



EnergyAustralia

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

METERING DATA PROVISION PROCEDURES
PACKAGE

Participant: EnergyAustralia

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1. Draft Metering Data Provision Procedures

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2	IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES	
2.1	Verifying the identity of a retail customer or customer authorised representative	<p>The AEMC Final Rule Determination Customer access to information about their energy consumption:</p> <p>6 General information about electricity consumption data 6.1 Rule change proposal</p> <p>The COAG Energy Council proposed that retailers and distributors be required to make information available to customers outlining who may obtain data obtained from the meter and for what purposes electricity consumption data is used.</p> <p>In particular, the rule change proposed that:</p> <ul style="list-style-type: none"> • retailers and DNSPs publish information on their websites about how such electricity consumption data is used. This website information would include <ul style="list-style-type: none"> — what parties may have access to metering data; — the circumstances in which metering data would be disclosed to parties other than the customer's retailer and DNSP; — when metering data is used and for what purpose; — options customer may have to stop the use of metering data; — how metering data is protected by regulation and by the customer and DNSP;

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		<p>6.4 Analysis</p> <p>In evaluating this proposal, we note that the Seed Advisory report commissioned by the COAG Energy Council did not specifically recommend publishing information on retailers and DNSPs' websites nor recommended that meter data common terminology guidelines be published</p> <p>In line with the above, EnergyAustralia recommends the following update to clause 2.1. (a) of the Meter Data Provision Procedure (MDPP)</p> <p>(a) <i>Retailers and DNSPs must and publish provide at a minimum, the information below required from a retail customer or customer authorised representative who requests metering data.</i></p> <ul style="list-style-type: none"> I. Sufficient information to verify identity and relevant consents from <i>retail customers and customer authorised representatives</i>. II. The way in which a request for <i>metering data</i> can be made, e.g. email, writing, telephone, etc. III. The form in which the <i>metering data</i> will be provided by the <i>retailer or DNSP</i>, e.g. electronic, physical copy, etc. <p>Further to the above, the AEMC Final Rule Determination Customer access to information about their energy consumption includes:</p> <p>5.3.4 Analysis</p> <p><i>We consider that retailers and DNSPs should respond, using reasonable endeavours, within the time frames specified by AEMO in its metering data provision procedures that would be triggered upon receipt of a metering data request from a customer or its authorised representative. This time frame should include sufficient time for the verification of a customer or its authorised representative.</i></p> <p>In line with the above, EnergyAustralia recommends the following</p>

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		<p>update to clause 2.1. (a) of the Meter Data Provision Procedure (MDPP)</p> <p>(c) Where a <i>retailer</i> or <i>DNSP</i> determines it cannot verify the identity or relevant consents of a <i>retail customer</i> or <i>customer authorised representative</i>, the <i>retailer</i> or <i>DNSP</i> must advise the <i>retail customer</i> or <i>customer authorised representative</i> within three seven <i>business days</i> of receiving the request for <i>metering data</i> that insufficient verification information has been provided.</p> <p>This is to accommodate any requests received in writing, where insufficient verification has been provided, EnergyAustralia suggests the timeframe is changed from three to seven business days for clause 2.1.(c) to allow a reasonable time to respond to these requests in writing.</p>
2.2	Retail customer request	<p>EnergyAustralia suggests that the following clause of the MDPP is updated to reflect the requirements as per the NER 7.16 (below):</p> <p>(a) Where a <i>retail customer</i> requests their <i>metering data</i>, <i>Retailers</i> and <i>DNSPs</i> must use reasonable endeavours to deliver respond to the <i>metering data</i> request to the <i>retail customer</i> within 10 <i>business days</i>. This The delivery timeframe for the provision of customer data commences from the date the valid request is received by the <i>retailer</i> or <i>DNSP</i>.</p> <p>7.16 Metering data provision to retail customers</p> <p>(4) include timeframes in which a retailer or a Distribution Network Service Provider must, using reasonable endeavours, respond to requests made under rule 7.7(a)(7). The timeframe to be included must:</p> <ul style="list-style-type: none"> (i) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a customer authorised representative in relation to more than one retail customer of either the retailer or Distribution Network Service Provider to whom the request is made

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2.3	Customer authorised representative	<p>As per the above, EnergyAustralia suggests the following clauses of the MDPP are updated in line the requirements of the NER 7.16 (as per comments to 2.2):</p> <p>(a) Where a <i>customer authorised representative</i> requests <i>metering data</i> for one <i>retail customer</i>, <i>retailers</i> and <i>DNSPs</i> must use reasonable endeavours to deliver respond to the <i>metering data</i> request to the <i>customer authorised representative</i> within 10 <i>business days</i>. This The delivery timeframe for the provision of customer data commences from the date the valid request is received by the <i>retailer</i> or <i>DNSP</i>.</p> <p>(b) Where a <i>customer authorised representative</i> requests <i>metering data</i> for more than one but less than 100 <i>retail customers</i> in a single request, <i>Retailers</i> and <i>DNSPs</i> must use reasonable endeavours to deliver respond to the <i>metering data</i> request to the <i>customer authorised representative</i> within 20 <i>business days</i>. This The delivery timeframe for the provision of data commences from the date the valid request is received by the <i>retailer</i> or <i>DNSP</i>.</p>
3	DATA DELIVERY METHOD	
3.1	Delivering summary data	
3.2	Delivering detailed data	<p>EnergyAustralia suggests the following update to the below clause of the MDPP so as not to restrict a customer or authorised representative in selecting another delivery method.</p> <p>(a) The <i>retailer</i> or <i>DNSP</i> must provide the detailed data electronically, unless otherwise agreed with the <i>retail customer</i> or <i>customer authorised representative</i>.</p>
3.3	File naming conventions	
3.4	Numbering of metering data files to be provided	
4	DATA FILE CONTENT	
4.1	Field details – format and unit of measure	

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4.2	Accumulated metering data summary	<p>7.16 Metering data provision to retail customers (2) for retail customers for whom interval metering data is available, specify the summary data format, which, at a minimum should include the retail customer's: (iii) a diagrammatic representation of the information referred to in subparagraph (i);</p> <p>The above clause from the NER currently indicates that diagrammatic representation is limited to interval metering data; inclusion of this for accumulated metering data is not required. AEMO's assessment of the responses provided to the first stage rules consultation proposes the inclusion so that retail customers are able to understand the information provided. EnergyAustralia recommends the following update to the MDPP which allows, as a minimum, how the accumulated metering data is represented:</p> <p>(a) The accumulated metering data summary must, at a minimum, include: II. A diagrammatical and or numerical representation of the usage information.</p> <p>EnergyAustralia recommends the removal & update, respectively of the following for clause 4.2.(d) of the MDPP:</p> <ul style="list-style-type: none"> Removal of (IV) as only validated meter data will be provided to a Retailer by a Meter Data Provider (MDP) which may include estimated data Update to (VII) to replace or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc. with meter register/suffix. <p>Representation of Energy Flow Types, i.e. Peak, Shoulder, Off-Peak can cause confusion or a different outcome if the customer requested data from a Retailer as opposed to the DNSP.</p> <p>Retailers and DNSPs may not have the same configuration for peak off peak, dependant on customer choice of product. If the customer requested data from both parties this could cause considerable confusion. EnergyAustralia believes the simpler form</p>

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		<p>of data available at register or meter level would be a better outcome.</p> <p>Hence has suggested the below update to clause 4.2.(d):</p> <p>(d) The summary data format for <i>accumulated metering data</i> provided by a <i>retailer</i> 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 <i>accumulated metering data</i> (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 per meter register/suffix 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>
4.3	Interval metering data summary	<p>As per the comments to 4.2.(d)(IV) & 4.2.(d)(VII)A, i.e. removal of 4.3.(d)(IV) & update 4.3.(d)(VII)A to the following:</p> <p>IV. Data quality indication</p> <p>VII. Energy Flow Types:</p> <p>A. Total usage per meter register/suffix</p>
4.4	Detailed data format	<p>EnergyAustralia recommends that the following components of the NEM12 file are only provided to a retail customer or authorised party:</p> <ul style="list-style-type: none"> • NMI data details record (200) excluding the Next Scheduled Read Date field • Interval data record (300) excluding fields such as: <ul style="list-style-type: none"> ○ QualityMethod ○ ReasonCode

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		<ul style="list-style-type: none"> ○ ReasonDescription ○ UpdateDateTime ○ MSATSLoadDateTime <p>If reference is removed for estimated data within the 300 record there is no reason to provide this level of information to the retail customer or customer authorised representative.</p> <p>UpdateDateTime and MSATSLoadDateTime information is irrelevant to the customer and cannot be populated in the provision of 24 months of data provided in the one file.</p> <p>Hence the following update:</p> <p>(a) The detailed data format for interval metering data provided by a <i>retailer</i> or <i>DNSP</i> must be 200 & 300 record components of the NEM12 file that complies with the Meter Data File Format Specification NEM12 & NEM13 with exclusions.</p> <p>Energy Australia also suggests that the following is <u>not included</u> in the MDPP in line with the AEMC's analysis of 6.1 Rule change proposal:</p> <p>(b) <i>Retailers</i> and <i>DNSPs</i> 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> <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> <p>When engaging with retail customers and authorised representatives Retailers will provide information in a format to ensure energy literacy, and an understanding of how to interpret the data provided.</p> <p>6 General information about electricity consumption data</p>

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		<p>6.1 Rule change proposal</p> <p>The COAG Energy Council proposed that retailers and distributors be required to make information available to customers outlining who may obtain data obtained from the meter and for what purposes electricity consumption data is used.</p> <p>In particular, the rule change proposed that:</p> <ul style="list-style-type: none"> • the AER develop 'metering data common terminology' guidelines. These common terms would relate to how electricity consumption data is used in the NEM by retailers and any other parties. The purpose of the guidelines would make the information published on retailer and DNSP websites uniform across industry. These guidelines would act as a form of template for retailers and DNSPS to use for their website disclosures. <p>6.4 Analysis</p> <p>In evaluating this proposal, we note that the Seed Advisory report commissioned by the COAG Energy Council did not specifically recommend publishing information on retailers and DNSPs' websites nor recommended that meter data common terminology guidelines be published.</p> <p>Hence we believe that there is no need for this obligation. Retailers have the right incentive in a competitive market to ensure customers understand their metering data information.</p>
4.5	Ability to offer alternative metering data formats	<p>Energy Australia suggests that the following is not included in the MDPP in line with the AEMC's analysis of 6.1 Rule change proposal:</p> <p>(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.</p> <p>When engaging with retail customers and authorised representatives Retailers will provide information in a format to ensure energy literacy, and an understanding of how to interpret</p>

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		<p>the data provided.</p> <p>6 General information about electricity consumption data</p> <p>6.1 Rule change proposal</p> <p>The COAG Energy Council proposed that retailers and distributors be required to make information available to customers outlining who may obtain data obtained from the meter and for what purposes electricity consumption data is used.</p> <p>In particular, the rule change proposed that:</p> <ul style="list-style-type: none"> • the AER develop 'metering data common terminology' guidelines. These common terms would relate to how electricity consumption data is used in the NEM by retailers and any other parties. The purpose of the guidelines would make the information published on retailer and DNSP websites uniform across industry. These guidelines would act as a form of template for retailers and DNSPS to use for their website disclosures. <p>6.4 Analysis</p> <p>In evaluating this proposal, we note that the Seed Advisory report commissioned by the COAG Energy Council did not specifically recommend publishing information on retailers and DNSPs' websites nor recommended that meter data common terminology guidelines be published.</p> <p>Hence we believe that there is no need for this obligation. Retailers have the right incentive in a competitive market to ensure customers understand their metering data information.</p>
5	OTHER COMMENTS	
Appendix A	ACCUMULATED METERING DATA SUMMARY FORMAT	
A.1	File conditions	<p>In line with comments provided to 4.2.(d) EnergyAustralia recommends the following update of this section of the MDPP:</p> <ul style="list-style-type: none"> • Removal of the billing component representation, i.e. Peak, Shoulder, Off-Peak, Demand' within the parameters of the File

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		<p>component Energy Flow type, replacing this with usage as per the meter register/suffix</p> <ul style="list-style-type: none"> Removal of File component 'Data Quality' as only validated meter data will be provided to a Retailer by a Meter Data Provider (MDP) which may include estimated data
A.2	Example: accumulated file	
A.3	Example: diagrammatic representation of energy usage	Refer comments provided to 4.2(d)VII A
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	File conditions	<p>In line with comments provided to 4.3.(d) EnergyAustralia recommends the following update of this section of the MDPP:</p> <ul style="list-style-type: none"> Removal of the billing component representation, i.e. Peak, Shoulder, Off-Peak, Demand' within the parameters of the File component Energy Flow type, replacing this with usage as per the meter register/suffix Removal of File component 'Data Quality' as only validated meter data will be provided to a Retailer by a Meter Data Provider (MDP) which may include estimated data
B.2	Example: interval file	
B.3	Example: diagrammatic representation of energy usage	In line with comments provided to 4.3.(d)VII A EnergyAustralia recommends the removal of the billing component representation