DRAFT DETERMINATION – PARTICIPANT RESPONSE

METERING DATA PROVISION PROCEDURES

***Participant**: AusNet Services*

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1. Response to Consultation Paper

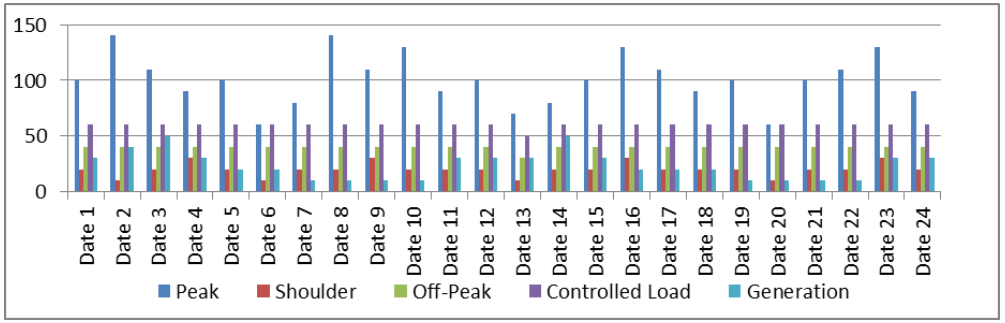
A. Responses to Questions and Suggestions

Item	Description	Category	Participant Proposed Action
1	**PROPOSED/ REQUESTED CHANGES**		
	Metering Data Provision Procedures – Strawman for Consultation		
1.1	General Comment **1.1 General MDPP Outcomes** The Metering Data Provision Procedure (MDPP) is no different in intent to the MDFF and MDM Procedures. The MDPP is an IT build document which needs to specify all those aspects of the two formats which are to be mandated as the minimums. The Procedure should be drafted such that the businesses' IT departments have all the necessary definition to produce the files/documents. It is not a customer document, rather AusNet Services suggests the establishment separate explanatory material and FAQs for customers (and customer authorised representatives).	**General comment**	AusNet Services highlights the importance of clearly defining the MDPP with the necessary level detail to enable consistent IT implementations.
1.2	General Comment **1.2 Detailed Data Format** It is AusNet Services understanding that the detailed data format should be a "machine" loadable format which can form the basis of customer (customer authorised representative) manipulation and analysis. The MDFF is a well-defined, fully detailed data format and represents the least expensive and risk free approach to the detailed data format. Unless very good reasons are determined, the MDFF should be the chosen detailed data format. If other than MDFF, AEMO should offer testing of registered participant files, and produce a format validation tool to verify as-built format before go live.	**General comment**	AusNet Services highlights the importance of having well-defined, fully detailed data format, and recommends the MDFF.

1.3	General Comment **1.3 Summary Data Format** AusNet Services makes a number of views regarding the types of details required in the summary data format (and the CUAC proposal seems to generally cover what is necessary), but can implement any data format as long as the format is clearly defined and the information is available. However in the detailed comments below point out the types of information which add complexity, processing difficulties and IT implementation and operations costs e.g. accounting for public holidays. • Accumulation type 6 data summary data format should be simple: probably average daily usage over monthly and quarterly periods. • The summary data format should provide the customer with an understanding of their energy usage and generation patterns over the period requested. It is not intended for bill checking. Hence retailer billing Time of Use (TOU) is not a requirement. • If retailer billing TOU information is deemed required, than only retailer tariffs have direct customer bill impacts. Network businesses do not have access to retailer billing Time of Use (TOU) and hence cannot provide the data on this basis.	**General comment**	AusNet Services highlights the importance of establishing a summary format that minimises costs to the industry
1.4	Re 3.1.3 proposed minimum summary and detailed data formats. **1.4 Issues in providing tariff based information** i) Need for tariff based summary? The purpose of the summary data formats is not for bill checking but rather to provide an understanding of the customer's consumption pattern. As such AusNet Services regards the provision of retail usage rate information as an unnecessary complication. This is consistent with the CUAC view of what is required by customers. ii) DNSP have no visibility of retailer billing Time of Use (TOU) information AusNet Services notes the following information specified in the strawman Metering Data Provision Procedure (MDPP) relates specifically to retail billing:	**High**	AusNet Services strongly suggests removing daily time periods, separate "energy flow types", and references to peak, off-peak, and shoulder from the minimum summary and detailed data formats. This is especially important because network businesses do not currently have this information or a reliable means to receive it.

	• "daily time periods", • separate "energy flow types", and • peak, off-peak, controlled load and shoulder usage rate times. Although there currently is generally correlation between the usage rate times in a Network Tariff and the Retailers billing charges, there is no certainty of this. Retailers are not obligated to match usage rate times with DNSP's Network Tariff, and hence retail offers do not necessarily align with Network Tariffs. DNSPs have no visibility as to the customer's retail billing contracts. If retailer billing TOU information is required, it is unclear how DNSPs will receive the customer's retailer billing TOU information. Will it be from the Retailers through the B2B: CSDN process, or will the customers (or customer authorised representatives) provide this in the request for data? DNSPs would also need visibility of retailer billing TOU information for all the various retailers nominated for customer over a potential 2 year period. Even if the procedure required the customer (or customer authorised representatives) to provide tariff based details to DNSPs, it is likely that mismatches in these quantities with the basis of bills will result in a poor customer experience and even billing disputes. AusNet Services strongly suggests removing these quantities from both the summary and detailed data formats, or alternatively removing these quantities from the data formats DNSPs provide.		
1.5	Re 3.1.3 proposed minimum summary and detailed data formats. **<u>1.5 Issue in providing tariff based information – controlled load</u>** Firstly, AusNet Services strongly suggests controlled load can only be provided if it is separately measured. In making this suggestion, it is important to realise the distinction between a controlled load and a separately metered controlled load with control i.e. referred to in Victoria as a dedicated circuit. If a controlled load is not separately measured at the meter then registered participants have no ability to provide it in the summary or detailed data formats. Secondly, it is worth noting that controlled load usage may be allocated to a combination of peak, shoulder or off-peak usage. Showing controlled load usage could be confusing and potentially result in data that double counts controlled load usage. This is minor compared to the issue of showing peak, off-peak and	**High**	If separately measured controlled load is to be included the definition of it in the MDPP needs to be clear.

	shoulder usage.		
1.6	Re 3.1.3 proposed minimum summary and detailed data formats. **1.6 Issues in providing demand** "Average daily demand" and demand are not well defined in the strawman Metering Data Provision Procedures. Further "average daily demand" and demand are not appropriate in the summary format as these quantities are not relevant to customers for billing. Including these quantities is superfluous to a customer's energy information needs and potentially confusing. It is unclear what "average daily demand" means. Demand is a measure that represents the maximum power level over a period. Demand is calculated and billed based on the highest use interval (30 minute or 15 minute) measured in a given period. Defining demand needs to make reference to this measurement period. Typically, the purpose of demand billing arrangements is to reduce the maximum power usage on certain days and at certain times, when peak usage normally occurs. These days and times are specified in the terms and conditions of the electricity supply contract and/or Network Tariff. Therefore providing the maximum demand over the requested period or average daily demand will generally not relate to the billing quantities. Further, demand is a quantity that can be calculated by a detailed analysis of the interval metering data. That is taking the highest interval in a measurement period and applying it to a billing period. Where a customer is billed on demand, they should have the sophistication to calculate their demand from the interval data themselves using the detailed interval data. Providing demand as part of the Metering Data Provision Procedures will to add complexity and be confusing to customers. If future regulatory framework changes introduce demand tariffs to small consumers and align network tariffs and retail pricing, then AEMO could re-introduce demand information into the MDPP. These changes will not come into effect before 2017.	**High**	AusNet Services suggests removing average daily demand from the minimum summary format.

1.7	Re 3.1.3 proposed diagrammatic representation **<u>1.7 Diagrams proposed not fit for purpose</u>** AusNet Services suggests the diagrammatic representation purpose is not for bill checking, but an assessment of a customer's energy usage. Notwithstanding the issues in providing retailer billing TOU based information regarding to the provision of usage rate times, AusNet Services considers the diagrammatic representation presented in the strawman MDPP is impractical because it does not suit analysis of a reasonable amount of data, for example 2 years of monthly data shown below. .  The key messages such as trends and seasonal differences get lost in the detail. One would expect the diagrammatic representations to contain succinct visual representations of the requested data, whether that is 1 week or 2 years. Alternatively, AusNet Services suggests a simplified monthly chart with only usage and generation average daily totals; and for where interval data is available extra charts can be provided, similar to the graphs provided by CUAC (circulated on 14 May 2015). Detailed comments regarding this material are provided in section 3 of AusNet Services response. AusNet Services suggests that all tabular summary data and graphical representations are provided on a single sheet of A4 paper.	**High**	AusNet Services suggests the proposed diagrammatic representation is impractical to customers, and does not achieve the intended purpose of providing a succinct visual representation of the requested data.

1.8	Re 3.1.3 proposed diagrammatic representation **1.8 Boundary and edge cases to consider** AusNet Services notes there are a number of request scenarios that need to be defined in the procedure. AusNet Services is less concerned about how these are defined, and more concerned about having adequate certainty in building IT systems. Each quantity, scale, assumption and business rule must be clearly defined. Certainty is required with regards to the following boundary and edge cases: • How to present data on monthly or weekly diagrams when less data is requested? Do Retailers and DNSPs provide only average daily quantities to provide a consistent basis for part week and part month requests, or do we specify that Retailers and DNSPs provide only whole months and weeks of data, i.e. truncating data? • How to present quarterly accumulation read data with special reads without misrepresenting the data, in terms of the representative quantity and timeline? • How do Retailers and DNSPs handle situations where the meter was removed or logically converted to an interval meter within the period of data requested? Each quantity presented in the diagrammatic representation needs to be clearly defined in terms what it is and how it is calculated. For example: • Average daily usage by month is the total energy exported (from the grid) for each month in the period requested of the customer's meter divided by the number of days in the month. ○ If only a part month of meter data is available then provide the meter data only divide by the number of days in that month for which there is meter data for. • Average daily generation by month is the total energy imported (from the grid) for each month in the period requested of the customer's meter divided by the number of days in the month.	**High**	AusNet Services suggests further additions are made to sections 3.3 clarify boundary and edge cases and clearly defining each measured quantity.

1.9	Re 3.1.3 including demand in the diagrammatic representation **1.9 Issues in providing demand in the diagrammatic representation** As raised in the earlier point 1.6, providing demand information is inappropriate in both summary information and detailed information. The question refers to large retail customers. What measure is being used to describe retail customers as large? How does this correspond to NECF or how is it defined in Victoria that has not implemented NECF?	**High**	AusNet Services suggests not including demand in diagrammatic representation, even for large retail customers. Noting the use of term large retail customers is unclear and should be defined in the MDPP.
1.10	Re 4.2 sliding scale used for delivery timeframes **1.10 Suggested sliding scale for delivery timeframes** AusNet Services supports the notion of a sliding scale delivery timeframe subject to reasonable endeavours, when responding to customer authorised representatives, on the basis that a sliding scale can give regard to the manual processing time of each request. However, this support is premised on the assumption that the sliding scale cannot reduce the 10 business day minimum timeframe, subject to reasonable endeavours. Even after undertaking the necessary IT work of fully automating the process of data extraction and for producing a summary, a number of manual steps remain. The most time consuming of these manual steps is validating customer information and consent. AusNet Services considers this manual step takes 6 minutes per customer, even with the above IT system automation. AusNet Services suggests the following sliding scale. • 81 → 400 requests – 15 business days • 401 → 800 requests – 20 business days • More than 801 requests should have no maximum timeframe Not giving regard to the increased processing load or the 10 business day minimum timeframe could unfairly disadvantage individual customers requesting their data, because DNSPs and Retailers would have to divert resources to meet the aggressive timeframe expected by customer authorised representatives.	**High**	AusNet Services supports the use of a sliding scale, subject to reasonable endeavours.

1.11	Re 4.2 reasonable maximum timeframe responding to customer authorised representatives. **1.11 maximum timeframe responding to customer authorised representatives** AusNet Services considers setting a maximum timeframe, where the number of requests exceeds the sliding timeframe, could create undue pressure on DNSPs and Retailers to prioritise the large request at the expense of other requests. Although large requests do not happen very often, initiatives like the “one big switch” can attract tens of thousands of signs up. In such a case, the timeframe should be subject to negotiation between the data provider and the customer authorised representatives to balance the cost of hiring additional contractual resources with the alternative of expanding the timeframe.	**High**	AusNet Services suggests that rather than setting a maximum timeframe there should be no maximum timeframe for situations where the number of requests exceeds the sliding timeframe.

1.12	Re 4.2 **<u>1.12 Defining what constitutes a customer request (e.g. by phone, or in writing)</u>** For AusNet Services, a phone request does not adequately authorise the provision of metering data. This reflects practical difficulties in identifying customers over the phone (including voice recording requirements) and the DNSPs reliance on only a limited set of identification information. AusNet Services requires a customer (or customer authorised representative) to provide adequate information to confirm the identity of each customer, and to provide a "consent to disclose" form signed by each customer. Based on this legal requirement, AusNet Services strongly suggests a definition of what constitutes a customer request is required in the Metering Data Provision Procedures to allow DNSPs to consistently set timing expectations with the public. Unless all the data and forms provided matches the registered participant's records the clock does not start on the timing requirements. The procedure should also clarify that if the customer (or customer authorised representative) request is not verified that there is no obligation to provide meter data in the required timeframe. Otherwise, a customer (or customer authorised representative) may insist on delivery timeframe without providing the necessary verification details. Clearly, the obligation rests on the customer directly (or via their customer authorised representative) to authorise the provision of data before the delivery timeframe starts. Based on the experience of processing bulk data requests from Authorised Representatives received since Dec 2014, the processing of such requests is improved by receiving the information confirming customer identity in an Excel spreadsheet or Word document table.	**High**	AusNet Services will not accept a customer request by phone, and suggests the MDPPs define what constitutes a request for the purpose of setting the timeframe requirements. Further, AusNet Service will require Customer Authorised Representatives to provide signed request letter, a table of customer identifying information in an easily process able electronic format (not PDF), and along with attached individually signed "consent to disclose" forms (PDF is okay).

1.13	Re 5.2 **<u>1.13 Minimum requirement for detailed data format</u>** AusNet Services regards Victorian obligations to provide detailed metering data to customers in one of two formats (NEM12 or myPowerPlanner format) are already inefficient. In establishing the detailed data format in the Metering Data Provision Procedures, AusNet Services strongly suggest AEMO use the existing NEM12 file format. The NEM12 file format is: • A well-defined industry standard; • Commonly used by third party energy services companies; • Not likely to result in additional billing disputes; and • Reads quiet well in a Notepad and through a number of readily available custom Excel macros It is important not to underestimate the value in using an existing, well defined meter data format. In defining a new format, experience has shown the devil is in the detail. When the Victorian government implemented myPowerPlanner, DNSPs and Retailers required extensive, iterative testing of their chosen format to enable processing through the myPowerPlanner website and a coordinated communications campaign. Similarly, a new MDPP detailed data format will require testing and validation to ensure consistency, and enable AEMO and registered participants to consistently respond to enquiries from customers or customer authorised representatives. To add another detailed format available to customer will leave Victorian DNSPs and Retailers with onerous and costly obligations to provide meter data in three different formats. If the NEM12 is not adopted, it is essential that the new format is described as compressively as the NEM12 file format is with • technical description of each quantity; • file and information structure; • file rules re technical aspects including spaces, nulls and commas; and whether fields are mandatory, required or not required.	**High**	In establishing the detailed data format in the Metering Data Provision Procedures, AusNet Services strongly suggest AEMO should utilize the existing NEM12 file format. This is important to avoid the interpretation and compatibility issues of establishing a new format that would require testing and validation. If the NEM12 is not adopted, it is essential that diligence is taken in defining every quantity and detailed rules in terms familiar to the industry.

2. Response to Strawman Procedure for Consultation

A. Proposed Changes

Item	Description	Category	Participant Comments
2	**PROPOSED/ REQUESTED CHANGES**		
	Metering Data Provision Procedures – Strawman for Consultation		
2.1	Re 1.1 Introduction These Procedures ~~must~~ specify the	**Editorial**	AusNet Services suggests changing as noted in red
2.2	Re 1.2.1 Glossary **2.2 Issue with using the term "daily time periods"** Firstly "daily time periods" is a term not used in the draft MDPP. Secondly, it is unclear whether the usage rates referred to either Retailer billing TOU pricing or DNSP Network Tariff TOU rates. Retailers and DNSPs often have different usage rates (refer point 1.4). The MDPP needs to be clear, unambiguous as to what usage rates are, if they are used. Is it the usage rates on the retail contract or the network tariff?	**High**	AusNet Services suggests removing "daily time period" as a defined term
2.3	Re 1.2.1 Glossary **2.3 Issue with using the term "energy flow type"** Although the Rules uses the term "energy flow", the term "energy flow type" is not used in any existing regulatory instruments. The MDPP needs to provide clear, unambiguous guidance to the industry participants. If the MDPP uses non-industry terms the definitions needs to be really clear and reference industry defined terms. Referring to separate usage rates is more problematic; as Retailers and DNSPs often have different usage rates (refer point 1.4). AusNet Services suggests using energy usage and energy generation in preference to "energy flow type".	**High**	AusNet Services suggests removing "energy flow type" as a defined term and using "energy usage" and "energy generation" instead

2.4	Re 1.2.1 Glossary "Extent of energy usage" defined in the glossary but is not used in the draft Procedure. Defining it is unnecessary as it should be clear what the extent of energy usage is.	**Editorial**	Suggest removing "extent of energy usage" as a defined term
2.5	Re 1.2.1 Glossary "Load profile" defined in the glossary but is not used in the draft Procedure. In any case, AusNet Services consider the load profile need not be provided because it doesn't relate to energy usage and is not relevant in some jurisdictions.	**Editorial**	Suggest removing "load profile" as a defined term
2.6	Re 1.2.2 Interpretation It is unclear why the procedures reference the principles of interpretation set out in Schedule 2 of the NEL?	**Editorial**	Suggest removing legal reference
2.7	Re 1.2.2 Interpretation The MDPP should reference times as Australian *Eastern Standard Time*. Consumers may not be familiar National Electricity Law definition of *Eastern Standard Time*. Even though the MDPP is not for distribution to consumers, the language should be clear. *Eastern Standard Time* could be confused with North American Eastern Standard Time.	**Editorial**	Suggest changing to Australian *Eastern Standard Time*
2.8	Re 3.1 Data Formats AusNet Services notes the proposed drafting makes reference twice to the condition for charging when "more than four requests are made in a 12 month period". Additionally the proposed drafting (b) does not accurately represent that data requested be within two years prior to the date of the request. AusNet Services also notes that NECF has not yet been implemented in Victoria, and recommend adding a footnote stating the Victorian basis for using the MDPP.	**Editorial**	Please consider issues raised and redraft appropriately

2.9	Re 3.2 Field details – format and unit of measure **2.9 Consolidate units of measure** For ease of automation, and in the interests of not confusing customers, the units of measure should be rationalised to just kWh. The examples in the Appendices only use kWh. If graphs show only average daily and interval usage/generation, and not monthly totals, there is no legitimate justification to provide data in MWh for small customers. As pointed out in point 1.6, showing demand raises more questions than it answer. Therefore, AusNet Services recommends not including demand units of kW, kVA, MW, and MVA.	**High**	AusNet Services suggests rationalizing the units of measure to just kWh to keep the Metering Data Provision Procedures (MDPP) simple.
2.10	Re 3.3 Summary data format **2.10 Issues with summary data format** AusNet Services suggests the proposed data summary format be rationalised to the following list: I. NMI II. Meter Serial Number (provide a separate summary for meter at the site) III. Unit of measure IV. Data period requested V. Average daily usage VI. Average daily generation VII. Graphical representations as necessary In suggesting this change, AusNet Services notes the following issues with the proposed summary data format: 1. As a principle, the delivery of tabulated data is a different requirement is fundamentally different to the delivery of summary diagrammatic information. Tabulated data is inherently detailed, needs to be readily analysable and as such best is suited to delivery in CSV file format. Whilst summary information should tell the story in a single glance it needs to be accurate and not confusing. As such AusNet Services suggests a data format presents on a single A4 sheet of paper, no matter how long the period of data requested is. 2. Providing data quality indication is more suited to detailed data analysis of tabulated data that can accurately indicate which interval is substituted. Providing this at the summary level will confuse customers	**High**	AusNet Services suggests the issues with the proposed format and adapting the recommended rationalised summary data format.

	and potentially conflict with the data quality flag on the customer's bill resulting in billing disputes. 3. Read dates or read frequency do not relate to the customer's energy usage and are too much information for customers. Also read dates/frequency is difficult for the industry to implement. Do registered participant provide the Standing Data for the scheduled dates/frequency or the actual read dates and frequency e.g. read daily on 99 out of the last 100 days? Providing actual reads/frequency would result in material IT costs for both Retailers and DNSPs, especially in the provision of interval summary data. 4. As mentioned on point 1.4 providing different energy flow types based on usage rate times is problematic due to differences between Network Tariffs and retailer billing TOU pricing. 5. The summary data format needs specify how metering data is provided where there is a meter type or meter configuration change e.g. Type 6 to Type 5. Is the summary data provided in a number of summary sheet (containing graphical representations), or is it combined into a single summary sheet? 6. If a summary data format table is provided, it is essential that the new format is described in terms of: a. technical description of each quantity; and b. information structure and other rules.		
2.11	Re 3.3.1 and 3.3.2 Summary data formats – conditions that apply Condition III recommends ordering the summary date table with the most recent data at the top. AusNet Services considers that if summary data has to be provided in a table it should be ordered in a form consistent with NEM12/NEM13 files with the newest (and most relevant) data at the top. This would reduce system implementation work.	**High**	If summary data is required as a table then AusNet Services suggests it should have the newest data at the top.
2.12	Re 3.3.1 and 3.3.2 Repeating the Rules obligations does not provide any additional information to the reader as to what the formats mean. AusNet Services suggests the procedure should describe what the outputs actually mean to customer or not be included at all.	**Editorial**	Please consider making the suggested alteration.

2.13	Re 3.4 **2.13 Issues with detailed data format** AusNet Services strongly suggest AEMO should utilize the existing NEM12 file format (CSV), also see to comment 1.13. In suggesting this change, AusNet Services notes the following issues with the proposed data format: 1. Providing data quality indication is more suited to detailed data analysis of tabulated data that can accurately indicate which interval is substituted. Providing this as a single daily quality flag will confuse customers and potentially conflict with the data quality flag on the customer's bill which will have a different basis resulting in billing disputes. 2. Providing actual read dates and times is a deviation from the NEM12 format, resulting in material IT costs for both Retailers and DNSPs. Rather the NEM12 file format has DateTime associated with the file creation that along with the data quality flag should inform the reader as whether data has been read or whether a read is outstanding. 3. As mentioned on point 1.4 providing different energy flow types based on usage rate times is problematic due to differences between Network Tariffs and retailer contracts, and even more so with detailed data format as there is no clear linkage between NEM12 datastreams and usage time periods such as peak, off-peak and shoulder times. 4. The detailed data format needs specify how metering data is provided where there is a meter type or meter configuration change e.g. Type 6 to Type 5. Suggest it does make sense to provide multiple detailed metering data files in these situations – both in terms of producing the data and for customer analysing the data.	**High**	AusNet Services strongly suggests AEMO give regard to the issues raised and consider the suggestion of utilizing the existing NEM12 file format. This is important because it promotes consistency and avoids the need for testing.
2.14	Re 3.4 **2.14 Inconsistency in detailed data format and examples** Clause 3.4 states that the interval detailed data format should have usage time information of peak, shoulder and off-peak while the Appendix C example does not. What is the AEMO proposal?	**Clarification required**	Please clarify the inconsistency raised

2.15	General Comment Rather than attempting to produce the MDPP for both the industry and consumers, AusNet Services recommends AEMO produce the MDPP primarily for registered participants, and separate explanatory material and FAQs for customers (and customer authorised representatives).	**General comment**	AusNet Services suggests producing separate explanatory material/FAQs for customers and customer authorized representatives.

3. Comments in relation to CUAC's suggested Data Summary format

A. Comments

Item	Description	Category	Participant Comments
3	**PROPOSED/ REQUESTED CHANGES**		
	Metering Data Provision Procedures – Strawman for Consultation		
3.1	**3.1 Average daily usage** AusNet Services recommends that "average daily usage over period the requested" should be provided in the Data Summary. However, this is the only non-diagrammatic information appropriate to be provided in the summary.	**Support suggestion**	AusNet Services supports providing average daily usage in the Data Summary
3.2	**3.2 Removing textual information from CUAC summary format** AusNet Services notes the CUAC provided additional textual information e.g. "highest average usage month" included in the Summary Format raises more questions than it answers and makes the process of providing Summary Format information unreasonably difficult to automate. Further this information should be evident by looking at the graphs presented. As such, AusNet Services suggests not providing as part of the minimum Summary Format: • Highest average usage month; • Lowest average usage month; • Highest average usage day; • Lowest average usage day; and • The time of day during which you use the most electricity is usually 9:30pm - 11:30pm (shaded)	**Do not support suggestion**	Suggest removing textual information as indicated
3.3	**3.3 Support the first graph with suggested change** AusNet Services support the suggestion of providing the average daily usage by month graph as indicated. Noting the title should be the Average Daily Usage by Month. Where generation is present the title should be Average	**Support suggestion**	Support providing Average Daily Usage by Month

	Daily Usage and Generation by Month.		
3.4	**Support the second graph with suggested change** AusNet Services support the suggestion of providing the average daily usage by day graph as indicated. Noting the title should be the Average Daily Usage by Day. Where generation is present the title should be Average Daily Usage and Generation by Day.	**Support suggestion with alterations**	AusNet Services supports providing Average Daily Usage by Day
3.5	**3.5 General comment applicable to the first and second graphs** Only show whole days and whole months in the graphs, where applicable.	**General comment**	Only whole days and months should be used in graphs
3.6	**3.6 Third, fourth and fifth graphs** Although AusNet Services supports the concept of providing average interval usage and generation graphs, the following reservations in relation to the CUAC proposal need to be considered. • Public holidays have minimum impact on the average usage over a period but make automating the provision of Data Summary requests unduly difficult (given public holidays are different each year and can also be regional e.g. Melbourne Cup). This will make system calculations more complex, and require yearly updating of numerous different look up tables at state or locational level. • Providing the shading indicating the most electricity also makes automation difficult. This should be obvious from the graph. Without automating just process of shading the graph would add at least 10 minutes per request – that is adding an additional 2 days when processing 100 requests.	**Support concept, noting issues**	AusNet Services supports the concept of providing average interval usage and generation graphs, but not including public holidays in that analysis. Nor does AusNet Services support the provision of shading to indicate high usage periods.
3.7	**3.7 General comments to third, fourth and fifth graphs** All times should be (Australian) *Eastern Standard Time* rather than Australian Eastern Daylight Time (day light savings) or wall clock time to avoid billing disputes and confusion.	**General comment**	Only (Australian) *Eastern Standard Time* should be used in graphs