



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

METER DATA PROVISION PROCEDURES PACKAGE

Participant: *Simply Energy*

Completion Date: *2 June 2015*

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>Simply Energy generally supports the minimum formats specified. It is important to keep the specifications to an absolute minimum to support competition and allow customers the choice over what data they receive and the format in which they wish to receive it. One size will not suit all in this space and over-complicating requirements now may serve more to disenfranchise customers rather than allow them to learn and begin to engage with evolutions that are occurring in energy market.</p> <p>One thing we would suggest is to provide retailers with a degree of flexibility to step away from the minimum requirements where a customer has requested an even lower set of data. Customers will want different things and we envisage that there will be customers who want even less than what is specified by AEMO. We sometimes receive requests from customers on a range of matters that we cannot fulfil because the prevailing regulations do not allow for this. It would be unfortunate if customers were again disadvantaged by overly prescriptive regulations that bind retailers and prevent flexible responses to customer requests.</p>
2	For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval metering data summary format.	We do not see the relevance of applying this requirement to large customers. There is already active data exchange between retailers, large customers and their energy brokers to enable the development of price quotes for the customer. These are sophisticated customers and it is unlikely that they would find value in the application of this procedure to the large customer market.
3	What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?	<p><u>Timeframes for data provision to retail customers</u></p> <p>Simply Energy supports the 10 business day timeframe for responding to a request from one retail customer. We would be able to comply with this requirement.</p> <p>The Rule requirements (particularly NERR 56A) is that the 10 business day timeframe should only apply to retailers where up</p>

Meter Data Provision Procedures Package

Item	Question	Participant Comments
		<p>to 2 years of data has been requested by the customer. While this has been specified in section 3.1 of the proposed procedure, for consistency and to avoid confusion, we believe that this should be made clear in section 4 of the proposed procedure.</p> <p><u>Timeframes for data provision to a customer authorised representative</u></p> <p>Simply Energy supports AEMO's proposal that where a customer authorised representative requests more than one customer's metering data that the delivery timeframe should be agreed between the retailer or DNSP and the customer authorised representative.</p>
4	Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?	<p>Simply Energy does not support a sliding scale approach to delivery timeframes.</p> <p>Our preference is to agree with the customer authorised representative to the timeframes in which the data will be delivered. Given that Simply Energy could be confronted with more than one request relating to multiple customers at a time, allowing agreement makes the task more manageable and thus promotes compliance. At this point, we do not believe we would be able to comply with a sliding scale approach given that we ourselves have to do work to produce this data.</p>
5	Is there a need to define what constitutes a customer request (for example, by phone, in writing)?	<p>We would prefer that AEMO did not specify what constitutes a customer request. Customers ask for their data in different ways. Some will call and others will write to us requesting their data. It seems unnecessary to limit the methods a customer can use and will just aggravate a customer when we inform them that they have to follow the method specified in regulations.</p>
6	The Procedures presents the minimum requirement for the detailed data format. Please comment on these in Section 2.	<p>Simply Energy supports the proposed data formats. There is sufficient flexibility in what is proposed to allow us to respond in the form that the customer has requested.</p>

2. Strawman Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	The purpose and scope section appears sufficient
1.2	Definitions and interpretation	The definitions section appears sufficient
1.3	Related AEMO procedures	The related procedures section appears sufficient
2	OBJECTIVE	The objective appears comprehensive and we have no suggestions
3	DATA FORMATS	
3.1	General National Energy Retail Rules requirements	The Rule requirements (particularly NERR 56A) is that the 10 business day timeframe should only apply to retailers where up to 2 years of data has been requested by the customer. While this has been specified in section 3.1 of the proposed procedure, for consistency and to avoid confusion, we believe that this should be made clear in section 4 of the proposed procedure.
3.2	Field details – format and unit of measure	Simply Energy supports the proposal
3.3	Summary data format	Simply Energy supports the proposal
3.4	Detailed data format	We suggest that AEMO provide retailers with a degree of flexibility to step away from the minimum requirements where a customer has requested an even lower set of data.
4	DELIVERY TIMEFRAMES	<p>The Rule requirements (particularly NERR 56A) is that the 10 business day timeframe should only apply to retailers where up to 2 years of data has been requested by the customer. While this has been specified in section 3.1 of the proposed procedure, for consistency and to avoid confusion, we believe that this should be made clear in section 4 of the proposed procedure.</p> <p>Simply Energy believes that clarification is required regarding when the timeframe for providing the data commences. Simply Energy believes there are two options as to when the timeframe requirements should commence.</p>

Meter Data Provision Procedures Package

Item	Description	Participant Comments
		<p>Option one: Timeframe for providing the data commences once Simply Energy has received the necessary documentation from the customer authorised representative that assures Simply Energy that the request is legitimate and the customers data will be protected by the customer authorised representative. The Rule as it currently reads (“The delivery timeframe commences from the date the request is received by the retailer on DNSP”) will not give Simply Energy adequate time to determine the legitimacy of the request or the customer’s authorisation for the representative to request on their behalf.</p> <p>Option two: Leave the Rule as it is currently worded, but extend the timeframe to provide the requested data to 15 business days rather than 10. This would provide Simply Energy more time to verify the authorisation of the request.</p>
5	DELIVERY METHOD	
5.1	Summary data format	Simply Energy supports the proposed data formats. There is sufficient flexibility in what is proposed to allow us to respond in the form that the customer has requested.
5.2	Detailed data format	Simply Energy supports the proposed data formats. There is sufficient flexibility in what is proposed to allow us to respond in the form that the customer has requested.
Appendix A	ACCUMULATION METERING DATA SUMMARY FORMAT	
A.1	File conditions	Simply Energy supports the proposal
A.2	Example: accumulation file	Simply Energy supports the proposal
A.3	Example: diagrammatic representation of energy usage	Simply Energy supports the proposal
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	File conditions	Simply Energy supports the proposal
B.2	Example: interval file	Simply Energy supports the proposal
B.3	Example: diagrammatic representation of energy usage	Simply Energy supports the proposal

Meter Data Provision Procedures Package

Item	Description	Participant Comments
Appendix C	INTERVAL METERING DATA SUMMARY FORMAT	
C.1	File conditions	Simply Energy supports the proposal
C.2	Example: 30-minute interval file	Simply Energy supports the proposal
C.3	Example: 15-minute interval file	Simply Energy supports the proposal