



21 June 2015

AEMO Consultations - Meter Data Provision Procedures

By email: MDPP@aemo.com.au

Attention: Ms Taryn Maroney

Meter Data Provision Procedures- Draft consultation

Origin Energy (Origin) welcomes this opportunity to respond to the Australian Energy Market Operator's (AEMO's) consultation on the draft meter data provision procedures.

As noted in our response to the previous consultation, Origin is supportive of the policy objectives underlying the Customer Access to Data (CAD) rule change made by the Australian Energy Market Commission (AEMC) in late 2014. We reiterate the view put forward in our response on 6 June that the procedure supporting the rule change should deliver a minimum specification for the provision of meter data. The draft procedures in our view do not provide a minimum specification, go beyond the intent of the rule change and will result in significant costs to industry that will outweigh any benefits intended to deliver. Market participants and third parties will then have the incentive to innovate above this minimum (and in some cases already have via online customer portals).

We are particularly concerned about the use of additional data elements in required NEM12 file format as the standard data format and the application of billing information (e.g. tariff classes) to the summary data format. Origin also has concerns regarding the way customer verification timeframes are incorporated into the procedures.

The NEM12 file format sent by Meter Data Providers contains a large number of data fields that are irrelevant to customers and their authorised representatives. We suggest that the data relating to individual registers (the 300 record) is the key piece of information (along with the 200 record). To replicate the NEM12 file format in individual retailer/distributor meter data management systems will be costly, time consuming and result in information that will simply confuse end users.

The application of tariff structures (peak, off peak, shoulder periods for example) for the summary format will be complex and costly to implement. Customer tariff structures vary by network area, jurisdiction, and the presence of controlled loads and embedded generation. This complexity will further grow exponentially as network tariff reform increases the number of customers undergoing retail and network tariff reassignment. Origin is firmly of the view that this was not the intent of the summary format and that the customer's retail bill contains this information already. Providing the summary format in the manner suggested by the draft procedures will result in customer confusion as the data presented will change depending on a number of potential events over time. We would urge AEMO to reconsider the application of billing information to the summary format for accumulation and interval data.

Origin would welcome further discussion with AEMO on this consultation and our response. Please contact Mario logha on (03) 9821 8213 in the first instance.

Yours sincerely


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