

5 June 2015

Mr Matt Zema
Australian Energy Market Operator,
GPO Box 2008,
Melbourne Victoria 3000

Dear Mr Zema,

The NSW DNSPs Response to the *Metering Data Provision Procedures consultation paper*

The NSW Distribution Network Service Providers, Ausgrid, Endeavour Energy and Essential Energy (the NSW DNSPs) welcome the opportunity to provide this joint submission in response to the *Metering Data Provision Procedures consultation paper*.

The NSW DNSPs support the principle that all consumers should have a right to access and control the sharing of their electricity consumption data in accordance with privacy, security and other consumer protection arrangements. However, we are concerned that the current drafting of the procedures may not result in an outcome that fully achieves the policy intent of retail customers being able to use this information to better assess their energy consumption data.

As noted by AEMO in its consultation paper, we hold concerns that our ability to fulfil requests may be hampered by an inability to satisfactorily verify the identity of customers. In its final rule change determination, the AEMC noted that improving current B2B processes should “enhance DNSPs’ ability to verify the identity of customers and validate the authority of customer representatives”¹. We welcome the development of improved existing procedures to support this new procedure, through the Information Exchange Committee processes, with the support of AEMO. To ensure timely implementation of this new procedure, supporting procedures will need to be enhanced before March 2016.

We have provided detailed comments (Attachment A) on aspects of the draft strawman provided for consultation by AEMO. In summary, our key concerns with the current drafting are:

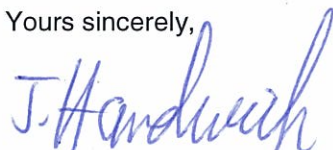
- Inclusion of potentially confusing energy flow type information,
- Redundant creation of new file formats, in lieu of the use of existing standard industry formats,
- Onerous requirements for data delivery methods.

Next Steps

We understand AEMO is holding a second workshop to allow stakeholders to discuss their feedback on the strawman procedures. The NSW DNSPs are very interested in participating in this workshop to assist in producing procedures that are clear, effective and able to achieve the intended policy outcomes.

If you have any further queries or would like to arrange a meeting to discuss our submission please contact Mr Murray Chandler, Group Manager Network Technology & Innovation at Networks NSW on (02) 9269 7210 or murray.chandler@ausgrid.com.au

Yours sincerely,



John Hardwick
Group Executive Network Strategy
Ausgrid, Endeavour Energy and Essential Energy

Attachment A: NSW DNSPs’ comments on the Strawman for Consultation

¹ AEMC 2014, National Electricity Amendment (Customer access to information about their energy consumption) Rule, Final Rule Determination, 6 November 2014, pg14.

Attachment A – NSW DNSPs' comments on the Strawman for Consultation

Data Formats

Inclusion of Energy Flow Types

AEMO's strawman procedure proposes that both the summary and detailed formats contain information on a customer's assigned network tariff through the inclusion of 'energy flow type' data. The NSW DNSPs believe that the energy flows currently proposed may cause confusion due to the differences in definitions between network tariff components and retail tariff components. DNSPs cannot guarantee that the assigned network tariff is reflected in the customer's retail tariff, and therefore it may appear to customers that there are discrepancies or mistakes with the data. The NSW DNSPs believe that energy flow types related to 'time of use' and demand components should be removed as a requirement of both the summary and detailed formats. We are supportive of the inclusion of the following energy flow types in the summary format:

1. General supply
2. Controlled load
3. Generation

An additional identifier may be required where multiple types of energy flows exist on a single NMI to differentiate them, now or in the future (for example, Controlled Load 1, Controlled Load 2).

Diagrammatic Representation

We note that the Rules only require a 'diagrammatic representation' for interval metering data, whereas the strawman procedure requires this for both interval and accumulation data. We believe that inclusion of a graph for accumulation data will not provide additional value to customers, and that this requirement should be removed from the procedure, in line with the Rules.

Read Date

Many of the NSW DNSPs' interval meters are manually read interval meters. We suggest the following changes to the drafting of the 'Read Date' requirements to reflect this: "monthly, for **remotely read interval metering data** or when read for **manually read interval** or **accumulation metering data**".

Use of Industry Standard Formats

The NSW DNSPs recommend the use of existing industry standard formats for the provision of detailed data. Use of existing industry standard formats, such as NEM12 and NEM13, for the detailed data would ensure the timely and cost effective provision of clearly defined and consistent information. Use of these standard formats will mean that both retailers and DNSPs will provide metering information in identical formats. This will be particularly helpful for the customer authorised representatives, who we believe will be the biggest users of the detailed format. It will also help achieve one of the desired policy outcomes to "reduce costs involved in building and maintaining comparative services that assess multiple data formats"².

Although the NSW DNSPs support 'customer-friendly' formats, such as that provided by the summary data, we believe that any format of detailed information will potentially be difficult for an individual customer to understand. To this end, we support the development of a guide that explains, in simple terms, the data contained in NEM12 and NEM13 to assist customers to understand their data.

Actual Daily Demand

Similarly to the energy flow type comments above, demand is a component of the tariff, and calculation methods vary. The NSW DNSPs suggest that this field be removed as a requirement to avoid confusion.

Timeframes

The NSW DNSPs do not support the use of a sliding scale for delivery timeframes for requests from customer authorised representatives. Due to the large variability in the size of these requests, it is suitable for the DNSP and the customer authorised representative to agree a mutually acceptable timeframe.

² AEMO, 2015, Metering Data Provision Procedures, Consultation Paper, 30 April 2015, pg6

Delivery Method

We believe that the requirement for the provision of the summary and/or detailed data should be limited to electronic distribution only. The provision of a physical format (such as paper) would be inefficient and provide little value to customers or their authorised representatives.

The file types of the data provided should also be limited. Provision of the summary data should be in Portable Document Format (PDF), in order to accommodate the required graphical representation. Similarly, provision of the detailed data should be limited to Comma Separated Values (CSV) format, to accommodate the potentially large amount of data.