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By email: MDPP@aemo.com.au

RE: Metering Data Provision Procedures – Draft Report and Determination

Dear Taryn,

Thank you for the opportunity to comment on AEMO's Metering Data Provision Procedures (MDPP).

The Consumer Utilities Advocacy Centre Ltd (CUAC) is a specialist consumer organisation established in 2002 to represent Victorian energy and water consumers in policy and regulatory processes. As Australia's only consumer organisation focused specifically on the energy and water sectors, CUAC has developed an in-depth knowledge of the interests, experiences, and needs of energy and water consumers.

Minimum requirements and standardisation

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.

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.

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.

Alternate data formats (actual vs. average data)

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.

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 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).[1]

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:

- 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; tCO_2-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.

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 numeracy and would benefit from information being presented without further analysis required.

Energy flow types and demand

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.

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

[1] See CUAC, CALC, ATA joint submission to the MDPP Consultation Paper, 20.05.2015

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.

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.

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.)

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.

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.

Inclusion of diagrams

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.

Identity verification and delivery timeframes

CUAC supports AEMO's proposal for delivery timeframe commencement.

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.

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:

- 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.

We propose the maximum limit instead be set in bands, or on a 'sliding scale'. For example, 1-20 requests should have a maximum 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.

Delivery method

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.

Yours sincerely,

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