condition for Data Quality seems to contain a superfluous Note.</p> <p>Data Quality: Metering data estimated? Y or N. Note this is the plain English use of the term estimate Metering data estimated? Y or N. Note this is the plain English use of the term estimate. Field value is Y if any of the elements on the associated row have been estimated Generally, the metering data is not obtained and the energy consumed is estimated. Does the plain English use of the term estimate include 'substituted data'? It may be an easier and clearer option to have this Data Quality field as 'Actual Read? Y or N C.2 and C.3 has a 'Data Quality field' of 'Consumption Date'. This is not defined in C1. Appendix A, B and C has the file condition for UOM as KWh . However, MWh an allowable UOM in 3.2? Alternatively, is it meant to state kWh or MWh in the file condition?</p>
C.2	Example: 30-minute interval file	C.2 and C.3 has a 'Data Quality field' of 'Consumption Date'. This is not defined in C1.
C.3	Example: 15-minute interval file	C.2 and C.3 has a 'Data Quality field' of 'Consumption Date'. This is not defined in C1.