



METERING DATA PROVISION PROCEDURES: DRAFT REPORT AND DETERMINATION AND DRAFT PROCEDURES – PARTICIPANT RESPONSE PACK

METERING DATA PROVISION PROCEDURES PACKAGE

Participant: *United Energy*

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1. Draft Metering Data Provision Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	The purpose should make it clear that the licenced network does not have an obligation to provide child metering data, the obligation is limited to the direct grid connected NMIs. The MDP Procedures could make it clear whether the exempt network ENO, or ENM had the obligation.
1.2	Definitions and interpretation	<p>Accumulated metering data – summary data. The diagrammatic representation should be for energy flow for the specified time period, remove the words "of daily volumes".</p> <p>Interval metering data – detailed data. UE support the use of the NEM12 for the interval data format, with the exception of the 400 and 500 records. The need for quality method flags/reason codes or B2B service orders is questionable, well beyond scope and would add significantly to the cost of implementation for no value. Additional data that provides no real value to the consumer will just add to file size and customer effort to understand the file and may detract from the value of the meter data. UE recommend that the 400/500 records be removed or that the obligation to provide the data be optional so that it may be provided where it is readily available. Fields such as data quality (A/E/S) are likely to be required in a meter data warehouse, however there may not be a need to keep reason code and reason description for all half hour periods for multiple years of warehoused meter data.</p> <p>The NEM 12 file format should be limited to the key records, i.e. the 200 and 300 records to describe the meter configuration and the meter data. This is consistent with the stated approach in the Draft Determination and clause 3.4 (b) that there are new meter files for each meter type or meter configuration.</p>
1.3	Related AEMO procedures	
2	IDENTITY VERIFICATION AND DATA DELIVERY	2(a) needs to recognise the two verification/consents required – Customer verification for the time period of the request and

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Item	Description	Participant Comments
	TIMEFRAMES	customer consent to the customer authorised representative. There needs to be an additional clause that confirms the position that unless the consent and verification of the customer is satisfied there is no obligation to provide the data.
2.1	Verifying the identity of a retail customer or customer authorised representative	<p>UE support the increased clarity relating to insufficient identification provided in the Draft Determination.</p> <p>Retailers and distributors know that it is their responsibility to meet the Privacy Act, clause (b) should be removed.</p> <p>Clause (c), the obligation to advise the customer or authorised representative within three business days should be changed from a 'must' to a 'reasonable endeavours' in line with the data provision obligation. AEMO acknowledge in the Draft Determination that the volume of workload is unknown and the number of parties that may request, this may make the timeframe difficult to adhere to as a 'must' obligation.</p> <p>The 3 business days should be extended to 5 business days to allow more time for customer verification and consent of an authorised representative. This is more reflective of the unknown number of verifications within a single request and the unknown number of requests that a distributor could be handling at any one time. In addition a distributor may choose to seek a CSDN from a retailer to confirm the customer and there is no obligation on the retailer to respond within such a short timeframe as proposed.</p>
2.2	Retail customer request	
2.3	Customer authorised representative	
3	DATA DELIVERY METHOD	
3.1	Delivering summary data	
3.2	Delivering detailed data	
3.3	File naming conventions	
3.4	Numbering of metering data files to be provided	3.4 (a) should be amended to read " <u>Subject to (b)</u> retailers and distributors must provide a single metering data file"..... Clause (b) clarifies that more than one file could also be provided.

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Item	Description	Participant Comments
4	DATA FILE CONTENT	
4.1	Field details – format and unit of measure	
4.2	Accumulated metering data summary	
4.3	Interval metering data summary	
4.4	Detailed data format	<p>UE support the old clause 2.1 relating to the NERR requirements being removed. However this does mean for a non NECF jurisdiction there is now no minimum requirement for the data file time period. UE recommend that the interval data file be specified to be a minimum of 1 year of interval meter data in Victoria which allows upload into the MPP (My Power Planner). Providing a minimum of 1 years data compared to 2 years data avoids the need for the informed consent of customers in 4.5 (d) to a reduced data file size or below the minimum requirements. UE strongly recommend that the minimum requirements be specified for Victoria as 1 year of interval meter data to facilitate the use of MPP.</p>
4.5	Ability to offer alternative metering data formats	<p>Rather than 40 or 50 parties developing a how to read NEM12 guide, it would be useful if AEMO developed a guide for use by each participant, This would be more cost effective than each party starting from scratch and allow the current working group in consultation with customers to approve a reasonable and consistent guide for use across industry. AEMO should develop the NEM12 guide by next February for use on participant websites.</p> <p>Informed consent is a defined term and is not reasonable in this context. Informed consent should be removed in clause 4.5 (d) and replaced with 'may agree'. UE understand that there needs to be agreement with the customer where the data being provided is below the minimum requirements in the MDP Procedure. However there should be no need for customer consent where a data file is above the minimum requirements and seeks to provide better information to the customer. The clause should be redrafted as:</p> <p>'A retail customer or customer authorised representative may agree to an alternative metering data file format from the retailers</p>

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Item	Description	Participant Comments
		and distributors where that alternative is below the minimum requirement.'
5	OTHER COMMENTS	
Appendix A	ACCUMULATED METERING DATA SUMMARY FORMAT	
A.1	File conditions	
A.2	Example: accumulated file	The example provided appears to be missing the data quality flag column and the allowable fields e.g. A or S, where S represents S or E. The required data format for distributors should also be provided as an example.
A.3	Example: diagrammatic representation of energy usage	
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	File conditions	
B.2	Example: interval file	The example provided appears to be missing the data quality flag column and the allowable fields e.g. A or S, where S represents S or E. The required data format for distributors should also be provided as an example.
B.3	Example: diagrammatic representation of energy usage	