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Dear Taryn

RE: Metering Data Provision Procedures

United Energy (UE) appreciates the opportunity to respond to the first stage of consultation on the new Metering Data Provision Procedures.

UE welcomes the opportunity to participate in the further development of this new Guideline with AEMO. We have provided responses to the questions in Attachment 1 and have made detailed comments on the strawman procedure in Attachment 2.

Victorian retailers and distributors already provide data in a range of standard data file formats to enable customers to use the Victorian retail price comparator service made available by the Victorian Government, My Power Planner.

We urge AEMO to ensure that the data files produced are clear, unambiguous and repeatable so that they are useful to customers and energy service providers. It is important to get the basic data formats clear and unambiguous for the highly variable meter type/meter configurations that occur at NMIs and across all customer sizes. Data format inconsistencies have the potential to heighten customer awareness or concerns with the power of choice reforms and metering data, and the new meters.

UE strongly urge AEMO to adopt the detailed data formats already available in the market, either those used in Victoria for the retail price comparator or the NEM 12 data file format. This may assist in avoiding a great deal of the ambiguity and inconsistency within the procedure and may also lead to lower implementation costs of this new procedure.

Providing time related information such as peak, off peak and shoulder or demand may prove challenging and may create customer confusion and significantly increase the cost across industry. As drafted it is not clear what the data provision obligation is:

- Will the peak, off peak and shoulder be a standardised time period requirement regardless of day type and applied for every NMI regardless of what tariff ie flat/variable rates the customer is actually on;
- If the current usage periods applicable to the current network tariff are used then are these same rates applied across the two years regardless of whether the tariff actually existed or not across that period or was applied for the full period;
- Where the retail tariff time periods for peak off peak etc differ from those in the network tariff which may be the case, retailers and distributors may seek to address the customer concerns to the extent of their knowledge, however who ultimately wears the EWOV complaint costs where the tariff components are legitimately different; and

- Similar concerns to above with regard to the actual daily demand component.

Whilst UE acknowledge the need for summary data format, we are concerned regarding the variability and impacts of the time based usage information. UE suggest that summary data not be based on any particular tariff structure, as these are subject to change. All tariff based information should be removed. Summary data could be provided on standardised daily time intervals and / or graphically. The MDPP should establish minimum requirements and focus on known standard data file formats already available in the market, NEM 12.

Should you have any comments in relation to this response please do not hesitate to contact me on (03) 8846 9856.

Yours sincerely

Verity Watson
Manager Regulatory Strategy

Attachment 1- Response to Consultation Paper Questions

Data Formats

The Procedures presents the minimum summary and detailed data formats. Please comment on the proposed formats and examples.

For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval metering data summary format.

The proposed minimum summary and detailed data formats do not represent the minimum and may in fact be misleading for customers. UE has provided more detail regarding our concerns in Attachment 2.

UE recommend that demand is not included in the diagrammatic representation for large retail customers for the following reasons:

- UE has a number of demand tariffs already available on LV and HV network tariffs for business customers – c/kVA/day calculated either as a summer demand incentive charge or as a rolling peak demand.
- Given that demand for large business customers could be calculated a number of ways and that the charge may be limited to seasons or 12 month rolling demands, or the large customer may have opted for a non demand tariff, UE considers that information included could be misleading.
- Seasonal demand components can also vary by time of the day (eg local time or EST) and day type eg Monday to Friday (weekday) vs workday (Monday to Friday but not including public holidays)
- The threshold for large business customers varies by jurisdictions, meaning that the numbers of customers on HV vs LV tariff and the applicable tariff classes is also variable across the NEM.
- In view of the fact that one size won't fit all customers, it would be misleading to provide demand information that was inconsistent to the customer's retail bill.

Demand should not form part of the minimum requirements, rather the retailer or distributor could provide where it may be of value to the customer.

Timeframes for delivering metering data formats

What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?

Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?

Is there a need to define what constitutes a customer request (for example, by phone, in writing)?

UE consider that the timeframe of 10 business days should remain for individual customer requests for the following reasons:

- There also needs to be a time allowance where the registered participants forms are not completed correctly or the customer (and/or customer authorised representative) cannot be verified as correct for the premise. If a distributor is unable to verify a customer then it may take an additional two business days to request and receive updated customer details from the current retailer.

- Where meter type change or meter configuration changes this may necessitate several files being formed to meet an individual data request. For example a type 6 accumulation meter which is exchanged for a type 5 interval meter and then later has solar added and a new bi-directional meter installed (or remote reconfiguration to establish a generation datastream) could cause 6 data files to be generated)
- In addition where IT systems or underlying meter databases are upgraded to cope with increased levels of interval data, there may be a need to access multiple IT systems in order to gain the full period of interval data requested.
- UE is already receiving a number of non – retailer requests with a variable number of NMIs and meters being requested. This workload will only increase in the future as more cost reflective tariffs create a market for energy information providers. The volume of requests on an individual business may vary significantly, however this does pose challenges for internal resource management and forecasting. Where the volume of work across all requests is lower, then response timeframes may be reduced from 10 business days, however if there is a high volume of requests then these may take longer. UE has a portal available for customers with AMI meters, this enables customers to access their interval data within minutes and is available for use for the majority of customers in the UE area who consume 160kWhpa or below.

A customer request is not properly constituted unless it is on the appropriate UE forms with the necessary information. The meter data request cannot be fulfilled until the business is able to verify the customer for that NMI, for the requested time period. Each business should be able to assess their internal processes and how best they can meet the confidentiality requirements under the NER for all customers and the requirements under the Australian Privacy Act. UE do not consider that the new MDPP needs to cover this process other than to recognise that where the necessary verifications cannot be made then the request will not be fulfilled or lack of a timely response from a customer/customer authorised representative may impact the timeframes.

A sliding scale is not preferred as the scale would only represent the allowable time for an individual customer authorised representative and takes no account of the internal workload of other individual customer requests and customer authorised representatives. The NER rule recognises the variability of the workload and suggests distributors should use reasonable endeavours to respond to requests. UE suggests that reasonable endeavours within 10 business days remain as stated; where correctly completed requests for verified customers are unable to be completed within 10 business days then UE would notify the customer authorised representative and we can agree on an alternative timeframe. As noted by AEMO this provides the flexibility for parties to negotiate alternative reasonable timeframes for individual circumstances. UE supports this approach.

Detailed Data Formats

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

Refer to the detailed comments in Attachment 2.

Attachment 2 – Response to strawman MDPP

Confidentiality and Privacy

Section 1.1 Purpose and Scope clarifies the Procedures do not cover processes to comply with the Privacy Act. This paragraph on privacy should also extend to the confidentiality requirements for metering data under the NER which applies to all customers, not just those covered by the Privacy Act.

Suggest adding into this section that the retailer and DSNP are not obliged to comply with this Procedure if they are unable to verify a customer and/or the customer authorised representative for the period of time the data request covers.

Definitions

Lack of clear interpretation of the defined terms will lead to varying data files being produced by retailers and distributors. Ultimately this mean that the same field may have different meanings in different files which may lead other parties to incorrect interpretation and recommendations. A number of our concerns are outlined below.

Energy flow type refers to separate energy measurement or a separate usage rate. This could be interpreted as customer load or customer generation (net generation or gross generation) or controlled load.

An alternative interpretation would be to focus on the separate usage rate and apply the peak, off peak, shoulder concept to both the load datastream and the (net or gross) generation datastream. Is the separate usage rate, based on a standard for peak, off peak and shoulder by day type and time or is it as per the customers current tariff as it applies at the time of the request ie basically reinventing history for a different tariff and talking into account the application of off peak consumption on weekends, public holidays etc.

Having a number of interpretations means that the customer may receive a different response from their current retailer and network businesses. This also means that energy service providers will have no strict standard by which to interpret data on behalf of customers.

The term energy flow type changes meaning between summary data formats and detailed interval data formats. There may be benefit in using a different term rather than having the same term mean different things in different files. The customer receives both of the file formats so there may be benefit in a consistent meaning.

Energy volume or demand – The procedure refers to demand measured over a period of time for each energy flow type. UE recognise the term demand for a load datastream however we query the value of such a term for a generation datastream in the context of this procedure.

Off-peak – a time period during a day when an off peak usage rate is applied to energy consumption. For UE network tariffs off peak may be applied at certain times of day or may vary by day type. In some places in the procedure these usage rates refer to the rates based on the retailer usage timeframes eg Appendix B. The distributor does not know what retail tariff the customer is on.

Are these usage rates based on the tariff the customer has at the time and these are applied going back 2 years if possible or is the off peak based on the tariff of the day/month for that months data?
If retailers and distributors provide different consumptions against these usage rates, this will not instil confidence in the energy market or the new smart meters.

UE strongly recommend that the data formats be limited to load and generation, the details regarding time periods that may reflect tariffs should be removed.

UE also recommend that the demand components be removed.

The reference to Eastern Standard Time should refer to Australian Eastern Standard Time.

General NERR Requirements

Suggest removing this section as it does not apply in Victoria. If the drafting remains then the requirements in Victoria should also be reflected. We would be happy to work with AEMO to improve the drafting in this section

Summary Data Formats

Energy flow types may be more correctly specified as load or net/gross generation (where applicable) in sub clause VI. A. Sub clause B should be removed.

Where the meter type/meter configuration changes part way through the requested data period it would be useful to confirm that two summary data formats would be provided. Where a meter configuration change occurs eg a generation stream is established part way through the requested data period, is the expectation to create a new set of files with the new configuration or to create a zero generation datastream before the generation was turned on?

The Read Date columns may benefit from more consistency – From Read Date and To Read Date in Appendix A (or From Date and To Date to make it consistent with Appendix B)

If a singular date is used in the diagrammatic representation then is this the From or To date for the consumption or will it be some other unit eg month? Having multiple date 1's to represent different measurement elements/ datastreams may create confusion. If generation is added on would this datastream be shown graphically as a negative amount?

The Customer Data Summary provided by CUAC appears more customer friendly. It may be useful to see a few more versions of this style of summary format with hot Water load control and generation version and also two years of data rather than one.

It would also be useful to clarify if the average daily usage is created for the last 1 year of data or is it the average for the last two years in the second graph?

The usage patterns for week days and weekend days should be kept simple, suggest removing and ignoring public holidays as these may vary by year across the day types in the third and fourth graphs. It appears unnecessary to highlight the period of maximum demand as this is self-evident. These graphs should also make it clear that the timeframe is in Australian Eastern Standard Time, not local time.

Detailed Data Format

The detailed data format in 3.3 introduces new terms which are not in the glossary eg read date, data quality indication. Some terms would also benefit from more consistency and clarity within the procedures, preferably in the one location, the glossary. The term data quality indication is called data quality in Appendix A. The Appendix A outlines the allowable content eg Y or N. Where Y is actual and N is estimated, substituted and final substituted.

As mentioned in the comments on the glossary the energy flow type should be load, generation or controlled load rather than the datastreams split into time period. In Appendix B1. The energy flow referenced to a retail tariff definition should be removed. If the slicing of load datastream into different rate periods persists then how is this communicated to the customer that this is indicative only and may not be consistent with either the underlying network or retail tariffs that the customer is on?

The term actual daily demand should be defined in the glossary, including the basis of this field eg a uniform calculation method or whether this field is only populated if the NMI and meter in question has been allocated a demand tariff and then this field is completed based on the demand calculation methodology specific to that meter and network tariff.

Delivery Timeframes

There is benefit in clarifying in this section that the 10 business days is subject to the customer and the customer authorised representative being verified for the requested data period involved. If the customer has not lived at the premises for 2 years then the full data request may not be able to be filled.

Delivery Method

The strawman notes that the summary data format may be physically delivered rather than electronic. It may be useful to confirm that the intent is that the pdf diagrammatic version may be posted to the customer, although this may take additional time.