



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

METERING DATA PROVISION PROCEDURES PACKAGE

Participant: Momentum Energy

Completion Date: 22nd July, 2015

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1. Draft Metering Data Provision Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	Agreed
1.2	Definitions and interpretation Daily time periods - Time periods during a day when different usage rates are applied to energy usage.	NER 7.16(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: (i) nature and extent of energy usage for daily time periods (ii) usage or load profile over a specified period; and (iii) a diagrammatic representation of the information referred to in subparagraph (i); Remove this definition on the basis that usage rates are out of scope of the NER and purpose of this document.
	Energy flow type - Energy flow over a period of time for which there is a separate energy measurement or a separate usage rate-	It is Momentum Energy's position and interpretation that "nature and extent of <u>energy usage</u> " should be further defined as consumption, controlled load and generation data. AEMO have interpreted this definition to mean Peak, Shoulder and Off Peak periods which is billing related information and not meter data information. This single definition applies to both the DNSP and the Retailer. To further reduce confusion and for consistency with the NER, the definition should be titled Energy Usage and not Energy Flow type.
	Interval metering data - summary This includes: <ul style="list-style-type: none"> Total volume of energy for each energy flow type for the specified time period. Diagrammatic representation of daily volumes for each energy flow type for the specified time period. From Date and To Date for the specified time period. 	Consistency with NER: Replace energy flow with energy usage.
	Nature - See energy flow type.	Consistency with NER: Replace energy flow with energy usage.
	Off-peak : A time period during a day when an off-peak rate is applied to energy usage. Peak : A time period during a day when a peak rate is applied to energy usage. Shoulder : A time period during a day when a shoulder rate is	Removal of Off Peak, Peak and Shoulder definitions on the basis that "Energy Flow Type" should only include consumption, generation and controlled load data.

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	applied to energy usage.	
		<p>Additional definition:</p> <p>Authorised participant period:</p> <p>Momentum Energy would like to see the inclusion of a definition that pertains to the limited responsibility for provision of metering data only for the period within the requested period, for which the participant was an authorised participant (i.e. Financially Responsible Market Participant or DNSP).</p>
1.3	Related AEMO procedures II. Standing Data for MSATS.	Consider removal this document on the basis that Standing Data is out of scope for Metering Data.
2	<p>IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES</p> <p>(a) <i>Retailers and DNSPs must verify customer identity and use reasonable endeavours to provide metering data to retail customers and customer authorised representatives within the delivery timeframes detailed in clauses 2.2 and 2.3.</i></p>	<p>Final Determination – Executive Summary:</p> <p>“The final rules are consistent with the draft rules in terms of retailers and DNSPs having up to a maximum 10 business days to respond to a single request for data from a customer or its authorised representative”</p> <p>5.3 Time frame for retailer and DNSP to respond to a data request</p> <p>5.3.1 Rule change proposal</p> <p>The COAG Energy Council has proposed that DNSPs and retailers must respond to a request to provide data within 10 business days.</p> <p>NER 7.16:</p> <p>include timeframes in which a <i>retailer</i> or a <i>Distribution Network Service Provider</i> must, using reasonable endeavours, respond to requests made under rule 7.7(a) (7). The timeframe to be included must:</p> <p>(i) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a <i>customer authorised representative</i> in relation to more than one <i>retail customer</i> of either the <i>retailer</i> or <i>Distribution Network Service Provider</i> to whom the request is made; and</p> <p>Momentum Energy considers that it is imperative to accurately reflect both the intent of the final determination and the rule set out in the NER. In doing so, we consider that this section should reflect the response timeframe and the not provision of meter data within the said timeframes, hence should read as follows (refer to Momentum Energy commentary 2.1 (c)):</p> <p>IDENTITY VERIFICATION AND METER DATA REQUEST RESPONSE TIMEFRAMES</p> <p>(a) <i>Retailers and DNSPs must verify customer identity and use reasonable</i></p>

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		endeavours to RESPOND to retail customers and customer authorised representatives within the delivery timeframes detailed in clauses 2.2 and 2.3.
2.1	<p>Verifying the identity of a retail customer or customer authorised representative</p> <p>(a) Retailers and DNSPs must identify and publish, at a minimum, the information below required from a retail customer or customer authorised representative who requests metering data.</p> <ol style="list-style-type: none"> Sufficient information to verify identity and relevant consents from retail customers and customer authorised representatives. The way in which a request for metering data can be made, e.g. email, writing, telephone, etc. The form in which the metering data will be provided by the retailer or DNSP, e.g. electronic, physical copy, etc. 	<p>2.3 Final determination: ... “The final NERR rule will not require retailers and DNSPs to place information on their websites about how metering data is used and will not therefore require AER to develop 'metering data common terminology guidelines'. While we strongly support reforms to enhance energy literacy and consumer engagement, we do not consider that the COAG Energy Council's proposal is the most effective regulatory response to address privacy concerns. We consider that any privacy concerns are better addressed through the application of privacy legislation to the extent that meter data is personal information”.</p> <p>4.4 Analysis: ...” In relation to whether the NER should specify the nature of consent required by parties authorised by customers, we do not consider that the NER should specify this. We consider that existing laws, including privacy legislation, sufficiently addresses this issue. We consider that it is not generally appropriate for energy market regulations to apply and potentially duplicate obligations found in existing laws. Under this approach, for example, it would be up to the retailer or DNSP to determine what it needs to do to so that it meets its privacy obligations. It would also be up to the parties authorised by the customer to only use the information as permitted by privacy law.”</p> <ol style="list-style-type: none"> On the basis of the final determination 2.3 and amended NER 7.16, Momentum Energy consider that it is out of scope and inappropriate for AEMO to mandate publication of “information to verify identity and relevant consents from retail customers and customer authorised representatives” and recommend that this clause is removed. Privacy will be managed by each participant in line with its understanding of The Privacy Act and contained Australian Privacy Principles to which end; The National Energy Rules require that Retailers and DNSP's must publish their Privacy Policy on their websites in addition to including a Privacy Act notice in their standard contract terms and conditions. Further, as determined by the AEMC it is “not generally appropriate for energy market regulations to apply and potentially duplicate obligations”. Momentum Energy's policies and practices will continue to apply and take precedent over AEMO procedural requirements.

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	(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.	On the basis of the above arguments, Momentum Energy would encourage the removal this clause.
	(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>(c).../ 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>Momentum Energy consider that this requirement is completely beyond the scope of the AEMC Final Determination and of 7.16 of the NER:</p> <p>Final Determination – Executive Summary:</p> <p>“The final rules are consistent with the draft rules in terms of retailers and DNSPs having up to a maximum 10 business days to respond to a single request for data from a customer or its authorised representative”</p> <p>5.3 Time frame for retailer and DNSP to respond to a data request</p> <p>5.3.1 Rule change proposal</p> <p>The COAG Energy Council has proposed that DNSPs and retailers must respond to a request to provide data within 10 business days.</p> <p>NER 7.16:</p> <p>include timeframes in which a <i>retailer</i> or a <i>Distribution Network Service Provider</i> 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"> (ii) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a <i>customer authorised representative</i> in relation to more than one <i>retail customer</i> of either the <i>retailer</i> or <i>Distribution Network Service Provider</i> to whom the request is made; and (iii) take account of procedures in place relating to the validation of <i>metering data</i>; <p>1. The final determination and the NER clearly state that the retailer or DNSP has up to a maximum of 10 business days to RESPOND to a single request for data. The purpose of the response should be either to inform of delivery of the data or notification of failure to meet the validation requirements at which time the request should be deemed as closed. Momentum Energy considers that the MDPP should reflect the full 10 business days as a response timeframe not guaranteed</p>

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		<p>delivery of data.</p> <p>2. Should the MDPP retain the shorter timeframe for validation failure, Momentum Energy will invoke the inconsistency clause and respond to customers within the 10 business day requirement with either a validation failure notice or with the requested data files.</p>
	<p>(d) The retailer or DNSP notification, issued in accordance with clause 2.1(c), must:</p> <ul style="list-style-type: none"> I. Provide detail of where the verification information was insufficient. II. Advise that the request for metering data is closed. III. Advise that a new metering data request with complete verification information must be provided. 	<p>Agree.</p>
2.2	<p>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>1. Momentum Energy require further clarification: Is this type of request limited to a single site? Retailers will have many examples of a single customer who is the account holder for multiple NMI's. In such scenarios, would AEMO consider that multiple site should be treated as a bulk request?</p> <p>2. Momentum Energy highlight that "reasonable endeavours to respond" should be applied per NER 7.16 and Momentum Energy commentary as previously stated at 2(a) and 2.1(c).</p>
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>Momentum Energy highlight that "reasonable endeavours to respond" should be applied per NER 7.16 and Momentum Energy commentary as previously stated at 2(a) and 2.1(c).</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>The AEMC Rule Change specifically excludes timeframes for bulk data requests and recommended in its final determination that the timeframe for bulk requests should be defined by the AEMO procedure:</p> <p>NER 7.16:</p> <p>(4) include timeframes in which a <i>retailer</i> or a <i>Distribution Network Service Provider</i> must, using reasonable endeavours, respond to requests made under rule 7.7(a) (7). The timeframe to be included must:</p>

Item	Description	Participant Comments
		<p>(i) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a <i>customer authorised representative</i> in relation to more than one <i>retail customer</i> of either the <i>retailer</i> or <i>Distribution Network Service Provider</i> to whom the request is made; and</p> <p>Final Determination</p> <p>4.4: “However, we recognise the potential demands placed on retailers and DNSPs in responding to bulk data requests from customer authorised representatives. We consider that bulk data requests - recognised in the NER final rule as requests made by customer authorised representatives in relation to more than one retail customer- should be treated differently to singular requests. Retailers and DNSPs should be able to have a longer time frame to respond to bulk data requests as an exception to the time limits for data requests set out in the NER. AEMO would specify the time limits for bulk data requests in its metering data provision procedures. These time limits could vary depending on the size of the bulk data request or other relevant factors.”</p> <p>5.3: “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.”</p> <p>1. Momentum Energy acknowledges and appreciate that there is a need to build requirements into the procedure that define a bulk request and the management of such requests. We have highlighted on previous occasions the risks associated with this type of request as being:</p> <ul style="list-style-type: none"> (a) The potential for 3rd party service providers to exploit the gaps when submitting bulk requests by submitting multiple single requests. We requested that the procedure should specify that all requests by the same customer authorised representative should be submitted in a single transaction per business day. (e.g... one email containing a single excel file, containing all requests for that business day). (b) The potential impact to resourcing and business processes when receiving multiple bulk requests from multiple customer authorised representatives. (c) That changing market conditions will mean that the volume of requests are unprecedented and therefore are unpredictable and all care should

Item	Description	Participant Comments
		<p>be taken in considering the limit to the number of requests.</p> <p>2. Momentum Energy have done further analysis of this type of request and would like to highlight the key concerns we have regarding the current draft:</p> <p>(a) “Where a customer authorised representative requests metering data for more than one but less than 100 retail customers in a single request”.</p> <p>(i) This sentence leaves the door for exploitation open and allows for the customer authorised representative to send multiple single requests that have a 10 business day response requirement or to manipulate the bulk request so that it never exceeds 100 and therefore forcing participants to provide data within the timeframe specified.</p> <p>(ii) Momentum Energy would consider the receipt of multiple requests per customer authorised representative would collectively be considered as a bulk request however this would create extreme inefficiencies in process by having to track and count the number of requests received by each authorised representative, and this further demonstrates the need to specify one single request per business day, per customer authorised representative.</p> <p>(iii) 100 requests are considered to be most certainly unreasonably high. Under the National Privacy Principles Momentum Energy has a legal obligation to ensure that every customer request received via an authorised representative is legitimately and legally represented by the requesting party. As such, we are required to perform a validation process that includes contacting each of our customers to confirm that the appropriate consent was provided to the requesting party. Performing these validations will most certainly put demands on our business practices and resourcing.</p> <p>(b) “Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the customer authorised representative within 20 business days.” (Refer to 2.1) Momentum Energy again highlight that both the NER and AEMC determination quite clearly define that reasonable endeavours to RESPOND to requests are made not deliver metering data.</p>

Item	Description	Participant Comments
		<p>(c) Has AEMO considered how a participant should respond to the bulk request if one or more customers cannot be validated? Momentum Energy are not clear on this point and while the common sense approach would be to respond to each line of the bulk request as single responses it is not necessarily the adopted industry process.</p> <p>3. Momentum Energy makes the following recommendations:</p> <p>(a) While we would ideally like to see the removal of this section and regard any and all requests for more than one customer as a bulk request with negotiated timeframes, we also appreciate the need to specify a framework for a limited bulk request. We do however think that the number of requests should be reduced to not more than 10 customers for a bulk request, and;</p> <p>(b) While we acknowledged that this type of request is not part of B2B procedures, we recommend that AEMO refer to the current B2B Procedure Customer and Site Details Notification Process as a guide to setting the rules for the sending and receiving of both requests and responses. Notably the below section of the said process:</p> <p>2.2.2 Common business rules for Notifications</p> <p>b. Retailers must only send a single daily Notification of each type (where relevant) covering all Changes made to the NMI's details that day. The Retailer must ensure that the most recent details are provided. Notifications sent by a Retailer in response to a CustomerDetailsRequest may be sent individually or included with other Notifications (refer section 2.4.a of the Technical Delivery Specification for details regarding the bundling of transactions).</p> <p>(c) That the rule should be written as follows or similar:</p> <p>Customer authorised representative requesting metering data for more than one but less than 10 retail customers in a single business day, are required to submit a single bulk request by 5pm of that business day.</p> <p>The customer authorised representative must ensure that all meter data requests:</p> <p>(i) accumulated after 5pm on any business day, and;</p> <p>(ii) accumulated by the customer authorised representative on non-business days</p>

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		<p>Will be added to next business day request file.</p> <p>Retailers and DNSPs must use reasonable endeavours to respond to customer authorised representative within 20 business days and may send single responses to each customers meter data request. This response timeframe commences from the date the request is received by the retailer or DNSP.</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.	Momentum Energy would highlight the points previously made that it regards 100 customer requests to be too large a number and recommend that requests with greater than 10 customers will be subject to a negotiated and agreed RESPONSE time between the requester and the participant.
3	<p>DATA DELIVERY METHOD</p> <p>(a) Retail customers or customer authorised representatives may request detailed metering data for analysis or summary metering data.</p>	<p>1. Recommend removal of “for analysis” as this may be considered as overly prescriptive.</p> <p>2. Addition:</p> <p>(b) Participant must provide metering data for the authorised participant period only. (See Glossary)</p>
3.1	<p>Delivering summary data</p> <p>(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.</p>	Agreed.
	(b) The summary data must be provided in a Portable Document Format (PDF), unless otherwise agreed with the retail customer or customer authorised representative.	<p>The NER 7.16(c) states “The metering data provision procedures must: specify the manner and form in which retail customers' metering data must be provided,” which supports the AEMC 2.3 Final rule determination “The final rules sets out that the metering data provision procedures will provide for a minimum method of delivering data to customers or their authorised representatives upon request. This allows for innovation by retailers and DNSPs to provide this data to customers or their authorised representatives while providing certainty that there will be a minimum delivery method that will allow customers and their authorised representatives to obtain their data.”</p> <p>In order to encourage innovation and alternate methods of delivery (e.g. Portal, App etc) it is important to allow participant's sufficient flexibility in product development as technology evolves.</p> <p>Momentum Energy request that this clause is revised to include that file format must at minimum be convertible to PDF format, unless otherwise agreed by the retail customer or customer authorised representative. There are multiple file formats that can be delivered electronically which can later be converted</p>

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		<p>then read and printed in PDF format.</p> <p>Supported formats as listed on adobe.com:</p> <p>Direct file conversion formats (Acrobat)</p> <p>Use File > Create PDF > From File to convert these file formats to Adobe PDF. You can also convert clipboard data, web pages, and scanned documents to PDF. For more information about these conversion methods, see Creating simple PDFs with Acrobat in Acrobat Help.</p> <table> <tr> <th>Extension</th><th>Filename</th><th>Comments</th></tr> <tr> <td>.doc, .docx, .xls, .xlsx, .ppt, .pptx</td><td>Microsoft Office formats (Word 2007 and 2010, PowerPoint, Excel)</td><td>Make sure that the correct version of Microsoft Office is installed.</td></tr> <tr> <td>.txt, .rtf</td><td>Text, Rich Text Format</td><td></td></tr> <tr> <td>.ps, .eps, .prn</td><td>Adobe PostScript and Encapsulated PostScript</td><td></td></tr> <tr> <td>.bmp, .jpeg, .gif, .tiff, .png, .pcx, .emf, .rle, .dib</td><td>Image files</td><td></td></tr> <tr> <td>.wpd</td><td>Corel WordPerfect</td><td>Install Corel WordPerfect, and then convert using the Adobe PDF Printer (Acrobat 9 and Acrobat X Windows).</td></tr> <tr> <td>.odt, .odp, .ods, .odg, .odf, .sxw, .sxi, .sxc, .sxd, .stw</td><td>OpenOffice and StarOffice presentation, spreadsheet, graphic, and document files</td><td>If the applications can access the printer system, then you can use the Adobe PDF printer to convert these files.</td></tr> <tr> <td>.psd</td><td>Adobe Photoshop</td><td>Acrobat 9.x does not support this file format.</td></tr> <tr> <td>.ai</td><td>Adobe Illustrator</td><td></td></tr> <tr> <td>.u3d, .prc</td><td>3D files</td><td></td></tr> <tr> <td>.dwg, .dwt, .dxf, .dwf, .dst</td><td>Autodesk AutoCAD</td><td></td></tr> <tr> <td>.xps</td><td>XML paper specification</td><td></td></tr> </table>	Extension	Filename	Comments	.doc, .docx, .xls, .xlsx, .ppt, .pptx	Microsoft Office formats (Word 2007 and 2010, PowerPoint, Excel)	Make sure that the correct version of Microsoft Office is installed.	.txt, .rtf	Text, Rich Text Format		.ps, .eps, .prn	Adobe PostScript and Encapsulated PostScript		.bmp, .jpeg, .gif, .tiff, .png, .pcx, .emf, .rle, .dib	Image files		.wpd	Corel WordPerfect	Install Corel WordPerfect, and then convert using the Adobe PDF Printer (Acrobat 9 and Acrobat X Windows).	.odt, .odp, .ods, .odg, .odf, .sxw, .sxi, .sxc, .sxd, .stw	OpenOffice and StarOffice presentation, spreadsheet, graphic, and document files	If the applications can access the printer system, then you can use the Adobe PDF printer to convert these files.	.psd	Adobe Photoshop	Acrobat 9.x does not support this file format.	.ai	Adobe Illustrator		.u3d, .prc	3D files		.dwg, .dwt, .dxf, .dwf, .dst	Autodesk AutoCAD		.xps	XML paper specification	
Extension	Filename	Comments																																				
.doc, .docx, .xls, .xlsx, .ppt, .pptx	Microsoft Office formats (Word 2007 and 2010, PowerPoint, Excel)	Make sure that the correct version of Microsoft Office is installed.																																				
.txt, .rtf	Text, Rich Text Format																																					
.ps, .eps, .prn	Adobe PostScript and Encapsulated PostScript																																					
.bmp, .jpeg, .gif, .tiff, .png, .pcx, .emf, .rle, .dib	Image files																																					
.wpd	Corel WordPerfect	Install Corel WordPerfect, and then convert using the Adobe PDF Printer (Acrobat 9 and Acrobat X Windows).																																				
.odt, .odp, .ods, .odg, .odf, .sxw, .sxi, .sxc, .sxd, .stw	OpenOffice and StarOffice presentation, spreadsheet, graphic, and document files	If the applications can access the printer system, then you can use the Adobe PDF printer to convert these files.																																				
.psd	Adobe Photoshop	Acrobat 9.x does not support this file format.																																				
.ai	Adobe Illustrator																																					
.u3d, .prc	3D files																																					
.dwg, .dwt, .dxf, .dwf, .dst	Autodesk AutoCAD																																					
.xps	XML paper specification																																					
3.2	<p>Delivering detailed data</p> <p>(a) The retailer or DNSP must provide the detailed data electronically to the retail customer or customer authorised representative.</p>	<p>Agreed.</p>																																				

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	(b) The detailed data must be constructed in a CSV format, unless otherwise agreed with the retail customer or customer authorised representative.	Momentum Energy request a revision of this clause to include "CSV format at minimum" to allow scope for innovation and product development as technology develops.																		
	(c) Detailed data constructed in a CSV format may be delivered as a compressed file with a ".zip" extension if needed to manage file size of delivered data.	Agreed.																		
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	Agreed.																		
	(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: 8000000000_20140301_20160301_20160305130000_DETAILED.csv	Agreed.																		
	(c) File naming fields must use the following format. <table border="1"> <thead> <tr> <th>Field Name</th><th>Description</th><th>Format</th></tr> </thead> <tbody> <tr> <td>NMI</td><td>NMI for the connection point. Does not include check digit or NMI Suffix.</td><td>Char(10)</td></tr> <tr> <td>MeteringDataStartDate</td><td>Date at the start of the requested metering data period.</td><td>Date(8) (i.e. CCYYMMDD)</td></tr> <tr> <td>MeteringDataEndDate</td><td>Date at the end of the requested metering data period.</td><td>Date(8) (i.e. CCYYMMDD)</td></tr> <tr> <td>FileProvisionDate</td><td>Date and time when metering data file is produced.</td><td>DateTime(14) (i.e. CCYYMMDDhhmmss)</td></tr> <tr> <td>File Type</td><td>"SUMMARY" for both accumulated and interval summary files. "DETAILED" for interval detailed file.</td><td>VarChar(10) (not case sensitive)</td></tr> </tbody> </table>	Field Name	Description	Format	NMI	NMI for the connection point. Does not include check digit or NMI Suffix.	Char(10)	MeteringDataStartDate	Date at the start of the requested metering data period.	Date(8) (i.e. CCYYMMDD)	MeteringDataEndDate	Date at the end of the requested metering data period.	Date(8) (i.e. CCYYMMDD)	FileProvisionDate	Date and time when metering data file is produced.	DateTime(14) (i.e. CCYYMMDDhhmmss)	File Type	"SUMMARY" for both accumulated and interval summary files. "DETAILED" for interval detailed file.	VarChar(10) (not case sensitive)	Agreed.
Field Name	Description	Format																		
NMI	NMI for the connection point. Does not include check digit or NMI Suffix.	Char(10)																		
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File Type	"SUMMARY" for both accumulated and interval summary files. "DETAILED" for interval detailed file.	VarChar(10) (not case sensitive)																		
3.4	Numbering of metering data files to be provided (a) Retailers and DNSPs must provide a single metering data file in relation to a retail customer's metering installation for the requested period.	Agreed on the proviso that the statement referred to at 3.0 regarding period of responsibility is included.																		

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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 includes a change of tariff and a change from accumulated metering to interval metering.	Momentum Energy request that the statement referred to at 3.0 regarding period of responsibility is included and that inclusion of tariff change reconfigurations is removed on the basis that tariff is not relevant to metering data (see commentary at 4.2(d) and 4.3(d)).																
4	DATA FILE CONTENT (a) Retailers and DNSPs must provide the following content for each metering data file.	Revised condition to ensure clarity of minimum specification and responsible period to provide data as determined by AEMC: (a) Retailers and DNSPs must provide the following content at a minimum for each metering data file within its authorised participant period only. (See Glossary)																
4.1	Field details – format and unit of measure (a) Data fields for detailed and summary metering data files must use these permitted values (a subset of units of measure detailed in the Metering Data File Format Specification NEM12 & NEM13). Note that the permitted values for unit of measure are not case sensitive. <table><tr><th>Permitted values</th><th>Description</th><th>Format</th><th>Character length</th></tr><tr><td>kWh</td><td>Kilowatt hour (energy usage)</td><td>Numeric</td><td>15.3</td></tr><tr><td>kW</td><td>Kilowatt (demand/capacity)</td><td>Numeric</td><td>15.3</td></tr><tr><td>kVA</td><td>Kilovolt ampere (demand/capacity)</td><td>Numeric</td><td>15.3</td></tr></table>	Permitted values	Description	Format	Character length	kWh	Kilowatt hour (energy usage)	Numeric	15.3	kW	Kilowatt (demand/capacity)	Numeric	15.3	kVA	Kilovolt ampere (demand/capacity)	Numeric	15.3	Agree.
Permitted values	Description	Format	Character length															
kWh	Kilowatt hour (energy usage)	Numeric	15.3															
kW	Kilowatt (demand/capacity)	Numeric	15.3															
kVA	Kilovolt ampere (demand/capacity)	Numeric	15.3															
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.	Agree where “nature of usage” is defined as Consumption, Controlled Load and Generation.																
	(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.	Agree.																
	(c) Appendix A contains the accumulated metering data summary required file conditions and an example of a diagrammatic representation of energy usage.	See commentary for Appendix A.																

Item	Description	Participant Comments
	<p>(d) The summary data format for interval metering data provided by a retailer must include the following information:</p> <ul style="list-style-type: none"> I. National Metering Identifier (NMI), II. Meter Serial Number, III. Unit of Measure (UOM) for the Energy Flow Type, IV. Data quality indication, V. Read Date for accumulated metering data (i.e. end of meter reading period), VI. From Date (i.e. start of meter reading period), VII. Energy Flow Types: <ul style="list-style-type: none"> A. Total usage or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc., B. Controlled Load usage (only if applicable), C. Generation (only if applicable). VIII. Demand/Capacity (if applicable for billing or if requested by a retail customer, or customer authorised representative, and is available). 	<p>Rule 7.7 Entitlement to metering data and access to metering installation</p> <p>(a) The only persons entitled to access <i>energy data</i> or to receive <i>metering data</i>, <i>NMI Standing Data</i>, <i>settlements ready data</i> or <i>data from the metering register for a metering installation</i> are:</p> <p>(7) a:</p> <ul style="list-style-type: none"> (i) <i>retail customer</i> of: <ul style="list-style-type: none"> (A) a <i>retailer</i>; or (B) a <i>Distribution Network Service Provider</i>; or (ii) <i>customer authorized representative</i>, <p>upon request by that <i>retail customer</i> its <i>customer authorised representative</i> to the <i>retailer</i> or <i>Distribution Network Service Provider</i> <i>in relation to that retail customer's metering installation</i>;</p> <p>7.16 Metering data provision to retail customers</p> <p>(3) for retail customers for whom accumulated metering data is available, specify a summary data format;</p> <ol style="list-style-type: none"> 1. Momentum Energy strongly urge AEMO to remove this entire section and apply one set of criteria for both DNSP and Retailer with the removal of any and all billing related data including demand/capacity that is not available through meter data files. The NER7.7 clearly states that the customer and authorised customer representative are only entitled to “data from the metering register for a metering installation” as highlighted above. The inclusion of billing related data is outside the scope of this document and beyond the requirements and permissions granted by the NER7.7. 2. Retail participants should not be subject to additional requirements beyond what has been included in the NER as the minimum requirements. Further the retail participant should not be subject to the cost and resourcing that would require in design and development of systems so as to produce information beyond scope of what has been defined as the minimum criteria by the NER. 3. As noted in previous discussions between AEMO and retail participants, workshop discussions and emails sent by retail participants to AEMO, the intention of the provision of <u>metering data</u> is to provide the customer with information regarding their

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Item	Description	Participant Comments
		usage/generation patterns and not to reconcile or validate billing information or invoicing.
	<p>(e) The summary data format for <i>accumulated metering data provided by a DNSP</i> must include the following information:</p> <ul style="list-style-type: none"> I. National Metering Identifier (NMI), II. Meter Serial Number, III. Unit of Measure (UOM) for the Energy Flow Type, IV. Data quality indication, V. Read Date for accumulated metering data (i.e. end of meter reading period), metering data (i.e. end of meter reading period, VI. From Date (i.e. start of meter reading period). VII. Energy Flow Types: <ul style="list-style-type: none"> A. Total usage, B. Controlled load (only if applicable), C. Generation (only if applicable). 	<ol style="list-style-type: none"> 1. Change “Energy Flow Types” to “Energy Usage” and “Total Usage” to “Consumption” as preferred terminology in NER 7.16(2)(i), which although is applicable to interval meter data can also be applied to accumulation metering and provide for a consistent approach. 2. Momentum Energy would support and agree that this is the correct format for both the DNSP and Retailer and is within the scope of the NER and the intention of the AEMC final determination. 3. Momentum Energy would also highlight that there is a single rule that applies to all relevant participants (i.e. DNSP and Retailer) in the provision of metering data. Momentum Energy question if it is in the scope of AEMO’s authority to create separate obligations for the provision of information not included in the scope of metering data. 4. Is it the intention that <u>all</u> 550 records (service order related reads) should be included in the file? Momentum Energy’s interpretation is that each period will include all 550 records and the data quality statement should be inclusive of all service order reads.
4.3	<p>Interval metering data summary</p> <p>(a) The interval metering data summary to be provided by a retailer and DNSP must, at a minimum, include:</p> <ul style="list-style-type: none"> I. The nature and extent of energy usage for daily time periods II. Usage or load profile over a specified period III. A diagrammatic representation of the information in (I) above. 	Agree where “nature of usage” is defined as Consumption, Controlled Load and Generation.
	<p>(b) Conditions that apply to all summary <i>interval metering data</i> files are:</p> <ul style="list-style-type: none"> 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. 	Agree.
	(c) Appendix B contains the interval metering data summary format required file conditions and an example of a diagrammatic representation of energy usage.	See commentary for Appendix B.
	(d) The summary data format for interval metering data provided by a retailer must include the following information:	<p>Rule 7.7 Entitlement to metering data and access to metering installation</p> <p>(a) The only persons entitled to access <i>energy data</i> or to receive <i>metering</i></p>

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Item	Description	Participant Comments
	<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. Date, monthly for remotely read interval metering data or To Date for manually read interval 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 (only if applicable),</p> <p>C. Generation (only if applicable).</p> <p>VIII. Demand/Capacity (if applicable for billing or if requested by a retail customer, or customer authorised representative, and is available).</p>	<p><i>data, NMI Standing Data, settlements ready data or data from the metering register for a metering installation</i> are:</p> <p>(7) a:</p> <p>(i) <i>retail customer of:</i></p> <p>(A) <i>a retailer; or</i></p> <p>(B) <i>a Distribution Network Service Provider; or</i></p> <p>(ii) <i>customer authorised representative,</i></p> <p>upon request by that <i>retail customer</i> its <i>customer authorised representative</i> to the <i>retailer or Distribution Network Service Provider in relation to that retail customer's metering installation</i>;</p> <p>7.16 Metering data provision to retail customers</p> <p>(c) The metering data provision procedures must:</p> <p>(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:</p> <p>(i) nature and extent of energy usage for daily time periods;</p> <p>(ii) usage or load profile over a specified period; and</p> <p>(iii) a diagrammatic representation of the information referred to in subparagraph (i);</p> <p>1. Momentum Energy strongly urge AEMO to remove this entire section and apply one set of criteria for both DNSP and Retailer with the removal of any and all billing related data including demand/capacity that is not available through meter data files.</p> <p>The NER7.7 clearly states that the customer and authorised customer representative are only entitled to "data from the metering register for a metering installation" as highlighted above.</p> <p>The inclusion of billing related data is outside the scope of this document and beyond the requirements and permissions granted by the NER7.7.</p> <p>2. Retail participants should not be subject to additional requirements beyond what has been included in the NER as the minimum requirements. Further the retail participant should not be subject to the cost and resourcing that would require in design and development of systems so as to produce information beyond scope of what has been defined as the minimum criteria by the NER.</p> <p>3. As noted in previous discussions between AEMO and retail</p>

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Item	Description	Participant Comments
		<p>participants, workshop discussions and emails sent by retail participants to AEMO, the intention of the provision of metering data is to provide the customer with information regarding their usage/generation patterns and not to reconcile or validate billing information or invoicing.</p>
	<p>(e) The summary data format for interval metering data provided by a DNSP must include the following information:</p> <ol style="list-style-type: none"> I. National Metering Identifier (NMI), II. Meter Serial Number, III. Unit of Measure (UOM) for the Energy Flow Type, IV. Data quality indication, V. Date, monthly for remotely read interval metering data or To Date for manually read interval metering data (i.e. end of meter reading period, VI. From Date (i.e. start of meter reading period). VIII. Energy Flow Types: <ol style="list-style-type: none"> A. Total usage, B. Controlled load (only if applicable), C. Generation (only if applicable). 	<ol style="list-style-type: none"> 1. Change “Energy Flow Types” to “Energy Usage” and “Total Usage” to “Consumption” as preferred terminology in NER 7.16(2) (i). 2. Momentum Energy would support and agree that this is the correct format for both the DNSP and Retailer and is within the scope of the NER and the intention of the AEMC final determination. 3. Momentum Energy would also highlight that there is a single rule that applies to all relevant participants (i.e. DNSP and Retailer) in the provision of metering data. Momentum Energy question if it is in the scope of AEMO’s authority to create separate obligations for the provision of information not included in the scope of metering data.
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>AEMC Final Determination 5.1.4:</p> <p>“We evaluated 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.⁹⁵ However, we decided not to adopt this approach. We considered that AEMO’s metering data provision procedures should set out minimum requirements with respect to format that would ensure customers receive their data in an understandable manner.”</p> <p>Momentum Energy concur with several other retail participants that the adoption of the NEM12 file as the minimum specification is not conducive to the customer experience or that a standard file format is the intention of the AEMC’s determination on the matter.</p> <p>The creation of a standardised format and use of the NEM12 file format as that standard is inappropriate for the following reasons:</p> <ul style="list-style-type: none"> • A standardised approach contravenes the AEMC’s determination • It contains substantial amounts of data that is not relevant, understandable or fit for purpose.

Item	Description	Participant Comments																						
		<ul style="list-style-type: none">It requires retail participants to re- construct files that are produced by providers with specific accreditations, qualifications and expertise to provide which the retail business does not have.It requires retail participants to invest significant funds and resources that in many cases would not have been included when forecasting and appropriating budgeted funds, for the purpose of developing systems and architecture to support the storage and construction of the detailed files. <p>Momentum Energy consider that while the NEM12 file contains the data that is required to provide these type of files, that it would be more appropriate to nominate a sub-set of the NEM12 file elements as the source of extraction into a minimum specification .csv file format.</p> <p>Examples of data that is used by industry that Momentum Energy considers not relevant to customers or their authorised representatives:</p> <table><tr><th>Record</th><th>Fields/Elements</th></tr><tr><td>100 – Header Record</td><td>VersionHeader</td></tr><tr><td></td><td>DateTime</td></tr><tr><td></td><td>FromParticipant</td></tr><tr><td></td><td>ToParticipant</td></tr><tr><td>200 – NMI Data Details</td><td>NextScheduledReadDate</td></tr><tr><td>500 – B2B Details</td><td>TransCode</td></tr><tr><td></td><td>RetServiceOrder</td></tr><tr><td></td><td>ReadDateTime</td></tr><tr><td></td><td>IndexRead</td></tr><tr><td>400 – Interval Event</td><td>Only required what quality is flagged as “V” (variable) or “A” with specific event/reason codes. This information is overly complex and not considered useful information for the intended customer’s purpose.</td></tr></table>	Record	Fields/Elements	100 – Header Record	VersionHeader		DateTime		FromParticipant		ToParticipant	200 – NMI Data Details	NextScheduledReadDate	500 – B2B Details	TransCode		RetServiceOrder		ReadDateTime		IndexRead	400 – Interval Event	Only required what quality is flagged as “V” (variable) or “A” with specific event/reason codes. This information is overly complex and not considered useful information for the intended customer’s purpose.
Record	Fields/Elements																							
100 – Header Record	VersionHeader																							
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200 – NMI Data Details	NextScheduledReadDate																							
500 – B2B Details	TransCode																							
	RetServiceOrder																							
	ReadDateTime																							
	IndexRead																							
400 – Interval Event	Only required what quality is flagged as “V” (variable) or “A” with specific event/reason codes. This information is overly complex and not considered useful information for the intended customer’s purpose.																							
	(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>2.3 Final rule determination</p> <p>“The final NERR rule will not require retailers and DNSPs to place information on their websites about how metering data is used and will not therefore require AER to develop 'metering data common terminology guidelines”</p> <p>On the basis of the above determination and that Momentum Energy do not support the standardisation and use of the NEM12 file to be the appropriate approach, we do not support the inclusion of this obligation.</p>																						

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Item	Description	Participant Comments
		<p>Further, the NER, NERR do not require retail participants to publish a document of this nature.</p> <p>AGL appropriately challenged this requirement and expressed concern that multiple versions of this document would result in confusion and it was suggested that if this document is to be considered as a useful and beneficial in contributing to the NEO, then it would be a more appropriate approach for AEMO to produce and maintain a single document for industry reference which participants could publish on their own websites for customer access. Momentum Energy supports this view.</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.	See above.
4.5	<p>Ability to offer alternative metering data formats</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 offer a retail customer and/or a customer authorised representative an alternative metering data format.</p>	<p>Revision of this clause to permit agreement by the DNSP or Retailer to offer:</p> <p>“.../ 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.	<p>Momentum Energy do not support the inclusion of this obligation as it is not a prescribed obligation supported by the NER, NERR or Final Determination and is beyond the scope of AEMO's delegation to include this obligation in the MDPP. Momentum Energy note that this a similar obligation to that contained in 4.4 (b) and would refer AEMO to detailed commentary at 4.4(b).</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>Momentum Energy do not support the inclusion of this obligation as it is not a prescribed obligation supported by the NER, NERR or Final Determination and is beyond the scope of AEMO's delegation to include this obligation in the MDPP. Momentum Energy note that this a similar obligation to that contained in 4.4 (b) and would refer AEMO to detailed commentary at 4.4(b).</p>
	(d) Retailers and DNSPs must obtain informed consent from a retail customer or customer authorised representative before providing an alternative metering data file.	<p>One of the key intentions in the implementation of the rule change to allow customers and their authorised representative access to metering data, was not to over complicate and over prescribe the format in the interests of promoting innovation amongst participants hence, the MDPP is intended to</p>

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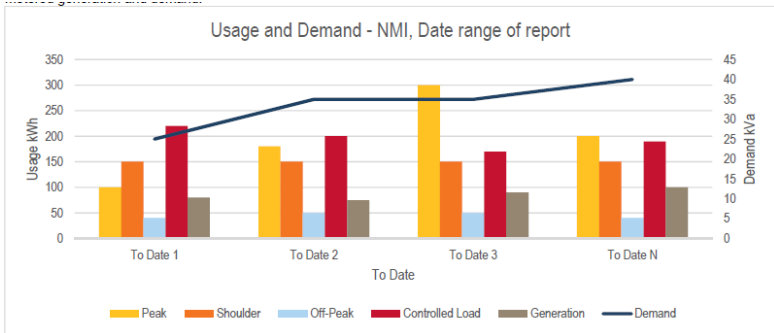
Item	Description	Participant Comments																								
		<p>support a minimum specification that would allow participants to be innovative in developing alternative solutions as technology and systems are developed.</p> <p>Momentum Energy cannot locate any documentary evidence to the contrary that states participants are required to “obtain informed consent from a retail customer or customer authorised representative before providing an <u>alternative</u> metering data file”.</p> <p>It should also be noted that alternative formats developed by DNSP and Retail participants would only be developed with a criteria that is above and beyond the minimum specification requirements (as is the intention) set in this document as to provide less would be a breach of obligation and Momentum Energy consider the inclusion of the obligation to be moot.</p>																								
5	OTHER COMMENTS	<p>It is noted that AEMO have not provided an example of the Interval Detailed Data Format. In the interest of consistency, Momentum Energy considers that the inclusion of an example should be considered.</p>																								
Appendix A	ACCUMULATED METERING DATA SUMMARY FORMAT																									
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> <table><tr><th>File component</th><th>Parameters</th></tr><tr><td>File Type</td><td>PDF</td></tr><tr><td>National Metering Identifier (NMI)</td><td>NMI for the connection point. Does not include check-digit or NMI suffix.</td></tr><tr><td>Meter Serial Number</td><td>Multiple meters indicated by their respective meter serial numbers. Energy values from each meter are to be published by Read Date.</td></tr><tr><td>Energy Flow Type</td><td>Total usage, Peak, Shoulder, Off-Peak, Controlled Load and Generation energy flows, where applicable, to be provided by retailers. Total usage, Controlled Load (if applicable) and Generation (if applicable) to be provided by DNSPs.</td></tr><tr><td>Energy Value</td><td>kWh value identifies the consumption for the associated Energy Flow Type. Usage means energy flows to the connection point from the grid. Generation means energy flows to the grid from the connection point.</td></tr><tr><td>UOM</td><td>kWh</td></tr><tr><td>Read Date</td><td>The date the metering data was collected, i.e. the end of</td></tr><tr><td>From Date</td><td>The start date of the meter reading period.</td></tr><tr><td>Date Format</td><td>DDMMYYYY</td></tr><tr><td>Data Quality</td><td>Provide a statement indicating whether the metering data file contains estimated data and specify which reading period(s) contain estimated data.</td></tr><tr><td>File Order</td><td>File ordered by date. Ordered by oldest date at the top of the file and most recent date at the bottom of the file.</td></tr></table>	File component	Parameters	File Type	PDF	National Metering Identifier (NMI)	NMI for the connection point. Does not include check-digit or NMI suffix.	Meter Serial Number	Multiple meters indicated by their respective meter serial numbers. Energy values from each meter are to be published by Read Date.	Energy Flow Type	Total usage, Peak, Shoulder, Off-Peak, Controlled Load and Generation energy flows, where applicable, to be provided by retailers. Total usage, Controlled Load (if applicable) and Generation (if applicable) to be provided by DNSPs.	Energy Value	kWh value identifies the consumption for the associated Energy Flow Type. Usage means energy flows to the connection point from the grid. Generation means energy flows to the grid from the connection point.	UOM	kWh	Read Date	The date the metering data was collected, i.e. the end of	From Date	The start date of the meter reading period.	Date Format	DDMMYYYY	Data Quality	Provide a statement indicating whether the metering data file contains estimated data and specify which reading period(s) contain estimated data.	File Order	File ordered by date. Ordered by oldest date at the top of the file and most recent date at the bottom of the file.	<ol style="list-style-type: none">Disagree in the application of 4.2(d). Refer to relevant commentary which argues for removal of this section.Agree in accordance 4.2(e) with consideration for commentary provided at the section 4.2(d) and on the proviso that “Energy Flow” is revised to be “Energy Usage” and the definition of Energy Usage does not include Peak, Off Peak and Shoulder. (Refer to commentary at 4.2(d)).Data Quality – Based on commentary provided in Appendix A. A.2 and suggested format of Accumulation Metering Data Summary, Momentum Energy would propose that Data Quality is further defined as NEM13 QualityMethod (i.e. CurrentQualityMethod) A = Actual Data and S = Substitute Data and does not include retailer estimates.Data Quality in the table should be appropriately defined to align with the 3 (above)
File component	Parameters																									
File Type	PDF																									
National Metering Identifier (NMI)	NMI for the connection point. Does not include check-digit or NMI suffix.																									
Meter Serial Number	Multiple meters indicated by their respective meter serial numbers. Energy values from each meter are to be published by Read Date.																									
Energy Flow Type	Total usage, Peak, Shoulder, Off-Peak, Controlled Load and Generation energy flows, where applicable, to be provided by retailers. Total usage, Controlled Load (if applicable) and Generation (if applicable) to be provided by DNSPs.																									
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From Date	The start date of the meter reading period.																									
Date Format	DDMMYYYY																									
Data Quality	Provide a statement indicating whether the metering data file contains estimated data and specify which reading period(s) contain estimated data.																									
File Order	File ordered by date. Ordered by oldest date at the top of the file and most recent date at the bottom of the file.																									
A.2	Example: accumulated file	<p>On the assumption that 4.2 (d) is removed, the following commentary is based on the content as defined by 4.2 (e).</p> <ol style="list-style-type: none">Example does not include a statement as defined by Data Quality in table provided by Appendix A. A.1 and as required in the minimum criteria at 4.2(e) so it is assumed that by exclusion of this information																								

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Item	Description	Participant Comments																																																															
		<p>that the data is actual data.</p> <p>2. Momentum Energy prefer the file format is a combination of that provided in the Strawman Appendix A. A.2 and the Draft MDPP and the removal of the statement that only applies to estimate data.</p> <p>The provision of a statement is an inefficient method that will confuse customers and Momentum Energy consider that the application of quality methods for each line would be easily extracted from the NEM13 file and readily interpreted by customers.</p> <p><i>Example of preferred format for Interval Metering Data Summary Format:</i></p> <table><tr><th>NMI</th><th>Meter Serial Number</th><th>UOM</th><th>Data Quality</th><th>From Read Date</th><th>To Read Date</th><th>Consumption</th><th>Controlled Load</th><th>Generation</th></tr><tr><td>6xxxxxxxxx</td><td>123xxxx</td><td>kWh</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>300</td><td>50</td><td>65</td></tr><tr><td>6xxxxxxxxx</td><td>123xxxx</td><td>kWh</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>230</td><td>40</td><td>75</td></tr><tr><td>6xxxxxxxxx</td><td>123xxxx</td><td>kWh</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>325</td><td>45</td><td>125</td></tr><tr><td>6xxxxxxxxx</td><td>123xxxx</td><td>kWh</td><td>S</td><td>From Date 1</td><td>To Date 1</td><td>420</td><td>40</td><td>100</td></tr><tr><td>6xxxxxxxxx</td><td>123xxxx</td><td>kWh</td><td>S</td><td>From Date 1</td><td>To Date 1</td><td>420</td><td>40</td><td>100</td></tr><tr><td>6xxxxxxxxx</td><td>123xxxx</td><td>kWh</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>380</td><td>40</td><td>100</td></tr></table> <p>3. Is estimate data inclusive of substitute data? As highlighted in previous conversations, retail estimates are often provided to customers on invoices and are not MDP but retailer validated reads. Many retails will apply their own policies and practices on the generation of such reads but it should be understood that retail estimates as they may appear on customer invoices, are not received in the NEM13 file format provided by accredited MDP's.</p> <p>Momentum Energy therefore submits that quality indicators should be applied to NEM13 standards and retailer estimates should be excluded from the summary format.</p>	NMI	Meter Serial Number	UOM	Data Quality	From Read Date	To Read Date	Consumption	Controlled Load	Generation	6xxxxxxxxx	123xxxx	kWh	A	From Date 1	To Date 1	300	50	65	6xxxxxxxxx	123xxxx	kWh	A	From Date 1	To Date 1	230	40	75	6xxxxxxxxx	123xxxx	kWh	A	From Date 1	To Date 1	325	45	125	6xxxxxxxxx	123xxxx	kWh	S	From Date 1	To Date 1	420	40	100	6xxxxxxxxx	123xxxx	kWh	S	From Date 1	To Date 1	420	40	100	6xxxxxxxxx	123xxxx	kWh	A	From Date 1	To Date 1	380	40	100
NMI	Meter Serial Number	UOM	Data Quality	From Read Date	To Read Date	Consumption	Controlled Load	Generation																																																									
6xxxxxxxxx	123xxxx	kWh	A	From Date 1	To Date 1	300	50	65																																																									
6xxxxxxxxx	123xxxx	kWh	A	From Date 1	To Date 1	230	40	75																																																									
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6xxxxxxxxx	123xxxx	kWh	S	From Date 1	To Date 1	420	40	100																																																									
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A.3	Example: diagrammatic representation of energy usage Example of diagrammatic representation of data that could be provided by a retailer for a connection point with peak, shoulder, off-peak and controlled load energy usage and gross metered generation.	Agree on the provision that the Peak, Shoulder and Off Peak are replaced with Consumption, Controlled Load and Generation and example could be used by both the DNSP and retailer. (See commentary 4.2 (d) and 4.2 (e))																																																															

Item	Description	Participant Comments																														
	<div><div>Energy Usage - NMI, Date range of report</div><div><table border="1"><caption>Estimated Energy Usage Data (kWh)</caption><thead><tr><th>Read Date</th><th>Peak</th><th>Shoulder</th><th>Off-Peak</th><th>Controlled Load</th><th>Generation</th></tr></thead><tbody><tr><td>Read Date 1</td><td>100</td><td>150</td><td>40</td><td>220</td><td>80</td></tr><tr><td>Read Date 2</td><td>180</td><td>150</td><td>40</td><td>200</td><td>75</td></tr><tr><td>Read Date 3</td><td>300</td><td>150</td><td>50</td><td>170</td><td>90</td></tr><tr><td>Read Date N</td><td>200</td><td>150</td><td>40</td><td>190</td><td>100</td></tr></tbody></table></div></div>	Read Date	Peak	Shoulder	Off-Peak	Controlled Load	Generation	Read Date 1	100	150	40	220	80	Read Date 2	180	150	40	200	75	Read Date 3	300	150	50	170	90	Read Date N	200	150	40	190	100	
Read Date	Peak	Shoulder	Off-Peak	Controlled Load	Generation																											
Read Date 1	100	150	40	220	80																											
Read Date 2	180	150	40	200	75																											
Read Date 3	300	150	50	170	90																											
Read Date N	200	150	40	190	100																											
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT																															
B.1	<div>File conditions</div> <div>File conditions detail the requirements for the information that must be provided in accordance with clauses 4.3(d) and 4.3(e).</div> <div><table><tr><th>File component</th><th>Parameters</th></tr><tr><td>File Type</td><td>PDF.</td></tr><tr><td>National Metering Identifier (NMI)</td><td>NMI for the connection point. Does not include check-digit or NMI suffix.</td></tr><tr><td>Meter Serial Number</td><td>Multiple meters indicated by their respective meter serial numbers. Energy values from each meter are to be published by Read Date when manually read interval metering data and monthly for remotely read interval metering data.</td></tr><tr><td>Energy Flow Type</td><td>Total usage, Peak, Shoulder, Off-Peak, Controlled Load, Generation energy flows, where applicable, to be provided by retailers. Demand/Capacity (if applicable for billing or if requested by a retail customer, or customer authorized representative, and is available). Total usage, Controlled Load (if applicable) and Generation (if applicable) to be provided by DNSPs.</td></tr><tr><td>Energy Value</td><td>kWh value identifies the consumption and kW or kVA value identifies demand for the associated Energy Flow Type. Summation is data between the 'From Date' and 'To Date' inclusive of intervals on both calendar days. Reporting period boundary is midnight EST. Usage means that energy flows to the connection point from the grid. Generation means energy flows to the grid from the connection point.</td></tr><tr><td>UCM</td><td>kWh (energy usage), kW or kVA (demand).</td></tr><tr><td>From Date</td><td>The start date of the meter reading period for a manually read meter.</td></tr><tr><td>To Date</td><td>The end date of the meter reading period for a manually read meter.</td></tr><tr><td>Date (remotely read meters only)</td><td>Month in which energy usage or demand occurred.</td></tr><tr><td>Date Format</td><td>DDMMYYYY</td></tr><tr><td>Data Quality</td><td>Provide a statement indicating whether the metering data file contains estimated data and specify which reading period(s) contain estimated data.</td></tr><tr><td>File Order</td><td>File ordered by date. Ordered by oldest date at the top of the file and most recent date at the bottom of the file.</td></tr></table></div>	File component	Parameters	File Type	PDF.	National Metering Identifier (NMI)	NMI for the connection point. Does not include check-digit or NMI suffix.	Meter Serial Number	Multiple meters indicated by their respective meter serial numbers. Energy values from each meter are to be published by Read Date when manually read interval metering data and monthly for remotely read interval metering data.	Energy Flow Type	Total usage, Peak, Shoulder, Off-Peak, Controlled Load, Generation energy flows, where applicable, to be provided by retailers. Demand/Capacity (if applicable for billing or if requested by a retail customer, or customer authorized representative, and is available). Total usage, Controlled Load (if applicable) and Generation (if applicable) to be provided by DNSPs.	Energy Value	kWh value identifies the consumption and kW or kVA value identifies demand for the associated Energy Flow Type. Summation is data between the 'From Date' and 'To Date' inclusive of intervals on both calendar days. Reporting period boundary is midnight EST. Usage means that energy flows to the connection point from the grid. Generation means energy flows to the grid from the connection point.	UCM	kWh (energy usage), kW or kVA (demand).	From Date	The start date of the meter reading period for a manually read meter.	To Date	The end date of the meter reading period for a manually read meter.	Date (remotely read meters only)	Month in which energy usage or demand occurred.	Date Format	DDMMYYYY	Data Quality	Provide a statement indicating whether the metering data file contains estimated data and specify which reading period(s) contain estimated data.	File Order	File ordered by date. Ordered by oldest date at the top of the file and most recent date at the bottom of the file.	<div><div>1. Disagree in the application of 4.3(d). Refer to relevant commentary which argues for removal of this section.</div><div>2. Agree in accordance 4.3(e) with consideration for commentary provided at the section 4.3(d) and on the proviso that “Energy Flow” is revised to be “Energy Usage” and the definition of Energy Usage does not include Peak, Off Peak and Shoulder.</div><div>3. The application of Data Quality should be included in the summary file as suggested for accumulation summary data on a line by line basis for each period and as applied by an accredited MDP in the provision of the NEM12 file according to Metrology Procedure Part B (i.e. A = Actual, S = Substitute and F = Final Substitute).</div><div>4. Data Quality in the table should be appropriately defined to align with the 3 (above)</div></div>				
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B.2	Example: interval file	<div>On the assumption that 4.3 (d) is removed, the following commentary is based on the content as defined by 4.3 (e).</div> <div><div>1. Example does not include a statement as defined by Data Quality in table provided by Appendix B. B.1 and as required in the minimum criteria at 4.3(e) so it is assumed that by exclusion of this information</div></div>																														

Meter Data Provision Procedures Package

Item	Description	Participant Comments																																																																																																																																															
		<p>that the data is actual data.</p> <p>2. Momentum Energy prefer the file format provided in the Strawman Appendix B. B.2 with the inclusion of a column indicating data quality for each period in place of the draft version that requires a statement that only applies to estimate data.</p> <p><i>Example of preferred format for Accumulation Metering Data Summary Format:</i></p> <table><tr><th>NMI</th><th>Meter Serial Number</th><th>Data Quality</th><th>From Read Date</th><th>To Read Date</th><th>Consumption</th><th>Controlled Load</th><th>Generation</th><th>UOM</th><th>Demand</th><th>UOM</th></tr><tr><td>6000000000</td><td>1230000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>300</td><td>0</td><td>65</td><td>kWh</td><td>25</td><td>kVA</td></tr><tr><td>6000000000</td><td>4560000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>0</td><td>50</td><td>0</td><td>kWh</td><td>0</td><td>kVA</td></tr><tr><td>6000000000</td><td>1230000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>230</td><td>0</td><td>75</td><td>kWh</td><td>35</td><td>kVA</td></tr><tr><td>6000000000</td><td>4560000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>0</td><td>40</td><td>0</td><td>kWh</td><td>0</td><td>kVA</td></tr><tr><td>6000000000</td><td>1230000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>325</td><td>0</td><td>125</td><td>kWh</td><td>35</td><td>kVA</td></tr><tr><td>6000000000</td><td>4560000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>0</td><td>45</td><td>0</td><td>kWh</td><td>0</td><td>kVA</td></tr><tr><td>6000000000</td><td>1230000</td><td>S</td><td>From Date 1</td><td>To Date 1</td><td>420</td><td>0</td><td>100</td><td>kWh</td><td>30</td><td>kVA</td></tr><tr><td>6000000000</td><td>4560000</td><td>S</td><td>From Date 1</td><td>To Date 1</td><td>0</td><td>40</td><td>0</td><td>kWh</td><td>0</td><td>kVA</td></tr><tr><td>6000000000</td><td>1230000</td><td>S</td><td>From Date 1</td><td>To Date 1</td><td>420</td><td>0</td><td>100</td><td>kWh</td><td>30</td><td>kVA</td></tr><tr><td>6000000000</td><td>4560000</td><td>S</td><td>From Date 1</td><td>To Date 1</td><td>0</td><td>40</td><td>0</td><td>kWh</td><td>0</td><td>kVA</td></tr><tr><td>6000000000</td><td>1230000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>380</td><td>0</td><td>100</td><td>kWh</td><td>45</td><td>kVA</td></tr><tr><td>6000000000</td><td>4560000</td><td>A</td><td>From Date 1</td><td>To Date 1</td><td>0</td><td>40</td><td>0</td><td>kWh</td><td>0</td><td>kVA</td></tr></table>	NMI	Meter Serial Number	Data Quality	From Read Date	To Read Date	Consumption	Controlled Load	Generation	UOM	Demand	UOM	6000000000	1230000	A	From Date 1	To Date 1	300	0	65	kWh	25	kVA	6000000000	4560000	A	From Date 1	To Date 1	0	50	0	kWh	0	kVA	6000000000	1230000	A	From Date 1	To Date 1	230	0	75	kWh	35	kVA	6000000000	4560000	A	From Date 1	To Date 1	0	40	0	kWh	0	kVA	6000000000	1230000	A	From Date 1	To Date 1	325	0	125	kWh	35	kVA	6000000000	4560000	A	From Date 1	To Date 1	0	45	0	kWh	0	kVA	6000000000	1230000	S	From Date 1	To Date 1	420	0	100	kWh	30	kVA	6000000000	4560000	S	From Date 1	To Date 1	0	40	0	kWh	0	kVA	6000000000	1230000	S	From Date 1	To Date 1	420	0	100	kWh	30	kVA	6000000000	4560000	S	From Date 1	To Date 1	0	40	0	kWh	0	kVA	6000000000	1230000	A	From Date 1	To Date 1	380	0	100	kWh	45	kVA	6000000000	4560000	A	From Date 1	To Date 1	0	40	0	kWh	0	kVA
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