



22 July 2015

**AEMO Consultations - Meter Data Provision Procedures**

By email: MDPP@aemo.com.au

Attention: Ms Taryn Maroney

Dear Ms Maroney,

**Submission in Response to the AEMO Draft Report and Determination on the Meter Data Provisions Procedure (MDPP)**

AGL Energy (AGL) welcomes the opportunity to make a submission on the AEMO consultation relating to Meter Data Provision Procedures (the Procedure) which is required by the Customer Access to Data (CAD) NER Rule Change.

AGL is a significant retailer of energy with over 3.8 million electricity and gas customers nationally. Accordingly, AGL has a strong interest in the efficient delivery of customer services.

AGL supports the provision of accurate, useful information to customers to enable them to effectively manage their electricity consumption and with that the concept of a standardised consumption report.

In reviewing the recent Draft Report and Procedure, AGL believes that AEMO is extending the boundaries substantially from what was expected to be produced by the AEMC, and therefore suggests that AEMO should seek further guidance from the AEMC on the expected outcomes.

Our detailed comments on the Draft Report and Determination are contained within Attachment 1.

If you have any further questions regarding this submission or would like to discuss this matter further, please contact Mr Mark Riley at [mriley@agl.com.au](mailto:mriley@agl.com.au) or (03) 8633 6131.

Yours sincerely,

Ms Alicia Volvricht

**AMI Regulations & Industry Advice Manager**

Att.

## Attachment 1 – Detailed comments on MDPP Draft Procedure

### Summary of Response

In summary, AGL wishes to provide feedback to AEMO on the following issues with the Draft Procedure. The key issues that AGL wishes to draw AEMO's attention to are:

- Customer Verification timeframes;
- Responses to requests from Customer Agents;
- Details of information to be provided, particularly the cost of providing contract or tariff based information; and
- Over complication of detailed data for interval meter customers.

### Specific Comments

#### 1. Identity Verification

Clause 2.1(c) of the Procedure states that

*(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.*

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.

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.

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).

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.

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.

This is covered by Rule 7.16(4)(i) which clearly states that:

*(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) 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;*

Clause 2.1(d) of the draft Procedure proscribes that, after having responded to a request, retailers and DNSPs advise customers that *...the request for metering data is closed*. Clause 2.1(e) also states that *A new metering request is deemed to exist when.. complete verification information ... 3.3(a)*.

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.

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.

## 2. Retail Customer Request

Clause 2.2 of the Procedures states that

*(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.*

The AEMC Final Determination and Rule (CI 7.14(4)(a)) only require the retailer or DNSP to respond to a request:

*(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).*

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.

## 3. Customer Authorised Representative

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.

Clause 2.3(b) of the Procedure states that:

*(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.*

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.

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 bulk request, which AEMO suggested could be 100 retail customer requests.

Participants indicated that this number may be too high. This depended on:

- 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.

AEMO in its Draft Decision indicated that it considered the following factors made it difficult for AEMO to establish a single solution:

- *Uncertainty about the number of customer requests that will be included in a customer authorised representatives request.*
- *Uncertainty about the number of customer authorised representative requests that will be received in a business day.*
- *Unknown resourcing and processing times of retailers and DNSPs.*
- *Negotiating power of customer authorised representatives.<sup>1</sup>*

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.

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**... ).

The number of requests for this period should also be reduced (e.g. to 25) to ensure the resourcing requirements are not inefficient.

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.

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<sup>1</sup> AEMO Metering Data Provision Procedures - Draft Report And Determination, 2015, p 22

#### 4. Accumulated Metering Data Summary Format

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 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.

AGL believes that the quality flag should be provided against the period and meter / register to which it is appropriate.

#### 5. Provision of Tariff Information

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:

*VII. Energy Flow Types:*

- A. Total usage or billing related components, e.g. Peak, Shoulder, Off-Peak usage, etc.*
- B. Controlled Load (only if applicable),*
- C. Generation (only if applicable).*

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.

Further, this requirement has also been placed only on retailers and not DNSPs. AEMO, in its Draft Determination, has stated that:

*To eliminate any potential confusion retail customers may experience comparing their metering data provided by a retailer and DNSP...<sup>2</sup>*

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.

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<sup>2</sup> AEMO Metering Data Provision Procedures - Draft Report And Determination, 2015, p2

The definition of peak, shoulder and off-peak varies between retailer and state. The table below shows the definitions for three states:

**Table 1 - Examples of Peak, Shoulder and Off-Peak periods**

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"> <li>7 am to 2 pm business days</li> <li>8 pm to 10 pm business days</li> <li>7 am to 10 pm weekends and public holidays</li> </ul>	<ul style="list-style-type: none"> <li>10pm to 7am business days</li> <li>10pm to 7am weekends and public holidays</li> </ul>
Qld	4pm to 8 pm weekdays	<ul style="list-style-type: none"> <li>7am to 4pm weekdays</li> <li>8pm to 10pm weekdays</li> <li>7am to 10pm weekends</li> </ul>	<ul style="list-style-type: none"> <li>10pm to 7am business days</li> <li>10pm to 7am weekends</li> </ul>

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.

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

*the MDPP is to establish requirements for the manner and form in which metering data, not existing standing data, is to be provided.<sup>3</sup>*

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.

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.

The AEMC, as part of its Final Determination considered whether the rule change *would result in a disproportionate regulatory or administrative burden on market participants.<sup>4</sup>*

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.

## 6. Interval Metering Data Summary Format

Clause 4.3(d)VII requires the calculation of the demand / capacity for each day only by the retailer.

*VIII. Demand/Capacity (if applicable for billing or if requested by a retail customer, or customer authorised representative, and is available).*

<sup>3</sup> Ibid, p 18

<sup>4</sup> AEMC Final Rule Determination NER, NERR, 1 December 2014, p 8

This requirement is to generate a demand period for each *Date* period, which is defined as the month in which energy usage or demand occurred for remotely read meters only.

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.

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.

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.

## 7. Detailed Data Format

### Interval Meter Detailed Data File Format

Clause 4.4(a) specifies that the detailed data format which should be produced by retailers and DNSPs is the NEM 12/NEM13 format.

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.

For example, NEM 12/13 files contain information relating to:

- 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;
  - 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;

These file formats provide a substantial amount of information which AGL believes would be unnecessary and unhelpful for a customer.



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.

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.

## Customer Guide

Clause 4.4(b) of the AEMO procedure requires:

*(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.*

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<sup>5</sup>:

*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'.*

The AEMC also considered other issues relating to consumer information and determined that producing guides was not an effective response.

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.

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.

Rather, if such a guide is deemed necessary or of value, then it would be more appropriate for one party, such as AEMO, to produce and maintain such a guide which all participants could refer to.

## 8. Alternative Data Formats

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.

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.

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<sup>5</sup> AEMC Final Rule Determination NER, NERR, 1 December 2014, , p9



Also, clause 4.5(d) requires the retailer or DNSP to obtain *Explicit Informed Consent* for an alternative format. As metering data is considered personal data, AGL would expect all requests are made on the basis of *Explicit Informed Consent* and do not see why this clause is specifically included here.

## **9. Appendix A – Accumulated Metering Data Summary Format**

The specification for the Accumulated Metering Data file uses headers labelled *From Date* and *Read Date* to represent customer meter reading periods.

Many retailers use the terminology of *From date* and *To date* to represent the start and finish dates for a customer's current billing period.

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 *From* and *To date* is more understandable for customers.

## **10. APPENDIX B. INTERVAL METERING DATA SUMMARY FORMAT**

### **From / To Date**

AGL also notes that the use of *From* and *To* 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 *From* and *To* 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.

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.

## **Conclusion**

Overall, AGL believes that AEMO has developed a procedure which is far in excess of the expectation of the AEMC and industry and has developed a complex and convoluted procedure which will be difficult and costly to implement.

This includes the insertion of mandatory obligations within the procedure which are not supported by the rule, extremely short timeframes to respond to requests and complex tariff calculations rather than metering information.