



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

METERING DATA PROVISION PROCEDURES PACKAGE

Participant: Lumo Energy

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1. Draft Metering Data Provision Procedures

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1	INTRODUCTION	
1.1	Purpose and scope	
1.2	Definitions and interpretation	<p>Lumo Energy requests that the terms for Controlled Load, Off-Peak, Peak and Shoulder are removed from clause 1.2.1. The rationale for this is provided in response to clause 4.2(d) as we question the relevance of billing-related information to be provided in the summary data format for accumulated metering data.</p> <p>UOM – The glossary should establish the meaning of the term. It is not considered effective drafting to refer a reader of clause within a document for the definition.</p>
1.3	Related AEMO procedures	
2	IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES	
2.1	<p>Verifying the identity of a retail customer or customer authorised representative</p> <p>(b) It is the responsibility of retailers and DNSPs to determine what needs to be done to ensure their Privacy Act 1988 (Commonwealth) obligations have been met.</p>	<p>The Privacy Act includes 13 privacy principles that regulate the handling of personal information. These principles are called the Australian Privacy Principles (APPs). The National Energy Retail Rules requires retailers and DNSP's to include a Privacy Act notice into their standard contract terms and conditions. Retailers and DNSP's are also required to publish their Privacy Policy on their websites.</p> <p>Similar AEMO Procedures, such as Customer and Site Details Notification Process and Meter Data Process Procedures, do not contain statements regarding retailers and DNSP's responsibility to determine privacy obligations. The AEMC noted in the Final Rule Determination that privacy legislation, rather than energy market regulation, to be a more appropriate avenue to address privacy concerns about electricity consumption data.¹ If AEMO seek to include privacy obligations into this Procedure, they too</p>

¹ Section 6.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

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		<p>should list all other compliance obligations that retailers and DNSP's may have including, but not limited to, ACL, NERR, Credit Support and NEL. It is our view that AEMO have drafted the Meter Data Provision Procedures more broadly than what was requested by the AEMC and on this basis Lumo Energy requests that clause 2.1(b) is deleted from the final Metering Data Provision Procedures.</p>
	<p>(c) Where a retailer or DNSP determines it cannot verify the identity or relevant consents of a retail customer or customer authorised representative, the retailer or DNSP must advise the retail customer or customer authorised representative within three business days of receiving the request for metering data that insufficient verification information has been provided.</p>	<p>The final rule, 7.16(4)(i) provides retailers and DNSPs up to a maximum of 10 business days to respond to a single request for data from a customer or its authorised representative.</p> <p>The final rule does not have a requirement for retailers and DNSPs to advise within three business days of insufficient verification information. It does however provide AEMO with the discretion to set precise timeframes to allow for progressive improvement in the timeliness of responses due to advances in technology.</p> <p>As stated in the Final Rule Determination² <i>"the Metering Data Provision Procedures considered that the maximum time frame should not be more than 10 business days with the precise time frame to be specified by AEMO in its metering data provision procedure. By providing AEMO with the discretion to set the precise time frame in the procedures (but not exceeding 10 business days) this allows for the possibility for market participants to progressively improve the timeliness of their response due to advances in technology. We consider that the obligation to respond within a specified period of time should be a 'reasonable endeavours' obligation. This caters for reasonable circumstances where a retailer or DNSP may require a longer period of time to respond to a data request."</i></p> <p>Where a customer contacts a retailer or a DNSP via telephone the verification process should be straightforward. However, where the retail customer makes the request in writing, there may be more time required to respond to the retail customer if insufficient verification information is provided. A retailer or DNSP would be</p>

² Section 5.3.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

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		<p>required to provide a written response to the retail customer advising of the failed verification.</p> <p>Under the NERR and Victorian Energy Retail Code, an allowance of two business day for the delivery of Notices is required. It is our understanding that the two business days required for delivery of the Notice would be considered as a component of the three business days contained within clause 2.1(c) of Metering Data Provision Procedures. To meet the three business days provision within the Metering Data Provision Procedures would require a retailer or a DNSP to complete the verification process within one business day of receipt of the request. Lumo Energy is of the view that the three business days proposed by AEMO is onerous and the drafting of clause 2.1(c) is broader than NER 7.16(4)(i) and the Final Determination.</p> <p>Lumo Energy considers as this is the first iteration of this Procedure, the correct approach is for AEMO not to set a verification timeframe, allowing the full 10 business days. Lumo Energy considers that as retailers and DNSPs understand their obligations under these Procedures and make the necessary IT changes to support it, 10 business days is appropriate. In future iterations of this Procedure, the intent of the AEMC's Final Determination can be met with a shorter verification timeline.</p> <p>However, should AEMO consider that it must set a timeframe irrespective of the AEMC's Final Determination Lumo Energy recommends a seven business day timeframe.</p> <p>Lumo Energy requests that clause 2.1(c) is altered to include 'reasonable endeavours'.</p> <p>Lumo Energy suggest the following drafting amendments:</p> <p>(c) Where a retailer or DNSP determines it cannot verify the identity or relevant consents of a retail customer or customer authorised representative, the retailer or DNSP must use reasonable endeavours to advise the retail customer or customer authorised representative within threeseven business days of receiving the request for metering data that insufficient verification information has been provided.</p>

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	<p>(d) The retailer or DNSP notification, issued in accordance with clause 2.1(c), must:</p> <p>I. Provide detail of where the verification information was insufficient.</p> <p>II. Advise that the request for metering data is closed.</p> <p>III. Advise that a new metering data request with complete verification information must be provided.</p>	No amendment suggested.
2.2	<p>Retail customer request</p> <p>2.2. Retail customer request</p> <p>(a) Where a retail customer requests their metering data, Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the retail customer within 10 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP.</p>	<p>Rule 7.16(4)(i) of the NER provides retailers and DNSPs up to a maximum of 10 business days to use reasonable endeavours respond to a single request for data from a customer or its authorised representative.</p> <p>It is the view of Lumo Energy that the drafting of clause 2.2(a) within the Metering Data Provision Procedures is inconsistent with the language used in NER 7.16(4)(i). This inconsistency can create confusion in the market, lead to different interpretations and create compliance issues as seen recently with AEMO's Meter Churn Procedures for FRMP's and the NER. On this basis Lumo Energy requests that clause 2.2(a) is amended to reflect the following drafting:</p> <p>Where a retail customer requests their metering data, Retailers and DNSPs must use reasonable endeavours to deliver respond to the request for metering data to the retail customer within 10 business days. This delivery response timeframe commences from the date the request is received by the retailer or DNSP.</p>

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2.3	<p>Customer authorised representative</p> <p>(a) Where a customer authorised representative requests metering data for one retail customer, retailers and DNSPs must use reasonable endeavours to deliver the metering data to the customer authorised representative within 10 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP.</p>	<p>Rule 7.16(4)(i) of the NER provides retailers and DNSPs up to a maximum of 10 business days to use reasonable endeavours respond to a single request for data from a customer or its authorised representative.</p> <p>It is the view of Lumo Energy that the drafting of clause 2.3(a) within the Metering Data Provision Procedures is inconsistent with the language used in NER 7.16(4)(i). This inconsistency can create confusion in the market, on this basis Lumo Energy requests that clause 2.3(a) is amended to reflect the below drafting:</p> <p style="padding-left: 40px;">a) Where a customer authorised representative requests metering data for one retail customer, retailers and DNSPs must use reasonable endeavours to deliver respond to the request for metering data to the customer authorised representative within 10 business days. This delivery-response timeframe commences from the date the request is received by the retailer or DNSP.</p>
	<p>(b) Where a customer authorised representative requests metering data for more than one but less than 100 retail customers in a single request, Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the customer authorised representative within 20 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP</p> <p>(c) Where a customer authorised representative requests metering data for more than 100 retail customers in a single request, the delivery timeframe must be agreed between the retailer or DNSP and the customer authorised representative.</p>	<p>Lumo Energy agrees that the final rule does not require retailers and DNSPs to comply with the maximum 10 business day time frame in relation to bulk data requests from customer authorised representatives. Establishing a timeframe associated to 1 < 100 requests received in a single request may not be effective and provide the outcome that AEMO is seeking. Nothing will prohibit a customer authorised representative sending 100 single retail customer requests or 100 retail customers in a single request. Both types of requests will potentially be onerous, especially on a retailer or DNSP who do not have an automated solution, particularly for smaller retailers. The delivery timeframe of a multiple request from an individual or an organisation in one day should be by agreement</p> <p>On this basis, Lumo Energy requests that clause 2.3(b) and clause 2.3(c) are combined to state:</p> <p style="padding-left: 40px;">(b) Retailers and DNSPs must agree with a customer authorised representative on the delivery timeframe where a request for metering data is received for multiple retail customers. Retailers and DNSPs must use reasonable</p>

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		endeavours to deliver provide a response to the request for metering data to the customer authorised representative in the timeframe agreed. This delivery response timeframe commences from the date the request is received by the retailer or DNSP.
3	DATA DELIVERY METHOD (a) Retail customers or customer authorised representatives may request detailed metering data for analysis or summary metering data.	No amendment suggested.
3.1	Delivering summary data (a) The retailer or DNSP must provide the summary data electronically or physically to the retail customer or customer authorised representative, whichever is requested by the retail customer or customer authorised representative. (b) The summary data must be provided in a Portable Document Format (PDF), unless otherwise agreed with the retail customer or customer authorised representative.	The NER 7.16(c)(1) states that the Metering Data Provision Procedures must specify the manner and form in which retail customers' metering data must be provided. Lumo Energy is seeking clarification on the requirement to seek agreement with a retail customer or customer authorised representative for the provision of the summary information in a format other than a Portable Document Format (PDF). In the Final Determination, the AEMC considered that setting out a minimum method of delivering data to customers or their authorised representatives upon request would allow for innovation by retailers and DNSPs to provide this data to customers or their authorised representatives. Whilst providing certainty that there will be a minimum delivery method that will allow customers and their authorised representatives to obtain their data. A PDF may not be the most efficient format to provide the summary information to a retail customer or the customer authorised representative or allow for future innovation. As technology evolves this information could be provided to customers via their phone/tablet or an app. Retailers and DNSP's may choose to have summary data displayable on a Portal. It is not efficient to require a retailer or

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		<p>DNBP to provide a PDF version of information in addition to the information that can be electronically viewed. It is our view that requiring a PDF as a minimum and require agreement for alternative formats may stifle innovation.</p> <p>As a PDF is a file format, that has captured all the elements of a document as an electronic image, we are seeking clarification on how a PDF would be provided physically to a retail customer or customer authorised representative. AEMO have been too prescriptive in specifying the manner and form in which retail customers' metering data must be provided and this approach is not in the long term interest of consumers.</p> <p>At a minimum, Lumo Energy requests that 3.1(b) is altered to:</p> <p><u>Where provided electronically, the summary data must be provided in a format that is able to be opened in Portable Document Format (PDF) or other common standard, the summary data must be provided in a Portable Document Format (PDF), unless otherwise agreed with the retail customer or customer authorised representative.</u></p>
3.2	<p>Delivering detailed data</p> <p>(a) The retailer or DNBP must provide the detailed data electronically to the retail customer or customer authorised representative.</p> <p>(b) The detailed data must be constructed in a CSV format, unless otherwise agreed with the retail customer or customer authorised representative.</p>	<p>Lumo Energy is seeking clarification as to the intent of clause 3.2(a). AEMO have excluded retail customers who may wish to receive their detailed data physically. Whilst it may not be optimal to provide the detailed data physically, some customers currently request the information to be provided in this manner and we are of the view that retail customers should be able to access the information in an agreed manner. Electronically may not be the appropriate medium for a customer who is visually impaired or who has special needs.</p> <p>Lumo Energy requests that clause 3.2(a) is altered to:</p> <p>(a) The retailer or DNBP must provide the detailed data electronically to the retail customer or customer authorised representative <u>or otherwise agreed with the retail customer.</u></p> <p>No amendment suggested.</p>

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	(c) Detailed data constructed in a CSV format may be delivered may be delivered as a compressed file with a ".zip" extension if needed to manage file size of delivered data.	Lumo Energy suggest the removal of the 'may be delivered' in clause 3.2(c) as it has been duplicated. The following drafting amendment is suggested: Detailed data constructed in a CSV format may be delivered may be delivered as a compressed file with a ".zip" extension if needed to manage file size of delivered data.
3.3	File naming conventions (a) PDF summary data file name must follow the convention detailed below and in clause 3.3(c). I. NMI_MeteringDataStartDate_MeteringDataEndDate_FileProvisionDate_FileType.pdf II. Example: 8000000000_20140301_20160301_20160305130000_SUMMARY.pdf	It is Lumo Energy's view that a naming convention is outside the scope of this Procedure. Retailers and DNSPs can describe the document to a customer or customers authorised representative in a manner that is clear to the customer. For example "Brad Pitt's Summary Data" not 6123456789_20140301_20160301_20160305130000_SUMMARY.pdf This is not conducive to a good customer experience, nor is it conducive to participants who wish to create / produce this file manually. AEMO has established a physical delivery method in clause 3.1(a), it is unclear how a naming convention would be required when the summary data file is delivered physically. Lumo Energy consider that clause 3.3(a) is outside of the AEMC Final Determination and should be deleted. However, should AEMO consider that it must set a file naming convention irrespective of the AEMC's Final Determination, Lumo Energy recommends the following drafting amendment: (a) The summary data file name must contain the NMI follow the convention detailed below <u>when requested electronically</u> and in clause 3.3(c).
	(b) CSV detailed data file name must follow the convention detailed below and in clause 3.3(c). IV. NMI_MeteringDataStartDate_MeteringDataEndDate_FileProvisionDate_FileType.csv V. Example	It is Lumo Energy's view that a naming convention is outside the scope of this Procedure. Retailers and DNSPs can describe the document to a customer or a customer authorised representative in a manner that is clear to the customer. For example "Brad Pitt's Detailed Data" not 6123456789_20140301_20160301_20160305130000_DETAILED.csv This is not conducive to a good customer experience, nor is it

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	8000000000_20140301_20160301_20160305130000_DET ILED.csv	<p>conductive to participants who wish to create / produce this file manually.</p> <p>AEMO has established a physical delivery method in clause 3.1(a); it is unclear how the naming convention would be required when the detailed data file is delivered physically.</p> <p>Lumo Energy consider that clause 3.3(b) is outside of the AEMC Final Determination and should be deleted.</p> <p>However, should AEMO consider that it must set a file naming convention irrespective of the AEMC's Final Determination, Lumo Energy recommends the following drafting amendment, Specifically:</p> <p>(b) The CSV detailed data file name <u>delivered electronically</u> must contain the NMI. Retailers and DNSPs may choose to follow the convention detailed below and in clause 3.3(c).</p> <p>IV. NMI_MeteringDataStartDate_MeteringDataEndDate_File ProvisionDate_FileType.csv</p> <p>V. Example 8000000000_20140301_20160301_20160305130000_D ETAILED.csv</p>
3.4	<p>Numbering of metering data files to be provided</p> <p>(a) Retailers and DNSPs must provide a single metering data file in relation to a retail customer's metering installation for the requested period.</p> <p>(b) Where there has been a change of metering installation configuration during the period for which metering data is requested, the retailer or DNSP may provide a separate metering data file for each metering installation configuration period. A metering installation configuration change includes a change of tariff and a change from accumulated metering to interval metering.</p>	<p>The Final Determination of the rule change clarified the types of data that a customer or a customer authorised representative is entitled to receive and this set out in rule 7.7(a) of the NER. Rule 7.7(a)(7) provides customers and their authorised representatives access to the types of data specifically set out in rule 7.7(a) of the NER and is limited to metering data or energy data. This did not include billing data which would include tariff information.</p> <p>Lumo Energy request that a change in tariff is removed from clause 3.4(b) as it is our view that whilst the Final Determination allows customers, or parties authorised by customers, access to NMI standing data to the extent that such data is relevant to a customer's metering installation, we do not consider that this information is relevant.</p> <p>We request the following amendment to clause 3.4(b):</p>

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		(b) Where there has been a change of metering installation configuration during the period for which metering data is requested, the retailer or DNSP may provide a separate metering data file for each metering installation configuration period. A metering installation configuration change <u>can</u> include a <u>customer installing solar PV</u> change of tariff and <u>or</u> a change from accumulated metering to interval metering.
4	DATA FILE CONTENT (a) Retailers and DNSPs must provide the following content for each metering data file.	It is our view that the Final Determination required AEMO to specify the minimum data file content that retailers and DNSP's must provide. It is on this basis that we request the following amendment to clause 4.4(a): (a) Retailers and DNSPs must provide, <u>at a minimum</u> , the following content for each metering data file.
4.1	Field details – format and unit of measure	
4.2	Accumulated metering data summary (a) The accumulated metering data summary must, at a minimum, include: I. The nature and extent of energy usage. II. A diagrammatic and numerical representation of the usage information.	Lumo Energy is supportive of the concepts contained within clause 4.2(a) and offer no suggested amendments.
	(b) Conditions that apply to all summary accumulated metering data files are: I. File must be based on validated metering data. II. File ordered by Date – oldest date at the top of the file and most recent date at the bottom of the file.	Lumo Energy is supportive of the concepts contained within clause 4.2(b) and offer no suggested amendments.
	(c) Appendix A contains the accumulated metering data summary required file conditions and an example of a diagrammatic representation of energy usage.	AEMO is to develop a minimum summary data format for a retail customer who has an accumulated meter. As the summary data format is a minimum, the content of Appendix A should as a guide only. This clause should be amended to state that it is the

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		<p>minimum data summary required.</p> <p>The following drafting amendment is suggested:</p> <p>(c) Appendix A contains the an accumulated metering data summary <u>guide required and the minimum summary data as</u> file conditions and an example of a diagrammatic representation of energy usage.</p> <p>If it is AEMO's intent for the Appendices for these to be a guide, it may appropriate for this clause to be a footnote.</p>
	<p>(d) The summary data format for accumulated metering data provided by a retailer must include the following information:</p> <p>I. National Metering Identifier (NMI),</p> <p>II. Meter Serial Number,</p> <p>III. Unit of Measure (UOM) for the Energy Flow Type,</p> <p>IV. Data quality indication,</p> <p>V. Read Date for accumulated metering data (i.e. end of meter reading period),</p> <p>VI. From Date (i.e. start of meter reading period),</p> <p>VII. Energy Flow Types:</p> <p>A. Total usage or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc.,</p> <p>B. Controlled Load usage (only if applicable),</p> <p>C. Generation (only if applicable).</p>	<p>Lumo Energy consider it inappropriate and outside the scope of the AEMC's Final Determination to prescribing billing-related information in the summary data format for accumulated metering data. Each retailer potentially will have different timeframes for peak, off-peak and shoulder periods. In addition, an individual retailer may offer different peak, off-peak and shoulder timeframes to individual customer on a contract by contract basis. This leads to creating a manual process to create summary data, which is highly inefficient and is not in the long term interests of consumers.</p> <p>It is the view of Lumo Energy that the summary data provided to a customer or customer authorised representative by a retailer or DNSP must be identical. The information should also be considered the minimum summary data format that is to be provided to a retail customer who has an accumulated meter.</p> <p>On this basis, we request that 4.2(d) and 4.2(e) be combined and 4.2(d)(VII)(A) be altered to 'Total Usage' only.</p> <p>For ease, Lumo Energy offer AEMO the following drafting suggestion (deleting clause 4.2(e)) and amending clause 4.2(d) with:</p> <p>The summary data format for accumulated metering data provided by a retailer and DNSP must include, <u>at a minimum,</u> the following information:</p> <p>I. National Metering Identifier (NMI),</p> <p>II. Meter Serial Number,</p> <p>III. Unit of Measure (UOM) for the Energy Flow Type,</p> <p>IV. Data quality indication,</p>

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		<p>V. Read Date for accumulated metering data (i.e. end of meter reading period),</p> <p>VI. From Date (i.e. start of meter reading period).</p> <p>VII. Energy Flow Types:</p> <p>A. Total usage,</p> <p>B. Controlled Load usage (only if applicable),</p> <p>C. Generation (only if applicable).</p>
	<p>(e) The summary data format for accumulated metering data provided by a DNSP must include the following information:</p> <p>I. National Metering Identifier (NMI),</p> <p>II. Meter Serial Number,</p> <p>III. Unit of Measure (UOM) for the Energy Flow Type,</p> <p>IV. Data quality indication,</p> <p>V. Read Date for accumulated metering data (i.e. end of meter reading period),</p> <p>VI. From Date (i.e. start of meter reading period).</p> <p>VII. Energy Flow Types:</p> <p>A. Total usage,</p> <p>B. Controlled Load usage (only if applicable),</p> <p>C. Generation (only if applicable).</p>	<p>Please refer to the response provided to clause 4.2(d) where Lumo Energy requested clause 4.2(d) and 4.2(e) be combined and 4.2(d)(VII)(A) altered to 'Total Usage'.</p>
4.3	Interval metering data summary	
4.4	<p>Detailed data format</p> <p>(a) The detailed data format for interval metering data provided by a retailer or DNSP must be the NEM12 file that complies with the Meter Data File Format Specification NEM12 & NEM13.</p>	<p>The AEMC evaluated in the Final Determination whether a single standardised summary data format and detailed data format should be developed by AEMO in the metering data provision procedures and uniformly applied across the NEM. However, the AEMC decided not to adopt this approach and considered that the Procedure should set out minimum requirements with respect to format that would ensure customers receive their data in an understandable manner. The Final Determination also noted</p>

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		<p>that AEMO's Procedure could then address the necessary details and respond with more flexibility to changes in technology and customer preferences.³</p> <p>Lumo Energy question that decision by AEMO to prescribe NEM12 as a uniform format. There is a substantial amount of information contained within a NEM12 that is not relevant. For example:</p> <p><u>Record 100 - File creation time and date</u></p> <p>Is it expected that a retailer would generate this based on when the customer file is generated, rather than the date / time the meter read file was generated? Or is this the date/time that the file naming convention detailed in clause 3.3(b)?</p> <p><u>Record 200 - NMI configuration</u></p> <p>e.g....E1, B1, N1 Next schedule Read date(NSRD)</p> <p>Which NSRD should be provided? And why is providing historical NSRD considered relevant information?</p> <p><u>Record 300 – Interval Data</u></p> <p>Reason Code & Reason description– relevance for provisioning the substitution code?</p> <p>Update Date Time and MSATS Load Date Time – relevance for provisioning date and time fields</p> <p><u>Record 400 – Interval Event</u></p> <p>Determining the quality method for interval data.</p> <p>E.g. Intervals 1 to 26 are actual and 27 to 48 are substituted.</p> <p>Complex information not normally maintained in retail billing systems</p> <p><u>Record 500 – B2B Details</u></p> <p>Transaction Code, Retailer service Order, Index Read</p> <p>Lumo Energy is supportive of the concept of setting out minimum requirements with respect to format that would ensure customers receive their interval data in an understandable manner.</p> <p>We do not consider that the NEM12 meets this requirement.</p> <p>Retailers do not create a NEM12 file. Placing an obligation onto a</p>

³ Section 5.1.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

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		retailer to recreate a full NEM12 file will require significant IT development and/or individual interrogation. An alternative approach could be setting a sub-set of the NEM12 file as the minimum. For example components of Record 200,300,400 may be more appropriate.
	(b) Retailers and DNSPs must make a NEM 12 customer guide available to assist retail customers to understand and interpret the data included in the NEM 12 file.	<p>Whilst COAG Energy Council proposal required retailers and DNSPs to publish information sheets on their websites about electricity consumption data - which has access to it, how it is used, when it may be disclosed and how it is protected, the Final Determination did not require this. The final NERR rule and NER rule does not require retailers and DNSPs to place information on their websites about how metering data is used.</p> <p>Requiring all retailers and DNSP's to develop an individual organisational customer guide and make it available is not efficient. It is our view that this approach does not meet the NEO.</p> <p>As we are unable to locate any obligation within the NER, the amendments to the NERR or the AEMC Final Determination that requires the development of a NEM12 customer guide we consider that AEMO have drafted this section of the Procedures broader than instructed. It is on this basis that we request AEMO delete the following two clauses, clause 4.4(b) and 4.4(c) from the Metering Data Provision Procedures.</p>
	(c) The NEM 12 customer guide must, at a minimum, explain how usage, generation or controlled load is represented in a NEM 12 file in an understandable manner and how to load and open the NEM12 file.	<p>As stated in our response to clause 4.4(b) Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP's to develop a NEM12 customer guide. It is on this basis that we request AEMO delete clause 4.4(c) from the Metering Data Provision Procedures. Alternatively, as AEMO currently produce and publish Meter Data File Format Specification NEM12 and NEM13, as well as NEM12 and NEM13 File Format Clarifications. Lumo Energy consider that if AEMO considers it necessary for a NEM12 customer guide to be made available then it would be more efficient for AEMO to produce a customer guide to assist retail customer or customer authorised representatives understand and interpret the data.</p>
4.5	<p>Ability to offer alternative metering data formats</p> <p>(a) For either a summary or detailed metering data format,</p>	Lumo Energy note that the retail customer or customer authorised representative may request a retailer or DNSP to offer an alternative metering data format. However, the clause does not

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	where a retail customer or customer authorised representative requests an alternative metering data format that does not meet the minimum metering data requirements specified in these Procedures, a retailer or DNSP may offer a retail customer and/or a customer authorised representative an alternative metering data format.	<p>permit a retailer or DNSP to agree to offer the alternative metering data format. Lumo Energy suggest the following amendment:</p> <p>(a) For either a summary or detailed metering data format, where a retail customer or customer authorised representative requests an alternative metering data format that does not meet the minimum metering data requirements specified in these Procedures, a retailer or DNSP may agree to offer a retail customer and/or a customer authorised representative an alternative metering data format.</p>
	(b) Retailers and DNSPs must make a customer guide available to assist retail customers understand and interpret the data included in the alternative file.	As stated in our response to clause 4.4(b), Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP's to develop a customer guide. It is on this basis that we request AEMO delete clause 4.5(b) from the Metering Data Provision Procedures.
	(c) The customer guide must, at a minimum, explain in an understandable manner how usage, generation or controlled load is represented in an alternative file, and how to load and open the alternative file.	As stated in our response to clause 4.4(b) and 4.5(b), Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP's to develop a customer guide. It is on this basis that we request AEMO delete clause 4.5(c) from the Metering Data Provision Procedures.
	(d) Retailers and DNSPs must obtain informed consent from a retail customer or customer authorised representative before providing an alternative metering data file.	<p>The Final Determination, and the obligations within the NER and NERR established that the metering data provision procedures were to provide a minimum format for summary and detailed data to customers or their authorised representatives upon request. This was to allow for innovation by retailers and DNSPs. For example, retailers or DNSP's may choose to have summary or detailed data displayable on a Portal. Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP's that requires retailers and DNSP's to obtained informed consent from a retail customer or customer authorised representative.</p> <p>It is on this basis that we request AEMO delete clause 4.5(d) from the Metering Data Provision Procedures.</p>

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Item	Description	Participant Comments
5	OTHER COMMENTS	If AEMO considers it valuable to industry to provide examples for the summary data formats, the same approach should be taken to the CSV format.
Appendix A	ACCUMULATED METERING DATA SUMMARY FORMAT	Please ensure that the Appendices are marked as examples only and therefore not obligations as stated in clause 4.2(c) and 4.3(c).
A.1	<p>File conditions</p> <p>File conditions detail the requirements for the information that must be provided in accordance with clauses 4.2(d) and 4.2(e).</p> <p>Data Quality - Provide a statement indicating whether the metering data file contains estimated data and specify which reading period(s) contain estimated data.</p>	<p>Lumo Energy suggest the following amendment to A.1 to reflect the drafting amendments suggested in clause 4.</p> <p><u>Clause 4 of the Procedure outlines the minimum requirements. The file conditions are an example of this information.</u> File conditions detail the requirements for the information that must be provided in accordance with clauses 4.2(d) and 4.2(e).</p> <p>It is unclear where the requirement to provide a statement indicating whether the metering data file contains estimated data and to specify which reading periods contain the estimated data. On the basis that the accumulated metering data summary format contained within A.1 is a guide only, then Lumo Energy will accept the content that has been proposed.</p>
A.2	Example: accumulated file	We have not commented on these examples as the final examples will need to be amended to reflect all changes made.
A.3	Example: diagrammatic representation of energy usage	We have not commented on these examples as the final examples will need to be amended to reflect all changes made.
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	<p>File conditions</p> <p>File conditions detail the requirements for the information that must be provided in accordance with clauses 4.3(d) and 4.3(e).</p>	<p>Lumo Energy suggest the following amendment to A.1 to reflect the drafting amendments suggested in clause 4.</p> <p><u>Clause 4 of the Procedure outlines the minimum requirements. The file conditions are an example of this information.</u> File conditions detail the minimum requirements for the information that must be provided in accordance with clauses 4.3(d) and 4.3(e).</p> <p>It is unclear where the requirement to provide a statement</p>

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Item	Description	Participant Comments
		indicating whether the metering data file contains estimated data and to specify which reading periods contain the estimated data. On the basis that the accumulated metering data summary format contained within B.1 is a guide only, then Lumo Energy will accept the content that has been proposed.
B.2	Example: interval file	We have not commented on these examples as the final examples will need to be amended to reflect all changes made.
B.3	Example: diagrammatic representation of energy usage	We have not commented on these examples as the final examples will need to be amended to reflect all changes made.