



5 June 2015

AEMO Consultations - Meter Data Provision Procedures

By email: MDPP@aemo.com.au

Attention: Ms Taryn Maroney

Dear Ms Maroney,

Submission in Response to the AEMO First Stage of Consultation on the Meter Data Provisions Procedure (MDPP) Strawman for Consultation

AGL Energy (AGL) welcomes the opportunity to make a submission on the AEMO consultation relating to Meter Data Provision Procedures (the Procedure) which is required by the Customer Access to Data (CAD) NER Rule Change.

AGL is a significant retailer of energy with over 3.8 million electricity and gas customers nationally. Accordingly, AGL has a strong interest in the efficient delivery of customer services.

AGL supports the provision of accurate, useful information to customers to enable them to effectively manage their electricity consumption. AGL supports the concept of a standardised consumption report. However, we would caution against overly manipulating the basic data as we believe that increases the risk that the data can be interpreted incorrectly.

Our detailed comments on the proposed strawman are contained within Attachment 1.

If you have any further questions regarding this submission or would like to discuss this matter further, please contact Mr Mark Riley at mriley@agl.com.au or (03) 8633 6131.

Yours sincerely,

Ms Allicia Volvricht

AMI Regulations & Industry Advice Manager

Att.

Attachment 1 – Detailed comments on MDPP Strawman

1. Fundamental principle

The AEMC has made this Rule change to:

*make it easier for customers to access their electricity consumption data so that...
.... customers will be able to make better and more informed choices about energy
products and services.¹*

The COAG Energy Council (COAG EC) also stated that:

*Also, increasing transparency would promote greater competition in the retail
market and assist market participants and third parties to develop innovative DSP
products.²*

AGL believes that there are some fundamental principles which should be considered in this process to meet the stated goals of these Rule Changes:

- First, the provision of this data should be kept as simple as possible at all times;
- Second, the data provided by either any Retailer or the Distribution Network Service Provider (DNSP) should look the same for a common period; and
- Third, given that data can be amended and updated, the party providing the data can only provide the most appropriate data that it has at that time.

AGL believes that in finalising this Procedure some consideration should be given to stating these fundamental principles within the Procedure as general guidance.

2. Clarity of Obligations

In general, AGL believes that the Procedure needs to ensure that supporting obligations (e.g. customer validation requirements, agent requests) are clearly identified and stated in the procedure to minimise any ambiguity.

AGL believes that issues such as this should be clarified so that the industry applies these processes in a consistent manner and seeks clarification on how this clause is intended to operate.

2.1 Authorised Representatives Submissions

Clause 56A of the NERR indicates that a customer representative can only be charged when a request is

part of a request for information about more than one small customer.

So, for instance, if an Authorised Representatives makes a submission for a single customer every 5 minutes, is that to be considered a single request?

AGL believes that the receiving party should consider all requests made by an Authorised Representatives by close of business each day, and if there is more than one request per business day, can charge the agent if it chooses to do so.

¹ AEMC Final Rule Determination NER, NERR, 1 December 2014, p i

² COAG Energy Council rule change request, p10.

2.2 Ability to Decline Authorised Representatives Requests

AGL seeks clarification on whether there are circumstances where it is permissible for a data provider to reject a request from an authorised representative.

The types of circumstances which can be considered, for instance, are:

- an agent is refusing to pay the charge for data previously delivered; or
- the data provider genuinely believes that the agent has not received consent from the customer.

Authorised agents may not be industry participants and therefore not subject to privacy requirements or licence obligations, which RBs and DBs are subject to. Therefore, RBs and DBs must consider the issue of legitimacy and veracity when responding to requests.

2.3 Definition of Customer Request

The consultation paper (section 4.2 Customer Authorised Representatives) asks whether there is a need to define a customer request.

AGL takes this question to be related to customer requests made by authorised representatives, rather than direct customer requests.

For requests made by agents on behalf of customers, the key issues will be to

1. ensure that the customer has provided authorisation (e.g. explicit informed consent);
2. provide suitable information to allow verification of that customer (i.e. DBs and RBs);
3. clearly identify the agent;
4. preferably provide a clear statement on how long the authorisation is valid for (e.g. a single request, a month, a quarter); authorisations should not be indefinite.

3. Summary Data - Information to be provided

AGL agrees that the following data elements are necessary for any customer data:

- National Metering Identifier Number (NMI); and
- Meter Serial Number;
- Unit of Measure;

However, for summary data (accumulation and interval), AGL does not believe that it is sensible to provide information in the summary relating to:

- Data quality;
- Read date;
- Energy flow type
- Validated data; and
- Blank rows and columns.

3.1 Data Quality

Data quality generally relates to a single piece of information and is unlikely to relate to a full two years of data.

As such, while we support the use of a quality flag on individual data elements, we do not believe that it would be useful or appropriate for summary data.

3.2 Read date

Again for summary data, we do not believe that individual read dates are of value. Rather this information should relate to the overall period for which the data is provided – i.e. start and end date.

3.3 Energy Flow Type

Broadly, AGL has concerns about identifying data as being of a particular type, such as *Peak* or *Off-Peak*. The AEMO National Meter identifier Procedure (NMI Procedure) specifies that meters or registers be defined as Import or Export.

As such, that level of information is discernible. However, while a DNSP may classify certain information (e.g. a meter register or a second meter) with constructs such as *Peak* or *Off-Peak*, this may have no relation to the way the data is treated by the retailer.

Alternatively, and in particular with interval data, no parties are treating data as *Peak* or *Off-Peak*, but rather recording the time of use to the consumption data and applying their own charge to that data.

3.4 Validated Data

The requirement to only provide validated meter readings may not be possible. If a site has had access problems then there may only be estimated or substituted data.

It should be noted that depending on updates received from the Meter Data provider, the same report generated a day apart could have different data associated with it.

AGL believes that it can only provide what data is available to it at the time that the information is generated. There should be no obligation for a party to be required to seek more updated data when a request is made and the Procedure should be clear on this matter.

3.5 Blank Rows and Columns

Removal of blank columns (or Rows) may also be problematic.

In the Strawman, the columns have been specified (e.g. Shoulder, Generation) in the detailed data format. Should there be a mix of data, then it is very likely that blank columns would exist in the data set. An example of this would arise if the file contained a mix of accumulation and interval data or 30 minute and 15 minutes interval data.

For this reason, AGL is suggesting that each row be a date time period for each meter or register (see below).

4. Delivery Timeframes

AGL believes that there are three elements to this issue:

1. The 'clock' cannot start until the applicant (customer or agent) has been appropriately validated;
2. Depending on how many requests are received at any one time (i.e. single or multiple agents) will affect the time required to generate the information; and
3. Time to deliver the information if the delivery is by physical means

First, the 10 day obligation. AGL believes that any timeframes to deliver data to either customers or customer authorised representatives cannot start until that party has been appropriately identified by the information provider (i.e. DB or RB).

The strawman specifies that:

Retailers and DNSPs must use reasonable endeavours to deliver a retail customer's requested metering data within 10 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP.

However, the amendment to the National Electricity Rules (Clause 7.7(a1)) states:

... after having first done whatever may be required or otherwise necessary, where relevant, under any applicable privacy legislation (including if appropriate making relevant disclosures or obtaining relevant consents from retail customers).

AGL understands this to clearly mean that any request must be validated (by the Retailer or DNSP) before the request becomes active. As such, the procedure should clearly state that the 10 business day timeframe does not commence until the Retailer or DNSP has verified the customer or customer representative.

Similarly, if an agent or customer provides a request which does not meet the relevant criteria for validation (e.g. incorrect name, mismatched name and NMI etc.). Any requests that fail validation would be rejected and not processed.

Second, in terms of responding to an agent's request. This issue is difficult to quantify as it would depend on how many requests an agent makes and how many agents are making requests at the same time.

AGL would like to suggest that any agent making more than a nominal number of requests (e.g. 20), be required to provide a standardised electronic list (e.g. NMIs and customer names) so that the Retailer or DNSP could choose to automate the process if they wished.

Also, given that the numbers are undefined, each block request would have to be assessed and negotiated with the agent at the time, given existing workloads.

Third, if the information has to be delivered physically the NERR, AGL seeks clarification on whether the delivery time has to be included in the ten day period or the information has to be despatched by the tenth business day. Since, the general discussion has been the provision of information electronically by the tenth business day, AGL would argue that it must be able to despatch any physical information on the tenth business day for consistency.

In either case, AGL would point clause 17(b) (ii) of the NERR which takes a notice or bill as having been received two business days after it is posted, and submit that this is the appropriate and consistent standard to be applied.

5. Detailed Data Format

5.1 Data Quality Column

The example in Appendix A indicates that data quality is represented with the column heading *Estimated* (Y or N). This assumes that none of the other data quality flags (e.g. S-Substituted, A-Actual) are required or meaningful.

AGL suggests that it would be better to retain the data quality flag that is provided by the Meter Data Provider and provide an appropriate legend on the summary page.

5.2 Energy Flow Type

AGL believes that this information is best kept to the simplest form available – which is at the register or meter level with the energy direction and not apply constructs such as Peak or Generation to those identifiers.

The information provided by the meter data provider to the retailer is specified in AEMO's NEM Meter Data File Format Specification, and there is no classification of generation. Provision of information as Import or Export is achievable as meter (or meter register) identifiers define that function per the AEMO NMI Procedure.

With the rapid changes to technology, installations with storage batteries will be installed within the next 2-3 years. There are likely to be periods when the householder may be consuming less than their charged battery can provide and the customer may be exporting energy to the grid. In these circumstances calling the exported energy *Generation* (as specified in the strawman) may not be entirely appropriate, whereas specifying it as export may be.

AGL believes that specifying energy consumption in forms such as *Peak*, *Off-Peak* and *Shoulder* etc. is not appropriate for the following reasons.

First, *Peak*, *Off-Peak* and *Shoulder* etc. are constructs applied by a party which are overlaid on the consumption. A simple example would be a flat network tariff (or monthly Maximum Demand (MD) tariff as are about to be employed) against a retail tariff, such as AGL's free Saturday.

In this case the DB would not specify any particular usage as *Peak* or *Off-Peak*, but will simply record and provide consumption against interval and look for the monthly MD. AGL on the other hand would apply a no charge tariff to any period which is a Saturday. Thus when the customer's tariff or product changes, then a different construct would have to be applied.

Since these constructs are applied independently, a customer who received data from both a Retailer and DNSP may see quite different versions of the data for the same period.

AGL does not believe that this is a good outcome. It may create uncertainty in the customer and limit the customer's ability to reconcile their current tariff or limit a third party application's ability to adequately analyse that customers' usage and recommend appropriate options.

Second, many retailer and network databases only record the metering data and do not record how the data is treated at any time. Rather the billing systems apply a tariff to the data when the bill is produced. This is important, as tariffs may be changed retrospectively.

Again, a customer whose tariff is retrospectively changed, would see changes in their data when it is produced a second time for the relevant period.

5.3 Date Time Information for Interval meter

5.3.1 Data Format

AEMO is suggesting that the formats for these data elements should be column based rather than row based – that is each row has a column for the various time periods (for interval data) with the relevant consumption for that device or register. While the data can be processed to this form, AGL suggests that this could lead to complications.

Present data formats have a row format with each date / time period for a device on a row. AGL believes that this format is more suitable, especially as it is very likely that over a two year period a customer's metering installation could change from an accumulation meter to an interval meter. Further, the meter data periods could change from 30 minute to 15 minute intervals in that two year period.

CSV files generally use the first row as a header row, with data contained in the following rows.

By requiring the consumption data to be column based, AGL believes that producing a data file for a two year period containing a mix of accumulation data to 30 minute data (or 15 minute data) would require new header rows or multiple files (and multiple summaries) for that period.

By producing the data in a row based format, AGL believes that it is easier to produce a single CSV file with all versions of the data as each row would specify the relevant date time period when the data was related.

This also suggests that there should be some description of each row of meter data being produced should be tagged as either accumulation or interval.

Example of a mixed format file:

NMI	Meter	Register	Device	UoM	Data Quality	Start Date	End date	Consumption
612345	123456	123456	Acc	kWh	A	1 Jan 2014	1 Mar 2014	125
612345	123456	123456	Acc	kWh	A	1 Mar 2014	1 Jun 2014	121
612345	98765	98765	Acc	kWh	A	1 Jan 2014	1 Mar 2014	45
612345	98765	98765	Acc	kWh	A	1 Mar 2014	1 Jun 2014	42
612345	65432	1234567	MRIM	kWh	A	2 Jun 2014 00:00	2 Jun 2014 00:14	4
612345	654321	1234567	MRIM	kWh	A	2 Jun 2014 00:15	2 Jun 2014 00:29	3
612345	654321	1234567	MRIM	kWh	A	2 Jun 2014 00:30	2 Jun 2014 00:44	4
612345	654321	1234567	MRIM	kWh	A	2 Jun 2014 00:45	2 Jun 2014 00:59	5

Table 1- Example of mixed metrology output

AGL believes this meets the requirements of the AEMC Rule change while providing a simple, efficient outcome which can cater to a data set made up of varied metrology information.

We would suggest that AEMO should develop a dummy file of mixed metrology data and assess that against the procedural requirements to determine what can be produced.

5.3.2 Data Specification

We note that the data formats suggested section 3.2 Field Details for Units of Measure are defined as character lengths of 15.3 which inconsistent with other procedures used within industry (e.g. AEMO Metrology Procedure: Part B) where the field length is defined in aseXML as a maximum of 5 characters.

Specific definitions (and specifications) like this one should be consistent across multiple procedures and we suggests that a review of these be taken of all these definitions and specifications to ensure they are consistent across the various procedures.

6. Proposed Summary Information from CUAC

AGL has reviewed the proposed summary information that the Customer Utilities Advocacy Centre (CUAC) has suggested be incorporated in this process. AGL supports better understanding by consumers of their usage and demand patterns and provides information in various formats, such as AGL IQ, which is attached.

Moreover, as discussed above, AGL expects many consumers will have mixed metrology for some years. As such, it would be difficult to provide the type of information CUAC is seeking for the two year period and generally can only be provided for the periods where interval metering is available.

In many of these cases, any information provided would only represent part of the consumer's history, which could be considered misleading. Further, consumption usage is dependent on many things. For example, if the previous year's summer was mild, then the highest period may be the winter period if reverse cycle heating is used.

Producing this information would require substantially greater logic and processing, particularly if it is from a partial data set. Each retailer is providing various forms of this information in consumer bills and most with secondary services, such as the AGL IQ service.

As previously stated, AGL believes that the core goal of this Rule Change is to ensure that any consumer could get a standard data set to provide them with a basic understanding of their consumption, but more importantly be analysed by other third party applications.

As such, AGL believes that the data analysis requirements for this report should be kept as simple as possible to enable efficient operation of these third applications.

MY AGL IQ - Reference



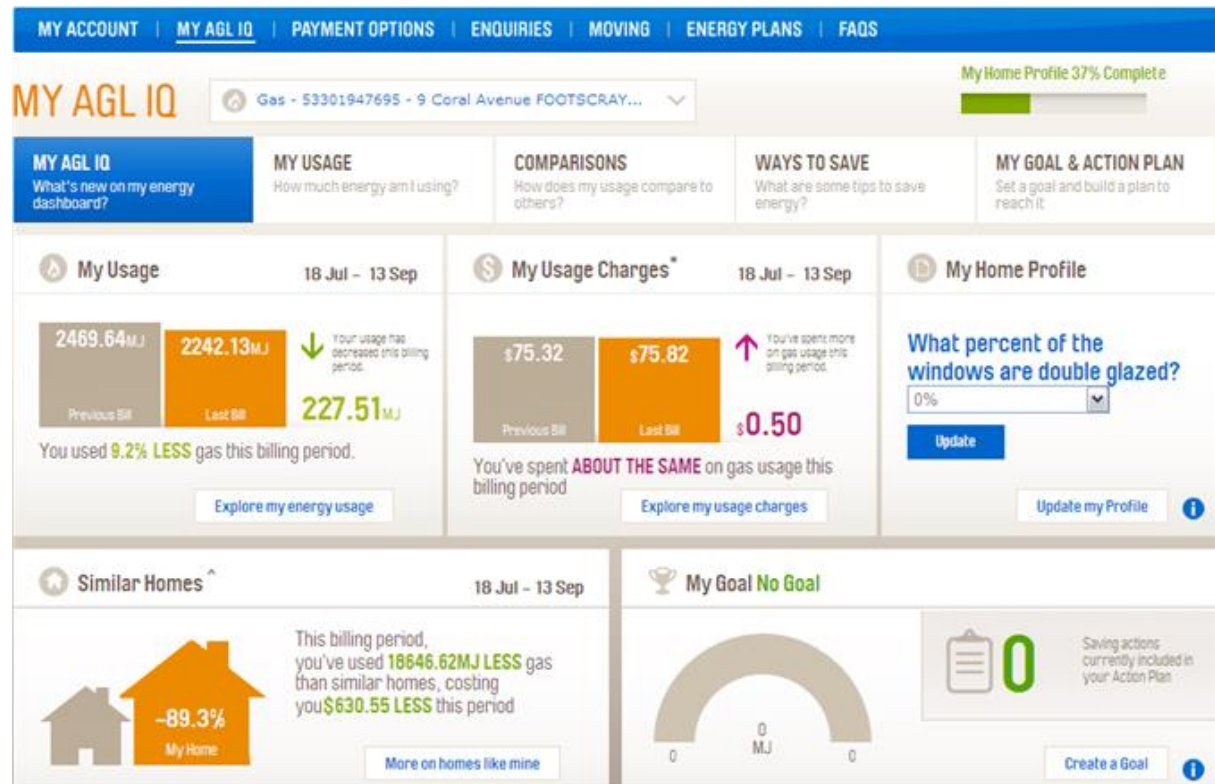
MY AGL IQ Overview

Customer Benefits

My AGL IQ supports AGL's vision of providing energy solutions for people and communities. It provides tools for AGL Consumer Customers in all states, for all fuels and with all meter types (including solar) to take control of their energy and save money.

Customers are able to:

- > **See and manage** their energy usage
- > **Predict** usage and costs
- > **Compare** energy use with similar households
- > **Set goals** and track progress (Smart Meter customers can elect to receive SMS & Email alerts if usage is predicted to be higher than the last period)
- > **Cut consumption** with energy saving advice
- > **Create** a personalised energy action plan
- > **Earn rewards** for saving energy
- > **Access offers** and discounts



How My AGL IQ works

Comparison to Other Households

Benchmarks are initially generated using a number of data sources including customer data that AGL holds, such as billing data, housing data, small business data, weather data and demographic data which will address the following key questions customers have:

- > How much energy am I using?
- > How do I compare with other households like mine?
- > How much money can I save?
- > How can AGL help me?

Customers are able to increase the accuracy of their comparison with other households by filling in the Home Profile data page. This feature is available for all customers registered for My AGL IQ with **Interval/Smart and Basic Meter types**. Customers can setup their own profile attributes online. Currently this feature is only available to **residential** customers. SME customers can update this information in readiness for when this feature becomes available to them.



My AGL IQ Goals

Customers using AEO My AGL IQ can also setup **goals**. They can select a goal of a reduction of 10%, 12% or 15% off previous consumption amounts. The available options on AEO My AGL IQ online will also display the \$ saving for each option.

This feature is not available for CSR's to create on the customer's behalf in SAP.

Set a Goal

Select one of the savings goals below and be on your way to maximise your energy savings. You can track your progress anytime, with energy saving actions from AGL IQ to help you reach your goal. Get started now.

Save 12%	Save 10%	Save 15%
Over 12 months	Over 12 months	Over 12 months
68kWh* Electricity savings	57kWh* Electricity savings	85kWh* Electricity savings
63kg* Greenhouse savings	52kg* Greenhouse savings	78kg* Greenhouse savings
\$23.02*	\$19.19*	\$28.78*
Select Goal	Select Goal	Select Goal

My AGL IQ Consumption

Customers are able to view their historical consumption in My AGL IQ. This will assist them with identifying trends and patterns to understand their consumption and how to reduce their energy costs.

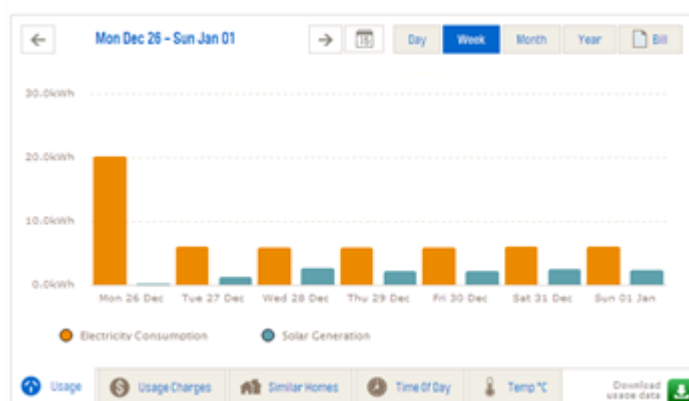
Basic Metered customers using AGL Online will only see their historical consumption up to the last bill date. For Basic Metered customers viewed in SAP, consumption figures are displayed but will be estimated data only. For this reason, **My AGL IQ Consumption(SAP) is not to be used for customers with Basic Meters.**

For **Interval Metered** customers the daily/weekly/monthly data will be viewable, however, it will only be up to the customers last bill date - this is the view both in SAP *and* through the customer's AEO Portal. This means if a customer's last bill was 15 days ago then the "last day/week" option will show ZERO data and "last month" will only show data up to bill date.

My Usage



My Usage



My Usage

