



# METERING DATA PROVISION PROCEDURES: DRAFT REPORT AND DETERMINATION AND DRAFT PROCEDURES – PARTICIPANT RESPONSE PACK

## METERING DATA PROVISION PROCEDURES PACKAGE

***Participant:*** AusNet Services

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## 1. Draft Metering Data Provision Procedures

Item	Description	Participant Comments		
1	INTRODUCTION			
1.1	Purpose and scope	No comments		
1.2	Definitions and interpretation	<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 <b>yellow highlighted red font</b>.</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><tr><td><b>Accumulated metering data - summary data</b></td><td><p>This includes:</p><ul style="list-style-type: none"><li>- Total volume of energy for each energy flow type for the specified time period.</li><li>- Diagrammatic representation of daily <b>average</b> 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.</li><li>- From Date and Read Date for the specified time period</li></ul></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</p>	<b>Accumulated metering data - summary data</b>	<p>This includes:</p> <ul style="list-style-type: none"><li>- Total volume of energy for each energy flow type for the specified time period.</li><li>- Diagrammatic representation of daily <b>average</b> 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.</li><li>- From Date and Read Date for the specified time period</li></ul>
<b>Accumulated metering data - summary data</b>	<p>This includes:</p> <ul style="list-style-type: none"><li>- Total volume of energy for each energy flow type for the specified time period.</li><li>- Diagrammatic representation of daily <b>average</b> 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.</li><li>- From Date and Read Date for the specified time period</li></ul>			

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Item	Description	Participant Comments
		<p>files are.</p> <div data-bbox="1111 296 1890 686"> <div data-bbox="1111 296 1435 686">Generation</div> <div data-bbox="1435 296 1890 686"> <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.</p> <p>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> </div> <p>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="1111 903 1890 1142"> <div data-bbox="1111 903 1435 1142">Interval metering data - summary data</div> <div data-bbox="1435 903 1890 1142"> <p>This includes:</p> <ul style="list-style-type: none"> <li>- Total volume of energy for each energy flow type for the specified time period.</li> <li>- Diagrammatic representation of daily average volumes for each energy flow type for the specified time period.</li> <li>- From Date and To Date for the specified time period.</li> </ul> </div> </div>
1.3	Related AEMO procedures	No comments

Item	Description	Participant Comments
2	IDENTITY VERIFICATION AND DATA DELIVERY TIMEFRAMES	<p><b>Verifying a request should also be a reasonable endeavours obligation</b></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>The benefit of extending the reasonable endeavours provisions to section 2.1 is that it allows DNSPs to have more time to undertake a further assessment as per our obligations under the <i>Privacy Act 1988</i>. This may involve taking more information into account and escalating the issue. Without a reasonable endeavours provision the DNSP may be more inclined to reject the request without giving consideration to the particular circumstances.</p>

Item	Description	Participant Comments
2.1	Verifying the identity of a retail customer or customer authorised representative	<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><b>1) Three business days is insufficient to verify a request</b></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 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><b><i>AusNet Services recommends extending this time limit to 7 business days and removing it altogether for bulk requests.</i></b></p>

Item	Description	Participant Comments
		<p><b>2) Providing detail of where the verification information was insufficient may enable phishing.</b></p> <p>2.1(d)(I) 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><b><i>We therefore recommend that the obligation to “provide detail of where the verification information was insufficient” should be either removed or changed to “advise the requestor of the reason in a manner that is consistent with the Privacy Act 1988”.</i></b></p>
2.2	Retail customer request	No comments

Item	Description	Participant Comments
2.3	Customer authorised representative	<p>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 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><b><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></b></p>
<b>3</b>	<b>DATA DELIVERY METHOD</b>	No comments
3.1	Delivering summary data	No comments
3.2	Delivering detailed data	No comments
3.3	File naming conventions	No comments
3.4	Numbering of metering data files to be provided	No comments
<b>4</b>	<b>DATA FILE CONTENT</b>	No comments
4.1	Field details – format and unit of measure	No comments
4.2	Accumulated metering data summary	No comments



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Item	Description	Participant Comments
4.3	Interval metering data summary	<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><b><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></b></p>
4.4	Detailed data format	<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><b><i>AusNet Services recommends changing the MDPP to allow the DNSPs and retailers to provide a NEM12 file without including the “500 records”.</i></b></p>

Item	Description	Participant Comments
		<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><b><i>AusNet Services suggests that AEMO should develop and publish a customer guide to the NEM12 file for the benefit of the industry.</i></b></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><b><i>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”.</i></b></p>
4.5	Ability to offer alternative metering data formats	<p>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.</p> <p><b><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></b></p>

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Item	Description	Participant Comments
		<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><b>AusNet Services recommends modifying section 4.5(d) to remove reference to customer authorised representatives.</b></p>
5	<b>OTHER COMMENTS</b>	
Appendix A	<b>ACCUMULATED METERING DATA SUMMARY FORMAT</b>	
A.1	File conditions	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.
A.2	Example: accumulated file	We note the example file does not appear to contain data quality information and suggest this is updated in the final MDPP.
A.3	Example: diagrammatic representation of energy usage	No comments
Appendix B	<b>INTERVAL METERING DATA SUMMARY FORMAT</b>	
B.1	File conditions	<p>The <b>meter serial number</b> file component definition should clarify whether the energy value for each meter is separately represented or not.</p> <p>We suggest the <b>energy value</b> 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>

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Item	Description	Participant Comments
		The <b>data quality</b> 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.
B.2	Example: interval file	We note the example file does not appear to contain data quality information and suggest this is updated in the final MDPP.
B.3	Example: diagrammatic representation of energy usage	No comments