



5 June 2015

AEMO Consultations - Meter Data Provision Procedures

By email: MDPP@aemo.com.au

Attention: Ms Taryn Maroney

Meter Data Provision Procedures

Origin Energy (Origin) welcomes this opportunity to respond to the Australian Energy Market Commission's (AEMO's) consultation on the development of procedures to support the implementation of recent changes to the National Electricity Rules (NER).

As Australia's largest retailer of energy, Origin has a significant interest in the development of these procedures. Origin is supportive of the policy objectives supporting the rule change and is committed to providing services to our customers that meet their needs, including the provision of consumption data. We have developed tools including My Account and future digital offering to facilitate customer access to their energy data. Other market participants have developed similar tools and we support the development of such services for customers as it demonstrates that some of the objectives of the rule change are being met through competitive markets.

Origin notes that a central objective for procedure supporting the rule change is to deliver a minimum specification for the provision of meter data. In order to minimise the risk of providing confusing information to customers and to ensure efficient delivery of data, we believe that to deliver on the objective above, the procedures need to be:

- Simple, in order to enable efficient and timely implementation; and
- Supportive of consistent provision of information, for both retailers and distributors.

In Origin's view the detailed energy data format (for interval data) forms the basis for analysis of data. We do not believe that the intention of the rule change was for the summary data format to set out analysis of meter data. Applying sophisticated analysis to interval (or basic) consumption data (for example setting out consumption by tariff type) will add significantly to the cost of summary data delivery and runs the risk of creating inconsistent reporting between distributors and retailers, without improving customer's understanding of their pattern of consumption.

We believe the objective of the summary data format was to provide an easily digestible, clearly presented snapshot of key data, rather than replicate or expand upon information provided through existing industry portals and the retail bill. Furthermore, Origin considers that the provision of detailed data will support the development of the market for such information as consumer preferences evolve over time- in our view, the role of procedures should not overlap the evolution of new products and service.

Should you wish to discuss the contents of this response, please contact Mario logha on (03) 9821 8213 in the first instance.

Yours sincerely



Arun Wadhwa
Manager, Network Performance

(03) 9821 8176 – Arun.Wadhwa@Originenergy.com.au



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

METER DATA PROVISION PROCEDURES PACKAGE

Participant: Origin Energy

Completion Date: 5th June, 2015

Table of Contents

1. RESPONSES TO QUESTIONS IN THE CONSULTATION PAPER	3
2. STRAWMAN PROCEDURES	4

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>Origin has reviewed both summary and detailed formats in the context that the objective of the metering data provision procedures is to 'establish the minimum requirements for the manner and form in which metering data should be provided to a retail customer or its customer authorised representative'</p> <p>For the <u>Detailed format</u> we strongly recommend that the procedures adopt the existing Victorian My Power Planner (MPP) formats that are in existence and extend this out to other states, with each participant having the flexibility to choose any of the formats. These have proven to serve the needs of customers and will minimise the cost for participants who have already built processes on MPP.</p> <p>For <u>Summary format</u>, align the minimum requirements to the information contained within the NEM files, without the requirement to perform calculations to split energy flow, which typically is performed by a Billing engine.</p> <p>The provision of Energy flow such as Peak, Off-Peak. Shoulder can vary between Network and Retail products and will likely confuse the customer more so than meeting the objective of this change.</p> <p>Added to this are other complexities that can create confusion by sourcing Billing data eg.</p> <ul style="list-style-type: none"> -Interval data provided as EST versus Billing that accounts for day-light savings -Provision of revised data beyond an out of code period that is not billed to the customer -Dealing with multiple products over a period of 2 years. <p>Origin recommends that the summary be provided at a minimum level containing net energy flow for net metering or gross energy where streams are measured separately.</p>
2	For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval	Origin does not support the inclusion of demand in the diagrammatic representation and question the value this adds,

Meter Data Provision Procedures Package

Item	Question	Participant Comments
	metering data summary format.	<p>given:</p> <ol style="list-style-type: none"> 1) This information is contained within the customer's bill 2) Introducing a calculation component to the provision of data request and increase complexity. eg. Determining the max demand value 3) Low number of customers that are classified as Small that are on a specific retail demand tariff. 4) The objective is for the provision of a minimum standard data format that can be customised by the customer to meet their need.
3	What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?	<p>Origin supports the wording within the Strawman Procedures that allows for Retailer/DNSP to negotiate an agreed delivery timeframe with the customer authorised representative.</p> <p>In addition to negotiating an agreed delivery timeframe, Origin's believes it is important to cap the number of requests that a customer representative can submit per day. The suggested cap is recommended to be set at 30. It is important to note that Retailers/DNSPs may receive high volumes from multiple authorised Representatives and this provides some control to manage the peak level of work received.</p>
4	Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?	<p>A sliding scale is not practical. By allowing the parties to agree to a delivery timeframe, it allows for influx of requests, potentially from multiple authorised representatives to be effectively managed.</p>
5	Is there a need to define what constitutes a customer request (for example, by phone, in writing)?	<p>Origin recommends that the procedures are not prescriptive in defining a customer requests or the delivery mechanism. Rather the procedure provides the flexibility that allows the Retailer/DNSP to serve the customer or the customer reps within the channels that they so desire.</p> <p>Consider the following wording for the procedure: "Retailers and DNSP's can agree with the customer or customer authorised representative the preferred channel for receiving metering data requests and the delivery method to be used."</p>

Item	Question	Participant Comments
6	The Procedures presents the minimum requirement for the detailed data format. Please comment on these in Section 2.	As per Item 1 feedback.

2. Strawman Procedures

Item	Description	Participant Comments
1	INTRODUCTION	
1.1	Purpose and scope	No comment
1.2	Definitions and interpretation	<p>In response to Origin's feedback to the format, alter the definitions to:</p> <ul style="list-style-type: none"> • Energy flow type - Total energy flow for which there is separate energy measurement. • Energy volume or demand – remove demand measured • Extent of energy – remove demand • Include definition for : <p>Index Read – schedule read as per MSATS NSRD/Billing cycle. (This prevents every read such as service order reads being captured and included in diagrammatic and load profile graph)</p> <ul style="list-style-type: none"> • Load Profile – Quarterly or Monthly for accumulation meters as per MSATS schedule reading cycle. • Off-Peak, Peak, Shoulder definitions- remove
1.3	Related AEMO procedures	No comment
2	OBJECTIVE	No comment
3	DATA FORMATS	
3.1	General National Energy Retail Rules requirements	<p>General NERR requirement should not sit under Data Formats. Best to create new section 1.4.</p> <p>Include rule that it applies to Standard Retail Contract and refers to small customers (across all states and all meter types).</p> <p>Further investigation should be done to review whether this is</p>

Meter Data Provision Procedures Package

Item	Description	Participant Comments
		applicable to small customers as per NMI classification or by the site usage.
3.2	Field details – format and unit of measure	Use existing definition of UOM as per MSATS Procedures
3.3	Summary data format	<p>3.3 IV. Data quality indication. Change the column from “Estimate” to “Actual”. Data quality indicator therefore will be “Y” for actual data or “N” for Subs, Final Subs.</p> <p>3.3 V. Read Date</p> <ul style="list-style-type: none"> Interval: Clarity required between: Read date, “monthly” for interval metering data and; 1.2.1 Interval data summary definition of “daily” energy volumes for energy flow type and requirement for “From Date” and “To Date” in Appendix B Interval data summary format. Is it meant to be daily or monthly? Basic: Input the word “scheduled” before read for accumulation meter data. This way, it aligns with the intent of providing the read as per NSRDs and not every accumulated read taken eg. check reads . <p>VI. Energy Flow types: As per definitions feedback Item 1.2</p> <p>Conditions II. File may not contain blanks. This may be practical if say an entire row is unable to contain blanks. However it may be valid for blanks to be present at a column level. For example, Generation column is likely to be blank in a lot of cases. Zero should also not be a substitute for blanks, as zero can be a valid value.</p>

Meter Data Provision Procedures Package

Item	Description	Participant Comments
		<p>3.3.1 Diagrammatic representation Not required as per NER clause 7.16(c)(3). Refer to Appendix A feedback</p>
3.4	Detailed data format	<p>3.4 VI. Energy flow types As per definitions feedback Item 1.2</p> <p>Change wording from “Condition that apply to all summary data files are” To “Condition that apply to all detailed data files are:”</p>
4	DELIVERY TIMEFRAMES	<ul style="list-style-type: none"> It is imperative that the timeframe commences once the required information requested by the Retailer or DNSP is received and validated to meet their Privacy obligations. Procedures should also allow for mail delivery timeframes in the event of physical delivery. Include a section that provides clarity for Retailers and DNSPs for charging a reasonable charge. <ol style="list-style-type: none"> When the request is received by the Customers Authorised Representative, who is the charge rendered to? The Customers Authorised Representative or to the Customer. Retailer and DNSPs may apply a reasonable charge to a customer’s authorised representative even if they choose to send through multiple individual requests on any given day (as opposed to one request received including multiple customers).
5	DELIVERY METHOD	<ul style="list-style-type: none"> As per feedback in Item 5 of the Consultation paper questions, include in the Procedures: “Retailers and DNSP’s can agree with the customer or customer authorised representative the preferred channel for receiving

Meter Data Provision Procedures Package

Item	Description	Participant Comments
		<p>metering data requests and the delivery method to be used.”</p> <ul style="list-style-type: none"> • Include in the procedures that the Retailer and DNSP may reserve the right to refuse to provide metering data under certain circumstances and can decline the request for meter data should the customer authorised representative not meet customer validation criteria or associated commercial terms. • In addition, include that Retailers/DNSPs are not obligated to provide a format that is different to the manner the procedures specify (even though a charge can be applied).
5.1	Summary data format	Provision of summary data in a CSV format will provide the customer with options to customise reports and charts to suit their needs. This solution does not generate a diagram for the customer in the format provided.
5.2	Detailed data format	Ok
Appendix A	ACCUMULATION METERING DATA SUMMARY FORMAT	
A.1	File conditions	<p>-Header Record: Change “estimate” to “actual”. Remove time periods.</p> <p>-Meter Serial Number: Define Read Date as Scheduled Read Date.</p> <p>-Energy Flow Type: As per definitions feedback Item 1.2</p> <p>-UOM: file condition for UOM as only KWh but MWh is an allowable UOM in 3.2?</p> <p>-Read Date: Refer to it as the date the meter were read, not when the reading event should have happened. Remove mention of Estimate.</p> <p>-To Date: unclear what this refers to, given Read date definition</p> <p>-Data Quality: Change to meter data actual? Y or N. Data quality indicator therefore will be “Y” for actual data or “N” for Subs, Final Subs.</p>

Meter Data Provision Procedures Package

Item	Description	Participant Comments
A.2	Example: accumulation file	File to represent File condition feedback as per A.1
A.3	Example: diagrammatic representation of energy usage	Provision of summary data in a CSV format will provide the customer with options to customise reports and charts to suit their needs.
Appendix B	INTERVAL METERING DATA SUMMARY FORMAT	
B.1	File conditions	<ul style="list-style-type: none"> -Header Record: Remove time period, demand -Energy Flow Type: As per definitions feedback Item 1.2 Energy Values: remove kW or KVa -Data Quality: Change to meter data actual? Y or N. Data quality indicator therefore will be “Y” for actual data or “N” for Subs, Final Subs.
B.2	Example: interval file	File to represent File condition feedback as per B.1
B.3	Example: diagrammatic representation of energy usage	<p>Provision of summary data in a CSV format will provide the customer with options to customise reports and charts to suit their needs.</p> <p>Provision of the diagrammatic representation of consumption can be made through an agreed method, such as on-line portal.</p>
Appendix C	INTERVAL METERING DATA SUMMARY FORMAT	
C.1	File conditions	Victorian My Power Planner (MPP) formats that are in existence and extend this out to other states, with each participant having the flexibility to choose any of the formats. These have proven to serve the needs of customers and will minimise the cost for participants who have already built processes on MPP.
C.2	Example: 30-minute interval file	<p>Change Estimate to Actual.</p> <p>Remove Read Date, as consumption date is really only relevant to</p>

Meter Data Provision Procedures Package

Item	Description	Participant Comments
		the customer.
C.3	Example: 15-minute interval file	
	Consumer Utilities Advocacy Centre – Customer Data Summary	<p>In Origin's view the detailed energy data format (for interval data) forms the basis for analysis of data. We do not believe that the intention of the rule change was for the summary data format to set out analysis of meter data. Applying sophisticated analysis to interval (or basic) consumption data (for example setting out consumption by tariff type) will add significantly to the cost of summary data delivery and runs the risk of creating inconsistent reporting between distributors and retailers, without improving customer's understanding of their pattern of consumption.</p> <p>We believe the objective of the summary data format was to provide an easily digestible, clearly presented snapshot of key data, rather than replicate or expand upon information provided through existing industry portals and the retail bill. Furthermore, Origin considers that the provision of detailed data will support the development of the market for such information as consumer preferences evolve over time- in our view, the role of procedures should not overlap the evolution of new products and service.</p>