



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

METERING DATA PROVISION PROCEDURES PACKAGE

Participant: Origin Energy

Completion Date: 21st July, 2015

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1. Draft Metering Data Provision Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	No Comment

1.2	Definitions and interpretation	<p>Origin recommends that some of the terms are removed or redefined as noted below.</p> <p>Energy flow as defined in the draft procedure is separate energy measurement or a separate usage rate. Origin views this definition as Billing data/Retail tariff information and believes this is deviating from 7.16 (NER) which refers to the provision of metering data and not billing data.</p> <p>Origin recommends to align minimum meter data requirements to the information contained within the NEM files. Origin therefore recommends that the summary format be provided at a minimum level containing net energy flow for net metering or gross energy flow where streams are measured separately.</p> <p>Accumulated metering data – summary data Remove “daily” as this is not available for accumulation meters</p> <p>Daily Time Periods - remove as related to billing data/tariff information</p> <p>Demand/Capacity - remove as related to billing data/tariff information</p> <p>Origin does not support the inclusion of demand in the diagrammatic representation and questions the value this adds, given:</p> <ol style="list-style-type: none"> 1) This information is contained within the customer’s bill 2) Introducing a calculation component to the provision of meter data request and increased complexity. eg. Determining the maximum demand value 3) Low number of customers that are classified as Small that are on a specific retail demand tariff. <p>The objective is for the provision of a minimum standard meter data format that can be customised by the customer to meet their needs.</p>
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		<p>Energy flow type - Total energy flow for which there is separate energy measurement.</p> <p>Interval metering data – summary data Diagrammatic representation of daily volumes is per example appendix A3/B3, however this is contradicted by Load profile definition which states that the diagram of energy consumption is to be monthly for remote read interval meters and by the Read Date for manually read interval meters. Please clarify and be clear in the Procedure whether the Diagrammatic representation i.e. The graph needs to be daily volumes or as per load profile definition. It must be noted that daily representation of a graph for say 2 years could be up to 3285 column bars (if displaying Peak, Off-Peak, Shoulder). This is not practical in a PDF format. It is strongly advised that the graph shows at minimum monthly time periods.</p> <p>Load profile Please confirm and be clear in the procedure whether this is actually the tabular form i.e. appendix A.2/B.2 ?</p> <p>Off-Peak – remove as billing time slice Peak – remove as billing time slice Shoulder – remove as billing time slice</p>
1.3	Related AEMO procedures	No comment
2	IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES	
2.1	Verifying the identity of a retail customer or customer authorised representative	2.1 (c) Recommend that the time to advise the customer in the event that the Retailer/Distributor cannot successful verify the identity or relevant consent is changed from 3 days to 5 business days. This extension will allow sufficient time for verification process and subsequent postage time if required.

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2.2	Retail customer request	<p>Origin suggests that metering data is provided within 10 Business days only when verification was successful.</p> <p>Origin recommends wording within Procedures that allows for Retailer/DNSP to negotiate an agreed delivery timeframe with the customer after more than 1 request</p>
2.3	Customer authorised representative	<p>2.3 (c) Origin does not agree that the number of request from an authorised representative needs to exceed 100 before negotiating timeframes. Origin recommends wording within Procedures that allows for Retailer/DNSP to negotiate an agreed delivery timeframe with the customer authorised representative (after more than 1 request)</p> <p>Origin recommends to include a section that provides clarity for Retailers and DNSPs for charging a reasonable charge. Please address as this issue was not addressed as part of the first consultation</p> <ol style="list-style-type: none"> 1) When the request is received by the Customer's Authorised Representative, who is the charge rendered to? The Customer's Authorised Representative or to the Customer. 2) Retailer and DNSPs may apply a reasonable charge to a customer's authorised representative even if they choose to send through multiple individual requests on any given day (as opposed to one request received including multiple customers). 3) Include in the procedures that the Retailer and DNSP may reserve the right to refuse to provide metering data under certain circumstances and can decline the request for meter data should the customer authorised representative not meet customer validation criteria or associated commercial terms.

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3	DATA DELIVERY METHOD	No comment
3.1	Delivering summary data	No Comment
3.2	Delivering detailed data	No Comment
3.3	File naming conventions	No Comment
3.4	Numbering of metering data files to be provided	No Comment
4	DATA FILE CONTENT	
4.1	Field details – format and unit of measure	No comment
4.2	Accumulated metering data summary	<p>(d) IV Data quality indication should be provided in the tabular form as Actual = Y or “N” for Subs or Final Subs.</p> <p>It is not practical to provide a statement indicating the file contains estimated meter data and specifying each period.</p> <p>VII (A.) Remove billing related components and maintain consistency with information provided by DNSP.</p>
4.3	Interval metering data summary	<p>(d) IV Data quality indication should be provided in the tabular form as Actual = Y or “N” for Subs or Final Subs.</p> <p>It is not practice to provide a statement indicating the file contains estimated and specifying each period.</p> <p>VII (A.) Remove billing related components and maintain consistency with information provided by DNSP.</p> <p>VIII – remove demand/capacity requirement. This is per Origin feedback in 1.2.</p>
4.4	Detailed data format	<p>Origin supported the initial format from the Strawman procedures. This format maintained the rule objective by containing detailed metering data as a minimum requirement. It was quite valid that additional data elements were not part of the initial format proposed.</p> <p>Origin views the additional data elements contained with the required NEM12 format is going beyond the minimum specification and will introduce unnecessary high costs formulating a NEM12 for a Retailer.</p>

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		<p>Origin can support the concept of formulating a NEM12 format, if there was a 'cut-down' version containing data that was pertaining to the interval data (300 Record) and data elements in the NMI Data detail (200 record).</p> <p>We question the value some of these fields provides to the customer, especially given the complexities to provide the information and suggest default values be allowable to construct the records.</p> <p>For example:</p> <p><u>Record 100 -</u> File creation time and date - generate based on when the customer file is generated, rather than the date/time the multiple meter read file(s) were generated FromParticipant and ToParticipant – default values be allowable</p> <p><u>Record 200</u> Next schedule Read date – recommend default values.</p> <p><u>Record 400</u> Determining the quality method for Variable. Eg. Intervals 1 to 26 are actual and 27 to 48 are subs. Complexity, as we don't store this information.</p> <p>Reading description – Free text – purpose of this in terms of provisioning meter data (applies for 300 record as well)</p> <p><u>Record 500</u> Transaction Code Retail Service order details Index Read</p>
4.5	Ability to offer alternative metering data formats	(d). Include wording that providing an alternative metering data file may be subject to a reasonable charge
5	OTHER COMMENTS	
Appendix A	ACCUMULATED METERING DATA SUMMARY FORMAT	

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A.1	File conditions	<p>Energy Flow Type: Information should only be obtained based on the metering data contained within the metering files.</p> <p>Data quality: It is not practical to provide a statement indicating the file contains estimated data and specifying each period. Recommended that the Data quality indication should be provided in the tabular form as Actual = Y or “N” for Subs or Final Subs.</p>
A.2	Example: accumulated file	<p>Based on above file conditions:</p> <ol style="list-style-type: none"> 1) Include data quality indication. 2) Remove energy flow types as per Retailer tariff
A.3	Example: diagrammatic representation of energy usage	Remove energy flow types as per Retailer tariff
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	File conditions	<p>Energy Flow Type: Information should only be obtained based on the metering data contained within the metering files.</p> <p>Data quality: It is not practical to provide a statement indicating the file contains estimated data and specifying each period. Recommended that the Data quality indication should be provided in the tabular form as Actual = Y or “N” for Subs or Final Subs.</p>
B.2	Example: interval file	<p>Based on above file conditions:</p> <ol style="list-style-type: none"> 1) Include data quality indication. 2) Remove energy flow types as per Retailer tariff ie. Peak, off-peak, shoulder, demand
B.3	Example: diagrammatic representation of energy usage	Remove energy flow types as per Retailer tariff