



825 Ann Street, Fortitude Valley QLD 4006

PO Box 264, Fortitude Valley QLD 4006

[ergon.com.au](http://ergon.com.au)

21 July 2015

Mr Matt Zema  
Australian Energy Market Operator  
PO Box 2008  
MELBOURNE VIC 3001

Dear Mr Zema

**NATIONAL ENERGY MARKET CONSULTATION: METERING DATA PROVISION  
PROCEDURES – DRAFT REPORT AND DETERMINATION.**

Ergon Energy Corporation Limited (Ergon Energy), in its capacity as a Distribution Network Service Provider (DNSP) in Queensland, welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its *Metering Data Provision Procedures: Draft Report and Determination*.

Ergon Energy is generally supportive of the framework proposed for the Metering Data Provision Procedures (MDPP). However, as advised in our submission on the *Metering Data Provision Procedures: Consultation Paper*, Ergon Energy has some technical limitations that need to be managed to ensure we are able to be compliant with the MDPP. Specifically, some of Ergon Energy's existing meters for 1<sup>st</sup> tier non-market customers may not have the capability to provide demand information (we estimate this at around 10-20% of these customers). Further, Ergon Energy also has sites with multiple meters at a NMI, meaning we are unable to produce an aggregated or coincident demand figure.

To manage these technical limitations we suggested in our submission on the Consultation Paper, that the MDPP should stipulate this information is to be provided "where available", and we note and appreciate that AEMO has accepted this position in its draft report. However, the wording of the draft MDPP does not appear to incorporate this principle. For example 2.2 (a) and 2.3 (a) and (b) outline requirements that DNSP's "must" adhere to when data is requested, but do not note that this data need only be provided "where available". Ergon Energy recommends that a clause be included within the MDPP that stipulates demand information is to be provided "where available".

As a member of the Energy Network's Association (ENA), Ergon Energy also supports the issues raised by the ENA in its submission

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely



Jenny Doyle  
Group Manager Regulatory Affairs

Telephone: (07) 3851 6416

Email: [jenny.doyle@ergon.com.au](mailto:jenny.doyle@ergon.com.au)

Enc: Ergon Energy's submission