

APPENDIX A. CONSOLIDATED SUMMARY OF RESPONSES

DRAFT REPORT AND DETERMINATION AND DRAFT PROCEDURES – STAKEHOLDER RESPONSES

METERING DATA PROVISION PROCEDURES

Table of Contents

1. DRAFT METERING DATA PROVISION PROCEDURES3

1. Draft Metering Data Provision Procedures

Item	Description	Participant Comments	AEMO Response
1	INTRODUCTION		
1.1	Purpose and scope	<p>ENA</p> <p>The purpose should make it clear that: when referring to retail customers, the obligations on the licensed network is <u>limited to the grid connected NMI</u>s and does not apply to child connections for retail customers within an embedded network.</p> <p>EnerNOC</p> <p>EnerNOC is grateful for the opportunity to comment on this topic. We would like to congratulate AEMO on running an informative and genuinely engaging process.</p> <p>In EnerNOC's opinion, the key principles underpinning the procedure change are:</p> <p>Principle 1. Ensuring that consumers can access their data</p> <p>Principle 2. Ensuring that consumers can make informed decisions based on the information provided</p> <p>EnerNOC strongly supports the recommendation to require NEM12 as the detailed data standard.</p> <p>We believe this supports both principles, and will lead to the development of tools and services that will enable consumers to make more informed procurement, consumption and investment decisions.</p> <p>UNITED ENERGY (UE)</p> <p>The purpose should make it clear that the licenced network does not have an obligation to provide child metering data, the obligation is limited to the direct grid connected NMIs. The MDP Procedures could make it clear whether the exempt network ENO, or ENM had the obligation.</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>Red Energy – No comment provided</p>	<p>AEMO considers it is not appropriate for the MDPP to include requirements relating to whether metering data is provided for child connection point. The MDPP is only concerned with the manner and form in which metering data is provided.</p> <p>AEMO notes the respondent's comments and position.</p> <p>AEMO considers it is not appropriate for the MDPP to include requirements relating to whether metering data is provided for child connection point. The MDPP is only concerned with the manner and form in which metering data is provided.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Lumo Energy – No comment provided Origin Energy – No comment provided Dept of Industry and Science – No comment provided AusNet Services – No comments Momentum Energy – Agreed ActewAGL – No comment NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided Energy Tailors – No comment EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
1.2	Definitions and interpretation	<p>NSW DNSPs Demand/Capacity Definitions may differ between participants, accordingly, this should be omitted from the procedure. Additionally in this definition, the equation displayed appears to be missing a square root sign. Generation For excess generation, depending on the meter set-up, this will not necessarily be shown as a negative value. We suggest that this definition be reworded to “may be negative”. Interval Metering Data – Detailed Data The NSW DNSPs support the use of the NEM12 format for the detailed interval data format. Momentum Energy Daily time periods - Time periods during a day when different usage rates are applied to energy usage. NER 7.16(2) for retail customers for whom interval metering data is available, specify the summary data format, which, at a minimum should include the retail customer's: (i) nature and extent of energy usage for daily time periods (ii) usage or load profile over a specified period; and</p>	<p>Terms defined in the NEL or NER have the same meaning in these Procedures unless otherwise specified. AEMO notes the respondent’s comments and has corrected the equation displayed for the square root sign. AEMO notes the respondent’s comments and has clarified the definitions. AEMO notes the respondent’s comments and position.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p><i>(iii) a diagrammatic representation of the information referred to in subparagraph (i);</i></p> <p>Remove this definition on the basis that usage rates are out of scope of the NER and purpose of this document.</p> <p>Energy flow type - Energy flow over a period of time for which there is a separate energy measurement or a separate usage rate.</p> <p>It is Momentum Energy's position and interpretation that "nature and extent of energy usage" should be further defined as consumption, controlled load and generation data. AEMO have interpreted this definition to mean Peak, Shoulder and Off Peak periods which is billing related information and not meter data information. This single definition applies to both the DNSP and the Retailer. To further reduce confusion and for consistency with the NER, the definition should be titled Energy Usage and not Energy Flow type.</p> <p>Interval metering data - summary This includes: <ul style="list-style-type: none"> • Total volume of energy for each energy flow type for the specified time period. • Diagrammatic representation of daily volumes for each energy flow type for the specified time period. • From Date and To Date for the specified time period. </p> <p>Consistency with NER: Replace energy flow with energy usage.</p> <p>Nature - See energy flow type.</p> <p>Consistency with NER: Replace energy flow with energy usage.</p> <p>Off-peak: A time period during a day when an off-peak rate is applied to energy usage.</p> <p>Peak: A time period during a day when a peak rate is applied to energy usage.</p> <p>Shoulder: A time period during a day when a shoulder rate is applied to energy usage.</p> <p>Removal of Off Peak, Peak and Shoulder definitions on the basis that "Energy Flow Type" should only include consumption, generation and controlled load data.</p> <p>Additional definition: Authorised participant period:</p>	<p>AEMO notes the respondent's comments and position.</p> <p>AEMO notes the respondent's comments and has clarified the definitions</p> <p>AEMO notes the respondent's comments and has clarified the definitions</p> <p>AEMO notes the respondent's comments and has removed the definitions</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response		
		<p>Momentum Energy would like to see the inclusion of a definition that pertains to the limited responsibility for provision of metering data only for the period within the requested period, for which the participant was an authorised participant (i.e. Financially Responsible Market Participant or DNSP).</p> <p>AusNet Services</p> <p>AusNet Services has identified the following editorial issues within the glossary to which we make the following suggestions. We have suggested alternative wording, refer yellow highlighted red font.</p> <p>1.2.1.1 The accumulated metering data - summary data definition refers to representing daily volumes. Conversely, the examples in Appendix A refer to monthly or quarterly volumes being displayed. In situations where there is an irregular meter read (special read) of a manually read meter, then by not using an average energy value will misrepresent the energy value on the graph. We agree that the monthly or quarterly volumes should be represented as daily average usage over the period, but we emphasize this should be the daily average usage.</p> <table border="1" data-bbox="654 863 1435 1150"> <tr> <td data-bbox="654 863 981 1150">Accumulated metering data - summary data</td> <td data-bbox="981 863 1435 1150"> This includes: <ul style="list-style-type: none"> - Total volume of energy for each energy flow type for the specified time period. - Diagrammatic representation of daily average volumes for each energy flow type for the specified time period. Each meter reading date for each energy flow type for the specified period of time. - From Date and Read Date for the specified time period </td> </tr> </table> <p>1.2.1.2 The generation definition refers to net energy flows for a period. This misrepresents net metering in terms of being represented in the NEM12/NEM13 files. We recognise that it does reflect the MDM file sent to AEMO, but this is not used for the purpose of billing retail customers while the NEM12/NEM13 files are.</p>	Accumulated metering data - summary data	This includes: <ul style="list-style-type: none"> - Total volume of energy for each energy flow type for the specified time period. - Diagrammatic representation of daily average volumes for each energy flow type for the specified time period. Each meter reading date for each energy flow type for the specified period of time. - From Date and Read Date for the specified time period 	<p>AEMO notes the respondent's comments and position.</p> <p>AEMO notes the respondent's comments and has clarified the definitions</p>
Accumulated metering data - summary data	This includes: <ul style="list-style-type: none"> - Total volume of energy for each energy flow type for the specified time period. - Diagrammatic representation of daily average volumes for each energy flow type for the specified time period. Each meter reading date for each energy flow type for the specified period of time. - From Date and Read Date for the specified time period 				

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<div data-bbox="651 220 981 608" style="background-color: #4F81BD; color: white; padding: 5px;">Generation</div> <div data-bbox="981 220 1435 608" style="border: 1px solid black; padding: 5px;"> <p>Volume of energy generated by the retail customer, i.e. energy flow to the grid from the connection point. Where the generated energy is measured by a net metering installation, the generated energy will be combined with energy usage values prior to being measured and excess energy flows will be metered in absolute terms of total energy imported and total energy exported, energy usage values will be negative when excess generation occurs for a period. Where the generated energy is measured by a gross metering installation, the generated energy will be separate from energy usage and will have a positive value.</p> </div> <p data-bbox="651 655 1525 778">1.2.1.3 Similarly to the accumulated metering data (1.2.1.1) we agree that the monthly or quarterly volumes should be represented as daily average usage over the period, but we emphasize this should be the daily average usage.</p> <div data-bbox="651 826 981 1066" style="background-color: #4F81BD; color: white; padding: 5px;">Interval metering data - summary data</div> <div data-bbox="981 826 1435 1066" style="border: 1px solid black; padding: 5px;"> <p>This includes:</p> <ul style="list-style-type: none"> - Total volume of energy for each energy flow type for the specified time period. - Diagrammatic representation of daily average volumes for each energy flow type for the specified time period. - From Date and To Date for the specified time period. </div> <p data-bbox="651 1114 712 1142">ENA</p> <p data-bbox="651 1155 1480 1214">Accumulated metering data – summary data: delete “of daily volumes’ from “Diagrammatic representation ... for each energy type”</p> <p data-bbox="651 1225 1525 1407">Interval metering data – detailed data. ENA support the use of the NEM12 for the interval data format. Whilst the 400 fields such as data quality (A/E/S) are likely to be required in a meter data file, the ENA query the value of the reason code and reason description. The ENA also don't see the value of providing the 500 record- B2B details in a meter data file. ENA suggest that this data only be provided where it is available. Any</p>	<p data-bbox="1554 1155 2152 1214">AEMO notes the respondent's comments and has clarified the definitions.</p> <p data-bbox="1554 1302 2175 1361">AEMO notes the respondent's position and refers to AEMO's statement provided above in item 4.4.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>longer term, interval metering data ware housing solution should not need these additional fields.</p> <p>Origin Energy Origin recommends that some of the terms are removed or redefined as noted below.</p> <p>Energy flow as defined in the draft procedure is separate energy measurement or a separate usage rate. Origin views this definition as Billing data/Retail tariff information and believes this is deviating from 7.16 (NER) which refers to the provision of metering data and not billing data.</p> <p>Origin recommends to align minimum meter data requirements to the information contained within the NEM files. Origin therefore recommends that the summary format be provided at a minimum level containing net energy flow for net metering or gross energy flow where streams are measured separately.</p> <p>Accumulated metering data – summary data Remove “daily” as this is not available for accumulation meters</p> <p>Daily Time Periods - remove as related to billing data/tariff information</p> <p>Demand/Capacity - remove as related to billing data/tariff information</p> <p>Origin does not support the inclusion of demand in the diagrammatic representation and questions the value this adds, 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 meter data request and increased complexity. eg. Determining the maximum demand value 3) Low number of customers that are classified as Small that are on a specific retail demand tariff. <p>The objective is for the provision of a minimum standard meter data format that can be customised by the customer to meet their needs.</p> <p>Energy flow type - Total energy flow for which there is separate energy measurement.</p>	<p>AEMO notes the respondent’s comments and has clarified the definitions.</p> <p>AEMO notes the respondent’s comments and position.</p> <p>AEMO notes the respondent’s comments and has amended the definitions for the MDPP.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.</p> <p>AEMO notes the respondent’s comment.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Interval metering data – summary data</p> <p>Diagrammatic representation of daily volumes is per example appendix A3/B3, however this is contradicted by Load profile definition which states that the diagram of energy consumption is to be monthly for remote read interval meters and by the Read Date for manually read interval meters.</p> <p>Please clarify and be clear in the Procedure whether the Diagrammatic representation i.e. The graph needs to be daily volumes or as per load profile definition.</p> <p>It must be noted that daily representation of a graph for say 2 years could be up to 3285 column bars (if displaying Peak, Off-Peak, Shoulder). This is not practical in a PDF format. It is strongly advised that the graph shows at minimum monthly time periods.</p> <p>Load profile</p> <p>Pease confirm and be clear in the procedure whether this is actually the tabular form i.e. appendix A.2/B.2 ?</p> <p>Off-Peak – remove as billing time slice</p> <p>Peak – remove as billing time slice</p> <p>Shoulder – remove as billing time slice</p> <p>Lumo Energy</p> <p>Lumo Energy requests that the terms for Controlled Load, Off-Peak, Peak and Shoulder are removed from clause 1.2.1. The rationale for this is provided in response to clause 4.2(d) as we question the relevance of billing-related information to be provided in the summary data format for accumulated metering data.</p> <p>UOM – The glossary should establish the meaning of the term. It is not considered effective drafting to refer a reader of clause within a document for the definition.</p> <p>Red Energy</p> <p>Red Energy requests that the terms for Controlled Load, Off-Peak, Peak and Shoulder are removed from clause 1.2.1. The rationale for this is provided in response to clause 4.2(d) as we question the relevance of billing-related information to be provided in the summary data format for accumulated metering data.</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.</p> <p>AEMO notes the respondents’ position and refers to AEMO’s statement provided in item 4.2.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>UOM – The glossary should establish the meaning of the term. It is not considered effective drafting to refer a reader of clause within a document for the definition.</p> <p>UE</p> <p>Accumulated metering data – summary data. The diagrammatic representation should be for energy flow for the specified time period, remove the words "of daily volumes".</p> <p>Interval metering data – detailed data. UE support the use of the NEM12 for the interval data format, with the exception of the 400 and 500 records. The need for quality method flags/reason codes or B2B service orders is questionable, well beyond scope and would add significantly to the cost of implementation for no value. Additional data that provides no real value to the consumer will just add to file size and customer effort to understand the file and may detract from the value of the meter data. UE recommend that the 400/500 records be removed or that the obligation to provide the data be optional so that it may be provided where it is readily available. Fields such as data quality (A/E/S) are likely to be required in a meter data warehouse, however there may not be a need to keep reason code and reason description for all half hour periods for multiple years of warehoused meter data.</p> <p>The NEM 12 file format should be limited to the key records, i.e. the 200 and 300 records to describe the meter configuration and the meter data. This is consistent with the stated approach in the Draft Determination and clause 3.4 (b) that there are new meter files for each meter type or meter configuration.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided Dept of Industry and Science – No comment provided ActewAGL – No comment M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided Energy Tailors – No comment EnergyAustralia – No comment provided</p>	<p>AEMO notes the respondent's comments and has clarified the definitions.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.4.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>ERAA – No comment provided CUAC – No comment provided</p>	
1.3	Related AEMO procedures	<p>Momentum Energy II. Standing Data for MSATS. Consider removal this document on the basis that Standing Data is out of scope for Metering Data. UE – No comment provided EnerNOC SA Power Network - No comment provided Citipower / Powercor - No comment provided Red Energy – No comment provided Lumo Energy – No comment provided Origin Energy – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided AusNet Services – No comments ActewAGL – No comment NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided Energy Tailors – No comment EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	AEMO notes the respondent’s comments and has removed this reference.
2	IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES	<p>Momentum Energy Final Determination – Executive Summary: “The final rules are consistent with the draft rules in terms of retailers and DNSPs having up to a maximum 10 business days to respond to a single request for data from a customer or its authorised representative”</p>	NER clause 7.16(b) states the objective of the MDPP 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) in response to

Item	Description	Participant Comments	AEMO Response
		<p>5.3 Time frame for retailer and DNSP to respond to a data request</p> <p>5.3.1 Rule change proposal</p> <p>The COAG Energy Council has proposed that DNSPs and retailers must respond to a request to provide data within 10 business days.</p> <p>NER 7.16:</p> <p>include timeframes in which a <i>retailer</i> or a <i>Distribution Network Service Provider</i> must, using reasonable endeavours, respond to requests made under rule 7.7(a) (7). The timeframe to be included must:</p> <p>(i) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a <i>customer authorised representative</i> in relation to more than one <i>retail customer</i> of either the <i>retailer</i> or <i>Distribution Network Service Provider</i> to whom the request is made; and</p> <p>Momentum Energy considers that it is imperative to accurately reflect both the intent of the final determination and the rule set out in the NER. In doing so, we consider that this section should reflect the response timeframe and the not provision of meter data within the said timeframes, hence should read as follows (refer to Momentum Energy commentary 2.1 (c)):</p> <p>IDENTITY VERIFICATION AND METER DATA REQUEST RESPONSE TIMEFRAMES</p> <p>(a) <i>Retailers and DNSPs</i> must verify customer identity and use reasonable endeavours to RESPOND to <i>retail customers</i> and <i>customer authorised representatives</i> within the delivery timeframes detailed in clauses 2.2 and 2.3.</p> <p>AusNet Services</p> <p>Verifying a request should also be a reasonable endeavours obligation</p> <p>AusNet Services supports the draft MDPP insofar as it clarifies as reasonable endeavours the obligation to deliver metering data in response to requests from retail customers or customer authorised representatives.</p> <p>However, we note these reasonable endeavours provisions in the draft MDPP do not extend to the timeframe for verifying a request, as referenced to in section 2.1. Our concern is that the verification of a request is the most time consuming activity in the broader metering data provision process. As such, we suggest that the task of verifying a request should also be a reasonable endeavours obligation. Accordingly, we recommend adding a reference to 2.1 in section 2(a).</p>	<p>a request for such data from the retail customer or customer authorised representative.”</p> <p>NER clause 7.16(b) does not only refer to a ‘response to a request’, it clearly states that the objective of the MDPP is to place requirements on retailers and DNSPs to provide or deliver of the requested metering data to a retail customer or customer authorised representative. This is also consistent with the Standing Council on Energy and Resources (now the COAG Energy Council) rule change intent and the AEMC’s Final Determination.</p> <p>AEMO agrees that section 2.1(a) of the MDPP should refer to a reasonable endeavours requirement, consistent with wording in NER clause 7.16(c)(4).</p> <p>AEMO agrees and will amend the MDPP to reflect the inclusion of “reasonable endeavours” term.</p>

Item	Description	Participant Comments	AEMO Response
		<p>Energy Tailors – No comment Provided EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
2.1	Verifying the identity of a retail customer or customer authorised representative	<p>Energy Australia The AEMC Final Rule Determination Customer access to information about their energy consumption:</p> <p>6 General information about electricity consumption data 6.1 Rule change proposal</p> <p>The COAG Energy Council proposed that retailers and distributors be required to make information available to customers outlining who may obtain data obtained from the meter and for what purposes electricity consumption data is used.</p> <p>In particular, the rule change proposed that:</p> <ul style="list-style-type: none"> • retailers and DNSPs publish information on their websites about how such electricity consumption data is used. This website information would include <ul style="list-style-type: none"> – what parties may have access to metering data; – the circumstances in which metering data would be disclosed to parties other than the customer's retailer and DNSP; – when metering data is used and for what purpose; – options customer may have to stop the use of metering data; – how metering data is protected by regulation and by the customer and DNSP; <p>6.4 Analysis In evaluating this proposal, we note that the Seed Advisory report commissioned by the COAG Energy Council did not specifically recommend publishing information on retailers and DNSPs' websites nor recommended that meter data common terminology guidelines be published</p>	AEMO notes the respondent's position and refers to AEMO's statement provided above in item 2.

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>In line with the above, EnergyAustralia recommends the following update to clause 2.1. (a) of the Meter Data Provision Procedure (MDPP)</p> <p><i>(a) Retailers and DNSPs must and publish provide at a minimum, the information below required from a retail customer or customer authorised representative who requests metering data.</i></p> <ul style="list-style-type: none"> I. Sufficient information to verify identity and relevant consents from retail customers and customer authorised representatives. II. The way in which a request for metering data can be made, e.g. email, writing, telephone, etc. III. The form in which the metering data will be provided by the retailer or DNSP, e.g. electronic, physical copy, etc. <p>Further to the above, the AEMC Final Rule Determination Customer access to information about their energy consumption includes:</p> <p>5.3.4 Analysis</p> <p><i>We consider that retailers and DNSPs should respond, using reasonable endeavours, within the time frames specified by AEMO in its metering data provision procedures that would be triggered upon receipt of a metering data request from a customer or its authorised representative. This time frame should include sufficient time for the verification of a customer or its authorised representative.</i></p> <p>In line with the above, EnergyAustralia recommends the following update to clause 2.1. (a) of the Meter Data Provision Procedure (MDPP)</p> <p><i>(c) Where a retailer or DNSP determines it cannot verify the identity or relevant consents of a retail customer or customer authorised representative, the retailer or DNSP must advise the retail customer or customer authorised representative within three seven business days of receiving the request for metering data that insufficient verification information has been provided.</i></p>	<p>AEMO considers three business days is a reasonable period of time to confirm whether the request has included all their verification information and notify a retail customer or a customer authorised representative if they have not provided all of the information to meet their published verification requirements. No change to the MDPP.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>This is to accommodate any requests received in writing, where insufficient verification has been provided, EnergyAustralia suggests the timeframe is changed from three to seven business days for clause 2.1.(c) to allow a reasonable time to respond to these requests in writing.</p> <p>ERAA</p> <p>The Draft Procedures contain mandatory requirements that are beyond the scope of the Final Determination. The Final Determination states that retailers and distribution businesses are expected to strive to achieve a shorter timeframe as technology develops. Of particular concern is the three day verification of the customer's entitlement to data, within the ten day allowed timeframe to respond to a customer. Where a customer contacts a retailer or a distribution business via telephone the verification process should be straightforward. However, where the customer makes the request in writing or electronically, there may be more time required to validate the customer. The ERAA believes that there is no reason for AEMO to place this further obligation on retailers and distribution business. The ERAA supports a seven business day timeframe to validate the customer's request.</p> <p>CUAC</p> <p>CUAC supports AEMO's proposal for delivery timeframe commencement.</p> <p>CUAC supports proposals by customer authorised representatives such as Energy Tailors that customers be subject to uniform verification processes regardless of the delivery channel, and that third party providers be held to the same verification requirements as customers directly.</p> <p>Energy Tailors</p> <p>Energy Tailors believes that points a) and b) of Section #2.1, which leave the verification and request process to the discretion of <i>retailers</i> and <i>DNSPs</i> render this proposed procedure unviable and hence useless for the purposes intended by the AEMC Rule Change ERC 0171 <i>Customer Access to Information about their Energy Consumption</i>.</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2.1. Postal delivery time is excluded from the timeframe.</p> <p>AEMO notes the respondent's positions.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2 and 2.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>A business model for <i>customer authorised representatives</i> such as Energy Tailors is unviable without standardisation of these procedures. In particular:</p> <ul style="list-style-type: none"> a) Verification requirements should be standardised across participants b) All participants should allow for an electronic mode of request which is thereby able to be automated, reducing costs for customers and industry participants. <p>We urge AEMO to consult with the AEMC and other relevant federal regulatory / legal bodies regarding this issue. We note that <i>retailers</i> currently request energy consumption information from <i>DNSP's</i> (e.g. via a Provide Meter Data request) without providing the <i>DNSP</i> with any customer consent information.</p> <p>NSW DNSPs</p> <p>Clause (c) amendments</p> <p>“DNSP must advise” should be changed to “DNSP should use reasonable endeavours to advise”. This will allow DNSPs to prioritise workloads during significant network events, as well as acknowledging the unknown workload that may result from this procedure.</p> <p>The proposed 3 business days should be extended to 5 business days to allow more time for customer verification and consent of an customer authorised representative. This is more reflective of the unknown number of verifications within a single request and the unknown number of requests that a distributor could be handling at any one time.</p> <p>Momentum Energy</p> <p>2.3 Final determination: ... “The final NERR rule will not require retailers and DNSPs to place information on their websites about how metering data is used and will not therefore require AER to develop 'metering data common terminology guidelines'. While we strongly support reforms to enhance energy literacy and consumer engagement, we do not consider that the COAG Energy Council's proposal is the most effective regulatory response to address privacy concerns. We consider that any privacy concerns are better addressed through the application of privacy legislation to the extent that meter data is personal information”.</p> <p>4.4 Analysis: ...” In relation to whether the NER should specify the nature of consent required by parties authorised by customers, we do not consider that the NER should specify this. We consider that existing laws,</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2.</p> <p>NER clause 7.16(c)(4) requires the MDPP to include timeframes on retailers and DNSPs to respond to requests.</p> <p>AEMO considers that it is within its scope to include requirements to clarify the circumstances where verification cannot be achieved in a reasonable timeframe since this is a necessary step in the process in delivering the requested metering data to a retail customer or customer authorised representative.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>including privacy legislation, sufficiently addresses this issue. We consider that it is not generally appropriate for energy market regulations to apply and potentially duplicate obligations found in existing laws. Under this approach, for example, it would be up to the retailer or DNSP to determine what it needs to do to so that it meets its privacy obligations. It would also be up to the parties authorised by the customer to only use the information as permitted by privacy law.”</p> <p>1. On the basis of the final determination 2.3 and amended NER 7.16, Momentum Energy consider that it is out of scope and inappropriate for AEMO to mandate publication of “information to verify identity and relevant consents from retail customers and customer authorised representatives” and recommend that this clause is removed. Privacy will be managed by each participant in line with its understanding of The Privacy Act and contained Australian Privacy Principles to which end;</p> <p>2. The National Energy Rules require that Retailers and DNSP’s must publish their Privacy Policy on their websites in addition to including a Privacy Act notice in their standard contract terms and conditions. Further, as determined by the AEMC it is “not generally appropriate for energy market regulations to apply and potentially duplicate obligations”.</p> <p>3. Momentum Energy’s policies and practices will continue to apply and take precedent over AEMO procedural requirements.</p> <p>(b) On the basis of the above arguments, Momentum Energy would encourage the removal this clause.</p> <p>AusNet Services</p> <p>AusNet Services supports the concept of separately outlining timing obligations and provisions for the activities to verify a request for metering data by a retail customer or customer authorised representative. We support the draft MDPP’s recognition that requests from customers or customer authorised representatives may lack clarity or accuracy to verify the identity of a retail customer, and that time is required to resolve these matters. We also acknowledge the draft MDPP appropriately recognises the obligations within the <i>Privacy Act 1988</i>. However, in regards to this section we have identified the following two issues:</p> <p>1) Three business days is insufficient to verify a request</p> <p>2.1(c) AusNet Services considers the specific activities to verify a request represents the most consuming activities in the broader metering data provision process. As such, we regard the 3 business days allowed for</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided above in item 2 and 2.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>the task is disproportionate in comparison to the 10 business day allowed for processing individual requests and the 20 business day allowed for processing bulk requests. This alone should provide a basis for extending this verification timeframe.</p> <p>Furthermore, imposing a stringent time limit for verifying requests may have the adverse effect of incentivising DNSPs to be very exacting in our processing of requests, for example not rejecting requests where the phone number is incorrectly formatted or customer name is misspelled. If DNSPs to have more time to undertake a further assessment as per our obligations under the <i>Privacy Act 1988</i>, we will be able to positively resolve whether the requestor has a legitimate right for the metering data, but only 3 business days is an insufficient timeframe to provide this higher level of customer service. Resolving these matters may also involve a close inspection of historical CDN records received.</p> <p><i>AusNet Services recommends extending this time limit to 7 business days and removing it altogether for bulk requests.</i></p> <p>2) Providing detail of where the verification information was insufficient may enable phishing.</p> <p>2.1(d)(l) AusNet Services has experienced situations where landlords and other unauthorised persons have fraudulently applied for metering data by falsely representing himself or herself as the account holder. In these situations, they are normally able to correctly guess some information, but get other information wrong. If we provided detail of where the verification information was insufficient we would in fact be telling them what information was correct. Then the unauthorised requestor could refine their information, potentially through social media, and make further requests until they get access to the metering data. We consider this obligation as currently worded does not represent best practice in terms of protecting private information.</p> <p><i>We therefore recommend that the obligation to “provide detail of where the verification information was insufficient” should be either</i></p>	<p>AEMO notes the respondent’s position and has amended section 2.1(e) of the MDPP.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>allow sufficient time for verification process and subsequent postage time if required.</p> <p>Lumo Energy</p> <p>The Privacy Act includes 13 privacy principles that regulate the handling of personal information. These principles are called the Australian Privacy Principles (APPs). The National Energy Retail Rules requires retailers and DNSP's to include a Privacy Act notice into their standard contract terms and conditions. Retailers and DNSP's are also required to publish their Privacy Policy on their websites.</p> <p>Similar AEMO Procedures, such as Customer and Site Details Notification Process and Meter Data Process Procedures, do not contain statements regarding retailers and DNSP's responsibility to determine privacy obligations. The AEMC noted in the Final Rule Determination that privacy legislation, rather than energy market regulation, to be a more appropriate avenue to address privacy concerns about electricity consumption data.¹ If AEMO seek to include privacy obligations into this Procedure, they too should list all other compliance obligations that retailers and DNSP's may have including, but not limited to, ACL, NERR, Credit Support and NEL. It is our view that AEMO have drafted the Meter Data Provision Procedures more broadly than what was requested by the AEMC and on this basis Lumo Energy requests that clause 2.1(b) is deleted from the final Metering Data Provision Procedures.</p> <p>Red Energy</p> <p>The Privacy Act includes 13 privacy principles that regulate the handling of personal information. These principles are called the Australian Privacy Principles (APPs). The National Energy Retail Rules requires retailers and DNSP's to include a Privacy Act notice into their standard contract terms and conditions. Retailers and DNSP's are also required to publish their Privacy Policy on their websites.</p> <p>Similar AEMO Procedures, such as Customer and Site Details Notification Process and Meter Data Process Procedures, do not contain statements regarding retailers and DNSP's responsibility to determine privacy obligations. The AEMC noted in the Final Rule Determination that privacy legislation, rather than energy market regulation, to be a more appropriate</p>	<p>AEMO notes the respondent's position. AEMO is not seeking to include privacy obligations in the MDPP. AEMO considers it is for retailers and DNSPs to identify the information required to meet their privacy obligations and how it is implemented. This is reflected in sections 2.1(b) and (e)(i) of the MDPP.</p> <p>AEMO notes the respondent's position.</p>

¹ Section 6.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>2.1 (c) – Citipower and Powercor Australia proposes a five day time frame to verify a customer or customer authorised representative. We would intend to respond to a customer as soon as possible however there may be times where additional time is required during the verification process. For example, authorisation of the representative by the party being represented in-line with the business’s privacy policies may involve extended processing time.</p> <p>This is in accord with the discussion and general position agreed during the AEMO workshop held on 18 June 2015.</p> <p>UE</p> <p>UE support the increased clarity relating to insufficient identification provided in the Draft Determination.</p> <p>Retailers and distributors know that it is their responsibility to meet the Privacy Act, clause (b) should be removed.</p> <p>Clause (c), the obligation to advise the customer or authorised representative within three business days should be changed from a ‘must’ to a ‘reasonable endeavours’ in line with the data provision obligation. AEMO acknowledge in the Draft Determination that the volume of workload is unknown and the number of parties that may request, this may make the timeframe difficult to adhere to as a ‘must’ obligation.</p> <p>The 3 business days should be extended to 5 business days to allow more time for customer verification and consent of an authorised representative. This is more reflective of the unknown number of verifications within a single request and the unknown number of requests that a distributor could be handling at any one time. In addition a distributor may choose to seek a CSDN from a retailer to confirm the customer and there is no obligation on the retailer to respond within such a short timeframe as proposed.</p> <p>ActewAGL – No additional comment M2 Energy – No comment provided Ergon Energy – No comment provided</p>	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 2 and 2.1.</p> <p>AEMO notes the respondent’s position and refers to the AEMO statement provided above in item 2 and 2.1.</p>
2.1 (c)	(c) Where a retailer or DNSP determines it cannot verify the	<p>AGL</p> <p>Clause 2.1(c) of the Procedure states that</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2 and 2.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
	<p>identity or relevant consents of a retail customer or customer authorised representative, the retailer or DNSP must advise the retail customer or customer authorised representative within three business days of receiving the request for metering data that insufficient verification information has been provided.</p>	<p><i>(c) Where a retailer or DNSP determines it cannot verify the identity or relevant consents of a retail customer or customer authorised representative, the retailer or DNSP must advise the retail customer or customer authorised representative within three business days of receiving the request for metering data that insufficient verification information has been provided.</i></p> <p>Under the Australian Privacy Principles AGL has a legal obligation to ensure that it takes appropriate action and is diligent in ensuring that it is not releasing personal data (which metering data is defined as) to a party other than the customer or customer authorised agent.</p> <p>The AEMC noted that a DNSP may not be able to verify a customer's identity and therefore not provide the customer's data. This statement clearly makes a link between the ability to verify a customer prior to data being provided. While the reference is to DNSPs, the fundamental principle must also apply to retailers.</p> <p>There are multiple reasons why a retailer may have no customer information, although a retail invoice is being paid (e.g. shared accommodation where no one has updated the customer information, customer who is paying a bill, but has not identified themselves with the retailer).</p> <p>The AEMC Final Determination and Rule (CI 7.14(4)(a)) only require the retailer or DNSP to respond to a request. The Rule does not specifically require the retailer or DNSP to verify, respond to a request and then wait for a response from the customer to re-verify the request and then provide the data within the 10 day period.</p> <p>The AEMC in its Final Rule Determination indicated that the maximum period of 10 business days was reasonable for a retailer or DNSP to verify the customer and respond to the customer request.</p> <p>This is covered by Rule 7.16(4)(i) which clearly states that: <i>(4) include timeframes in which a retailer or a Distribution Network Service Provider must, using reasonable endeavours, respond to requests made under rule 7.7(a)(7). The timeframe to be included must:</i> <i>(i) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a customer authorised representative in relation to</i></p>	

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p><i>more than one retail customer of either the retailer or Distribution Network Service Provider to whom the request is made;</i></p> <p>Momentum Energy</p> <p>(c).../ the retailer or DNSP must advise the retail customer or customer authorised representative within three business days of receiving the request for metering data that insufficient verification information has been provided.</p> <p>Momentum Energy consider that this requirement is completely beyond the scope of the AEMC Final Determination and of 7.16 of the NER:</p> <p>Final Determination – Executive Summary:</p> <p>“The final rules are consistent with the draft rules in terms of retailers and DNSPs having up to a maximum 10 business days to respond to a single request for data from a customer or its authorised representative”</p> <p>5.3 Time frame for retailer and DNSP to respond to a data request</p> <p>5.3.1 Rule change proposal</p> <p>The COAG Energy Council has proposed that DNSPs and retailers must respond to a request to provide data within 10 business days.</p> <p>NER 7.16:</p> <p>include timeframes in which a <i>retailer or a Distribution Network Service Provider</i> must, using reasonable endeavours, respond to requests made under rule 7.7(a) (7). The timeframe to be included must:</p> <p>(ii) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a <i>customer authorised representative</i> in relation to more than one <i>retail customer</i> of either the <i>retailer or Distribution Network Service Provider</i> to whom the request is made; and</p> <p>(iii) take account of procedures in place relating to the validation of <i>metering data</i>;</p> <p>1. The final determination and the NER clearly state that the retailer or DNSP has up to a maximum of 10 business days to RESPOND to a single request for data. The purpose of the response should be either to inform of delivery of the data or notification of failure to meet the validation requirements at which time the request should be deemed as closed. Momentum Energy considers that the MDPP should reflect the full 10 business days as a response timeframe not guaranteed delivery of data.</p> <p>2. Should the MDPP retain the shorter timeframe for validation failure, Momentum Energy will invoke the inconsistency clause and respond to</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided above in item 2 and 2.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>customers within the 10 business day requirement with either a validation failure notice or with the requested data files.</p> <p>Lumo Energy</p> <p>The final rule, 7.16(4)(i) provides retailers and DNSPs up to a maximum of 10 business days to respond to a single request for data from a customer or its authorised representative.</p> <p>The final rule does not have a requirement for retailers and DNSPs to advise within three business days of insufficient verification information. It does however provide AEMO with the discretion to set precise timeframes to allow for progressive improvement in the timeliness of responses due to advances in technology.</p> <p>As stated in the Final Rule Determination³ <i>“the Metering Data Provision Procedures considered that the maximum time frame should not be more than 10 business days with the precise time frame to be specified by AEMO in its metering data provision procedure. By providing AEMO with the discretion to set the precise time frame in the procedures (but not exceeding 10 business days) this allows for the possibility for market participants to progressively improve the timeliness of their response due to advances in technology. We consider that the obligation to respond within a specified period of time should be a ‘reasonable endeavours’ obligation. This caters for reasonable circumstances where a retailer or DNSP may require a longer period of time to respond to a data request.”</i></p> <p>Where a customer contacts a retailer or a DNSP via telephone the verification process should be straightforward. However, where the retail customer makes the request in writing, there may be more time required to respond to the retail customer if insufficient verification information is provided. A retailer or DNSP would be required to provide a written response to the retail customer advising of the failed verification.</p> <p>Under the NERR and Victorian Energy Retail Code, an allowance of two business day for the delivery of Notices is required. It is our understanding that the two business days required for delivery of the Notice would be considered as a component of the three business days contained within clause 2.1(c) of Metering Data Provision Procedures. To meet the three business days provision within the Metering Data Provision Procedures would require a retailer or a DNSP to complete the verification</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2 and 2.1.</p>

³ Section 5.3.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>process within one business day of receipt of the request. Lumo Energy is of the view that the three business days proposed by AEMO is onerous and the drafting of clause 2.1(c) is broader than NER 7.16(4)(i) and the Final Determination.</p> <p>Lumo Energy considers as this is the first iteration of this Procedure, the correct approach is for AEMO not to set a verification timeframe, allowing the full 10 business days. Lumo Energy considers that as retailers and DNSPs understand their obligations under these Procedures and make the necessary IT changes to support it, 10 business days is appropriate. In future iterations of this Procedure, the intent of the AEMC's Final Determination can be met with a shorter verification timeline.</p> <p>However, should AEMO consider that it must set a timeframe irrespective of the AEMC's Final Determination Lumo Energy recommends a seven business day timeframe.</p> <p>Lumo Energy requests that clause 2.1(c) is altered to include 'reasonable endeavours'.</p> <p>Lumo Energy suggest the following drafting amendments:</p> <p style="padding-left: 40px;">(c) Where a retailer or DNSP determines it cannot verify the identity or relevant consents of a retail customer or customer authorised representative, the retailer or DNSP must use reasonable endeavours to advise the retail customer or customer authorised representative within three seven business days of receiving the request for metering data that insufficient verification information has been provided.</p> <p>Red Energy</p> <p>The final rule, 7.16(4)(i) provides retailers and DNSPs up to a maximum of 10 business days to respond to a single request for data from a customer or its authorised representative.</p> <p>The final rule does not have a requirement for retailers and DNSPs to advise within three business days of insufficient verification information. It does however provide AEMO with the discretion to set precise timeframes to allow for progressive improvement in the timeliness of responses due to advances in technology.</p> <p>As stated in the Final Rule Determination⁴ <i>"the Metering Data Provision Procedures considered that the maximum time frame should not be more</i></p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2 and 2.1.</p>

⁴ Section 5.3.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p><i>than 10 business days with the precise time frame to be specified by AEMO in its metering data provision procedure. By providing AEMO with the discretion to set the precise time frame in the procedures (but not exceeding 10 business days) this allows for the possibility for market participants to progressively improve the timeliness of their response due to advances in technology. We consider that the obligation to respond within a specified period of time should be a 'reasonable endeavours' obligation. This caters for reasonable circumstances where a retailer or DNSP may require a longer period of time to respond to a data request."</i></p> <p>Where a customer contacts a retailer or a DNSP via telephone the verification process should be straightforward. However, where the retail customer makes the request in writing, there may be more time required to respond to the retail customer if insufficient verification information is provided. A retailer or DNSP would be required to provide a written response to the retail customer advising of the failed verification.</p> <p>Under the NERR and Victorian Energy Retail Code, an allowance of two business day for the delivery of Notices is required. It is our understanding that the two business days required for delivery of the Notice would be considered as a component of the three business days contained within clause 2.1(c) of Metering Data Provision Procedures. To meet the three business days provision within the Metering Data Provision Procedures would require a retailer or a DNSP to complete the verification process within one business day of receipt of the request. Red Energy is of the view that the three business days proposed by AEMO is onerous and the drafting of clause 2.1(c) is broader than NER 7.16(4)(i) and the Final Determination.</p> <p>Red Energy considers as this is the first iteration of this Procedure, the correct approach is for AEMO not to set a verification timeframe, allowing the full 10 business days. Red Energy considers that as retailers and DNSPs understand their obligations under these Procedures and make the necessary IT changes to support it, 10 business days is appropriate. In future iterations of this Procedure, the intent of the AEMC's Final Determination can be met with a shorter verification timeline.</p> <p>However, should AEMO consider that it must set a timeframe irrespective of the AEMC's Final Determination Red Energy recommends a seven business day timeframe.</p>	

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Red Energy requests that clause 2.1(c) is altered to include 'reasonable endeavours'.</p> <p>Red Energy suggest the following drafting amendments:</p> <p>(c) Where a retailer or DNSP determines it cannot verify the identity or relevant consents of a retail customer or customer authorised representative, the retailer or DNSP must use reasonable endeavours to advise the retail customer or customer authorised representative within three seven business days of receiving the request for metering data that insufficient verification information has been provided.</p>	
2.1 (d)	<p>(d) The retailer or DNSP notification, issued in accordance with clause 2.1(c), must:</p> <p>I. Provide detail of where the verification information was insufficient.</p> <p>II. Advise that the request for metering data is closed.</p> <p>III. Advise that a new metering data request with complete verification information must be provided</p>	<p>AGL</p> <p>Clause 2.1(d) of the draft Procedure proscribes that, after having responded to a request, retailers and DNSPs advise customers that <i>...the request for metering data is closed</i>. Clause 2.1(e) also states that <i>A new metering request is deemed to exist when.. complete verification information ... 3.3(a)</i>.</p> <p>These requirements therefore confirms that the Participant has completed their obligation when they respond to a customer request, and the Rule provides 10 business days to do so. While there may have been an expectation that this would lead to data being delivered to the customer if the request passed verification, the rule only states that a Participant is required to respond. That response could be either the data requested or a response indicating that the requestor could not be validated.</p> <p>AGL therefore believes that the imposition of a response to a customer request being undertaken within three business days is untenable and inefficient, especially if there are substantial number of requests for data which have to be manually reviewed.</p> <p>Momentum Energy - Agree</p> <p>Lumo Energy - No amendment suggested.</p> <p>Red Energy - No amendment suggested.</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2 and 2.1.</p>
2.2	Retail customer request	<p>Energy Australia</p> <p>EnergyAustralia suggests that the following clause of the MDPP is updated to reflect the requirements as per the NER 7.16 (below):</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided above in item 2 and 2.1.</p>

Item	Description	Participant Comments	AEMO Response
		<p><i>(a) Where a retail customer requests their metering data, Retailers and DNSPs must use reasonable endeavours to deliver respond to the metering data request to the retail customer within 10 business days. This The delivery timeframe for the provision of customer data commences from the date the valid request is received by the retailer or DNSP.</i></p> <p>7.16 Metering data provision to retail customers</p> <p>(4) include timeframes in which a retailer or a Distribution Network Service Provider must, using reasonable endeavours, respond to requests made under rule 7.7(a)(7). The timeframe to be included must:</p> <p>(i) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a customer authorised representative in relation to more than one retail customer of either the retailer or Distribution Network Service Provider to whom the request is made</p> <p>AGL</p> <p>Clause 2.2 of the Procedures states that</p> <p><i>(a) Where a retail customer requests their metering data, Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the retail customer within 10 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP.</i></p> <p>The AEMC Final Determination and Rule (CI 7.14(4)(a)) only require the retailer or DNSP to respond to a request:</p> <p><i>(4) include timeframes in which a retailer or a Distribution Network Service Provider must, using reasonable endeavours, respond to requests made under rule 7.7(a)(7).</i></p> <p>AGL therefore believes that the AEMO procedure should not require the delivery of metering data within that timeframe but, rather as required by the NER, provide a response within that timeframe.</p> <p>Ergon Energy</p> <p>The MDPP should stipulate information is to be provided “where available”. Wording of the draft MDPP does not appear to incorporate this principle. 2.2(a) and 2.3 (a) and (b) outline requirements that DNSPs “must” adhere to when data is requested, but do not note that this data need only be provided “where available”. Ergon Energy recommends that</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided above in item 2 and 2.1.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2 and 2.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>a clause be included within the MDPP that stipulates demand information is to be provided “where available”.</p> <p>NSW DNSPs</p> <p>The NSW DNSPs suggest rewording to "Where a retail customer requests their metering data and no payment is required, Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the retail customer within 10 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP.</p> <p>Where a retail customer requests their metering data and payment is required, Retailers and DNSPs may reject the request if payment is not received within the timeframe specified by the Retailers or DNSPs. Metering data will only be provided after payment has been received."</p> <p>Momentum Energy</p> <p>1. Momentum Energy require further clarification: Is this type of request limited to a single site? Retailers will have many examples of a single customer who is the account holder for multiple NMI's. In such scenarios, would AEMO consider that multiple site should be treated as a bulk request?</p> <p>2. Momentum Energy highlight that “reasonable endeavours to respond” should be applied per NER 7.16 and Momentum Energy commentary as previously stated at 2(a) and 2.1(c).</p> <p>Origin Energy</p> <p>Origin suggests that metering data is provided within 10 Business days only when verification was successful.</p> <p>Origin recommends wording within Procedures that allows for Retailer/DNSP to negotiate an agreed delivery timeframe with the customer after more than 1 request</p> <p>Lumo Energy</p> <p>Rule 7.16(4)(i) of the NER provides retailers and DNSPs up to a maximum of 10 business days to use reasonable endeavours respond to a single request for data from a customer or its authorised representative.</p> <p>It is the view of Lumo Energy that the drafting of clause 2.2(a) within the Metering Data Provision Procedures is inconsistent with the language used in NER 7.16(4)(i). This inconsistency can create confusion in the market, lead to different interpretations and create compliance issues as seen recently with AEMO’s Meter Churn Procedures for FRMP’s and the</p>	<p>NER clause 7.16 does not include any requirement for the MDPP to include provisions relating to payment of charges. Therefore, it is not appropriate for the MDPP to include requirements relating to charging a retail customer or customer authorised representative.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2 and 2.1.</p> <p>Section 2.1 of the MDPP allows retailers and DNSPs to close a retail customer’s or customer authorised representative’s request if incomplete verification information is supplied.</p> <p>AEMO does not consider it appropriate for the delivery timeframe to be negotiated after more than one request as NER clause 7.16(c)(4)(i) states this timeframe must be no more than 10 business days.</p> <p>AEMO notes the respondent’s position and refers to AEMO’ statement provided above in item 2 and 2.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>NER. On this basis Lumo Energy requests that clause 2.2(a) is amended to reflect the following drafting:</p> <p style="padding-left: 40px;">Where a retail customer requests their metering data, Retailers and DNSPs must use reasonable endeavours to deliver respond to the request for metering data to the retail customer within 10 business days. This delivery response timeframe commences from the date the request is received by the retailer or DNSP.</p> <p>Red Energy</p> <p>Rule 7.16(4)(i) of the NER provides retailers and DNSPs up to a maximum of 10 business days to use reasonable endeavours respond to a single request for data from a customer or its authorised representative.</p> <p>It is the view of Red Energy that the drafting of clause 2.2(a) within the Metering Data Provision Procedures is inconsistent with the language used in NER 7.16(4)(i). This inconsistency can create confusion in the market, lead to different interpretations and create compliance issues as seen recently with AEMO’s Meter Churn Procedures for FRMP’s and the NER. On this basis Red Energy requests that clause 2.2(a) is amended to reflect the following drafting:</p> <p style="padding-left: 40px;">Where a retail customer requests their metering data, Retailers and DNSPs must use reasonable endeavours to deliver respond to the request for metering data to the retail customer within 10 business days. This delivery response timeframe commences from the date the request is received by the retailer or DNSP.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided AusNet Services – No comments ActewAGL – No additional comment M2 Energy – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2 and 2.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
2.3	Customer authorised representative	<p>Energy Australia</p> <p>As per the above, EnergyAustralia suggests the following clauses of the MDPP are updated in line the requirements of the NER 7.16 (as per comments to 2.2):</p> <p>(a) <i>Where a customer authorised representative requests metering data for one retail customer, retailers and DNSPs must use reasonable endeavours to deliver respond to the metering data request to the customer authorised representative within 10 business days. This The delivery timeframe for the provision of customer data commences from the date the valid request is received by the retailer or DNSP.</i></p> <p>(b) <i>Where a customer authorised representative requests metering data for more than one but less than 100 retail customers in a single request, Retailers and DNSPs must use reasonable endeavours to deliver respond to the metering data request to the customer authorised representative within 20 business days. This The delivery timeframe for the provision of data commences from the date the valid request is received by the retailer or DNSP.</i></p> <p>CUAC</p> <p>As regards timeframes for multiple customer requests, CUAC welcomes AEMO's proposal to specify a maximum time limit for customer authorised representative requests (for 1-100 customers/NMIs) in case negotiation fails to deliver reasonable outcomes. However, we consider the proposed 20 business day limit too long for requests of size 1-9. Our reasoning:</p> <ul style="list-style-type: none"> • The timeframe for responding to a single request is 10 business days • A customer authorised representative with 9 requests could submit one request per business day and expect the final response by day 19. • A customer authorised representative who submitted 9 requests at once might have to wait 20 business days. This makes no sense. <p>We propose the maximum limit instead be set in bands, or on a 'sliding scale'. For example, 1-20 requests should have a maximum</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2 and 2.1.</p> <p>AEMO considers that a 100 retail customer per business day request limit is appropriate and provides retailers and DNSPs with some protection from the potential number of retail customer requests submitted by a customer authorised representative in a business day.</p> <p>A sliding scale was discussed in the MDPP Consultation Paper and Draft Report, but was not supported by stakeholders. AEMO is not re-considering the sliding scale.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>timeframe of 10 days, and 21-100 a maximum of 20 days. While customer authorised representatives could theoretically also 'game' such a scale by e.g. submitting multiple requests of 20 rather than a single request of 80, this can be dealt with by the parties concerned.</p> <p>Energy Tailors Energy Tailors believes that the proposed 10 business day turnaround, for an electronic request which has all required information in it, is unreasonably long and not in the best long- term interests of customers. We note that DNSPs are currently able to provide retailers with metering data (via a Provide Meter Data request) with an SLA of 1 business day, as per the AEMO B2B Procedures. We do not see why similar arrangements cannot be put in place for customer authorised representatives.</p> <p>Ergon Energy The MDPP should stipulate information is to be provided "where available". Wording of the draft MDPP does not appear to incorporate this principle. 2.2(a) and 2.3 (a) and (b) outline requirements that DNSPs "must" adhere to when data is requested, but do not note that this data need only be provided "where available". Ergon Energy recommends that a clause be included within the MDPP that stipulates demand information is to be provided "where available".</p> <p>NSW DNSPs Clause (a) amendments The NSW DNSPs suggest similar rewording to this as Item 2.2, regarding payment. Clause (b) amendments The NSW DNSPs submit that 20 days for up to 99 sites is an unreaonsable timeframe, and suggest that data for over 10 sites should be by negotiation.</p> <p>Momentum Energy Momentum Energy highlight that "reasonable endeavours to respond" should be applied per NER 7.16 and Momentum Energy commentary as previously stated at 2(a) and 2.1(c).</p> <p>AusNet Services AusNet Services fully supports the sliding delivery timeframe proposed in terms of 20 business days for more than 1 request and less than 100 requests. The benefit for this sliding scale is that it protects the interests of individual customer requests from being disadvantaged by the DNSPs</p>	<p>AEMO notes the respondent's position.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided above in item 2 and 2.1.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2.2.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2.3.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 2 and 2.1.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>and retailers diverting resources to meet more aggressive delivery timeframe to the customer authorised representatives making a bulk request.</p> <p>Although to fully support the timeframe in the draft MDPP we would like highlight the potential of a customer authorised representative raising multiple requests either throughout the day or over the following 10 business days. This may occur as a means of bypass the 20 business day applied to more than one request, or requesting metering data for more than 100 retail customers in the regulated 20 business day timeframe. We consider it is necessary for the MDPP to clarify the terms and conditions that relate to the sliding delivery timeframe without affecting the intent of the National Energy Retail Rules (NERR).</p> <p><i>Accordingly, AusNet Services recommends adding the following words to the end of 2.3(a) and 2.3(b). “The delivery timeframe is extended a further 10 business days if a subsequent request from the same customer authorised representative is received within the original delivery timeframe.”</i></p> <p>ENA</p> <p>Although this is a ‘reasonable endeavours’ requirement, ENA considers that the procedure needs to acknowledge that, where a customer authorised representative seeks to take advantage of the provisions to require response to an enquiry for more than one, but less than 100 retail customers in a single request ‘within 20 business days’, and submits MULTIPLE single requests for up to 100 retail customers within the same short timeframe, there should be flexibility within the provisions to recognise this tactic and enable transition to the requirement to 2.3 (c) where a timeframe is negotiated.</p> <p>Origin energy</p> <p>2.3 (c) Origin does not agree that the number of request from an authorised representative needs to exceed 100 before negotiating timeframes. Origin recommends wording within Procedures that allows for Retailer/DNSP to negotiate an agreed delivery timeframe with the customer authorised representative (after more than 1 request)</p> <p>Origin recommends to include a section that provides clarity for Retailers and DNSPs for charging a reasonable charge. Please address as this issue was not addressed as part of the first consultation</p>	<p>AEMO has amended to replaced “in a single request:” with “in a single day” in sections 2.3(b) and (c) of the MDPP.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>1) When the request is received by the Customer's Authorised Representative, who is the charge rendered to? The Customer's Authorised Representative or to the Customer.</p> <p>2) 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).</p> <p>3) 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.</p> <p>Lumo Energy Rule 7.16(4)(i) of the NER provides retailers and DNSPs up to a maximum of 10 business days to use reasonable endeavours respond to a single request for data from a customer or its authorised representative. It is the view of Lumo Energy that the drafting of clause 2.3(a) within the Metering Data Provision Procedures is inconsistent with the language used in NER 7.16(4)(i). This inconsistency can create confusion in the market, on this basis Lumo Energy requests that clause 2.3(a) is amended to reflect the below drafting:</p> <p style="padding-left: 40px;">a) Where a customer authorised representative requests metering data for one retail customer, retailers and DNSPs must use reasonable endeavours to deliver respond to the request for metering data to the customer authorised representative within 10 business days. This delivery response timeframe commences from the date the request is received by the retailer or DNSP</p> <p>Red Energy Rule 7.16(4)(i) of the NER provides retailers and DNSPs up to a maximum of 10 business days to use reasonable endeavours respond to a single request for data from a customer or its authorised representative. It is the view of Red Energy that the drafting of clause 2.3(a) within the Metering Data Provision Procedures is inconsistent with the language used in NER 7.16(4)(i). This inconsistency can create confusion in the market, on this basis Red Energy requests that clause 2.3(a) is amended to reflect the below drafting:</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>a) Where a customer authorised representative requests metering data for one retail customer, retailers and DNSPs must use reasonable endeavours to deliver respond to the request for metering data to the customer authorised representative within 10 business days. This delivery response timeframe commences from the date the request is received by the retailer or DNSP.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Dept of Industry and Science – No comment provided ActewAGL – No additional comment</p>	
2.3 (b)(c)	<p>(b) Where a customer authorised representative requests metering data for more than one but less than 100 retail customers in a single request, Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the customer authorised representative within 20 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP</p> <p>(c) Where a customer authorised representative requests metering data for more than 100 retail customers in a single request, the delivery timeframe must be agreed</p>	<p>AGL</p> <p>AGL previously requested the AEMO procedure to provide guidance on a customer representative providing more than a single request in a day to a participant. AGL suggested that all requests made to a Participant in a day be treated as part of a request.</p> <p>Clause 2.3(b) of the Procedure states that: <i>(b) Where a customer authorised representative requests metering data for more than one but less than 100 retail customers in a single request, Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the customer authorised representative within 20 business days. This delivery timeframe commences from the date the request is received by the retailer or DNSP.</i></p> <p>The current drafting of the AEMO procedures allows Customer Representatives to submit bulk data requests as a series single requests made during a day, requiring Participants to respond within tighter timeframes than those considered reasonable by the AEMC. This will lead to inefficient and costly work processes and practices being required to be implemented by Participants at no real benefit to end customers.</p> <p>The AEMC Rule change specifically excluded timeframes for bulk data requests. At the AEMO workshop, participants were prepared to consider some timeframe to be associated with a</p>	<p>It is not appropriate for the MDPP to limit the number of requests a customer authorised representative can submit or treat multiple single requests as a bulk request.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
	<p>between the retailer or DNSP and the customer authorised representative.</p>	<p>bulk request, which AEMO suggested could be 100 retail customer requests. Participants indicated that this number may be too high. This depended on:</p> <ul style="list-style-type: none"> i. how many agents were making a request at the same time; ii. how manual the process was; and iii. how much effort was required to verify customer details. <p>AEMO in its Draft Decision indicated that it considered the following factors made it difficult for AEMO to establish a single solution:</p> <ul style="list-style-type: none"> • <i>Uncertainty about the number of customer requests that will be included in a customer authorised representatives request.</i> • <i>Uncertainty about the number of customer authorised representative requests that will be received in a business day.</i> • <i>Unknown resourcing and processing times of retailers and DNSPs.</i> • <i>Negotiating power of customer authorised representatives.¹</i> <p>It is for these very reasons that AGL, and others, seek to manage the number of requests that can be made by authorised representatives and therefore the resourcing required to respond to these queries.</p> <p>AGL does not believe that AEMO has considered this issue clearly or in sufficient detail. It was indicated at the AEMO workshop that legal advice in respect to meeting Participant Privacy obligations might require each customer to be contacted to ensure they had provided their consent to an agent, which would almost certainly take more than 20 business days to complete. While AGL can understand the desire to provide some framework around a small bulk request, AGL does not believe that the procedure should impose a mandatory requirement (...must use reasonable endeavours...) but suggests that a more reasonable approach (given efficiency of work practice, cost to implement and requests received) is to make the requirement a guideline rather than an obligation (i.e. ...should take reasonable steps...).</p> <p>The number of requests for this period should also be reduced (e.g. to 25) to ensure the resourcing requirements are not inefficient.</p>	

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>As this process is not a user pays process, each retailer’s customer base must fund these requests. In the interests of an efficient market these additional activities to a portion of a retailer’s customer base should therefore be provided in a cost efficient manner.</p> <p>M2 Energy M2 considers that it is reasonable to differentiate the response timings for multiple file request, but we believe that the maximum file number be reduced to 30 requests per party. We consider that 100 items per day, per Authorised Rep will be an onerous requirement for small retailers to manage, even with the extended 20 day time frame. M2 believes the process of authenticating 100 requests alone is a potentially time intensive process.</p> <p>Reducing the number to 30, reduces the risk/impact of small retailers being swamped with several multiple file requests, that then cannot be easily managed.</p> <p>Momentum Energy The AEMC Rule Change specifically excludes timeframes for bulk data requests and recommended in its final determination that the timeframe for bulk requests should be defined by the AEMO procedure: NER 7.16: (4) include timeframes in which a <i>retailer</i> or a <i>Distribution Network Service Provider</i> must, using reasonable endeavours, respond to requests made under rule 7.7(a) (7). The timeframe to be included must: (i) be no more than 10 business days, except where requests are made under rule 7.7(a)(7) by a <i>customer authorised representative</i> in relation to more than one <i>retail customer</i> of either the <i>retailer</i> or <i>Distribution Network Service Provider</i> to whom the request is made; and Final Determination 4.4: “However, we recognise the potential demands placed on retailers and DNSPs in responding to bulk data requests from customer authorised representatives. We consider that bulk data requests - recognised in the NER final rule as requests made by customer authorised representatives in relation to more than one retail customer- should be treated differently</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2.3.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 2.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>to singular requests. Retailers and DNSPs should be able to have a longer time frame to respond to bulk data requests as an exception to the time limits for data requests set out in the NER. AEMO would specify the time limits for bulk data requests in its metering data provision procedures. These time limits could vary depending on the size of the bulk data request or other relevant factors.”</p> <p>5.3: “We consider that the obligation to respond within a specified period of time should be a 'reasonable endeavours' obligation. This caters for reasonable circumstances where a retailer or DNSP may require a longer period of time to respond to a data request.”</p> <p>1. Momentum Energy acknowledges and appreciate that there is a need to build requirements into the procedure that define a bulk request and the management of such requests. We have highlighted on previous occasions the risks associated with this type of request as being:</p> <p>(a) The potential for 3rd party service providers to exploit the gaps when submitting bulk requests by submitting multiple single requests. We requested that the procedure should specify that all requests by the same customer authorised representative should be submitted in a single transaction per business day. (e.g... one email containing a single excel file, containing all requests for that business day).</p> <p>(b) The potential impact to resourcing and business processes when receiving multiple bulk requests from multiple customer authorised representatives.</p> <p>(c) That changing market conditions will mean that the volume of requests are unprecedented and therefore are unpredictable and all care should be taken in considering the limit to the number of requests.</p> <p>2. Momentum Energy have done further analysis of this type of request and would like to highlight the key concerns we have regarding the current draft:</p> <p>(a) “Where a customer authorised representative requests metering data for more than one but less than 100 retail customers in a single request”.</p> <p>(i) This sentence leaves the door for exploitation open and allows for the customer authorised representative to send multiple single requests that have a 10 business day response requirement or to manipulate the bulk request so that it never exceeds 100 and therefore forcing participants to provide data within the timeframe specified.</p> <p>(ii) Momentum Energy would consider the receipt of multiple requests per customer authorised representative would collectively be considered as a</p>	

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>bulk request however this would create extreme inefficiencies in process by having to track and count the number of requests received by each authorised representative, and this further demonstrates the need to specify one single request per business day, per customer authorised representative.</p> <p>(iii) 100 requests are considered to be most certainly unreasonably high. Under the National Privacy Principles Momentum Energy has a legal obligation to ensure that every customer request received via an authorised representative is legitimately and legally represented by the requesting party. As such, we are required to perform a validation process that includes contacting each of our customers to confirm that the appropriate consent was provided to the requesting party. Performing these validations will most certainly put demands on our business practices and resourcing. (b) “Retailers and DNSPs must use reasonable endeavours to deliver the metering data to the customer authorised representative within 20 business days.” (Refer to 2.1) Momentum Energy again highlight that both the NER and AEMC determination quite clearly define that reasonable endeavours to RESPOND to requests are made not deliver metering data.</p> <p>(c) Has AEMO considered how a participant should respond to the bulk request if one or more customers cannot be validated? Momentum Energy are not clear on this point and while the common sense approach would be to respond to each line of the bulk request as single responses it is not necessarily the adopted industry process.</p> <p>3. Momentum Energy makes the following recommendations:</p> <p>(a) While we would ideally like to see the removal of this section and regard any and all requests for more than one customer as a bulk request with negotiated timeframes, we also appreciate the need to specify a framework for a limited bulk request. We do however think that the number of requests should be reduced to not more than 10 customers for a bulk request, and;</p> <p>(b) While we acknowledged that this type of request is not part of B2B procedures, we recommend that AEMO refer to the current B2B Procedure Customer and Site Details Notification Process as a guide to setting the rules for the sending and receiving of both requests and responses. Notably the below section of the said process:</p> <p>2.2.2 Common business rules for Notifications</p>	

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>b. Retailers must only send a single daily Notification of each type (where relevant) covering all Changes made to the NMI’s details that day. The Retailer must ensure that the most recent details are provided. Notifications sent by a Retailer in response to a CustomerDetailsRequest may be sent individually or included with other Notifications (refer section 2.4.a of the Technical Delivery Specification for details regarding the bundling of transactions).</p> <p>(c) That the rule should be written as follows or similar: Customer authorised representative requesting metering data for more than one but less than 10 retail customers in a single business day, are required to submit a single bulk request by 5pm of that business day. The customer authorised representative must ensure that all meter data requests:</p> <p>(i) accumulated after 5pm on any business day, and; (ii) accumulated by the customer authorised representative on non-business days</p> <p>Will be added to next business day request file.</p> <p>Retailers and DNSPs must use reasonable endeavours to respond to customer authorised representative within 20 business days and may send single responses to each customers meter data request. This response timeframe commences from the date the request is received by the retailer or DNSP.</p> <p>Momentum Energy would highlight the points previously made that it regards 100 customer requests to be too large a number and recommend that requests with greater than 10 customers will be subject to a negotiated and agreed RESPONSE time between the requester and the participant.</p> <p>Lumo Energy</p> <p>Lumo Energy agrees that the final rule does not require retailers and DNSPs to comply with the maximum 10 business day time frame in relation to bulk data requests from customer authorised representatives. Establishing a timeframe associated to 1 < 100 requests received in a single request may not be effective and provide the outcome that AEMO is seeking. Nothing will prohibit a customer authorised representative sending 100 single retail customer requests or 100 retail customers in a single request. Both types of requests will potentially be onerous,</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statements provided in items 2 and 2.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>especially on a retailer or DNSP who do not have an automated solution, particularly for smaller retailers. The delivery timeframe of a multiple request from an individual or an organisation in one day should be by agreement</p> <p>On this basis, Lumo Energy requests that clause 2.3(b) and clause 2.3(c) are combined to state:</p> <p style="padding-left: 40px;">(b) Retailers and DNSPs must agree with a customer authorised representative on the delivery timeframe where a request for metering data is received for multiple retail customers. Retailers and DNSPs must use reasonable endeavours to deliver provide a response to the request for metering data to the customer authorised representative in the timeframe agreed. This delivery response timeframe commences from the date the request is received by the retailer or DNSP.</p> <p>Red Energy</p> <p>Red Energy agrees that the final rule does not require retailers and DNSPs to comply with the maximum 10 business day time frame in relation to bulk data requests from customer authorised representatives. Establishing a timeframe associated to 1 < 100 requests received in a single request may not be effective and provide the outcome that AEMO is seeking. Nothing will prohibit a customer authorised representative sending 100 single retail customer requests or 100 retail customers in a single request. Both types of requests will potentially be onerous, especially on a retailer or DNSP who do not have an automated solution, particularly for smaller retailers. The delivery timeframe of a multiple request from an individual or an organisation in one day should be by agreement</p> <p>On this basis, Red Energy requests that clause 2.3(b) and clause 2.3(c) are combined to state:</p> <p style="padding-left: 40px;">(b) Retailers and DNSPs must agree with a customer authorised representative on the delivery timeframe where a request for metering data is received for multiple retail customers. Retailers and DNSPs must use reasonable endeavours to deliver provide a response to the request for metering data to the customer authorised representative in the timeframe agreed. This delivery response timeframe commences from the date the request is received by the retailer or DNSP.</p>	<p>AEMO notes the respondents position and refers to AEMO's statement provided in items 2 and 2.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
3	DATA DELIVERY METHOD	<p>Momentum Energy</p> <p>1. Recommend removal of “for analysis” as this may be considered as overly prescriptive.</p> <p>2. Addition:</p> <p>(b) Participant must provide metering data for the authorised participant period only. (See Glossary)</p> <p>EnerNOC</p> <p>There are two items that impact data delivery:</p> <ol style="list-style-type: none"> 1. verification 2. actual delivery <p>Verification may require manual checking, however, delivery should be facilitated via an automatable process. The latter can be queued in daily batches.</p> <p>In our NEM experience to date, the quickest turn-around for a data request (including for multiple NMLs) is one business day, the average is one week, and two weeks would be considered extremely long.</p> <p>Accordingly, EnerNOC believes that a 20 business day turn-around is an unreasonable time period, and would not satisfy the spirit of the procedure change. This is especially true for subsequent requests i.e. once the identity of the requestor has been verified.</p> <p>Lumo Energy - No amendment suggested</p> <p>Red Energy - No amendment suggested.</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>UE – No comment provided</p> <p>Origin Energy – No comment provided</p> <p>Dept of Industry and Science – No comment provided</p> <p>ENA – No comment provided</p> <p>AusNet Services – No comments</p> <p>ActewAGL – No comment provided</p> <p>NSW DNSPs – No comment provided</p>	<p>AEMO notes the respondent’s comments and has removed this reference.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
3.1	Delivering summary data	<p>Momentum Energy (a) Agreed. (b) The NER 7.16(c) states “The metering data provision procedures must: specify the manner and form in which retail customers' metering data must be provided,” which supports the AEMC 2.3 Final rule determination “The final rules sets out that the metering data provision procedures will provide for a minimum method of delivering data to customers or their authorised representatives upon request. This allows for innovation by retailers and DNSPs to provide this data to customers or their authorised representatives while providing certainty that there will be a minimum delivery method that will allow customers and their authorised representatives to obtain their data.” <i>In order to encourage innovation and alternate methods of delivery (e.g. Portal, App etc) it is important to allow participant’s sufficient flexibility in product development as technology evolves.</i> <i>Momentum Energy request that this clause is revised to include that file format must at minimum be convertible to PDF format, unless otherwise agreed by the retail customer or customer authorised representative.</i> <i>There are multiple file formats that can be delivered electronically which can later be converted then read and printed in PDF format.</i> <i>Supported formats as listed on adobe.com:</i></p>	<p>Sections 3.1(b) and 3.2(b) of the Draft MDPP allowed retailers and DNSPs the flexibility to deliver the summary and interval detailed data formats to the retail customer or customer authorised representative in another form, where this is agreed. Additionally, Section 2.1(a)(iii) of the Draft MDPP required retailers and DNSPs to publish information as to the form in which that data would be provided. AEMO considers this provides sufficient scope for retailers and DNSPs to reach agreement with retail customers or customer authorised representatives to provide summary data in a form other than PDF.</p>

Item	Description	Participant Comments	AEMO Response																																				
		<p>Direct file conversion formats (Acrobat)</p> <p>Use File > Create PDF > From File to convert these file formats to Adobe PDF. You can also convert clipboard data, web pages, and scanned documents to PDF. For more information about these conversion methods, see Creating simple PDFs with Acrobat in Acrobat Help.</p> <table border="1" data-bbox="770 344 1406 938"> <thead> <tr> <th>Extension</th> <th>Filename</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>.doc, .docx, .xls, .xlsx, .ppt, .pptx</td> <td>Microsoft Office formats (Word 2007 and 2010, PowerPoint, Excel)</td> <td>Make sure that the correct version of Microsoft Office is installed.</td> </tr> <tr> <td>.txt, .rtf</td> <td>Text, Rich Text Format</td> <td></td> </tr> <tr> <td>.ps, .eps, .pm</td> <td>Adobe PostScript and Encapsulated PostScript</td> <td></td> </tr> <tr> <td>.bmp, .jpeg, .gif, .tiff, .png, .pcx, .emf, .rle, .dib</td> <td>Image files</td> <td></td> </tr> <tr> <td>.wpd</td> <td>Corel WordPerfect</td> <td>Install Corel WordPerfect, and then convert using the Adobe PDF Printer (Acrobat 9 and Acrobat X) Windows).</td> </tr> <tr> <td>.odt, .odp, .ods, .odg, .odf, .sww, .sxi, .sxw, .sxd, .stw</td> <td>OpenOffice and StarOffice presentation, spreadsheet, graphic, and document files</td> <td>If the applications can access the printer system, then you can use the Adobe PDF printer to convert these files.</td> </tr> <tr> <td>.psd</td> <td>Adobe Photoshop</td> <td>Acrobat 9.x does not support this file format.</td> </tr> <tr> <td>.ai</td> <td>Adobe Illustrator</td> <td></td> </tr> <tr> <td>.u3d, .prt</td> <td>3D files</td> <td></td> </tr> <tr> <td>.dwg, .dwt, .dxf, .dwt, .dst</td> <td>Autodesk AutoCAD</td> <td></td> </tr> <tr> <td>.xps</td> <td>XML paper specification</td> <td></td> </tr> </tbody> </table> <p>Lumo Energy</p> <p>The NER 7.16(c)(1) states that the Metering Data Provision Procedures must specify the manner and form in which retail customers' metering data must be provided. Lumo Energy is seeking clarification on the requirement to seek agreement with a retail customer or customer authorised representative for the provision of the summary information in a format other than a Portable Document Format (PDF). In the Final Determination, the AEMC considered that setting out a minimum method of delivering data to customers or their authorised representatives upon request would allow for innovation by retailers and DNSPs to provide this data to customers or their authorised representatives. Whilst providing certainty that there will be a minimum delivery method that will allow customers and their authorised representatives to obtain their data.</p>	Extension	Filename	Comments	.doc, .docx, .xls, .xlsx, .ppt, .pptx	Microsoft Office formats (Word 2007 and 2010, PowerPoint, Excel)	Make sure that the correct version of Microsoft Office is installed.	.txt, .rtf	Text, Rich Text Format		.ps, .eps, .pm	Adobe PostScript and Encapsulated PostScript		.bmp, .jpeg, .gif, .tiff, .png, .pcx, .emf, .rle, .dib	Image files		.wpd	Corel WordPerfect	Install Corel WordPerfect, and then convert using the Adobe PDF Printer (Acrobat 9 and Acrobat X) Windows).	.odt, .odp, .ods, .odg, .odf, .sww, .sxi, .sxw, .sxd, .stw	OpenOffice and StarOffice presentation, spreadsheet, graphic, and document files	If the applications can access the printer system, then you can use the Adobe PDF printer to convert these files.	.psd	Adobe Photoshop	Acrobat 9.x does not support this file format.	.ai	Adobe Illustrator		.u3d, .prt	3D files		.dwg, .dwt, .dxf, .dwt, .dst	Autodesk AutoCAD		.xps	XML paper specification		<p>AEMO notes the respondents position and refers to AEMO's statement provided above.</p>
Extension	Filename	Comments																																					
.doc, .docx, .xls, .xlsx, .ppt, .pptx	Microsoft Office formats (Word 2007 and 2010, PowerPoint, Excel)	Make sure that the correct version of Microsoft Office is installed.																																					
.txt, .rtf	Text, Rich Text Format																																						
.ps, .eps, .pm	Adobe PostScript and Encapsulated PostScript																																						
.bmp, .jpeg, .gif, .tiff, .png, .pcx, .emf, .rle, .dib	Image files																																						
.wpd	Corel WordPerfect	Install Corel WordPerfect, and then convert using the Adobe PDF Printer (Acrobat 9 and Acrobat X) Windows).																																					
.odt, .odp, .ods, .odg, .odf, .sww, .sxi, .sxw, .sxd, .stw	OpenOffice and StarOffice presentation, spreadsheet, graphic, and document files	If the applications can access the printer system, then you can use the Adobe PDF printer to convert these files.																																					
.psd	Adobe Photoshop	Acrobat 9.x does not support this file format.																																					
.ai	Adobe Illustrator																																						
.u3d, .prt	3D files																																						
.dwg, .dwt, .dxf, .dwt, .dst	Autodesk AutoCAD																																						
.xps	XML paper specification																																						

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>A PDF may not be the most efficient format to provide the summary information to a retail customer or the customer authorised representative or allow for future innovation. As technology evolves this information could be provided to customers via their phone/tablet or an app.</p> <p>Retailers and DNSP's may choose to have summary data displayable on a Portal. It is not efficient to require a retailer or DNSP to provide a PDF version of information in addition to the information that can be electronically viewed. It is our view that requiring a PDF as a minimum and require agreement for alternative formats may stifle innovation.</p> <p>As a PDF is a file format, that has captured all the elements of a document as an electronic image, we are seeking clarification on how a PDF would be provided physically to a retail customer or customer authorised representative. AEMO have been too prescriptive in specifying the manner and form in which retail customers' metering data must be provided and this approach is not in the long term interest of consumers.</p> <p>At a minimum, Lumo Energy requests that 3.1(b) is altered to:</p> <p style="text-align: center;"><u>Where provided electronically, the summary data must be provided in a format that is able to be opened in Portable Document Format (PDF) or other common standard, the summary data must be provided in a Portable Document Format (PDF), unless otherwise agreed with the retail customer or customer authorised representative.</u></p> <p>Red Energy</p> <p>The NER 7.16(c)(1) states that the Metering Data Provision Procedures must specify the manner and form in which retail customers' metering data must be provided. Red Energy is seeking clarification on the requirement to seek agreement with a retail customer or customer authorised representative for the provision of the summary information in a format other than a Portable Document Format (PDF). In the Final Determination, the AEMC considered that setting out a minimum method of delivering data to customers or their authorised representatives upon request would allow for innovation by retailers and DNSPs to provide this data to customers or their authorised representatives. Whilst providing certainty that there will be a minimum delivery method that will allow customers and their authorised representatives to obtain their data.</p> <p>A PDF may not be the most efficient format to provide the summary information to a retail customer or the customer authorised representative</p>	<p>AEMO notes the respondents position and refers to AEMO's statement provided in item 3.1.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>or allow for future innovation. As technology evolves this information could be provided to customers via their phone/tablet or an app.</p> <p>Retailers and DNSP's may choose to have summary data displayable on a Portal. It is not efficient to require a retailer or DNSP to provide a PDF version of information in addition to the information that can be electronically viewed. It is our view that requiring a PDF as a minimum and require agreement for alternative formats may stifle innovation.</p> <p>As a PDF is a file format, that has captured all the elements of a document as an electronic image, we are seeking clarification on how a PDF would be provided physically to a retail customer or customer authorised representative. AEMO have been too prescriptive in specifying the manner and form in which retail customers' metering data must be provided and this approach is not in the long term interest of consumers.</p> <p>At a minimum, Red Energy requests that 3.1(b) is altered to:</p> <p><u>Where provided electronically, the summary data must be provided in a format that is able to be opened in Portable Document Format (PDF) or other common standard, the summary data must be provided in a Portable Document Format (PDF), unless otherwise agreed with the retail customer or customer authorised representative.</u></p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Origin Energy – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided AusNet Services – No comments ActewAGL – No comment NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided Energy Tailors – No Comment</p>	

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
3.2	Delivering detailed data	<p>Lumo Energy Lumo Energy is seeking clarification as to the intent of clause 3.2(a). AEMO have excluded retail customers who may wish to receive their detailed data physically. Whilst it may not be optimal to provide the detailed data physically, some customers currently request the information to be provided in this manner and we are of the view that retail customers should be able to access the information in an agreed manner. Electronically may not be the appropriate medium for a customer who is visually impaired or who has special needs. Lumo Energy requests that clause 3.2(a) is altered to: (a) The retailer or DNSP must provide the detailed data electronically to the retail customer or customer authorised representative <u>or otherwise agreed with the retail customer.</u></p> <p>Red Energy Red Energy is seeking clarification as to the intent of clause 3.2(a). AEMO have excluded retail customers who may wish to receive their detailed data physically. Whilst it may not be optimal to provide the detailed data physically, some customers currently request the information to be provided in this manner and we are of the view that retail customers should be able to access the information in an agreed manner. Electronically may not be the appropriate medium for a customer who is visually impaired or who has special needs. Red Energy requests that clause 3.2(a) is altered to: (a) The retailer or DNSP must provide the detailed data electronically to the retail customer or customer authorised representative <u>or otherwise agreed with the retail customer.</u></p> <p>EnerNOC EnerNOC supports AEMO’s recommendation to require NEM12 in csv format. Email, FTP or other similar methods would be acceptable.</p> <p>SA Power Network - No comment provided Citipower / Powercor - No comment provided</p>	<p>The interval detailed data format is to be provided electronically. These files will potentially be large and contain up to two years of interval data. AEMO does not consider it practical to include a requirement to provide this amount of information physically</p> <p>AEMO notes the respondent’s position.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>UE – No comment provided Origin Energy – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided AusNet Services – No comments Momentum Energy – Agreed ActewAGL – No comment NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided Energy Tailors – No Comment EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
3.2 (b)	(b) The detailed data must be constructed in a CSV format, unless otherwise agreed with the retail customer or customer authorised representative.	<p>Lumo Energy - No amendment suggested. Red Energy - No amendment suggested. Momentum Energy – Momentum Energy request a revision of this clause to include “CSV format at minimum” to allow scope for innovation and product development as technology develops.</p>	AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 3.1.
3.2 (c)	(c) Detailed data constructed in a CSV format may be delivered may be delivered as a compressed file with a “.zip”extension if needed to manage file size of delivered data.	<p>Momentum Energy – Agreed. Lumo Energy Lumo Energy suggest the removal of the ‘may be delivered’ in clause 3.2(c) as it has been duplicated. The following drafting amendment is suggested: Detailed data constructed in a CSV format may be delivered may be delivered as a compressed file with a “.zip”extension if needed to manage file size of delivered data. Red Energy</p>	AEMO notes the respondent’s suggestion and disagrees this was duplicated. No amendment needed to Section 3.2(c) of the MDPP.

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Red Energy suggest the removal of the ‘may be delivered’ in clause 3.2(c) as it has been duplicated.</p> <p>The following drafting amendment is suggested:</p> <p style="padding-left: 40px;">Detailed data constructed in a CSV format may be delivered may be delivered as a compressed file with a “.zip”extension if needed to manage file size of delivered data.</p>	<p>AEMO notes the respondent’s suggestion and disagrees this was duplicated. No amendment needed to Section 3.2(c) of the MDPP.</p>
3.3	File naming conventions	<p>Energy Tailors</p> <p>Since these procedures suggest that metering data be provided in NEM12 or NEM13 file formats (Section #4.4), with an accompanying customer guide, Energy Tailors highlights that the file should therefore contain a reference to who has provided the file, to enable a customer authorised representative to be able to interpret it. This covers the situation where a customer might obtain a file and then pass it on to a customer authorised representative, without the information of whom the file was received from.</p> <p>Energy Tailors suggests that this be incorporated into the file naming convention, as PARTICIPANT-ID_NMI_MeteringDataStartDate_MeteringDataEndDate_FileProvisionDate_FileType.csv, where PARTICIPANT-ID refers to the participant’s ID in MSATS. Alternatively the data provider can list the ID that will be prefixed to the file naming convention in their customer reference guide.</p> <p>NSW DNSPs</p> <p>The NSW DNSPs believe that file naming conventions should be excluded from the procedure. This will allow for cost effective report creation by each DNSP, whose data systems will be configured individually. In addition, this will also allow the inclusion in the file name of such data as a ‘request number’ as a useful reference.</p> <p>Lumo Energy</p> <p>It is Lumo Energy’s view that a naming convention is outside the scope of this Procedure. Retailers and DNSPs can describe the document to a customer or customers authorised representative in a manner that is clear to the customer. For example “Brad Pitt’s Summary Data” not 6123456789_20140301_20160301_20160305130000_SUMMARY.pdf</p> <p>This is not conducive to a good customer experience, nor is it conducive to participants who wish to create / produce this file manually.</p>	<p>The purpose of the naming convention for the interval detailed data format is to identify the retail customer file. Implementation of a naming convention provides a standardised approach. Including a reference to the organisation providing the file provides a way for a customer authorised representative to identify and subsequently interpret the representation of metering data provided by that organisation.</p> <p>Amend the naming convention for the interval detailed data format to include a reference to the organisation providing the data.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 3.3.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 3.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>AEMO has established a physical delivery method in clause 3.1(a), it is unclear how a naming convention would be required when the summary data file is delivered physically.</p> <p>Lumo Energy consider that clause 3.3(a) is outside of the AEMC Final Determination and should be deleted. However, should AEMO consider that it must set a file naming convention irrespective of the AEMC's Final Determination, Lumo Energy recommends the following drafting amendment:</p> <p style="padding-left: 40px;">(a) The summary data file name must contain the NMI follow the convention detailed below when requested electronically and in clause 3.3(c).</p> <p>Red Energy</p> <p>It is Red Energy's view that a naming convention is outside the scope of this Procedure. Retailers and DNSPs can describe the document to a customer or customers authorised representative in a manner that is clear to the customer. For example "Brad Pitt's Summary Data" not 6123456789_20140301_20160301_20160305130000_SUMMARY.pdf</p> <p>This is not conducive to a good customer experience, nor is it conducive to participants who wish to create / produce this file manually.</p> <p>AEMO has established a physical delivery method in clause 3.1(a), it is unclear how a naming convention would be required when the summary data file is delivered physically.</p> <p>Red Energy consider that clause 3.3(a) is outside of the AEMC Final Determination and should be deleted. However, should AEMO consider that it must set a file naming convention irrespective of the AEMC's Final Determination, Red Energy recommends the following drafting amendment:</p> <p style="padding-left: 40px;">(a) The summary data file name must contain the NMI follow the convention detailed below when requested electronically and in clause 3.3(c).</p> <p>EnerNOC</p> <p>EnerNOC suggests that the file name should include:</p> <ol style="list-style-type: none"> 1. NMI 2. Timestamp of the application date e.g. 'yyyymmddhhmm'. Item 2 will allow facilitate matching the delivered file to a specific 	<p>AEMO notes the respondent's position and has amended Section 3.3(a) of the MDPP.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 3.3.</p> <p>AEMO notes the respondent's position and has amended Section 3.3(a) of the MDPP.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>request.</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>UE – No comment provided</p> <p>Origin Energy – No comment provided</p> <p>Dept of Industry and Science – No comment provided</p> <p>ENA – No comment provided</p> <p>AusNet Services – No comments</p> <p>Momentum Energy – (a)(b)(c) Agreed.</p> <p>ActewAGL – No comment</p> <p>M2 Energy – No comment provided</p> <p>Ergon Energy – No comment provided</p> <p>AGL – No comment provided</p> <p>EnergyAustralia – No comment provided</p> <p>ERAA – No comment provided</p> <p>CUAC – No comment provided</p>	
3.3 (b)	<p>b) CSV detailed data file name must follow the convention detailed below and in clause 3.3(c).</p> <p>IV. NMI_MeteringDataStartDate_MeteringDataEndDate_FileProvisionDate_FileType.csv</p> <p>V. Example 8000000000_20140301_20160301_20160305130000_DETAILED.csv</p>	<p>Lumo Energy</p> <p>It is Lumo Energy’s view that a naming convention is outside the scope of this Procedure. Retailers and DNSPs can describe the document to a customer or a customer authorised representative in a manner that is clear to the customer. For example “Brad Pitt’s Detailed Data” not 6123456789_20140301_20160301_20160305130000_DETAILED.csv</p> <p>This is not conducive to a good customer experience, nor is it conducive to participants who wish to create / produce this file manually.</p> <p>AEMO has established a physical delivery method in clause 3.1(a); it is unclear how the naming convention would be required when the detailed data file is delivered physically.</p> <p>Lumo Energy consider that clause 3.3(b) is outside of the AEMC Final Determination and should be deleted.</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 3.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>However, should AEMO consider that it must set a file naming convention irrespective of the AEMC's Final Determination, Lumo Energy recommends the following drafting amendment,</p> <p>Specifically:</p> <p style="padding-left: 40px;">(b) The CSV detailed data file name <u>delivered electronically</u> must contain the NMI. Retailers and DNSPs may choose to follow the convention detailed below and in clause 3.3(c).</p> <p>IV. NMI_MeteringDataStartDate_MeteringDataEndDate_FileProvisionDate_FileType.csv</p> <p>V. Example 8000000000_20140301_20160301_20160305130000_DETAILED.csv</p> <p>Red Energy</p> <p>It is Red Energy's view that a naming convention is outside the scope of this Procedure. Retailers and DNSPs can describe the document to a customer or a customer authorised representative in a manner that is clear to the customer. For example "Brad Pitt's Detailed Data" not 6123456789_20140301_20160301_20160305130000_DETAILED.csv</p> <p>This is not conducive to a good customer experience, nor is it conducive to participants who wish to create / produce this file manually.</p> <p>AEMO has established a physical delivery method in clause 3.1(a); it is unclear how the naming convention would be required when the detailed data file is delivered physically.</p> <p>Red Energy consider that clause 3.3(b) is outside of the AEMC Final Determination and should be deleted.</p> <p>However, should AEMO consider that it must set a file naming convention irrespective of the AEMC's Final Determination, Red Energy recommends the following drafting amendment,</p> <p>Specifically:</p> <p style="padding-left: 40px;">(b) The CSV detailed data file name <u>delivered electronically</u> must contain the NMI. Retailers and DNSPs may choose to follow the convention detailed below and in clause 3.3(c).</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 3.3.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>IV. NMI_MeteringDataStartDate_MeteringDataEndDate_FileProvisionDate_FileType.csv</p> <p>V. Example 8000000000_20140301_20160301_20160305130000_DETALIED.csv</p> <p>Momentum Energy – Agreed.</p>	
3.4	Numbering of metering data files to be provided	<p>Momentum Energy</p> <p>Agreed on the proviso that the statement referred to at 3.0 regarding period of responsibility is included.</p> <p>Momentum Energy request that the statement referred to at 3.0 regarding period of responsibility is included and that inclusion of tariff change reconfigurations is removed on the basis that tariff is not relevant to metering data (see commentary at 4.2(d) and 4.3(d)).</p> <p>ENA</p> <p>3.4 (a) should be amended to read “<u>Subject to (b)</u> retailers and distributors must provide a single metering data file”..... Clause (b) clarifies that more than one file could also be provided.</p> <p>Lumo Energy</p> <p>The Final Determination of the rule change clarified the types of data that a customer or a customer authorised representative is entitled to receive and this set out in rule 7.7(a) of the NER. Rule 7.7(a)(7) provides customers and their authorised representatives access to the types of data specifically set out in rule 7.7(a) of the NER and is limited to metering data or energy data. This did not include billing data which would include tariff information.</p> <p>Lumo Energy request that a change in tariff is removed from clause 3.4(b) as it is our view that whilst the Final Determination allows customers, or parties authorised by customers, access to NMI standing data to the extent that such data is relevant to a customer's metering installation, we do not consider that this information is relevant.</p> <p>We request the following amendment to clause 3.4(b):</p> <p>(b) Where there has been a change of metering installation configuration during the period for which metering data is</p>	<p>AEMO notes the respondent’s position and has deleted the reference to tariffs in Section 3.4 of the MDPP.</p> <p>AEMO notes the respondent’s position and has amended clause 3.4(a) of the MDPP to include “Subject to clause 3.4(b)”.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>requested, the retailer or DNSP may provide a separate metering data file for each metering installation configuration period. A metering installation configuration change <u>can</u> include a <u>customer installing solar PV</u> change of tariff and <u>or</u> a change from accumulated metering to interval metering.</p> <p>Red Energy</p> <p>The Final Determination of the rule change clarified the types of data that a customer or a customer authorised representative is entitled to receive and this set out in rule 7.7(a) of the NER. Rule 7.7(a)(7) provides customers and their authorised representatives access to the types of data specifically set out in rule 7.7(a) of the NER and is limited to metering data or energy data. This did not include billing data which would include tariff information.</p> <p>Red Energy request that a change in tariff is removed from clause 3.4(b) as it is our view that whilst the Final Determination allows customers, or parties authorised by customers, access to NMI standing data to the extent that such data is relevant to a customer's metering installation, we do not consider that this information is relevant.</p> <p>We request the following amendment to clause 3.4(b):</p> <p>(b) Where there has been a change of metering installation configuration during the period for which metering data is requested, the retailer or DNSP may provide a separate metering data file for each metering installation configuration period. A metering installation configuration change <u>can</u> include a <u>customer installing solar PV</u> change of tariff and <u>or</u> a change from accumulated metering to interval metering.</p> <p>UE</p> <p>3.4 (a) should be amended to read “<u>Subject to (b)</u> retailers and distributors must provide a single metering data file”..... Clause (b) clarifies that more than one file could also be provided.</p> <p>EnerNOC – As Above</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>Origin Energy – No comment provided</p> <p>Dept of Industry and Science – No comment provided</p> <p>ActewAGL – No additional comment</p>	<p>AEMO notes the respondent’s position and has deleted the reference to tariffs in Section 3.4 of the MDPP.</p> <p>AEMO notes the respondent’s position and has deleted the reference to tariffs in Section 3.4 of the MDPP.</p> <p>AEMO notes the respondent’s position and has amended clause 3.4(a) of the MDPP to include “Subject to clause 3.4(b)”.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided Energy Tailors – No Comment EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
4	DATA FILE CONTENT	<p>Momentum Energy Revised condition to ensure clarity of minimum specification and responsible period to provide data as determined by AEMC: (a) Retailers and DNSPs must provide the following content at a minimum for each metering data file within its authorised participant period only. (See Glossary)</p> <p>Lumo Energy It is our view that the Final Determination required AEMO to specify the minimum data file content that retailers and DNSP’s must provide. It is on this basis that we request the following amendment to clause 4.4(a):</p> <p style="padding-left: 40px;">(a) Retailers and DNSPs must provide, at a minimum, the following content for each metering data file.</p> <p>Red Energy It is our view that the Final Determination required AEMO to specify the minimum data file content that retailers and DNSP’s must provide. It is on this basis that we request the following amendment to clause 4.4(a):</p> <p style="padding-left: 40px;">(a) Retailers and DNSPs must provide, at a minimum, the following content for each metering data file.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided</p>	<p>AEMO notes the respondent’s position and has amended Section 4(a) of the MDPP to include “at a minimum”.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement above.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement above.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Origin Energy – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided AusNet Services – No comments ActewAGL – No comment provided NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
4.1	Field details – format and unit of measure	<p>ActewAGL Adding that this is a subset of the NEM12/13 spec adds no value, especially as you have specified the allowed values.</p> <p>Current wording (a) Data fields for detailed and summary metering data files must use these permitted values (a subset of units of measure detailed in the Metering Data File Format Specification NEM12 & NEM13). Note that the permitted values for unit of measure are not case sensitive.</p> <p>Proposed wording (a) Data fields for detailed and summary metering data files must use these permitted values. Note that the permitted values for unit of measure are not case sensitive.</p> <p>EnerNOC The current NEM12 standard would accommodate all requirements</p> <p>SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Red Energy – No comment provided Lumo Energy – No comment provided Origin Energy – No comment provided Dept of Industry and Science – No comment provided</p>	<p>AEMO notes the respondent’s position. AEMO considers the current wording is appropriate. No change to the MDPP.</p> <p>AEMO notes the respondent’s comments.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>ENA – No comment provided AusNet Services – No comments Momentum Energy – Agree. NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided AGL – No comment provided Energy Tailors – No Comment EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
4.2	Accumulated metering data summary	<p>Energy Australia</p> <p>7.16 Metering data provision to retail customers (2) for retail customers for whom interval metering data is available, specify the summary data format, which, at a minimum should include the retail customer's: (iii) a diagrammatic representation of the information referred to in subparagraph (i);</p> <p>The above clause from the NER currently indicates that diagrammatic representation is limited to interval metering data; inclusion of this for accumulated metering data is not required. AEMO's assessment of the responses provided to the first stage rules consultation proposes the inclusion so that retail customers are able to understand the information provided. EnergyAustralia recommends the following update to the MDPP which allows, as a minimum, how the accumulated metering data is represented:</p> <p>(a) The accumulated metering data summary must, at a minimum, include: II. A diagrammatic and or numerical representation of the usage information.</p>	<p>AEMO considers that NER clause 7.16 allows the MDPP to require retailers to provide time of use or flexible pricing information. Under this clause, the MDPP must establish the manner and form for detailed and summary data formats. NER clauses 7.16(c)(2)(i) and (ii) specifies that the interval summary data format should include at a minimum the:</p> <ul style="list-style-type: none"> ▪ Nature and extent of energy usage for daily time periods. ▪ Usage or load profile over a specified period. <p>AEMO considers that retail customers need information that is easy to understand and informs them about the relationship between their usage and the retail tariff they are on, as this allows them to more effectively assess whether a different offering is appropriate. From stakeholder discussions, AEMO agrees that retail customers only need to understand their current retail tariff offering as this applies to their usage, instead of different tariff structures that may have applied over the period the metering data is requested.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>EnergyAustralia recommends the removal & update, respectively of the following for clause 4.2.(d) of the MDPP:</p> <ul style="list-style-type: none"> Removal of (IV) as only validated meter data will be provided to a Retailer by a Meter Data Provider (MDP) which may include estimated data Update to (VII) to replace or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc. with meter register/suffix. <p>Representation of Energy Flow Types, i.e. Peak, Shoulder, Off- Peak can cause confusion or a different outcome if the customer requested data from a Retailer as opposed to the DNSP. Retailers and DNSPs may not have the same configuration for peak off peak, dependant on customer choice of product. If the customer requested data from both parties this could cause considerable confusion. EnergyAustralia believes the simpler form of data available at register or meter level would be a better outcome.</p> <p>Hence has suggested the below update to clause 4.2.(d):</p> <p><i>(d) The summary data format for accumulated metering data provided by a retailer must include the following information:</i></p> <p>I. National Metering Identifier (NMI), II. Meter Serial Number, III. Unit of Measure (UOM) for the Energy Flow Type, IV. Data quality indication V. Read Date for <i>accumulated metering data</i> (i.e. end of meter reading period), VI. From Date (i.e. start of meter reading period), VII. Energy Flow Types: A. Total usage per meter register/suffix or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc. B. Controlled Load usage (only if applicable), C. Generation (only if applicable).</p> <p>ERAA 3.3(d)</p>	<p>AEMO does not consider that the requirement on retailers and DNSPs needs to be identical. Since the average daily load profile shows a retail customers average usage during each hour in a 24 hour period, AEMO considers this diagram can also be used to relate this usage to the time of use information or flexible pricing information in a simpler manner.</p> <p>Therefore AEMO has included a requirement on retailers and DNSPs to provide an average daily load profile.</p> <p>Section 4 of the MDPP includes a requirement for the retailer provided average daily load profile graph to include a note that either provides the retail customer's current tariff time of use splits or directs them to a place on the retailers website that explains their available tariffs. The representation of energy usage for retailers and DNSPs is simplified to include general supply, controlled load (where applicable), generation (where applicable) and maximum demand (monthly or the end of the meter read period).</p> <p>AEMO considers these changes will provide retail customers with information that is useful and understandable, while also minimising industry costs and better meets the National Electricity Objective.</p> <p>The MDPP has been updated to include a requirement on retailers and DNSPs to provide a table and diagram that presents a retail customer's energy flows (this includes general supply, controlled load (where applicable) and generation (where applicable). A retail customer's maximum demand (in kilowatts), which can be presented monthly or quarterly depending on the end of the meter reading period, must be included.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>AEMO has published its Draft Procedures for consultation following the Australian Energy Market Commission's (AEMC) Final Rule Determination on the Customer access to information about their energy consumption rule change¹ (the Final Determination). The ERAA concerned that the Draft Procedures developed by AEMO do not reflect the primary intent of the Final Determination.</p> <p>The intent of the rule change as outlined in AEMC's Final Determination is to provide customers and their authorised representatives, with access to their consumption data from both retailers and distributors. The ERAA is concerned this intent has been wrongly interpreted by AEMO. The Final Determination refers to a customer's metering data as provided to retailers by a metering data provider or distribution businesses. However, the Draft Procedures do not reflect this and appear to be focused on retail billing information which is not the intent of the AEMC's Final Determination.</p> <p>CUAC</p> <p>CUAC strongly supports the inclusion of diagrammatical and numerical summaries in both the accumulation and interval summary data formats, consistent with the example consumer data summary we provided to the Consultation Paper. The procedures should not imply that only one diagram may be provided.</p> <p>CUAC strongly agrees with AEMO's proposal that summary data be provided both physically and electronically. This is greatly important for the accessibility of the information.</p> <p>AGL</p> <p>This section provides the requirements for the summary file for an accumulation meter. Clause 4.2(d)IV requires that a quality indicator be provided within that summary. It is not stated whether this quality indicator applies to each meter or all meters associated with the metering installation. Further, as a summary, this information could represent two</p>	<p>This change is reflected in the definition of maximum demand, and new definitions included for general supply and usage in the glossary in 1.2.1 of the MDPP.</p> <p>The MDPP includes a requirement on retailers and DNSPs to provide an average daily load profile graph. Retailers must include a note on that average daily load profile graph that either provides the retail customer's current tariff time of use splits or directs them to a place on the retailers website that explains their available tariffs.</p> <p>This change is reflected in the definition of average daily load profile in the glossary in 1.2.1 of the MDPP.</p> <p>The following definitions are removed to support the requirements for the new diagrammatic representations of the retail customer's metering data:</p> <ul style="list-style-type: none"> ▪ Daily time periods. ▪ Extent of energy usage. ▪ Load profile. ▪ Off-peak. ▪ Peak. ▪ Shoulder. <p>AEMO notes the respondent's comments and has amended the MDPP to include a statement whether the metering data file contains estimated data.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>years of quarterly reading (i.e. 8 meter readings or more readings if there are other meter readings taken). AGL does not believe that it is appropriate to apply a single quality indicator to data covering a two year period and potentially multiple meters – e.g. general power and hot water. If one reading on one meter fails validation and is estimated, the quality indicator would be flagged as estimated and would imply to the customer that all data in the summary was estimated, which is not the case. Further, providing this flag against two years of data would likely introduce a substantial and unnecessary increase in customer concern, which AGL does not believe is appropriate.</p> <p>AGL believes that the quality flag should be provided against the period and meter / register to which it is appropriate.</p> <p>Clause 4.2 and clause 4.3 of the Procedure specifies the information which should be provided in a summary file for interval metered sites which must be provided by a retailer. Within this specification are the following elements: <i>VII. Energy Flow Types:</i> A. <i>Total usage or billing related components, e.g. Peak, Shoulder, Off-Peak usage, etc.</i> B. <i>Controlled Load (only if applicable),</i> C. <i>Generation (only if applicable).</i></p> <p>Information such as Peak, Shoulder and Off-Peak are not provided for in metering information, but are based on a customer’s contract and not metering data. The Rule Change was focussed on metering data and not tariff data and the naming of the procedure (Meter Data Provision Procedure) makes clear what should be provided.</p> <p>Further, this requirement has also been placed only on retailers and not DNSPs. AEMO, in its Draft Determination, has stated that: <i>To eliminate any potential confusion retail customers may experience comparing their metering data provided by a retailer and DNSP...2</i></p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement above.</p>

Item	Description	Participant Comments	AEMO Response																
		<p>AGL would argue that by having the retailer and DNSP provide different information (for the same period) would increase the confusion which customers would experience.</p> <p>The definition of peak, shoulder and off-peak varies between retailer and state. The table below shows the definitions for three states:</p> <p>Table 1 - Examples of Peak, Shoulder and Off-Peak periods</p> <p><i>Table 1 - Examples of Peak, Shoulder and Off-Peak periods</i></p> <table border="1" data-bbox="663 480 1525 703"> <thead> <tr> <th>Period</th> <th>Peak</th> <th>Shoulder</th> <th>Off-Peak</th> </tr> </thead> <tbody> <tr> <td>Victoria</td> <td>3pm to 9pm AEST business days</td> <td>7am to 3pm AEST business days</td> <td>9pm to 7am AEST business days and all weekend</td> </tr> <tr> <td>NSW</td> <td>2pm to 8pm business days</td> <td> <ul style="list-style-type: none"> • 7 am to 2 pm business days • 8 pm to 10 pm business days • 7 am to 10 pm weekends and public holidays </td> <td> <ul style="list-style-type: none"> • 10pm to 7am business days • 10pm to 7am weekends and public holidays </td> </tr> <tr> <td>Qld</td> <td>4pm to 8 pm weekdays</td> <td> <ul style="list-style-type: none"> • 7am to 4pm weekdays • 8pm to 10pm weekdays • 7am to 10pm weekends </td> <td> <ul style="list-style-type: none"> • 10pm to 7am business days • 10pm to 7am weekends </td> </tr> </tbody> </table> <p>As can be seen from the above table, the definition of any of these tariff components is quite varied. The requirement to therefore produce this information, with all its variations, necessitates each retailer to build a version of a billing engine which can identify all contracts the customer has used in the two year period, and produce the necessary data.</p> <p>AGL does not believe that this outcome is what was intended, as it will require substantial costs to retailers to build the necessary systems to provide this data. AGL also notes that within the AEMO Draft Determination, AEMO explicitly states that the <i>the MDPP is to establish requirements for the manner and form in which metering data, not existing standing data, is to be provided.</i>³</p> <p>AGL believes that the provision of peak /off peak / shoulder information is not metering data, but tariff or standing data, which AEMO has rejected as being required to be provided by the MDPP.</p> <p>AGL previously suggested that the data which should be provided through this process should be based on the information provided by the DNSP (or Meter Data Provider) to the retailer. In other words, consumption information by meter register and nothing more.</p>	Period	Peak	Shoulder	Off-Peak	Victoria	3pm to 9pm AEST business days	7am to 3pm AEST business days	9pm to 7am AEST business days and all weekend	NSW	2pm to 8pm business days	<ul style="list-style-type: none"> • 7 am to 2 pm business days • 8 pm to 10 pm business days • 7 am to 10 pm weekends and public holidays 	<ul style="list-style-type: none"> • 10pm to 7am business days • 10pm to 7am weekends and public holidays 	Qld	4pm to 8 pm weekdays	<ul style="list-style-type: none"> • 7am to 4pm weekdays • 8pm to 10pm weekdays • 7am to 10pm weekends 	<ul style="list-style-type: none"> • 10pm to 7am business days • 10pm to 7am weekends 	
Period	Peak	Shoulder	Off-Peak																
Victoria	3pm to 9pm AEST business days	7am to 3pm AEST business days	9pm to 7am AEST business days and all weekend																
NSW	2pm to 8pm business days	<ul style="list-style-type: none"> • 7 am to 2 pm business days • 8 pm to 10 pm business days • 7 am to 10 pm weekends and public holidays 	<ul style="list-style-type: none"> • 10pm to 7am business days • 10pm to 7am weekends and public holidays 																
Qld	4pm to 8 pm weekdays	<ul style="list-style-type: none"> • 7am to 4pm weekdays • 8pm to 10pm weekdays • 7am to 10pm weekends 	<ul style="list-style-type: none"> • 10pm to 7am business days • 10pm to 7am weekends 																

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>The AEMC, as part of its Final Determination considered whether the rule change <i>would result in a disproportionate regulatory or administrative burden on market participants.</i>⁴</p> <p>AGL believes that requiring retailers to provide information that DNSPs do not have to provide imposes a disproportionate burden on retailers, which is inconsistent with the criteria applied by the AEMC to support the National Electricity Objective.</p> <p>NSW DNSPs</p> <p>The NSW DNSPs would like to clarify if the term “total usage” excludes controlled load and generation? This term should be added to the definitions in Section 1 of the procedure.</p> <p>ActewAGL</p> <p>Disagree with AEMO comments that they believe it will improve customer interaction. Agree with majority of industry respondents in First Stage Consultation, that this will cause unnecessary confusion/additional work/added costs.</p> <p>Providing a diagrammatic representation should be optional not mandatory. Most retailers, as per their NERR obligations (or as a competitive advantage), already provide a diagrammatic view of a customer’s usage on their bills. Why does this need to be duplicated, as the customer authorised representative cannot use it, and the customer already has it? Does not add value to this process.</p> <p>Revised wording (remove point II or add a new paragraph with this as a “may include”)</p> <p>(a)</p> <p>II. A diagrammatic and numerical representation of the usage information.</p> <p>Or reword</p> <p>(a) The accumulated metering data summary at a minimum:</p> <p>I. Must include the nature and extent of energy usage.</p> <p>II. May include a diagrammatic and numerical representation of the usage information.</p>	<p>AEMO notes the respondent’s position and has amended the MDPP to clarify total usage (which is termed General Supply usage in the MDPP) excludes controlled load and generation.</p> <p>Retail customers need information that is easy to understand and informs them about the relationship their usage. AEMO considers that a diagrammatic and numerical representation would better achieve this.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Momentum Energy (a) Agree where “nature of usage” is defined as Consumption, Controlled Load and Generation.</p> <p>Origin Energy (d) IV Data quality indication should be provided in the tabular form as Actual = Y or “N” for Subs or Final Subs. It is not practical to provide a statement indicating the file contains estimated meter data and specifying each period. VII (A.) Remove billing related components and maintain consistency with information provided by DNSP.</p> <p>Lumo Energy Lumo Energy is supportive of the concepts contained within clause 4.2(a) and offer no suggested amendments.</p> <p>Red Energy Red Energy is supportive of the concepts contained within clause 4.2(a) and offer no suggested amendments.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided AusNet Services – No comments M2 Energy – No comment provided Energy Tailors – No Comment ERAA – No comment provided</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided above.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided above.</p> <p>AEMO notes the respondent’s position.</p> <p>AEMO notes the respondent’s position.</p>
4.2 (b)	(b) Conditions that apply to all summary accumulated metering data files are: I. File must be based on validated metering data.	<p>Lumo Energy Lumo Energy is supportive of the concepts contained within clause 4.2(b) and offer no suggested amendments.</p> <p>Red Energy</p>	<p>AEMO notes the respondent’s position.</p> <p>AEMO notes the respondent’s position.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
	II. File ordered by Date – oldest date at the top of the file and most recent date at the bottom of the file.	Red Energy is supportive of the concepts contained within clause 4.2(b) and offer no suggested amendments. Momentum Energy – Agree.	
4.2 (c)	(c) Appendix A contains the accumulated metering data summary required file conditions and an example of a diagrammatic representation of energy usage.	<p>Momentum Energy See commentary for Appendix A.</p> <p>Lumo Energy AEMO is to develop a minimum summary data format for a retail customer who has an accumulated meter. As the summary data format is a minimum, the content of Appendix A should as a guide only. This clause should be amended to state that it is the minimum data summary required. The following drafting amendment is suggested: (c) Appendix A contains the an accumulated metering data summary guide required and the minimum summary data as file conditions and an example of a diagrammatic representation of energy usage. If it is AEMO’s intent for the Appendicies for these to be a guide, it may appropriate for this clause to be a footnote.</p> <p>Red Energy AEMO is to develop a minimum summary data format for a retail customer who has an accumulated meter. As the summary data format is a minimum, the content of Appendix A should as a guide only. This clause should be amended to state that it is the minimum data summary required. The following drafting amendment is suggested: (c) Appendix A contains the an accumulated metering data summary guide required and the minimum summary data as file conditions and an example of a diagrammatic representation of energy usage. If it is AEMO’s intent for the Appendicies for these to be a guide, it may appropriate for this clause to be a footnote.</p>	<p>AEMO notes the respondent’s position.</p> <p>AEMO agrees that the MDPP should clarify that Appendix A and B are examples only. The MDPP also needs to ensure that retailers and DNSPs requirements are in the MDPP, instead of the Appendices. To address this, AEMO has removed the File Conditions in Appendix A and B and transferred them to sections 4.2 and 4.3 of the MDPP.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided above.</p>
4.2 (d)	(d) The summary data format for accumulated metering data	<p>Momentum Energy Rule 7.7 Entitlement to metering data and access to metering installation</p>	AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
	<p>provided by a retailer must include the following information:</p> <p>I. National Metering Identifier (NMI),</p> <p>II. Meter Serial Number,</p> <p>III. Unit of Measure (UOM) for the Energy Flow Type,</p> <p>IV. Data quality indication,</p> <p>V. Read Date for accumulated metering data (i.e. end of meter reading period),</p> <p>VI. From Date (i.e. start of meter reading period),</p> <p>VII. Energy Flow Types:</p> <p>A. Total usage or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc.,</p> <p>B. Controlled Load usage (only if applicable),</p> <p>C. Generation (only if applicable).</p>	<p>(a) The only persons entitled to access <i>energy data</i> or to receive <i>metering data</i>, <i>NMI Standing Data</i>, <i>settlements ready data</i> or data from the <i>metering register</i> for a <i>metering installation</i> are:</p> <p>(7) a:</p> <p>(i) <i>retail customer</i> of:</p> <p>(A) a <i>retailer</i>; or</p> <p>(B) a <i>Distribution Network Service Provider</i>; or</p> <p>(ii) <i>customer authorized representative</i>, upon request by that <i>retail customer</i> its <i>customer authorised representative</i> to the <i>retailer</i> or <i>Distribution Network Service Provider</i> in relation to that <i>retail customer’s metering installation</i>;</p> <p>7.16 Metering data provision to retail customers</p> <p>(3) for retail customers for whom accumulated metering data is available, specify a summary data format;</p> <p>1. Momentum Energy strongly urge AEMO to remove this entire section and apply one set of criteria for both DNSP and Retailer with the removal of any and all billing related data including demand/capacity that is not available through meter data files.</p> <p>The NER7.7 clearly states that the customer and authorised customer representative are only entitled to “data from the metering register for a metering installation” as highlighted above.</p> <p>The inclusion of billing related data is outside the scope of this document and beyond the requirements and permissions granted by the NER7.7.</p> <p>2. Retail participants should not be subject to additional requirements beyond what has been included in the NER as the minimum requirements. Further the retail participant should not be subject to the cost and resourcing that would require in design and development of systems so as to produce information beyond scope of what has been defined as the minimum criteria by the NER.</p> <p>3. As noted in previous discussions between AEMO and retail participants, workshop discussions and emails sent by retail participants to AEMO, the intention of the provision of metering data is to provide the customer with information regarding their usage/generation patterns and not to reconcile or validate billing information or invoicing.</p> <p>Lumo Energy</p> <p>Lumo Energy consider it inappropriate and outside the scope of the AEMC’s Final Determination to prescribing billing-related information in the summary data format for accumulated metering data. Each retailer</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>potentially will have different timeframes for peak, off-peak and shoulder periods. In addition, an individual retailer may offer different peak, off-peak and shoulder timeframes to individual customer on a contract by contract basis. This leads to creating a manual process to create summary data, which is highly inefficient and is not in the long term interests of consumers.</p> <p>It is the view of Lumo Energy that the summary data provided to a customer or customer authorised representative by a retailer or DNSP must be identical. The information should also be considered the minimum summary data format that is to be provided to a retail customer who has an accumulated meter.</p> <p>On this basis, we request that 4.2(d) and 4.2(e) be combined and 4.2(d)(VII)(A) be altered to 'Total Usage' only.</p> <p>For ease, Lumo Energy offer AEMO the following drafting suggestion (deleting clause 4.2(e)) and amending clause 4.2(d) with:</p> <p style="padding-left: 40px;">The summary data format for accumulated metering data provided by a retailer and DNSP must include, at a minimum, the following information:</p> <ul style="list-style-type: none"> I. National Metering Identifier (NMI), II. Meter Serial Number, III. Unit of Measure (UOM) for the Energy Flow Type, IV. Data quality indication, V. Read Date for accumulated metering data (i.e. end of meter reading period), VI. From Date (i.e. start of meter reading period). VII. Energy Flow Types: <ul style="list-style-type: none"> A. Total usage, B. Controlled Load usage (only if applicable), C. Generation (only if applicable). <p>Red Energy</p> <p>Red Energy consider it inappropriate and outside the scope of the AEMC's Final Determination to prescribing billing-related information in the summary data format for accumulated metering data. Each retailer potentially will have different timeframes for peak, off-peak and shoulder periods. In addition, an individual retailer may offer different peak, off-</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>peak and shoulder timeframes to individual customer on a contract by contract basis. This leads to creating a manual process to create summary data, which is highly inefficient and is not in the long term interests of consumers.</p> <p>It is the view of Red Energy that the summary data provided to a customer or customer authorised representative by a retailer or DNSP must be identical. The information should also be considered the minimum summary data format that is to be provided to a retail customer who has an accumulated meter.</p> <p>On this basis, we request that 4.2(d) and 4.2(e) be combined and 4.2(d)(VII)(A) be altered to 'Total Usage' only.</p> <p>For ease, Red Energy offer AEMO the following drafting suggestion (deleting clause 4.2(e)) and amending clause 4.2(d) with:</p> <p style="padding-left: 40px;">The summary data format for accumulated metering data provided by a retailer and DNSP must include, at a minimum, the following information:</p> <ul style="list-style-type: none"> I. National Metering Identifier (NMI), II. Meter Serial Number, III. Unit of Measure (UOM) for the Energy Flow Type, IV. Data quality indication, V. Read Date for accumulated metering data (i.e. end of meter reading period), VI. From Date (i.e. start of meter reading period). VII. Energy Flow Types: <ul style="list-style-type: none"> A. Total usage, B. Controlled Load usage (only if applicable), C. Generation (only if applicable). 	
4.2 (e)	(e) The summary data format for accumulated metering data provided by a DNSP must include the following information:	<p>Momentum Energy</p> <p>1. Change “Energy Flow Types” to “Energy Usage” and “Total Usage” to “Consumption” as preferred terminology in NER 7.16(2)(i), which although is applicable to interval meter data can also be applied to accumulation metering and provide for a consistent approach.</p>	AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
	<p>I. National Metering Identifier (NMI),</p> <p>II. Meter Serial Number,</p> <p>III. Unit of Measure (UOM) for the Energy Flow Type,</p> <p>IV. Data quality indication,</p> <p>V. Read Date for accumulated metering data (i.e. end of meter reading period),</p> <p>VI. From Date (i.e. start of meter reading period).</p> <p>VII. Energy Flow Types:</p> <p>A. Total usage,</p> <p>B. Controlled Load usage (only if applicable),</p> <p>C. Generation (only if applicable).</p>	<p>2. Momentum Energy would support and agree that this is the correct format for both the DNSP and Retailer and is within the scope of the NER and the intention of the AEMC final determination.</p> <p>3. Momentum Energy would also highlight that there is a single rule that applies to all relevant participants (i.e. DNSP and Retailer) in the provision of metering data. Momentum Energy question if it is in the scope of AEMO's authority to create separate obligations for the provision of information not included in the scope of metering data.</p> <p>4. Is it the intention that all 550 records (service order related reads) should be included in the file? Momentum Energy's interpretation is that each period will include all 550 records and the data quality statement should be inclusive of all service order reads.</p> <p>Lumo Energy Please refer to the response provided to clause 4.2(d) where Lumo Energy requested clause 4.2(d) and 4.2(e) be combined and 4.2(d)(VII)(A) altered to 'Total Usage'</p> <p>Red Energy Please refer to the response provided to clause 4.2(d) where Red Energy requested clause 4.2(d) and 4.2(e) be combined and 4.2(d)(VII)(A) altered to 'Total Usage'.</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p>
4.3	Interval metering data summary	<p>Energy Australia As per the comments to 4.2.(d)(IV) & 4.2.(d)(VII)A, i.e. removal of 4.3.(d)(IV) & update 4.3.(d)(VII)A to the following: IV. Data quality indication VII. Energy Flow Types: A. Total usage per meter register/suffix</p> <p>ERAA 4.3(d) AEMO has published its Draft Procedures for consultation following the Australian Energy Market Commission's (AEMC) Final Rule Determination on the Customer access to information about their energy consumption rule change¹ (the Final Determination). The ERAA concerned that the Draft Procedures developed by AEMO do not reflect the primary intent of the Final Determination.</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>The intent of the rule change as outlined in AEMC's Final Determination is to provide customers and their authorised representatives, with access to their consumption data from both retailers and distributors. The ERAA is concerned this intent has been wrongly interpreted by AEMO. The Final Determination refers to a customer's metering data as provided to retailers by a metering data provider or distribution businesses. However, the Draft Procedures do not reflect this and appear to be focused on retail billing information which is not the intent of the AEMC's Final Determination.</p> <p>The ERAA believes that AEMO should be more pragmatic in its approach to the summary data format. For example, the requirement to include a statement within the summary data format on how many (data) intervals have been substituted or estimated in the two years of meter data, will require significant IT development and/or individual interrogation of the data. This development would come at significant cost and ultimately be passed on to end consumers. Alternatively, if the summary data contains identified estimated or substituted data, and where customers have concerns, they or their authorised representatives could review the specifics in the detailed data with the party responsible for providing the data.</p> <p>CUAC</p> <p>CUAC does not agree with AEMO's conclusion that 'actual' data related to a specific time period are better than average usage information. Both presentations are appropriate for different purposes. Un-averaged data are appropriate to show changes over time, e.g. sum of monthly consumption over time. However, averaged data are more appropriate to show 'representative' patterns, e.g. daily load curves.</p> <p>AEMO's concern about relevancy of data is more appropriately addressed by determining which set of data should form the basis of the average than by ruling out averages. A concern that e.g. an 'average daily load curve' does not show changes over time would be poorly founded, as this is not the purpose of a load curve. A concern</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>that an 'average daily load curve' that spans an entire year is unrepresentative because variations over time (seasonal or otherwise) are 'washed out' is more well founded. CUAC argues that there is likely still value in an average with yearly data, but also that there is value in more narrowly averages, such as 'summer' (Dec-Feb) or 'the last three months'. This is reflected in CUAC's example data summary, which includes all three of 'data for a month', 'average of data for three months', and 'average of data for a year' (or longer).</p> <p>Further, while CUAC agrees with AEMO (in discussions) that data over time is valuable (e.g. monthly consumption for each of the last X months), we consider that a daily average for a given month (or period) is more informative for consumers than a sum total for a given month (or period). This is for several reasons:</p> <ul style="list-style-type: none"> • Consumers primarily engage with (and are encouraged to engage with) their electricity on a daily basis. Typical reference values are expressed daily, across electricity (kWh per day; dollars per day; tCO₂-e per day), gas (MJ/day), and water bills (L/day; the Victorian "155L daily target" during the drought). Supply charges ("daily charges") are levied per day. A daily average would make the data consistent with other information. • Data from incomplete periods (e.g. months) can be more easily compared with other periods if both periods data' are expressed as daily averages. This applies generally to periods of different lengths, which can be relevant to consumers comparing data from meters read at different intervals. <p>While most consumers should be able to convert a monthly sum total into a daily average, this is not a given. Many consumers have poor</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>numeracy and would benefit from information being presented without further analysis required.</p> <p>CUAC supports requiring only retailers to provide 'time of use' and 'demand/capacity' information in data summaries. Both pieces of information are relevant to consumers only with reference to time periods determined by the retailer - the 'peak' period(s) - and cannot reasonably be provided by distributors.</p> <p>CUAC notes AEMO's proposal to only require retailers to provide demand/capacity information when a consumer is currently on a demand/capacity tariff. We recognise that it would be difficult to specify that a retailer must provide information for a plan the consumer is not currently on, as there may be multiple options from which to choose.</p> <p>However, the summary data format should provide consumers with sufficient information to generally assess the suitability of demand/capacity/time of use tariffs for their household. This can be done via means of a daily load curve (or curves), and should be provided by both retailers and distributors.</p> <p>In our joint submission to the MDPP Consultation Paper, CUAC suggested that data should be summarised across a whole home, rather than separate meters, registers, or elements. Up on further consideration, we no longer hold this view. The intent of the rules is to provide information about metered quantities, and as each meter or register is a separate quantity it should be displayed separately. (Potentially on the same diagram, but disaggregated none-the-less.)</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.2.</p>

Item	Description	Participant Comments	AEMO Response
		<p>Electricity usage from controlled loads is, by definition, not directly determined by the consumer. Nor is this usage commonly charged in the same way that e.g. light & power are. Consumers will therefore benefit from being provided with each piece of information separately. This benefit will likely increase as further elements/registers/meters enter households, e.g. for electric vehicles. While requiring separate display of this information may add to the complexity of the summary, that complexity is function of the household's situation, not the summary. The summary should honestly reflect the household's situation.</p> <p>CUAC very strongly disagrees with AEMO's proposal to define "generation" as "energy sent to the grid". This is not at all the common consumer understanding of "generation" and we strongly urge AEMO to replace this term with "export" or "energy sent to the grid". Use of "generation" is likely to cause great confusion amongst consumers whose total generation (e.g. from solar panels) exceeds their exports, or who export to the grid from batteries completely independently of generation.</p> <p>AGL</p> <p>Clause 4.3(d)VII requires the calculation of the demand / capacity for each day only by the retailer. <i>VIII. Demand/Capacity (if applicable for billing or if requested by a retail customer, or customer authorised representative, and is available).</i> This requirement is to generate a demand period for each <i>Date</i> period, which is defined as the month in which energy usage or demand occurred for remotely read meters only. AGL questions why the <i>Date</i> field specifies remotely read interval meters only. As long as the data is available the process to read</p>	<p>AEMO notes the respondents comments and revised the definition and clause 4.2(d) (viii) A, 4.3(d) (viii) A to clarify the treatment of generation energy flow when measured separately or when combined with energy usage.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>the meter (either remote or manual) should not impact the ability to generate the data. Assuming that this data is calculated for each month for each meter register (e.g. power and controlled load) then the number of data elements required to be produced increases from 24 to 48 or more data elements.</p> <p>AGL considers this rather more data than would be expected to be on a data summary. Further, based on the definitions AGL is not sure how this information would be appropriately presented in the summary table with the consumption data.</p> <p>M2 Energy</p> <p>M2 does not consider that the provision of demand information in the summary format will be practicable. At this stage billing based for small customer is still not a requirement, and there is still no consistent approach to how this will be calculated and applied by distributors. M2 considers that inclusion of this information in the summary reporting at this time is premature and complicates the delivery of the summary by 1/3/2016.</p> <p>M2 Believes that this requirement should be removed from this version of the MDPPs until demand based billing has been implemented.</p> <p>NSW DNSPs</p> <p>The NSW DNSPs would like to clarify if the term “total usage” excludes controlled load and generation? This term should be added to the definitions in Section 1 of the procedure.</p> <p>Momentum Energy</p> <p>(a) Agree where “nature of usage” is defined as Consumption, Controlled Load and Generation. (b) Agree. (c) See commentary for Appendix B. (d) Rule 7.7 Entitlement to metering data and access to metering installation</p> <p>(a) The only persons entitled to access <i>energy data</i> or to receive <i>metering data, NMI Standing Data, settlements ready data</i> or data from the <i>metering register</i> for a <i>metering installation</i> are:</p>	<p>AEMO notes the respondents position and has revised 4.3(d) viii of the procedure.</p> <p>AEMO understands that demand tariffs are being considered by some DNSPs and therefore does not agree it is premature to provide this information.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>(7) a: (i) <i>retail customer of:</i> (A) <i>a retailer</i>, or (B) <i>a Distribution Network Service Provider</i>, or (ii) <i>customer authorised representative</i>, upon request by that <i>retail customer</i> its <i>customer authorised representative</i> to the <i>retailer</i> or <i>Distribution Network Service Provider</i> in relation to that <i>retail customer's metering installation</i>;</p> <p>7.16 Metering data provision to retail customers</p> <p>(c) The metering data provision procedures must: (2) for retail customers for whom interval metering data is available, specify the summary data format, which, at a minimum should include the retail customer's: (i) nature and extent of energy usage for daily time periods; (ii) usage or load profile over a specified period; and (iii) a diagrammatic representation of the information referred to in subparagraph (i);</p> <p>1. Momentum Energy strongly urge AEMO to remove this entire section and apply one set of criteria for both DNSP and Retailer with the removal of any and all billing related data including demand/capacity that is not available through meter data files. The NER7.7 clearly states that the customer and authorised customer representative are only entitled to “data from the metering register for a metering installation” as highlighted above. The inclusion of billing related data is outside the scope of this document and beyond the requirements and permissions granted by the NER7.7.</p> <p>2. Retail participants should not be subject to additional requirements beyond what has been included in the NER as the minimum requirements. Further the retail participant should not be subject to the cost and resourcing that would require in design and development of systems so as to produce information beyond scope of what has been defined as the minimum criteria by the NER.</p> <p>3. As noted in previous discussions between AEMO and retail participants, workshop discussions and emails sent by retail participants to AEMO, the intention of the provision of metering data is to provide the customer with information regarding their usage/generation patterns and not to reconcile or validate billing information or invoicing.</p>	

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>e) 1. Change “Energy Flow Types” to “Energy Usage” and “Total Usage” to “Consumption” as preferred terminology in NER 7.16(2) (i).</p> <p>2. Momentum Energy would support and agree that this is the correct format for both the DNSP and Retailer and is within the scope of the NER and the intention of the AEMC final determination.</p> <p>3. Momentum Energy would also highlight that there is a single rule that applies to all relevant participants (i.e. DNSP and Retailer) in the provision of metering data. Momentum Energy question if it is in the scope of AEMO’s authority to create separate obligations for the provision of information not included in the scope of metering data.</p> <p>AusNet Services</p> <p>Providing data quality indication for interval data over a month or quarter in the summary format raises a number questions in terms of what basis is it provided.</p> <p>Providing quality information for every interval will make the summary table unwieldy. Further, the detailed classification of data quality for every interval is provided in the NEM12 detailed data format file. Therefore, providing the detailed data quality information in the summary format would be duplication of the detailed summary format.</p> <p>If the summary format does not represent the detailed data quality information, how then should data quality be represented? It seems representing interval metering data with one substituted interval as substituted data seems to misrepresent the integrity of the metering data. We understand some retail bills only indicate that the metering data is substituted only if more than 50% of the intervals are substituted.</p> <p><i>Given the number of potential interpretations, AusNet Services suggests the MDPP either clearly define the percentage threshold for classifying data quality or remove the obligation to provide data quality for remotely read interval data from the summary format altogether.</i></p> <p>Dept of Industry and Science</p> <p>The summary format for interval data must be easy to understand and should allow customers to:</p> <ul style="list-style-type: none"> Identify their usage pattern over a day, not just in relation to total usage in periods associated with their current billing arrangements; 	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.2.</p> <p>AEMO notes the respondent’s suggestion. The MDPP requires retailers to include a statement on summary data formats that indicates whether the information presented is based on actual or substituted data. There is no need for the MDPP to define a data quality indication threshold. This is the information the metering data provider sends to the retailer or DNSP.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>VII (A.) Remove billing related components and maintain consistency with information provided by DNSP.</p> <p>VIII – remove demand/capacity requirement. This is per Origin feedback in 1.2.</p> <p>EnerNOC – No comment provided</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>UE – No comment provided</p> <p>Red Energy – No comment provided</p> <p>Lumo Energy – No comment provided</p> <p>ENA – No comment provided</p> <p>ActewAGL – No comment</p> <p>Ergon Energy – No comment provided</p> <p>Energy Tailors – No Comment</p>	
4.4	Detailed data format	<p>Energy Australia</p> <p>EnergyAustralia recommends that the following components of the NEM12 file are only provided to a retail customer or authorised party:</p> <ul style="list-style-type: none"> • NMI data details record (200) excluding the Next Scheduled Read Date field • Interval data record (300) excluding fields such as: 	<p>The NEM12 file is an existing format which provides a good basis for the interval detailed data format since industry stakeholders accept and understand its technical specifications and specifying an existing format may minimise overall costs to retailers and DNSPs in implementing the interval detailed data format. AEMO agrees that a NEM12 file containing a complete set of the 100-900</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<ul style="list-style-type: none"> ○ QualityMethod ○ ReasonCode ○ ReasonDescription ○ UpdateDateTime ○ MSATSLoadDateTime <p>If reference is removed for estimated data within the 300 record there is no reason to provide this level of information to the retail customer or customer authorised representative.</p> <p>UpdateDateTime and MSATSLoadDateTime information is irrelevant to the customer and cannot be populated in the provision of 24 months of data provided in the one file.</p> <p>Hence the following update: (a) The detailed data format for interval metering data provided by a retailer or DNSP must be 200 & 300 record components of the NEM12 file that complies with the Meter Data File Format Specification NEM12 & NEM13 with exclusions.</p> <p>Energy Australia also suggests that the following is not included in the MDPP in line with the AEMC's analysis of 6.1 Rule change proposal:</p> <p>(b) Retailers and DNSPs must make a NEM 12 customer guide available to assist retail customers to understand and interpret the data included in the NEM 12 file. (c) The NEM 12 customer guide must, at a minimum, explain how usage, generation or controlled load is represented in a NEM 12 file in an understandable manner and how to load and open the NEM12 file.</p> <p>When engaging with retail customers and authorised representatives Retailers will provide information in a format to ensure energy literacy, and an understanding of how to interpret the data provided.</p> <p>Hence we believe that there is no need for this obligation. Retailers have the right incentive in a competitive market to ensure customers understand their metering data information.</p>	<p>records specified in the Metering Data File Format NEM12 & NEM13 includes information that retail customers and customer authorised representatives do not require for a retail customer to make more informed choices about their consumption, for example retail service order number.</p> <p>The MDPP has been modified and requires retailers and DNSPs to provide an abridged NEM12 file as the interval detailed data format in response to a retail customer's or customer authorised representative's request. The 200, 300 and 400 NEM12 file records are the minimum records required.</p> <p>The MDPP also allows retailers and DNSPs to provide an alternative format that does not include all of the required NEM12 file records if this is agreed with a retail customer or customer authorised representative.</p> <p>AEMO acknowledges that the NEM12 file, and the abridged version required, is not an easy format for retail customers to understand and access. AEMO expects a limited number of retail customers to request and use this format. These retail customers are likely to be "technically-motivated customers" who have the ability to understand the NEM12 file. Nevertheless, to account for retail customers who may not be familiar with or understand the NEM12 file, the MDPP requires retailers and DNSPs to provide a retail customer guide to help retail customers interpret and understand the detailed data format.</p> <p>Since the retail customer guide may include information specific to each retailer and DNSP, and</p>

Item	Description	Participant Comments	AEMO Response
		<p>6 General information about electricity consumption data</p> <p>6.1 Rule change proposal</p> <p>The COAG Energy Council proposed that retailers and distributors be required to make information available to customers outlining who may obtain data obtained from the meter and for what purposes electricity consumption data is used.</p> <p>In particular, the rule change proposed that:</p> <ul style="list-style-type: none"> • the AER develop 'metering data common terminology' guidelines. These common terms would relate to how electricity consumption data is used in the NEM by retailers and any other parties. The purpose of the guidelines would make the information published on retailer and DNSP websites uniform across industry. These guidelines would act as a form of template for retailers and DNSPS to use for their website disclosures. <p>6.4 Analysis</p> <p>In evaluating this proposal, we note that the Seed Advisory report commissioned by the COAG Energy Council did not specifically recommend publishing information on retailers and DNSPs' websites nor recommended that meter data common terminology guidelines be published.</p> <p>ERAA</p> <p>The ERAA is concerned that AEMO did not adequately take into account individual retailer concerns in developing the Draft Procedures</p>	<p>this information (for example, how it treats multiple data streams) can be changed by retailers and DNSPs, AEMO considers it is more appropriate for each retailer and DNSP to produce the retail customer guide.</p> <p>AEMO notes the respondent's position on the verification requirements included in the Draft MDPP. The information the respondent is referring is not relevant to the MDPP requirements set out in section 2.1 of the MDPP. These requirements do not seek to make the information published by retailers and DNSPs uniform, instead they require retailers and DNSPs to publish the verification information they require for a valid request.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>and that individual member submissions have been largely ignored to date.</p> <p>As the format for detailed data must be provided by both retailers and network service providers, the ERAA supports a minimum data format based on a sub-set of the NEM12 file data. The ERAA believes that the data should be based on suffix data as this is the purest form of the data retailers receive from metering data providers. Additional data provision, which is data not contained within the metering file, should not be covered by the rule change.</p> <p>The ERAA and its members would welcome the opportunity to work with AEMO to <u>further develop and finalise definitions</u> and output files that will be published in the final procedures developed by AEMO. In relation to the development and publication of a guide to the data, the ERAA would support AEMO, in consultation with industry, developing and publishing a standard guide for all customers and their authorised representatives. The development of this guide at an individual business level is not efficient and could have negative outcomes with respect to overall consumer experience.</p> <p>CUAC</p> <p>CUAC notes AEMO's proposal to specify minimum requirements for summarised data formats rather than specify a fully standardised format. As representing complex information well is difficult, we encourage AEMO to provide (or refer to) 'best practice' examples for summary formats. Consumers will benefit more when retailers and distributors focus 'upward' to meet a great example than when they focus 'downward' on the minimum required of them.</p> <p>CUAC strongly supports AEMO's proposal to standardise the interval data format. We have no strong opinion on which format is preferable, but note that in discussions most stakeholders appeared satisfied with the NEM12 format. CUAC has no objections to the NEM12 format.</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.4. Further, AEMO has continued to engage with retailers on the issues they have raised.</p> <p>The MDPP provides examples summary data formats.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.4.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>We strongly welcome AEMO's proposal to require retailers and distributors to provide a guide to help retail customers understand the NEM12 file. While we do not expect many consumers to attempt to analyse the file themselves, a guide will greatly assist those who do.</p> <p>Energy Tailors</p> <p>Please refer to comments in Section #3.3 above. We also point out that in order for the customer guide to be understandable by customers, there should be a relatively simple relationship between the file format and its interpretation. In particular we are concerned that <i>retailers</i> may provide instructions along the lines of:</p> <p>IF you are with Distributor X, then interpretation is: A, B, C IF you are with Distributor Y, then interpretation is: D, E, F</p> <p>As they may simply provide the NEM12 file that they receive from <i>DNSPs</i>. In our view, this does not comply with #4.4 c) to explain the file in an understandable manner.</p> <p>AGL</p> <p>Clause 4.4(a) specifies that the detailed data format which should be produced by retailers and DNSPs is the NEM 12/NEM13 format.</p> <p>The NEM 12/13 file formats are used within industry and contain far more information than just consumption. A lot of the information contained within the files relates to the provision of data and supporting information for use between DNSPs and retailers.</p> <p>For example, NEM 12/13 files contain information relating to:</p> <ul style="list-style-type: none"> • Record 100 - File creation time and date • Record 200 - NMI configuration • Information such as next scheduled read date (the quarterly date) which is a hangover from historic systems and irrelevant for interval data; • Record 300 – Interval Data • Consumption data which is relevant to customers; 	<p>AEMO notes the respondent's comment.</p> <p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.4.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<ul style="list-style-type: none"> • Reason Code & Reason description which has no relevance to customers; • Update Date Time and MSATS Load Date Time which has no relevance to customers; • Record 400 – Interval Event • Identifies the quality of each element of interval data; • Record 500 – B2B Details • Transaction Code; • Retailer service Order; • Index Read; <p>These file formats provide a substantial amount of information which AGL believes would be unnecessary and unhelpful for a customer.</p> <p>Further, these file formats are complex to produce and retailers rarely keep a majority of the information once the consumption information has been stored, as the information relates to the creation and transportation of the file.</p> <p>If retailers are required to produce these files then it will require substantial costs to build new servers to store this additional information and substantial costs to DNSPs to provide data dumps from DNSPs to retailers to provide two years of this data to retailers, assuming that it can be reproduced, which is unlikely.</p> <p>NSW DNSPs</p> <p>Rather than the production of many guides, the NSW DNSPs suggest that AEMO develop this guide in conjunction with the Participants. This would allow for consistency in approach and customer consultation on the appropriateness of an industry guide.</p> <p>Momentum Energy</p> <p>AEMC Final Determination 5.1.4: “We evaluated whether a single standardised summary data format and detailed data format should be developed by AEMO in the metering data provision procedures and uniformly applied across the NEM.⁹⁵ However, we decided not to adopt this approach. We considered that AEMO’s metering data provision procedures should set out minimum requirements</p>	<p>AEMO notes the respondent’s position. Since the retail customer guide may include information specific to each retailer and DNSP, and this information (for example, how it treats multiple data streams) can be changed by retailers and DNSPs, AEMO considers it is more appropriate for each retailer and DNSP to produce the retail customer guide.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response								
		<p>with respect to format that would ensure customers receive their data in an understandable manner.”</p> <p>Momentum Energy concur with several other retail participants that the adoption of the NEM12 file as the minimum specification is not conducive to the customer experience or that a standard file format is the intention of the AEMC’s determination on the matter.</p> <p>The creation of a standardised format and use of the NEM12 file format as that standard is inappropriate for the following reasons:</p> <ul style="list-style-type: none"> • A standardised approach contravenes the AEMC’s determination • It contains substantial amounts of data that is not relevant, understandable or fit for purpose. • It requires retail participants to re- construct files that are produced by providers with specific accreditations, qualifications and expertise to provide which the retail business does not have. • It requires retail participants to invest significant funds and resources that in many cases would not have been included when forecasting and appropriating budgeted funds, for the purpose of developing systems and architecture to support the storage and construction of the detailed files. <p>Momentum Energy consider that while the NEM12 file contains the data that is required to provide these type of files, that it would be more appropriate to nominate a sub-set of the NEM12 file elements as the source of extraction into a minimum specification .csv file format.</p> <p>Examples of data that is used by industry that Momentum Energy considers not relevant to customers or their authorised representatives:</p> <table border="1" data-bbox="654 986 1532 1390"> <thead> <tr> <th data-bbox="663 992 1093 1040">Record</th> <th data-bbox="1102 992 1523 1040">Fields/Elements</th> </tr> </thead> <tbody> <tr> <td data-bbox="663 1046 1093 1200">100 – Header Record</td> <td data-bbox="1102 1046 1523 1200">VersionHeader DateTime FromParticipant ToParticipant</td> </tr> <tr> <td data-bbox="663 1206 1093 1264">200 – NMI Data Details</td> <td data-bbox="1102 1206 1523 1264">NextScheduledReadDate</td> </tr> <tr> <td data-bbox="663 1270 1093 1383">500 – B2B Details</td> <td data-bbox="1102 1270 1523 1383">TransCode RetServiceOrder ReadDateTime IndexRead</td> </tr> </tbody> </table>	Record	Fields/Elements	100 – Header Record	VersionHeader DateTime FromParticipant ToParticipant	200 – NMI Data Details	NextScheduledReadDate	500 – B2B Details	TransCode RetServiceOrder ReadDateTime IndexRead	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4.</p>
Record	Fields/Elements										
100 – Header Record	VersionHeader DateTime FromParticipant ToParticipant										
200 – NMI Data Details	NextScheduledReadDate										
500 – B2B Details	TransCode RetServiceOrder ReadDateTime IndexRead										

Metering Data Provision Procedures Package

Item	Description	Participant Comments		AEMO Response
		<p>400 – Interval Event</p>	<p>Only required what quality is flagged as “V” (variable) or “A” with specific event/reason codes. This information is overly complex and not considered useful information for the intended customer’s purpose.</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4.</p>
		<p>AusNet Services</p> <p>4.4(a) We support the use of the NEM12 file as a format for providing detailed interval metering data, but consider the inclusion of “500 records” within the NEM12 file provided for a request should be optional. The “500 records” provide information regarding B2B Service Orders between the retailer and service providers. This information is in no way required to understand the energy usage of retail customer. Further, the DNSP is the recipient of the meter data provided the MDP. If the MDP is not storing metering data on behalf of the DNSP, it would be more efficient for DNSPs to only store usage data and not the information contained in the “500 records” within the NEM12 file.</p> <p>AusNet Services recommends changing the MDPP to allow the DNSPs and retailers to provide a NEM12 file without including the “500 records”.</p> <p>ENA</p> <p>ENA supports the use of the NEM12 file as a format for providing detailed interval metering data, but consider the inclusion of “500 records” within the NEM12 file provided for a request should be optional. The “500 records” provide information regarding B2B service orders between the retailer and service providers, not customer information.</p> <p>Further, the DNSP is the recipient of the meter data provided the MDP. If the MDP is not storing metering data on behalf of the DNSP, it would be more efficient for DNSPs to only store usage data and not the information contained in the “500 records” within the NEM12 file.</p> <p>Dept of Industry and Science</p> <p>The Department supports the proposed use of the NEM 12 format for the detailed data format and the provision of a user guide. This should reduce cost in the development of information services by using one standardised format already used by AEMO to provide data to market participants.</p>		

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>The AEMC evaluated in the Final Determination whether a single standardised summary data format and detailed data format should be developed by AEMO in the metering data provision procedures and uniformly applied across the NEM. However, the AEMC decided not to adopt this approach and considered that the Procedure should set out minimum requirements with respect to format that would ensure customers receive their data in an understandable manner. The Final Determination also noted that AEMO's Procedure could then address the necessary details and respond with more flexibility to changes in technology and customer preferences.⁵</p> <p>Lumo Energy question that decision by AEMO to prescribe NEM12 as a uniform format. There is a substantial amount of information contained within a NEM12 that is not relevant. For example:</p> <p><u>Record 100 - File creation time and date</u></p> <p>Is it expected that a retailer would generate this based on when the customer file is generated, rather than the date / time the meter read file was generated? Or is this the date/time that the file naming convention detailed in clause 3.3(b)?</p> <p><u>Record 200 - NMI configuration</u></p> <p>e.g...E1, B1, N1 Next schedule Read date(NSRD)</p> <p>Which NSRD should be provided? And why is providing historical NSRD considered relevant information?</p> <p><u>Record 300 – Interval Data</u></p> <p>Reason Code & Reason description– relevance for provisioning the substitution code?</p> <p>Update Date Time and MSATS Load Date Time – relevance for provisioning date and time fields</p> <p><u>Record 400 – Interval Event</u></p> <p>Determining the quality method for interval data.</p> <p>E.g. Intervals 1 to 26 are actual and 27 to 48 are substituted.</p> <p>Complex information not normally maintained in retail billing systems</p> <p><u>Record 500 – B2B Details</u></p> <p>Transaction Code, Retailer service Order, Index Read</p>	

⁵ Section 5.1.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Lumo Energy is supportive of the concept of setting out minimum requirements with respect to format that would ensure customers receive their interval data in an understandable manner.</p> <p>We do not consider that the NEM12 meets this requirement. Retailers do not create a NEM12 file. Placing an obligation onto a retailer to recreate a full NEM12 file will require significant IT development and/or individual interrogation. An alternative approach could be setting a sub-set of the NEM12 file as the minimum. For example components of Record 200,300,400 may be more appropriate.</p> <p>Red Energy</p> <p>The AEMC evaluated in the Final Determination whether a single standardised summary data format and detailed data format should be developed by AEMO in the metering data provision procedures and uniformly applied across the NEM. However, the AEMC decided not to adopt this approach and considered that the Procedure should set out minimum requirements with respect to format that would ensure customers receive their data in an understandable manner. The Final Determination also noted that AEMO's Procedure could then address the necessary details and respond with more flexibility to changes in technology and customer preferences.⁶</p> <p>Red Energy question that decision by AEMO to prescribe NEM12 as a uniform format. There is a substantial amount of information contained within a NEM12 that is not relevant. For example:</p> <p><u>Record 100 - File creation time and date</u></p> <p>Is it expected that a retailer would generate this based on when the customer file is generated, rather than the date / time the meter read file was generated? Or is this the date/time that the file naming convention detailed in clause 3.3(b)?</p> <p><u>Record 200 - NMI configuration</u></p> <p>e.g....E1, B1, N1 Next schedule Read date(NSRD)</p> <p>Which NSRD should be provided? And why is providing historical NSRD considered relevant information?</p> <p><u>Record 300 – Interval Data</u></p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.4.</p>

⁶ Section 5.1.4 of AEMC Final Rule Determination National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Reason Code & Reason description– relevance for provisioning the substitution code?</p> <p>Update Date Time and MSATS Load Date Time – relevance for provisioning date and time fields</p> <p><u>Record 400 – Interval Event</u></p> <p>Determining the quality method for interval data. E.g. Intervals 1 to 26 are actual and 27 to 48 are substituted. Complex information not normally maintained in retail billing systems</p> <p><u>Record 500 – B2B Details</u></p> <p>Transaction Code, Retailer service Order, Index Read</p> <p>Red Energy is supportive of the concept of setting out minimum requirements with respect to format that would ensure customers receive their interval data in an understandable manner.</p> <p>We do not consider that the NEM12 meets this requirement. Retailers do not create a NEM12 file. Placing an obligation onto a retailer to recreate a full NEM12 file will require significant IT development and/or individual interrogation. An alternative approach could be setting a sub-set of the NEM12 file as the minimum. For example components of Record 200,300,400 may be more appropriate.</p> <p>EnerNOC</p> <p>The current NEM12 standard would accommodate all requirements</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>UE</p> <p>UE support the old clause 2.1 relating to the NERR requirements being removed. However this does mean for a non NECF jurisdiction there is now no minimum requirement for the data file time period. UE recommend that the interval data file be specified to be a minimum of 1 year of interval meter data in Victoria which allows upload into the MPP (My Power Planner). Providing a minimum of 1 years data compared to 2 years data avoids the need for the informed consent of customers in 4.5 (d) to a reduced data file size or below the minimum requirements. UE strongly recommend that the minimum requirements be specified for Victoria as 1 year of interval meter data to facilitate the use of MPP.</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4.</p> <p>AEMO notes the respondent’s position. The MDPP will only refer to AEMO’s requirements under the National Electricity Rules.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>ActewAGL – No comment</p> <p>M2 Energy – No comment provided</p> <p>Ergon Energy – No comment provided</p>	
4.4 (b)	(b) Retailers and DNSPs must make a NEM 12 customer guide available to assist retail customers to understand and interpret the data included in the NEM 12 file.	<p>AGL</p> <p>Clause 4.4(b) of the AEMO procedure requires: <i>(b) Retailers and DNSPs must make a NEM 12 customer guide available to assist retail customers to understand and interpret the data included in the NEM 12 file.</i></p> <p>While AGL can understand the value in having a guide to assist customers in understanding the detailed interval data, AGL notes that the AEMC specifically considered and rejected the concept of requiring a guide to be produced in its Rule making process. In its Final Determination, the AEMC stated: <i>The final NERR rule will not require retailers and DNSPs to place information on their websites about how metering data is used and will not therefore require AER to develop 'metering data common terminology guidelines'.</i></p> <p>The AEMC also considered other issues relating to consumer information and determined that producing guides was not an effective response.</p> <p>AGL reasonably concludes that the requirement to develop appropriate guides was therefore considered and dismissed when the Rule was made, and is therefore not appropriate for the procedures.</p> <p>However, should a guide still be considered of value, AGL does not believe that it is efficient or cost effective for 39 Participants (retailers and DNSPs) to each separately produce and maintain the same guide for the same data file format, as this would not meet the NEO objective of efficient investment and operation of electricity services in the long interests of consumers.</p> <p>Rather, if such a guide is deemed necessary or of value, then it would be more appropriate for one party, such as AEMO, to</p>	<p>AEMO notes the respondent's position. Since the retail customer guide may include information specific to each retailer and DNSP, and this information (for example, how it treats multiple data streams) can be changed by retailers and DNSPs, AEMO considers it is more appropriate for each retailer and DNSP to produce the retail customer guide.</p> <p>The information the respondent is referring is not relevant to the MDPP requirements set out in section 2.1 of the MDPP. The information that must be included in the retail customer guide is to assist retail customers.</p>

Item	Description	Participant Comments	AEMO Response
		<p>produce and maintain such a guide which all participants could refer to.</p> <p>Momentum Energy</p> <p>2.3 Final rule determination</p> <p>“The final NERR rule will not require retailers and DNSPs to place information on their websites about how metering data is used and will not therefore require AER to develop 'metering data common terminology guidelines’”</p> <p>On the basis of the above determination and that Momentum Energy do not support the standardisation and use of the NEM12 file to be the appropriate approach, we do not support the inclusion of this obligation. Further, the NER, NERR do not require retail participants to publish a document of this nature.</p> <p>AGL appropriately challenged this requirement and expressed concern that multiple versions of this document would result in confusion and it was suggested that if this document is to be considered as a useful and beneficial in contributing to the NEO, then it would be a more appropriate approach for AEMO to produce and maintain a single document for industry reference which participants could publish on their own websites for customer access. Momentum Energy supports this view.</p> <p>AusNet Services</p> <p>4.4(b) The draft MDPP includes an obligation on Retailers and DNSPs to publish a customer guide to assist customers in understanding and interpreting their NEM12 file, including explaining how usage, generation or controlled load are represented and to open and load the NEM12 file. We suggest it is not efficient for each and every DB to provide their own customer guide on understanding NEM12 files. Further, we consider there should be a single interpretation of how usage, generation and controlled load are represented. Having a customer guide for each business will lead to anything but consistency.</p> <p>AusNet Services suggests that AEMO should develop and publish a customer guide to the NEM12 file for the benefit of the industry.</p> <p>ENA</p> <p>4.4(b) The draft MDPP includes an obligation on Retailers and DNSPs to publish a customer guide to assist customers in understanding and interpreting their NEM12 file, including explaining how usage, generation or controlled load are represented and to open and load the NEM12 file. It</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4(b).</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4(b).</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
4.4 (c)	(c) The NEM 12 customer guide must, at a minimum, explain how usage, generation or controlled load is represented in a NEM 12 file in an understandable manner and how to load and open the NEM12 file.	<p>AusNet Services</p> <p>4.4(c) Providing information on how to load and open NEM12 files will invariably involve specific applications, and toolsets. Having obligations to include this in a customer guide may include application specific instructions. Rather than providing operating instructions for using specific instructions it may be better to list some applications that can open the files.</p> <p>AusNet Services suggests replacing the words “and how to load and open the NEM12 file” with “and provide examples of applications that can open the NEM12 file”.</p> <p>ENA</p> <p>4.4(c) Providing information on “how to load and open the NEM12 file” will invariably involve applications, and toolsets. Having obligations to include this in a customer guide in any more than an illustrative example seems overly onerous. This phrase should be deleted.</p> <p>Lumo Energy</p> <p>As stated in our response to clause 4.4(b) Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP’s to develop a NEM12 customer guide. It is on this basis that we request AEMO delete clause 4.4(c) from the Metering Data Provision Procedures. Alternatively, as AEMO currently produce and publish Meter Data File Format Specification NEM12 and NEM13, as well as NEM12 and NEM13 File Format Clarifications. Lumo Energy consider that if AEMO considers it necessary for a NEM12 customer guide to be made available then it would be more efficient for AEMO to produce a customer guide to assist retail customer or customer authorised representatives understand and interpret the data.</p> <p>Red Energy</p> <p>As stated in our response to clause 4.4(b) Red Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP’s to develop a NEM12 customer guide. It is on this basis that we request AEMO delete clause 4.4(c) from the Metering Data Provision Procedures. Alternatively, as AEMO currently produce and publish Meter Data File Format Specification NEM12 and NEM13, as well as NEM12 and NEM13 File Format Clarifications. Red Energy consider that if AEMO considers it necessary for a NEM12</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4.</p> <p>AEMO notes the respondent’s position and has revised 4.4 (c).</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.4.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4(b).</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.4(b).</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		customer guide to be made available then it would be more efficient for AEMO to produce a customer guide to assist retail customer or customer authorised representatives understand and interpret the data.	
4.5	Ability to offer alternative metering data formats	<p>Energy Australia</p> <p>Energy Australia suggests that the following is not included in the MDPP in line with the AEMC's analysis of 6.1 Rule change proposal:</p> <p>(c) The customer guide must, at a minimum, explain in an understandable manner how usage, generation or controlled load is represented in an alternative file, and how to load and open the alternative file.</p> <p>When engaging with retail customers and authorised representatives Retailers will provide information in a format to ensure energy literacy, and an understanding of how to interpret the data provided.</p> <p>6 General information about electricity consumption data 6.1 Rule change proposal</p> <p>The COAG Energy Council proposed that retailers and distributors be required to make information available to customers outlining who may obtain data obtained from the meter and for what purposes electricity consumption data is used.</p> <p>In particular, the rule change proposed that:</p> <ul style="list-style-type: none"> • the AER develop 'metering data common terminology' guidelines. <p>These common terms would relate to how electricity consumption data is used in the NEM by retailers and any other parties. The purpose of the guidelines would make the information published on retailer and DNSP websites uniform across industry. These guidelines would act as a form of template for retailers and DNSPS to use for their website disclosures.</p> <p>6.4 Analysis</p> <p>In evaluating this proposal, we note that the Seed Advisory report commissioned by the COAG Energy Council did not specifically recommend publishing information on retailers and DNSPs' websites nor recommended that meter data common terminology guidelines be published.</p>	AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.4(b).

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Hence we believe that there is no need for this obligation. Retailers have the right incentive in a competitive market to ensure customers understand their metering data information.</p> <p>NSW DNSPs</p> <p>Clause (a) amendments The NSW DNSPs suggest rewording of this clause to be "A retailer or DNSP may offer a retail customer or a customer authorised representative an alternative metering data format provided informed consent is obtained from a retail customer or customer authorised representative before providing the alternative metering data file."</p> <p>Clause (d) amendments The NSW DNSPs suggest rewording of this clause to be "A retail customer or customer authorised representative may agree to an alternative metering data file format from the retailers and distributors where that format is below the minimum requirement."</p> <p>Momentum Energy Revision of this clause to permit agreement by the DNSP or Retailer to offer: ".../ a retailer or DNSP may agree to offer a retail customer and/or a customer authorised representative an alternative metering data format."</p> <p>Origin Energy (d). Include wording that providing an lternative metering data file may be subject to a reasonable charge</p> <p>Lumo Energy Lumo Energy note that the retail customer or customer authorised representative may request a retailer or DNSP to offer an alternative metering data format. However, the clause does not permit a retailer or DNSP to agree to offer the alternative metering data format. Lumo Energy suggest the following amendment: (a) For either a summary or detailed metering data format, where a retail customer or customer authorised representative requests an alternative metering data format that does not meet the minimum metering data requirements specified in these Procedures, a retailer or DNSP may agree to offer a retail</p>	<p>The MDPP clarifies:</p> <ul style="list-style-type: none"> ▪ Where a retailer or DNSP is providing less than the MDPP minimum requirements to a retail customer or customer authorised representative, the retailer or DNSP must obtain the retail customer’s or customer authorised representative’s informed consent. ▪ Where a retailer or DNSP is providing more than the MDPP minimum requirements to a retail customer or customer authorised representative, the retailer or DNSP must obtain the retail customer’s or customer authorised representative’s agreement. <p>Inclusion of “agree to” is superfluous as “may” in this context indicates a retailer’s or DNSP’s discretion.</p> <p>AEMO considers issues relating to the right to charge for providing metering data as outside the scope of the MDPP.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.5.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>'A retail customer or customer authorised representative may agree to an alternative metering data file format from the retailers and distributors where that alternative is below the minimum requirement.'</p> <p>SA Power Network - No comment provided Citipower / Powercor - No comment provided Dept of Industry and Science – No comment provided ActewAGL – No additional comment M2 Energy – No comment provided Ergon Energy – No comment provided Energy Tailors – No Comment ERAA – No comment provided CUAC – No comment provided</p>	
	<p>(b) Retailers and DNSPs must make a customer guide available to assist retail customers understand and interpret the data included in the alternative file.</p>	<p>AGL</p> <p>AGL also notes that there is a similar requirement to provide a guide associated with the provision of an alternative data format, clause 4.5(b). AGL believes that this requirement will stifle the provision of alternative formats as it will impose a substantial additional cost and time penalty on what is potentially a single request.</p> <p>AGL expects that if a party has the capability and knowledge to request a particular format then they have the necessary understanding of how to use that format, and therefore a supporting guide would be superfluous.</p> <p>Also, clause 4.5(d) requires the retailer or DNSP to obtain <i>Explicit Informed Consent</i> for an alternative format. As metering data is considered personal data, AGL would expect all requests are made on the basis of <i>Explicit Informed Consent</i> and do not see why this clause is specifically included here.</p> <p>Momentum Energy</p> <p>Momentum Energy do not support the inclusion of this obligation as it is not a prescribed obligation supported by the NER, NERR or Final Determination and is beyond the scope of AEMO's delegation to include this obligation in the MDPP. Momentum Energy note that this a similar</p>	<p>AEMO notes the respondent's position and refers to AEMO's statement provided in item 4.5.</p> <p>AEMO notes the respondent's position and considers this is within its scope.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>obligation to that contained in 4.4 (b) and would refer AEMO to detailed commentary at 4.4(b).</p> <p>Lumo Energy As stated in our response to clause 4.4(b), Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP's to develop a customer guide. It is on this basis that we request AEMO delete clause 4.5(b) from the Metering Data Provision Procedures.</p> <p>Red Energy As stated in our response to clause 4.4(b), Red Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP's to develop a customer guide. It is on this basis that we request AEMO delete clause 4.5(b) from the Metering Data Provision Procedures.</p>	<p>AEMO notes the respondent's position and considers this is within its scope.</p> <p>AEMO notes the respondent's position and and considers this is within its scope.</p>
	<p>(c) The customer guide must, at a minimum, explain in an understandable manner how usage, generation or controlled load is represented in an alternative file, and how to load and open the alternative file.</p>	<p>Momentum Energy Momentum Energy do not support the inclusion of this obligation as it is not a prescribed obligation supported by the NER, NERR or Final Determination and is beyond the scope of AEMO's delegation to include this obligation in the MDPP. Momentum Energy note that this a similar obligation to that contained in 4.4 (b) and would refer AEMO to detailed commentary at 4.4(b).</p> <p>AusNet Services 4.5(c) Providing information on how to load and open the alternative file will invariably involve specific applications, and toolsets. Having obligations to include this in a customer guide may include application specific instructions. Rather than providing operating instructions for using specific instructions it may be better to list some applications that can open the files. <i>AusNet Services suggests replacing the words "and how to load and open the alternative file" with "and provide examples of applications that can open the alternative file".</i></p> <p>Lumo Energy As stated in our response to clause 4.4(b) and 4.5(b), Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP's to develop a customer</p>	<p>AEMO notes the respondents position and and considers this is within its scope.</p> <p>AEMO agrees with the respondent's feedback and has amended the MDPP accordingly.</p> <p>AEMO notes the respondent's position and and considers this is within the MDPP's scope.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>guide. It is on this basis that we request AEMO delete clause 4.5(c) from the Metering Data Provision Procedures.</p> <p>Red Energy</p> <p>As stated in our response to clause 4.4(b) and 4.5(b), Red Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP’s to develop a customer guide. It is on this basis that we request AEMO delete clause 4.5(c) from the Metering Data Provision Procedures.</p>	<p>AEMO notes the respondent’s position and and considers this is within the MDPP’s scope.</p>
	<p>(d) Retailers and DNSPs must obtain informed consent from a retail customer or customer authorised representative before providing an alternative metering data file.</p>	<p>Momentum Energy</p> <p>One of the key intentions in the implementation of the rule change to allow customers and their authorised representative access to metering data, was not to over complicate and over prescribe the format in the interests of promoting innovation amongst participants hence, the MDPP is intended to support a minimum specification that would allow participants to be innovative in developing alternative solutions as technology and systems are developed.</p> <p>Momentum Energy cannot locate any documentary evidence to the contrary that states participants are required to “obtain informed consent from a retail customer or customer authorised representative before providing an <i>alternative</i> metering data file”.</p> <p>It should also be noted that alternative formats developed by DNSP and Retail participants would only be developed with a criteria that is above and beyond the minimum specification requirements (as is the intention) set in this document as to provide less would be a breach of obligation and Momentum Energy consider the inclusion of the obligation to be moot.</p> <p>AusNet Services</p> <p>4.5(d) The obligation to obtain informed consent creates a higher burden than just having an obligation to respond to a request. This higher burden may be appropriate for requests that originate from the retail customer in terms of protecting customers. Conversely, customer authorised representatives are likely to be commercial or community funded organisations with some level of sophistication. As such, they are not likely to need this level of protections.</p> <p>AusNet Services recommends modifying section 4.5(d) to remove reference to customer authorised representatives.</p> <p>ENA</p>	<p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.5.</p> <p>AEMO notes the respondent’s position and refers to AEMO’s statement provided in item 4.5.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>“Informed consent” should be removed in clause 4.5 (d) and replaced with ‘may agree’. “Informed consent “is a defined term and is not reasonable in this context. ENA accepts that there needs to be agreement with the customer where the data being provided is below the minimum requirements in the MDP Procedure. However there should be no need for customer consent where a data file is above the minimum requirements and seeks to provide better information to the customer. The clause should be redrafted as:</p> <p>‘A retail customer or customer authorised representative may agree to an alternative metering data file format from the retailers and distributors where that format is below the minimum requirement.’</p> <p>Lumo Energy</p> <p>The Final Determination, and the obligations within the NER and NERR established that the metering data provision procedures were to provide a minimum format for summary and detailed data to customers or their authorised representatives upon request. This was to allow for innovation by retailers and DNSPs. For example, retailers or DNSP’s may choose to have summary or detailed data displayable on a Portal. Lumo Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP’s that requires retailers and DNSP’s to obtained informed consent from a retail customer or customer authorised representative.</p> <p>It is on this basis that we request AEMO delete clause 4.5(d) from the Metering Data Provision Procedures.</p> <p>Red Energy</p> <p>The Final Determination, and the obligations within the NER and NERR established that the metering data provision procedures were to provide a minimum format for summary and detailed data to customers or their authorised representatives upon request. This was to allow for innovation by retailers and DNSPs. For example, retailers or DNSP’s may choose to have summary or detailed data displayable on a Portal. Red Energy is unable to locate any obligation within the NER, the NERR or the Final Determination that requires retailers and DNSP’s that requires retailers and DNSP’s to obtained informed consent from a retail customer or customer authorised representative.</p> <p>It is on this basis that we request AEMO delete clause 4.5(d) from the Metering Data Provision Procedures.</p>	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.5.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.5.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
5	OTHER COMMENTS	<p>Energy Tailors</p> <p>Energy Tailors welcomes the opportunity to respond to the second round consultation for the Meter Data Provision Procedures. We have been engaged in this process from when the AEMC rule change ERC0171 <i>Customer Access to Information about their Energy Consumption</i> was initiated.</p> <p>Unfortunately, we believe that the intentions behind the rule change ERC0171 have been neutered by a lack of standardisation and simplification in the AEMO procedures for obtaining the energy consumption information. In particular, by making it difficult and non-standardised for customers and <i>customer authorised representatives</i> to make the request, <i>retailers</i> and <i>DNSPs</i> are effectively putting up a significant barrier for those requests to be made. This is not in the long-term interests of customers and is contrary to the intent of the rule change which explicitly foresees increased involvement by <i>customer authorised representatives</i> on a customer's behalf.</p> <p>Furthermore, we believe that the AEMO draft procedures are strongly weighted in favour of existing industry participants, who have a vested interest in seeing less requests for energy consumption information. As this procedure is for the benefit of customers and <i>customer authorised representatives</i>, we would have expected a much stronger emphasis to be placed on what customers and <i>customer authorised representatives</i> require.</p> <p>Energex</p> <p>Energex appreciates the opportunity to provide a submission on the Australian Energy Market Operator's (AEMO's) draft report and determination on the Metering Data Povision Procedures (the Procedures).</p> <p>Energex generally supports AEMO's proposed amendments to its initial draft Procedures, particularly those amendments relating to identification and verification of customers and removal of the requirement for Distribution Network Service Providers (DNSPs) to provide retail tariff information. However, Energex does not agree with AEMO's decision not to mandate a standardised format for retailers and DNSPs to deliver accumulation and interval metering data to retail customers or customer authorised representatives.</p>	<p>AEMO supports making infomation easier for customers to access and understand in order to make better and more informed choices about energy products and services.</p> <p>The MDPP makes provision for the provision of innovative services. The interval detailed data format, whether requested by the retail customer or customer authorised representative, is most likely to be used in a third parties comparison website to assess whether the retail customer has better pricing offers available to them. However, there may also be circumstances when a retail customer wishes to assess their own consumption patterns without the assistance of a third party.</p> <p>AEMO agrees that the MDPP should require a standard detailed data format to be provided to retail customers and customer authorised representatives. Further, AEMO agrees with stakeholders that an existing industry format needs to be specified as there is insufficient time to develop this further and little incremental benefit in doing so. The NEM12 file provides the necessary minimum metering data that customer authorised representatives need and retail customers could use. This is a format that is used by all retailers and DNSPs, whereas the My Power Planner files are only used by those operating in Victoria.</p> <p>The MDPP will require one NEM12 file to be provided as the interval detailed data format in response to a retail customer's or customer authorised representative's request. Additionally, retailers and DNSPs will be required to make a customer guide available to assist retail customers to understand and interpret the data included in the NEM 12 file, retailers and DNSPs must provide a</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Energex remains firmly of the view that it is important, from a customer service perspective, that data provided to customers or their authorised representatives should be presented in a format that is nationally consistent, easy to interpret and understand and that facilitates further analysis of metering data for market comparison purposes. A non-standard approach to data formatting would potentially increase the likelihood of confusion and misinterpretation and would make market comparison by customers or their authorised representatives more difficult.</p> <p>Furthermore, while it is appreciated that some retailers and DNSPs are already providing this metering information to customers and that changes to their current formatting may therefore be necessary if a standard format is imposed, Energex considers that it would be more efficient and less costly to implement a standardised data format at this time rather than introduce such a requirement at a later date.</p> <p>Momentum Energy</p> <p>It is noted that AEMO have not provided an example of the Interval Detailed Data Format. In the interest of consistency, Momentum Energy considers that the inclusion of an example should be considered.</p> <p>Lumo Energy</p> <p>If AEMO considers it valuable to industry to provide examples for the summary data formats, the same approach should be taken to the CSV format.</p> <p>Red Energy</p> <p>If AEMO considers it valuable to industry to provide examples for the summary data formats, the same approach should be taken to the CSV format.</p> <p>EnerNOC – No comment provided</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>UE – No comment provided</p> <p>Origin Energy – No comment provided</p> <p>Dept of Industry and Science – No comment provided</p>	<p>guide that, at a minimum, explains usage, generation or controlled load.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>ENA – No comment provided</p> <p>AusNet Services – No comment provided</p> <p>ActewAGL – No comment provided</p> <p>NSW DNSPs – No comment provided</p> <p>M2 Energy – No comment provided</p> <p>Ergon Energy – No comment provided</p> <p>AGL – No comment provided</p>	
Appendix A	<p>ACCUMULATED METERING DATA SUMMARY FORMAT</p>	<p>AGL</p> <p>The specification for the Accumulated Metering Data file uses headers labelled <i>From Date</i> and <i>Read Date</i> to represent customer meter reading periods. Many retailers use the terminology of <i>From date</i> and <i>To date</i> to represent the start and finish dates for a customer’s current billing period.</p> <p>The definition of Read Date may be incorrect for a number of customers if their meter was not read, but the consumption was estimated. AGL believes that for ease of customer understanding the terminology of <i>From</i> and <i>To date</i> is more understandable for customers.</p> <p>Lumo Energy</p> <p>Please ensure that the Appendices are marked as examples only and therefore not obligations as stated in clause 4.2(c) and 4.3(c).</p> <p>Red Energy</p> <p>Please ensure that the Appendices are marked as examples only and therefore not obligations as stated in clause 4.2(c) and 4.3(c).</p> <p>EnerNOC – No comment provided</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>UE – No comment provided</p> <p>Origin Energy – No comment provided</p> <p>Dept of Industry and Science – No comment provided</p>	<p>AEMO notes the respondents position and has modified the File Conditions in Appendix A and B of the Draft MDPP are transferred to sections 4.2 and 4.3 of the MDPP.</p> <p>AEMO agrees that the MDPP should clarify that Appendix A and B are examples only. The MDPP also needs to ensure that retailers and DNSPs requirements are in the MDPP, instead of the Appendices. To address this, AEMO has removed the File Conditions in Appendix A and B and transferred them to sections 4.2 and 4.3 of the MDPP.</p> <p>Appendix A and B of the MDPP includes “Example” in the section headings.</p> <p>The File Conditions in Appendix A and B of the Draft MDPP are transferred to sections 4.2 and 4.3 of the MDPP.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>ENA – No comment provided AusNet Services – No comment provided Momentum Energy – No comment provided ActewAGL – No comment provided NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	
A.1	File conditions	<p>Energy Australia In line with comments provided to 4.2.(d) EnergyAustralia recommends the following update of this section of the MDPP:</p> <ul style="list-style-type: none"> • Removal of the billing component representation, i.e. Peak, Shoulder, Off-Peak, Demand' within the parameters of the File component Energy Flow type, replacing this with usage as per the meter register/suffix • Removal of File component 'Data Quality' as only validated meter data will be provided to a Retailer by a Meter Data Provider (MDP) which may include estimated data <p>NSW DNSPs The NSW DNSPs suggest that the “Data Quality” parameter be reworded to “An indicator identifying actual or substituted reads for all metering data”</p> <p>Momentum Energy</p> <ol style="list-style-type: none"> 1. Disagree in the application of 4.2(d). Refer to relevant commentary which argues for removal of this section. 2. Agree in accordance 4.2(e) with consideration for commentary provided at the section 4.2(d) and on the proviso that “Energy Flow” is revised to be “Energy Usage” and the definition of Energy Usage does not include Peak, Off Peak and Shoulder. (Refer to commentary at 4.2(d)). 3. Data Quality – Based on commentary provided in Appendix A. A.2 and suggested format of Accumulation Metering Data Summary, Momentum 	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Energy would propose that Data Quality is further defined as NEM13 QualityMethod (i.e. CurrentQualityMethod) A = Actual Data and S = Substitute Data and does not include retailer estimates.</p> <p>4. Data Quality in the table should be appropriately defined to align with the 3 (above)</p> <p>AusNet Services Data quality file component refers to estimated data. Given the MDPP is a procedure that establishes obligations for DNSPs and retailers we recommend changing the term to align with National Electricity Market (NEM) terminology of actual, substituted, estimated and final substituted.</p> <p>Origin Energy Energy Flow Type: Information should only be obtained based on the metering data contained within the metering files. Data quality: It is not practical to provide a statement indicating the file contains estimated data and specifying each period. Recommended that the Data quality indication should be provided in the tabular form as Actual = Y or "N" for Subs or Final Subs.</p> <p>Lumo Energy Lumo Energy suggest the following amendment to A.1 to reflect the drafting amendments suggested in clause 4. <u>Clause 4 of the Procedure outlines the minimum requirements. The file conditions are an example of this information. File conditions detail the requirements for the information that must be provided in accordance with clauses 4.2(d) and 4.2(e).</u> It is unclear where the requirement to provide a statement indicating whether the metering data file contains estimated data and to specify which reading periods contain the estimated data. On the basis that the accumulated metering data summary format contained within A.1 is a guide only, then Lumo Energy will accept the content that has been proposed.</p> <p>Red Energy Red Energy suggest the following amendment to A.1 to reflect the drafting amendments suggested in clause 4.</p>	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p><u>Clause 4 of the Procedure outlines the minimum requirements. The file conditions are an example of this information.</u> File conditions detail the requirements for the information that must be provided in accordance with clauses 4.2(d) and 4.2(e).</p> <p>It is unclear where the requirement to provide a statement indicating whether the metering data file contains estimated data and to specify which reading periods contain the estimated data. On the basis that the accumulated metering data summary format contained within A.1 is a guide only, then Red Energy will accept the content that has been proposed.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided ActewAGL – No comment M2 Energy – No comment provided Ergon Energy – No comment provided Energy Tailors – No Comment ERAA – No comment provided CUAC – No comment provided</p>	
A.2	Example: accumulated file	<p>Momentum Energy</p> <p>On the assumption that 4.2 (d) is removed, the following commentary is based on the content as defined by 4.2 (e).</p> <p>1. Example does not include a statement as defined by Data Quality in table provided by Appendix A. A.1 and as required in the minimum criteria at 4.2(e) so it is assumed that by exclusion of this information that the data is actual data.</p> <p>2. Momentum Energy prefer the file format is a combination of that provided in the Strawman Appendix A. A.2 and the Draft MDPP and the removal of the statement that only applies to estimate data.</p> <p>The provision of a statement is an inefficient method that will confuse customers and Momentum Energy consider that the application of quality</p>	AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.

Item	Description	Participant Comments	AEMO Response																																																															
		<p>methods for each line would be easily extracted from the NEM13 file and readily interpreted by customers. <i>Example of preferred format for Interval Metering Data Summary Format:</i></p> <table border="1" data-bbox="775 347 1411 464"> <thead> <tr> <th>NEM</th> <th>Meter Serial Number</th> <th>UOM</th> <th>Data Quality</th> <th>From Read Date</th> <th>To Read Date</th> <th>Consumption</th> <th>Controlled Level</th> <th>Generation</th> </tr> </thead> <tbody> <tr> <td>XXXXXXXXXX</td> <td>1230000</td> <td>kWh</td> <td>A</td> <td>From Date 1</td> <td>To Date 1</td> <td>300</td> <td>50</td> <td>85</td> </tr> <tr> <td>XXXXXXXXXX</td> <td>1230000</td> <td>kWh</td> <td>A</td> <td>From Date 1</td> <td>To Date 1</td> <td>200</td> <td>-40</td> <td>75</td> </tr> <tr> <td>XXXXXXXXXX</td> <td>1230000</td> <td>kWh</td> <td>A</td> <td>From Date 1</td> <td>To Date 1</td> <td>325</td> <td>-45</td> <td>125</td> </tr> <tr> <td>XXXXXXXXXX</td> <td>1230000</td> <td>kWh</td> <td>S</td> <td>From Date 1</td> <td>To Date 1</td> <td>400</td> <td>-40</td> <td>100</td> </tr> <tr> <td>XXXXXXXXXX</td> <td>1230000</td> <td>kWh</td> <td>S</td> <td>From Date 1</td> <td>To Date 1</td> <td>400</td> <td>-40</td> <td>100</td> </tr> <tr> <td>XXXXXXXXXX</td> <td>1230000</td> <td>kWh</td> <td>A</td> <td>From Date 1</td> <td>To Date 1</td> <td>380</td> <td>-40</td> <td>100</td> </tr> </tbody> </table> <p>3. Is estimate data inclusive of substitute data? As highlighted in previous conversations, retail estimates are often provided to customers on invoices and are not MDP but retailer validated reads. Many retailers will apply their own policies and practices on the generation of such reads but it should be understood that retail estimates as they may appear on customer invoices, are not received in the NEM13 file format provided by accredited MDP's. Momentum Energy therefore submits that quality indicators should be applied to NEM13 standards and retailer estimates should be excluded from the summary format.</p> <p>AusNet Services We note the example file does not appear to contain data quality information and suggest this is updated in the final MDPP.</p> <p>ENA The example provided appears to be missing the data quality flag column The examples provided only cover retailers' requirements. Examples for distributors should also be provided.</p> <p>Origin Energy Based on above file conditions: 1) Include data quality indication. 2) Remove energy flow types as per Retailer tariff</p> <p>Lumo Energy We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p> <p>Red Energy</p>	NEM	Meter Serial Number	UOM	Data Quality	From Read Date	To Read Date	Consumption	Controlled Level	Generation	XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	300	50	85	XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	200	-40	75	XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	325	-45	125	XXXXXXXXXX	1230000	kWh	S	From Date 1	To Date 1	400	-40	100	XXXXXXXXXX	1230000	kWh	S	From Date 1	To Date 1	400	-40	100	XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	380	-40	100	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.4.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p> <p>AEMO notes the respondents comments.</p> <p>AEMO notes the respondents comments.</p>
NEM	Meter Serial Number	UOM	Data Quality	From Read Date	To Read Date	Consumption	Controlled Level	Generation																																																										
XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	300	50	85																																																										
XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	200	-40	75																																																										
XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	325	-45	125																																																										
XXXXXXXXXX	1230000	kWh	S	From Date 1	To Date 1	400	-40	100																																																										
XXXXXXXXXX	1230000	kWh	S	From Date 1	To Date 1	400	-40	100																																																										
XXXXXXXXXX	1230000	kWh	A	From Date 1	To Date 1	380	-40	100																																																										

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p> <p>UE</p> <p>The example provided appears to be missing the data quality flag column and the allowable fields e.g. A or S, where S represents S or E.</p> <p>The required data format for distributors should also be provided as an example.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided Dept of Industry and Science – No comment provided ActewAGL – No comment NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided Energy Tailors – No Comment ERAA – No comment provided CUAC – No comment provided</p>	<p>AEMO notes the respondents comments.</p>
A.3	<p>Example: diagrammatic representation of energy usage</p>	<p>Energy Australia Refer comments provided to 4.2(d)VII A</p> <p>Momentum Energy Agree on the provision that the Peak, Shoulder and Off Peak are replaced with Consumption, Controlled Load and Generation and example could be used by both the DNSP and retailer. (See commentary 4.2 (d) and 4.2 (e))</p> <p>Origin Energy Remove energy flow types as per Retailer tariff</p> <p>Lumo Energy We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p> <p>Red Energy We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p>	<p>Noted.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in item 4.2.</p> <p>AEMO notes the respondents comments.</p> <p>AEMO notes the respondents comments.</p> <p>AEMO notes the respondents comments.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided AusNet Services – No comments ActewAGL – see comments above at 4.2 as adds no value to this process NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided Energy Tailors – No Comment ERAA – No comment provided CUAC – No comment provided</p>	
<p>Appendix B</p>	<p>INTERVAL METERING DATA SUMMARY FORMAT</p>	<p>AGL From / To Date AGL also notes that the use of <i>From</i> and <i>To</i> is used in the interval metering data summary. AGL believes that there should be consistency of terms for these summary files. AGL also questions why the <i>From</i> and <i>To</i> date specify the manual read dates for interval meter data. The expectation is that interval meter data is 15 or 30 minute energy consumption data, so dates when the data is downloaded for a summary do not seem relevant. In considering the construction of the summary file and its relationship to the graphs it seems that what is being sought would most likely be monthly data for the period the data is available. Date AGL questions why the Date field specifies remotely read interval meters only. As long as the data is available the process to read the meter (either remote or manual) should not impact the ability to generate the data, in particular interval data.</p>	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>AGL believes that the provision of some consumption is more reasonably provided in a summary format of say monthly. The use of an additional, and limited, defined term (Date) seems to be overly complicating this outcome.</p> <p>EnerNOC – No comment provided</p> <p>SA Power Network - No comment provided</p> <p>Citipower / Powercor - No comment provided</p> <p>UE – No comment provided</p> <p>Red Energy – No comment provided</p> <p>Lumo Energy – No comment provided</p> <p>Origin Energy – No comment provided</p> <p>Dept of Industry and Science – No comment provided</p> <p>ENA – No comment provided</p> <p>AusNet Services – No comment provided</p> <p>Momentum Energy – No comment provided</p> <p>ActewAGL – No comment provided</p> <p>NSW DNSPs – No comment provided</p> <p>M2 Energy – No comment provided</p> <p>Ergon Energy – No comment provided</p> <p>EnergyAustralia – No comment provided</p> <p>ERAA – No comment provided</p> <p>CUAC – No comment provided</p>	
B.1	File conditions	<p>Energy Australia</p> <p>In line with comments provided to 4.3.(d) EnergyAustralia recommends the following update of this section of the MDPP:</p> <ul style="list-style-type: none"> Removal of the billing component representation, i.e. Peak, Shoulder, Off-Peak, Demand' within the parameters of the File component Energy Flow type, replacing this with usage as per the meter register/suffix <p>Removal of File component 'Data Quality' as only validated meter data will be provided to a Retailer by a Meter Data Provider (MDP) which may include estimated data</p>	AEMO notes the respondents position and refers to the AEMO statement provided above in itrm 4.2.

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>NSW DNSPs</p> <p>The NSW DNSPs suggest that the “Data Quality” parameter be reworded to “An indicator identifying actual or substituted reads for all metering data”</p> <p>It should be noted that demand will only be provided by Retailers.</p> <p>Momentum Energy</p> <p>1. Disagree in the application of 4.3(d). Refer to relevant commentary which argues for removal of this section.</p> <p>2. Agree in accordance 4.3(e) with consideration for commentary provided at the section 4.3(d) and on the proviso that “Energy Flow” is revised to be “Energy Usage” and the definition of Energy Usage does not include Peak, Off Peak and Shoulder.</p> <p>3. The application of Data Quality should be included in the summary file as suggested for accumulation summary data on a line by line basis for each period and as applied by an accredited MDP in the provision of the NEM12 file according to Metrology Procedure Part B (i.e. A = Actual, S = Substitute and F = Final Substitute).</p> <p>4. Data Quality in the table should be appropriately defined to align with the 3 (above)</p> <p>AusNet Services</p> <p>The meter serial number file component definition should clarify whether the energy value for each meter is separately represented or not.</p> <p>We suggest the energy value file component definition should be represented as average daily usage over the period. Because in situations where there is an irregular meter read (special read) of a manually read meter, then by not using an average energy value will misrepresent the relative energy value on the graph.</p> <p>The data quality file component refers to estimated data. Given the MDPP is a procedure that establishes obligations for DNSPs and retailers we recommend changing the term to align with National Electricity Market (NEM) terminology of actual, substituted, estimated and final substituted.</p> <p>Origin Energy</p>	<p>AEMO notes the respondents comments and refers to the AEMO statement provided in item 4.2.</p> <p>AEMO notes the respondents comments and refers to the AEMO statement provided in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>Energy Flow Type: Information should only be obtained based on the metering data contained within the metering files.</p> <p>Data quality: It is not practical to provide a statement indicating the file contains estimated data and specifying each period Recommended that the Data quality indication should be provided in the tabular form as Actual = Y or “N” for Subs or Final Subs.</p> <p>Lumo Energy Lumo Energy suggest the following amendment to A.1 to reflect the drafting amendments suggested in clause 4. <u>Clause 4 of the Procedure outlines the minimum requirements. The file conditions are an example of this information.</u> File conditions detail the minimum requirements for the information that must be provided in accordance with clauses 4.3(d) and 4.3(e).</p> <p>It is unclear where the requirement to provide a statement indicating whether the metering data file contains estimated data and to specify which reading periods contain the estimated data. On the basis that the accumulated metering data summary format contained within B.1 is a guide only, then Lumo Energy will accept the content that has been proposed.</p> <p>Red Energy Red Energy suggest the following amendment to A.1 to reflect the drafting amendments suggested in clause 4. <u>Clause 4 of the Procedure outlines the minimum requirements. The file conditions are an example of this information.</u> File conditions detail the minimum requirements for the information that must be provided in accordance with clauses 4.3(d) and 4.3(e).</p> <p>It is unclear where the requirement to provide a statement indicating whether the metering data file contains estimated data and to specify which reading periods contain the estimated data. On the basis that the accumulated metering data summary format contained within B.1 is a guide only, then Red Energy will accept the content that has been proposed.</p> <p>EnerNOC – No comment provided</p>	

Item	Description	Participant Comments	AEMO Response																																																																																																																																															
		<p>SA Power Network - No comment provided Citipower / Powercor - No comment provided UE – No comment provided Dept of Industry and Science – No comment provided ENA – No comment provided ActewAGL – No comment M2 Energy – No comment provided Ergon Energy – No comment provided Energy Tailors – No Comment ERAA – No comment provided CUAC – No comment provided</p>																																																																																																																																																
B.2	Example: interval file	<p>Momentum Energy <i>On the assumption that 4.3 (d) is removed, the following commentary is based on the content as defined by 4.3 (e).</i> 1. Example does not include a statement as defined by Data Quality in table provided by Appendix B. B.1 and as required in the minimum criteria at 4.3(e) so it is assumed that by exclusion of this information that the data is actual data. 2. Momentum Energy prefer the file format provided in the Strawman Appendix B. B.2 with the inclusion of a column indicating data quality for each period in place of the draft version that requires a statement that only applies to estimate data. <i>Example of preferred format for Accumulation Metering Data Summary Format:</i></p> <table border="1" data-bbox="757 1082 1435 1251"> <thead> <tr> <th>NMI</th> <th>Meter Serial Number</th> <th>Data Quality</th> <th>From Read Date</th> <th>To Read Date</th> <th>Consumption</th> <th>Controlled Load</th> <th>Generation</th> <th>EDM</th> <th>Demand</th> <th>EDM</th> </tr> </thead> <tbody> <tr><td>000000000</td><td>5100000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>800</td><td>0</td><td>80</td><td>0%</td><td>20</td><td>0%</td></tr> <tr><td>000000000</td><td>4900000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>0</td><td>50</td><td>0</td><td>0%</td><td>0</td><td>0%</td></tr> <tr><td>000000000</td><td>5100000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>250</td><td>0</td><td>75</td><td>0%</td><td>0</td><td>0%</td></tr> <tr><td>000000000</td><td>4900000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>0</td><td>40</td><td>0</td><td>0%</td><td>0</td><td>0%</td></tr> <tr><td>000000000</td><td>5100000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>325</td><td>0</td><td>125</td><td>0%</td><td>0</td><td>0%</td></tr> <tr><td>000000000</td><td>4900000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>0</td><td>60</td><td>0</td><td>0%</td><td>0</td><td>0%</td></tr> <tr><td>000000000</td><td>5100000</td><td>S</td><td>From Date 1</td><td>To Date 3</td><td>450</td><td>0</td><td>150</td><td>0%</td><td>30</td><td>0%</td></tr> <tr><td>000000000</td><td>4900000</td><td>S</td><td>From Date 1</td><td>To Date 3</td><td>0</td><td>40</td><td>0</td><td>0%</td><td>0</td><td>0%</td></tr> <tr><td>000000000</td><td>5100000</td><td>S</td><td>From Date 1</td><td>To Date 3</td><td>400</td><td>0</td><td>100</td><td>0%</td><td>30</td><td>0%</td></tr> <tr><td>000000000</td><td>4900000</td><td>S</td><td>From Date 1</td><td>To Date 3</td><td>0</td><td>60</td><td>0</td><td>0%</td><td>0</td><td>0%</td></tr> <tr><td>000000000</td><td>5100000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>800</td><td>0</td><td>100</td><td>0%</td><td>40</td><td>0%</td></tr> <tr><td>000000000</td><td>4900000</td><td>A</td><td>From Date 1</td><td>To Date 3</td><td>0</td><td>40</td><td>0</td><td>0%</td><td>0</td><td>0%</td></tr> </tbody> </table> <p>AusNet Services We note the example file does not appear to contain data quality information and suggest this is updated in the final MDPP. ENA</p>	NMI	Meter Serial Number	Data Quality	From Read Date	To Read Date	Consumption	Controlled Load	Generation	EDM	Demand	EDM	000000000	5100000	A	From Date 1	To Date 3	800	0	80	0%	20	0%	000000000	4900000	A	From Date 1	To Date 3	0	50	0	0%	0	0%	000000000	5100000	A	From Date 1	To Date 3	250	0	75	0%	0	0%	000000000	4900000	A	From Date 1	To Date 3	0	40	0	0%	0	0%	000000000	5100000	A	From Date 1	To Date 3	325	0	125	0%	0	0%	000000000	4900000	A	From Date 1	To Date 3	0	60	0	0%	0	0%	000000000	5100000	S	From Date 1	To Date 3	450	0	150	0%	30	0%	000000000	4900000	S	From Date 1	To Date 3	0	40	0	0%	0	0%	000000000	5100000	S	From Date 1	To Date 3	400	0	100	0%	30	0%	000000000	4900000	S	From Date 1	To Date 3	0	60	0	0%	0	0%	000000000	5100000	A	From Date 1	To Date 3	800	0	100	0%	40	0%	000000000	4900000	A	From Date 1	To Date 3	0	40	0	0%	0	0%	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.</p>
NMI	Meter Serial Number	Data Quality	From Read Date	To Read Date	Consumption	Controlled Load	Generation	EDM	Demand	EDM																																																																																																																																								
000000000	5100000	A	From Date 1	To Date 3	800	0	80	0%	20	0%																																																																																																																																								
000000000	4900000	A	From Date 1	To Date 3	0	50	0	0%	0	0%																																																																																																																																								
000000000	5100000	A	From Date 1	To Date 3	250	0	75	0%	0	0%																																																																																																																																								
000000000	4900000	A	From Date 1	To Date 3	0	40	0	0%	0	0%																																																																																																																																								
000000000	5100000	A	From Date 1	To Date 3	325	0	125	0%	0	0%																																																																																																																																								
000000000	4900000	A	From Date 1	To Date 3	0	60	0	0%	0	0%																																																																																																																																								
000000000	5100000	S	From Date 1	To Date 3	450	0	150	0%	30	0%																																																																																																																																								
000000000	4900000	S	From Date 1	To Date 3	0	40	0	0%	0	0%																																																																																																																																								
000000000	5100000	S	From Date 1	To Date 3	400	0	100	0%	30	0%																																																																																																																																								
000000000	4900000	S	From Date 1	To Date 3	0	60	0	0%	0	0%																																																																																																																																								
000000000	5100000	A	From Date 1	To Date 3	800	0	100	0%	40	0%																																																																																																																																								
000000000	4900000	A	From Date 1	To Date 3	0	40	0	0%	0	0%																																																																																																																																								

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>The example provided appears to be missing the data quality flag column</p> <p>The examples provided only cover retailers' requirements. Examples for distributors should also be provided.</p> <p>Origin Energy Based on above file conditions:</p> <ol style="list-style-type: none"> 1) Include data quality indication. 2) Remove energy flow types as per Retailer tariff ie. Peak, off-peak, shoulder, demand <p>Lumo Energy We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p> <p>Red Energy We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p> <p>UE The example provided appears to be missing the data quality flag column and the allowable fields e.g. A or S, where S represents S or E. The required data format for distributors should also be provided as an example.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided Dept of Industry and Science – No comment provided ActewAGL – No comment NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided Energy Tailors – No Comment EnergyAustralia – No comment provided ERAA – No comment provided CUAC – No comment provided</p>	<p>AEMO notes the respondents position and refers to the AEMO statement provided above in the Appendix A item.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided in item 4.2 and Appendix A item.</p> <p>AEMO notes the respondents comments.</p> <p>AEMO notes the respondents comments.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided in item 4.2 and Appendix A item.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
B.3	Example: diagrammatic representation of energy usage	<p>Energy Australia In line with comments provided to 4.3.(d)VII A EnergyAustralia recommends the removal of the billing component representation</p> <p>Momentum Energy Agree on the provision that the Peak, Shoulder and Off Peak are replaced with Consumption, Controlled Load and Generation and example could be used by both the DNSP and retailer. (See commentary 4.3 (d) and 4.3 (e))</p> <p>Dept of Industry and Science The style of graph used as the example is important as some participants may choose to base their diagrams on the example provided by AEMO. The graph used as an example is quite complex (with more than one reference axis) and may not be readily understood by many users. Further, it does not address the need to provide customers with information on their actual load profile, irrespective of their current tariff arrangements. A line graph showing average use across a day would be easier for customers to interpret, and would allow customers to compare different tariff offers on their average usage pattern. Separately, the amount, date and time of maximum demand should be easily identifiable, as this information is most useful for purposes such as bill reconciliation and tariff comparison.</p> <p>Origin Energy Remove energy flow types as per Retailer tariff</p> <p>Lumo Energy We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p> <p>Red Energy We have not commented on these examples as the final examples will need to be amended to reflect all changes made.</p> <p>EnerNOC – No comment provided SA Power Network - No comment provided Citipower / Powercor - No comment provided</p>	<p>AEMO notes the respondents position and refers to the AEMO statement provided in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided in item 4.2.</p> <p>AEMO notes the respondents position and refers to the AEMO statement provided in item 4.2.</p> <p>AEMO notes the respondents comments.</p> <p>AEMO notes the respondents comments.</p>

Metering Data Provision Procedures Package

Item	Description	Participant Comments	AEMO Response
		<p>UE – No comment provided ENA – No comment provided AusNet Services – No comments ActewAGL – No comment NSW DNSPs – No comment provided M2 Energy – No comment provided Ergon Energy – No comment provided Energy Tailors – No Comment ERAA – No comment provided CUAC – No comment provided</p>	