

4 June 2015

Australian Energy Market Operator

**Subject: First Stage Consultation: Metering Data Provision Procedures**

SA Power Networks welcomes the opportunity to respond to the Australian Energy Market Operator's (AEMO) First Stage Consultation on the Metering Data Provision Procedures, issued on the 30<sup>th</sup> April 2015.

SA Power Networks has reviewed the Metering Data Procedures Consultation Paper and we recognise that these Strawman procedures are addressing a minimum requirement whilst allowing for participants to develop their own level of presentation and competitive products. We agree with this approach and believe that will result in an effective outcome for customers.

The attachment to this letter provides a response to specific questions raised by AEMO and captures any further detailed feedback.

Should the AEMO require further clarification of any of our comments, please contact David Woods, Business and Industry Development Manager, on (08) 8404 9482.

Yours sincerely,



David Woods

Business and Industry Development Manager

## Attachment 1

### 1. Metering Data Provision Procedures – Consultation Paper

SA Power Networks provides the following comments to address items identified within the Metering Data Provision Procedures – Consultation Paper (Published: 30 April 2015).

#### Section 3 – Drafting for proposed changes

AEMO proposed the following question at the conclusion of this section:

The Procedures presents the minimum summary and detailed data formats. Please comment on the proposed formats and examples.

For large retail customers, please provide your view on including demand in the diagrammatic representation for the interval metering data summary format.

SA Power Networks provides the following comments to address bullet points within the relevant sub-sections.

##### 3.1.1 - Summary data format – accumulation meters

- The nature and extent of energy usage information

*SA Power Networks agree with the summary format as described in Appendix A of the Strawman Procedures with the following recommendation:*

*That the Peak, Shoulder and Off-peak column be combined into a General Consumption category. This will provide the most common level of consumption between the different parties. Retailer tariff definitions are different from distributor definitions and will be a source of confusion for consumers if they try to compare distributor data with their retailer view. The “shoulder” category is not available for SA Power Networks.*

- A diagrammatic representation of energy usage information

*SA Power Networks agree – the data can be presented graphically. This specification as a minimum should not be prescriptive about the type of graph or any drill down capability.*

##### 3.1.2 - Summary data format – interval meters

- The nature and extent of energy usage information

*SA Power Networks agree with the summary format as described in the Appendix B of Strawman procedures with the exception that Peak, Shoulder and Off-peak should be combined as Consumption. Distributors do not necessarily know the breakup of this data as presented to the customer on their bill. Please refer to recommendation above.*

- Usage or load profile over a specified period



*SA Power Networks would be in a position to provide up to two years in most circumstances.*

- A diagrammatic representation of a retail customers energy usage information

*SA Power Networks agree – the data can be presented graphically. This specification as a minimum should not be prescriptive about the type of graph or any drill down capability.*

#### **Section 4 – Timeframes for delivering metering data formats**

AEMO proposed the following question at the conclusion of this section:

What would be a reasonable maximum timeframe to specify for retailers and DNSPs to respond to requests from customer authorised representatives?

Should a sliding scale be used for delivery timeframes for requests from customer authorised representatives?

Is there a need to define what constitutes a customer request (for example, by phone, in writing)?

SA Power Networks provides the following comments to address specific questions:

- Question 1  
*SA Power Networks believes that a timescale of 10 days is an appropriate obligation for this transaction, noting that the clock can only start when the consumer's right to access the data is confirmed.*
- Question 2  
*SA Power Networks recommends that a simple approach should be adopted within the procedure which requires the customer authorised representatives to negotiate delivery timeframes with the relevant participant for multiple sites.*
- Question 3  
*A customer request can be either by phone, writing, email or on-line. The timing starts from when the consumer's right to access the data is established.*

#### **Section 5 – Delivery Methods**

AEMO proposed the following question at the conclusion of this section:

The Procedures presents the minimum requirement for the detailed data format. Please comment on the these.

SA Power Networks provides the following comments to address specific questions:

*SA Power Networks agree with the example Detail data format – interval meters and the 30 minute interval file layout (noting the comments captured within the next section of this document - 2. Metering Data Provision Procedures – Strawman for Consultation).*

## 2. Metering Data Provision Procedures – Strawman for Consultation

SA Power Networks provides the following comments to address items identified within the Metering Data Provision Procedures – Strawman for Consultation V0.1.

Page 2 – 1.2.1 Glossary

*Quarterly load profile for accumulation meters is meaningless – should be removed*

	Start Date and End Date for the specified time period
Load profile	A graph showing a retail customers energy consumption over the time period as requested by the retail customer or customer authorised representative. This is provided: <del>Monthly for interval metering data</del> Quarterly for accumulation metering data
Nature	See energy flow type
Off-peak	A time period during a day when an off peak usage rate is applied to energy consumption

Page 3 – 3.3 Summary data format

*In the event of a 3rd Party MDP, if the data has not been provided to the distributor, the data cannot be provided to the consumer through this request. Therefore, this condition should be removed or additional words included to clarify when it would be valid.*

Conditions that apply to all summary data files are:

- I. File must be based on validated *metering data*.
- II. File must not contain any blank rows or columns.

Page 4 – 3.4 Detailed data format

*Typing error – conditions should reference detailed, not summary*

### 3.4. Detailed data format

The detailed data format for *Interval metering data* must include the following information:

- I. NMI
- II. Meter Serial Number
- III. UOM for the Energy Flow Type
- IV. Data quality Indication
- V. Read Date
- VI. Energy Flow Types:
  - A. Peak
  - B. Shoulder, Off-Peak, Controlled Load and/or Generation (only if applicable).

Conditions that apply to all ~~summary~~ data files are:

- I. File must be based on validated *metering data*
- II. File must not contain any blank rows or columns
- III. File ordered by Date – oldest date at the top of the file and most recent date at the bottom of the file.

The *Interval metering data* detailed format must be provided as a horizontal format.

Appendix C contains the *Interval metering data* detailed format, including the file conditions and example files

#### A1 and B1 File Conditions

*Some reformatting of this information could assist in the ease of understanding and provide a more logical display. We make this comment as it is a little confusing as to whether it is field definitions or layout. For example, the file component Header Record describes the field names within the file, whereas typically a header record provides a summary of the contents of the file for validation purposes e.g. number of records, checksums etc.*

#### A2 and B2 Example: accumulation file

*It is recommended that the Peak, Shoulder and Off-peak column be combined into a General Consumption category. Total consumption is the only common level between the different parties. Retailer tariff definitions are different from distributor definitions and will be a source of confusion for consumers if they try to compare distributor data with their retailer view.*