



METERING DATA PROVISION PROCEDURES CONSULTATION PAPER AND STRAWMAN PROCEDURES – PARTICIPANT RESPONSE PACK

METER DATA PROVISION PROCEDURES PACKAGE

Participant: Momentum Energy

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1. Responses to Consultation Paper Questions

Item	Question	Participant Comments
1	The Procedures presents the minimum summary and detailed data formats. Please comment on the proposed formats and examples in Section 2.	<p><u>Summary Data Format</u></p> <p><u>Comment 1:</u></p> <p>Appendix A A.1 File Conditions File Component "File Type" of PDF and/or CSV</p> <p>And;</p> <p>Appendix B B.1 File Conditions File Component "File Type" of PDF and/or CSV</p> <p>It is our opinion that a CSV file format does not support the provision of a Summary Data Format as demonstrated in examples or in a meaningful format for typical summary purposes. We recommend that the "File Type" should be stipulated as a format that supports both graphical representation of the customers data and tabular format.</p> <p>We further recommend that the procedure should not include a demonstration of the how the minimum data specification is displayed as this is at the discretion of each participant and should be considered a point of retail competition under commercial services rendered.</p> <p><u>Comment 2:</u></p> <p>Appendix A A.1 File Conditions File Component "Data Quality" Parameters specified as "Estimated " with accepted values of Y or N</p> <p>And;</p> <p>Appendix B B.1 File Conditions File Component "File Type" of PDF and/or CSV</p>

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		<p>Data Quality is often the basis of dispute and non-payment of invoice/s once a customer becomes aware that they are being invoiced on estimated or substituted data. The risk and impact to business can be quite significant if this information is not communicated appropriately and in a manner that will minimise these risks. To this end we would propose the following solution:</p> <p>The header should be "Data Quality" with accepted values of "A", "E" or "S" where;</p> <ul style="list-style-type: none"> • A = Actual [definition] • E = Estimate [definition], and; • S = Substitute [definition]. <p>This would also require that a table of reference is provided that clearly defines what each of these values mean in terms of quality. The inclusion of this table of reference may or may not be included in the minimum deliverable specification for customer reference.</p> <p><u>Comment 3:</u></p> <p>Appendix A A.2 Example: Accumulation File Column Header: Estimated?</p> <p>And;</p> <p>Appendix B B.2 Example: Interval File Column Header: Estimated?</p> <p>See Comment 2.</p> <p><u>Detailed Data Format</u></p> <p><u>Comment 4:</u></p> <p>Appendix C C.1 File Conditions File Component "Data Quality" Parameters specified as "Estimated " with accepted values of Y or N</p> <p>And;</p> <p>Appendix C</p>

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		<p>C.2 and C.3 Example: 30' and 15' Interval File Examples respectively Column Header: Estimated?</p> <p>See Comment 2</p> <p><u>Comment 5:</u></p> <p>In addition to comments at Item 1, we would only add that the file format is specified as minimum but not limited to File Format Type CSV.</p>
2	<p>For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval metering data summary format.</p>	<p>Our interpretation is such that it is the intent of this procedure to provision Retail and DNSP obligation for the supply of meter data to customers and their authorised representatives at a minimum standard set out in this procedure. We do not believe that it was the intent that this procedure should provide minimum specification for “large” customers.</p> <p>The obligation to provide metering data applies to small customers and specifically precludes large customers under clause 56A of the NERR (below) and further the scope of this document is such that “These Procedures relate to requirements in the National Energy Retail Rules (NERR) which are only relevant for jurisdictions participating the National Energy Customer Framework” making any rules set out in this procedure unenforceable for large customers:</p> <p>56A Energy consumption information - supply of electricity only</p> <p>(1) A retailer must, on a request by a small customer or a <i>customer authorised representative</i>, provide information about that customer’s energy consumption for the previous 2 years in the manner and form required by the <i>metering data provision procedures</i>.</p> <p>which has been amended as a result of the AEMC Customer Access to Data Final Determination (below):</p> <p>5.5.4 Analysis</p> <p>The minimum requirements relating to the provision of metering data set out in 7.16 of the NER final rule and in AEMO’s metering data provision procedures are designed primarily to help small customers obtain better access to their electricity consumption data. As a result, we consider that rule 56A of the NERR should be limited in its application to small customers. This is consistent with the policy settings in the NECF, which regulate the relationship between the retailer and the small customer only, including the provisions in standard and market retail contracts. Current NECF instruments do not regulate the relationship between retailers and large customers. For example, even if rule 56A of the NERR was amended to include large consumers, such a right could not be enforced through the model</p>

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		<p>terms and conditions of retail contracts. Large customers should be able to obtain their data in the terms of their contractual arrangements with retailers outside of the NECF regulatory framework, reflecting their commercial agreements.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> (a) Define Retail Customer for the purpose of this procedure, and; (b) Define Small Customer, and; (c) Define Large Customer. <p>This being said, it does not prevent the retail or DNSP business from using this document as a guide to their internal processes to meet obligations for both small and large customers. It is worth noting that there are a number of small business customers who are on demand tariffs who may find the inclusion of such information helpful in making informed decisions and we do not have an opinion either way as to the inclusion or exclusion of this information however if it is included in the minimum specification, it should in no way be reflected as "Large" customer information and should be applied to all customers where demand is applicable.</p> <p>If included, we question if there should be consideration given to how this will be addressed by other retailers who bundle demand into their retail tariffs? In these scenarios, customers are often unaware that they are on a demand tariff and often are unaware of what demand actually means and therefore how it plays a role in demand side participation. For these customers, they are often unaware of the demand components in their tariff until they switch to a retailer who does not apply the same pricing and invoicing strategies.</p>
3	What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?	<p><u>Recommendation:</u> Define "response". It is Momentum's experience that often an email to acknowledge that a request has been received has been treated as a response within the agreed industry SLA and would recommend that Response is at least defined in the glossary of the document.</p> <p>We would argue that obtaining the appropriate authority from the customer to authorise a representative to access their data can delay the provision of data and we would recommend that 10 business days (as is the requirement for customer requests) commences from receipt of the customer authorisation. As with customer requests, this should also state that the Retailer or DNSP will make "<u>reasonable endeavours</u>" to provide.</p>
4	Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?	<p>Given that this is a prediction of demand in an unknown market it is difficult to quantify average volumes and size of requests. Further it is a prediction of a process that is yet to be developed for many retail businesses.</p> <p>We would not support a sliding scale approach for bulk requests and believe that this should be negotiated and agreed between stakeholders. Multiple internal and external factors, not the least of which is the</p>

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		retailers system functionality, available resources and format of data requested, must be considered when negotiating a delivery time for bulk requests.
5	Is there a need to define what constitutes a customer request (for example, by phone, in writing)?	<p>Momentum would refer to existing B2B Procedure – Customer and Site Details Notification, 2.2.4.1 (4) “Upon receipt of routine updates provided by the existing customer”. This procedure does not specify what qualifies as customer provided update (i.e. telephone call or written notice) and is similar in nature to a customer requesting information.</p> <p>We do not support a minimum standard for what constitutes a request from the customer and would only refer to laws of privacy when considering and responding to customer and/or authorised representative requests.</p> <p>Further, it is our position that customer requests could be considered as a point of retail competition under commercial services rendered and does not require a procedural definition.</p>
6	The Procedures presents the minimum requirement for the detailed data format. Please comment on these in Section 2.	See comments at Item 1.

2. Strawman Procedures

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Item	Description	Participant Comments
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5.1	Summary data format	
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Appendix A	ACCUMULATION METERING DATA SUMMARY FORMAT	
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Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
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