



METERING DATA PROVISION PROCEDURES

DRAFT REPORT AND DETERMINATION

Published: **July 2015**





NOTICE OF SECOND STAGE CONSULTATION – METERING DATA PROVISION PROCEDURES

National Electricity Rules – Rule 8.9

Date of Notice: 6 July 2015

This notice informs all Registered Participants and interested parties (**Consulted Persons**) that AEMO is commencing the second stage of its consultation on **Metering Data Provision Procedures (MDPP)**.

This consultation is being conducted under clause **7.1.3** of the National Electricity Rules (**NER**), in accordance with the Rules consultation requirements detailed in rule 8.9 of the NER.

Invitation to make Submissions

AEMO invites written submissions on this Draft Report and Determination (Draft Report).

Please identify any parts of your submission that you wish to remain confidential, and explain why. AEMO may still publish that information if it does not consider it to be confidential, but will consult with you before doing so.

Consulted Persons should note that material identified as confidential may be given less weight in the decision-making process than material that is published.

Closing Date and Time

Submissions in response to this Notice of Second Stage of Rules Consultation should be sent by email to **MDPP@aemo.com.au**, to reach AEMO by 5.00pm (Australian Eastern Standard Time) on 21 July 2015.

Please send any queries about this consultation to the same email address.

AEMO has prepared a participant response template and requests that all Registered Participants and Interested Parties, intending to make a submission, complete the response template provided and forward it to AEMO as a Word document.

Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Publication

All submissions will be published on AEMO's website, other than content which AEMO considers is confidential.



EXECUTIVE SUMMARY

The publication of this Draft Report and Determination (Draft Report) commences the second stage of the Rules consultation process conducted by AEMO to develop the Metering Data Provision Procedures (MDPP) under clause 7.16 of the National Electricity Rules (NER).

NER clause 11.69.2(a) requires AEMO to develop the MDPP by 1 September 2015. Under NER clause 7.16, the MDPP must include:

- Minimum metering data requirements for:
 - Summary data formats for accumulation and interval metering data.
 - Detailed data formats for interval metering data.
- Timeframes for retailers and Distribution Network Service Providers (DNSPs) to respond to a request from a:
 - Retail customer.
 - Customer authorised representative.
- The minimum delivery method for the requested metering data.

On 30 April 2015, AEMO published its Consultation Paper and Strawman MDPP.¹

Stakeholders raised a number of key issues, including:

- A single standardised format should be uniformly applied.
- The NEM12 file should be used as the interval detailed data format.
- Alternate data formats:
 - Should be able to be provided, for example, the formats used in My Power Planner.
 - The interval summary data format should include a higher level of analytical information, more like that presented by the Consumer Utilities Advocacy Centre (CUAC) examples.²
- Data formats should be simplified by deleting time of use or flexible pricing information (peak, off-peak, shoulder and demand) to reduce confusion for retail customers comparing this often misaligned information between retailers and DNSPs. It is also an issue that DNSPs do not have visibility of time of use of information to provide it.
- Demand information should be included.
- The delivery timeframes:
 - Should commence after a retail customer or customer authorised representatives request is verified.
 - Should include a maximum timeframe for retailers and DNSPs to provide the requested metering data to a customer authorised representative.
- The definition of retail customer definition used by the MDPP should be clarified.

¹ These are available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.

² CUAC, CALC, ATA joint submission, Metering Data Provision Procedures – Consultation Paper, 30 April 2015, p. 5-6.



After considering stakeholder submissions, and evaluation against NER clause 7.16, the Draft Report proposes:

- To satisfy the requirements for accumulation and interval summary data formats, retailers and DNSPs must provide the minimum metering data requirements specified in Section 4 of the Draft MDPP. This includes example summary formats for those retailers and DNSPs who wish to provide these to retail customers or customer authorised representatives.
- To satisfy the requirements for the interval detailed data format, retailers and DNSPs must provide the NEM12 file and a guide to retail customers to explain how this file is to be used.
- To eliminate any potential confusion retail customers may experience comparing their metering data provided by a retailer and DNSP, only retailers are to provide time of use or flexible pricing information (for example, peak, off-peak, shoulder) in the summary data formats. DNSPs need to provide energy usage, controlled load (if applicable), and generation (if applicable).
- Demand or capacity is to be included in the interval summary data format, to support a retail customer's analysis of whether it is suitable for them to change to a demand tariff. Demand or capacity is to be presented only if it is applicable.
- To clarify circumstances where verification cannot be achieved in a reasonable timeframe, new clauses are added to Section 2 of the Draft MDPP, that:
 - Require retailers and DNSPs to identify and publish the minimum information they require from a requesting retail customer or customer authorised representative to verify the identity of a retail customer.
 - Provide a process for when a retailer or DNSP determines it cannot verify the identity of a retail customer or customer authorised representative with the information provided by them, which requires the retailer or DNSP to contact the retail customer or customer authorised representative within three business days to notify them that insufficient verification information was provided.
 - Allow the retailer's or DNSP's notification of insufficient verification information to close a retail customer or customer authorised representative's request for metering data.
 - Clarify that when the retail customer or customer authorised representative provides the additional verification information, this constitutes a new request.
- To clarify the maximum timeframe for delivery of a customer authorised representatives request for more than one retail customer's metering data, new clauses are added to Section 2 of the Draft MDPP, that require retailers and DNSPs to deliver:
 - A request that includes more than one but less than 100 retail customers' metering data within 20 business days.
 - A request that includes more than 100 retail customers' metering data, the retailer and DNSP and customer authorised representative must negotiate the delivery timeframe.

AEMO has also removed Section 3.1 that was included in the Strawman MDPP, which included information about the National Energy Retail Rules (NERR). This change is in keeping with AEMO's requirement under clause 7.16 of the NER.

AEMO's draft determination is to make the MDPP in the form published on AEMO's website at:

<http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



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1. STAKEHOLDER CONSULTATION PROCESS

As required by clause 7.1.3 of the NER, AEMO is consulting on the MDPP in accordance with the Rules consultation process in rule 8.9.

AEMO's indicative timeline for this consultation is outlined below. Future dates may be adjusted depending on the number and complexity of issues raised in submissions.

Deliverable	Indicative date
Submissions due on Draft Report	21 July 2015
Final Report published	1 September 2015

The publication of this Draft Report marks the start of the second stage of consultation.

Note that there is a link to all submissions received during consultation at **Appendix A**.

The Draft MDPP is published on AEMO's website at:

<http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



2. BACKGROUND

2.1 National Electricity Rules requirements

7.16 Metering data provision to retail customers

- (a) AEMO must establish, maintain and *publish* the *metering data provision procedures* in accordance with this rule 7.16, Chapter 7, and otherwise in accordance with the *Rules*.
- (b) The objective of the *metering data provision procedures* 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 a request for such data from the *retail customer* or *customer authorised representative*.
- (c) The *metering data provision procedures* must:
 - (1) specify the manner and form in which *retail customers' metering data* must be provided, including a:
 - (i) detailed data format; and
 - (ii) summary data format;
 - (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);
 - (3) for *retail customers* for whom *accumulated metering data* is available, specify a summary data format;
 - (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; and
 - (ii) take account of procedures in place relating to the validation of *metering data*; and
 - (5) specify a minimum method of delivery for the requested *metering data*.
- (d) *Retailers* and *Distribution Network Service Providers* must comply with the *metering data provision procedures* when responding to requests under rule 7.7(a)(7).

2.2 Context for this consultation

2.2.1 Australian Energy Market Commission (AEMC) Rule

In response to a Standing Council on Energy and Resources (now the COAG Energy Council) rule change request³, the AEMC made rules⁴ that:

- Allowed retail customers to obtain their metering data from DNSPs (the requirement on retailers was already included).

³ Standing Council on Energy and Resources, Rule Change Proposal – Consumer Access to their Energy and Metering Data under the NER, October 2013.

⁴ This included the National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014 No.7 and National Energy Retail Amendment (Customer access to information about their energy consumption) Rule 2014 No.2.



- Allowed customer authorised parties to obtain metering data on behalf of retail customers.
- Requires retailers and DNSPs to comply with the requirements included in the MDPP and the NERR.
- Requires AEMO to develop and publish the MDPP by 1 September 2015.

Except for the amendments to the NERR, these rules became effective on 1 December 2014. The amendments to the NERR commence on 1 March 2016.

The MDPP are to set out minimum requirements on retailers and DNSPs to provide retail customers, and their customer authorised representatives, with their accumulation and interval metering data. These requirements will make it easier for:

- Retail customers to access their electricity consumption data from retailers or DNSPs in an understandable format provided in a timely manner.
- Third parties to access a retail customer's electricity consumption data in a timely manner.⁵

2.3 First stage consultation

On 30 April 2015, AEMO issued a Notice of First Stage Consultation, and published a Consultation Paper and Strawman MDPP. This information is available on AEMO's website.⁶

The Consultation Paper included questions to facilitate discussion on the development of the MDPP. The Strawman MDPP provided:

- Minimum requirements and examples for:
 - Summary data formats for interval and accumulation metering data.
 - A detailed data format for interval metering data.
- Maximum timeframes for retailers and DNSPs to respond to:
 - A request for one retail customer's metering data, which was 10 business days.
 - A request for more than one retail customer's metering data (from a customer authorised representative), which was by agreement between the retailer or DNSP and customer authorised representative.
- The minimum delivery method for the requested metering data:
 - Summary data format, which must be provided electronically and/or physically to the retail customer or customer authorised representative, and able to be offered in PDF or CSV, unless agreed otherwise.
 - Detailed data format, which must be provided electronically to the retail customer or customer authorised representative and constructed in a CSV file, which may be compressed into a ".zip" extension file.

AEMO received 23 written submissions in the first stage of consultation and has held the following meetings with stakeholders:

- Monthly updates and discussion at the Retail Market Consultative Forum from March 2015.
- One-on-one stakeholder discussions, March 2015.
- Update at the Consumer Forum, 10 April 2015.
- Discussions with stakeholders in the first AEMO-led workshop, 13 April 2015.
- Discussions with stakeholders on the key stakeholder submission themes, 18 June 2015.

⁵ AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, p. i.

⁶ Available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



Copies of all written submissions (excluding any confidential information) have been published on AEMO's website.⁷

⁷ Available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.

3. SUMMARY OF ISSUES

The table below summarises the key issues arising from the proposal and raised by Consulted Persons. Issues are grouped under the broad headings used in the Consultation Paper:

- Data formats.
- Delivery timeframes.
- Delivery method.

A consolidation of issues raised by Consulted Persons in submissions, together with AEMO’s responses, is published on AEMO’s website.⁸

Table 1 Summary of issues raised by Consulted Persons

Category	Issue	Raised by
Standardising data formats – Section 4.3	Standardised formats should be universally applied.	Department of Industry and Science (DOI&S), Alternative Technology Association (ATA), Consumer Utilities Advocacy Centre Ltd (CUAC), Consumer Action Law Centre (CALC), AusNet Services (AusNet), Enernoc
	If the data format is to be prescribed, suggested AEMO must/should prescribe the seven existing Victorian data formats.	Lumo Energy and Red Energy (Lumo Energy), Origin Energy (Origin)
	Minimum metering data standards should be provided.	Lumo Energy, Aurora Energy (Aurora)
	Supported provision of standardised summary formats for non-solar and solar.	ATA, CALC, CUAC
	Supported the minimum requirements identified by AEMO in the Strawman MDPP.	Ergon, Simply Energy (Simply)
	Supported the inclusion of minimum requirements to allow retailers and DNSPs to innovate in response to customers’ needs.	AusNet, Energex, Energy Australia, Simply, United Energy (United)
Alternative data formats – Section 4.4	Suggested including the following in the interval summary data format: <ul style="list-style-type: none"> • Average daily and monthly usage. • Lowest and highest average usage per day. • Average usage patterns on weekday, weekends, public holidays and weekends. • Average seasonal usage patterns. 	CUAC
	For the interval summary data format, average daily load profile by season and weekday/weekend (and by tariff segment, if appropriate) and maximum demand (where available) should be provided.	DOI&S
	For the interval summary data format, simplified monthly chart with only usage and generation average daily totals; and for where interval metering data is available extra charts can be provided, similar to the graphs provided by CUAC.	AusNet

⁸ <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



Category	Issue	Raised by
	Retail customers should have flexibility to provide alternate formats that are agreed with the retail customer or customer authorised representative.	Simply
Energy flow types and demand – Section 4.5	Energy flow types (time of use or flexible pricing information) information should not be included because it could be confusing for retail customers as these vary between retailers and DNSPs.	AusNet, Origin
	Peak, off-peak and shoulder should be combined into a general consumption category.	CitiPower PowerCor (CitiPower)
	Demand information should not be included.	AusNet, Origin
	Demand information should be included.	DOI&S
	Demand information should not be included in the diagrammatic representation.	Energy Australia
	Agreed that demand should or could be included.	ActewAGL Distribution (ActewAGL), Energy Tailors
Data quality indication – Section 4.6	Amend “data quality” indicator from “estimate” to “estimated, actual and substituted” and these terms need to be defined.	Momentum Energy (Momentum)
	Amend “data quality” indicator from “estimate” to “actual”.	Origin, Energy Australia
	Amend “Data quality” indicator to that provided by the metering data provided.	AGL
	Amend “Data quality” indicator to that provided by the metering data provider.	Energy Australia
	Data quality flag is more suited to the interval detailed data format.	AGL, AusNet,
Network tariff codes – Section 4.7	Network tariff code should be included	Energy Tailors
Testing data formats and plain English – Section 4.8	Data formats should be tested with broader consumers using focus groups.	ATA, CALC, CUAC, EnerNoc
Inclusion of diagrams for summary data format – Section 4.9	Agree that the summary formats can be presented graphically.	SA Power Networks
	Does not support the inclusion of diagrams.	Energy Australia
Customer request – Section 4.10	Customer request should be defined and different methods should be included, for example by phone and writing.	ActewAGL, AusNet
	Customer request does not need to be defined.	Aurora, Energy Australia, Momentum, Origin, Simply and United
	A communication protocol for retail customers and customer authorised representatives is needed.	Energy Tailors
Delivery timeframe commencement – Section 4.11	Delivery timeframe should only commence once completed information is received and validated.	AGL, Origin, Simply, Lumo Energy, CitiPower, Momentum, SA Power Networks, United
	Support a maximum 10 business days response timeframe.	ActewAGL, Aurora, Simply, Jemena, SA Power Networks
Delivery timeframe of more than one customer request – Section 4.12	What definition of large retail customers is AEMO using?	AusNet
	A 24-hour maximum delivery timeframe should be included.	Energy Tailors



Category	Issue	Raised by
	Support a maximum delivery timeframe for metering data to customer authorised representatives.	DOI&S
	A maximum delivery timeframe for metering data to customer authorised representative requests is not supported	Electricity Network Association (ENA), Energy Australia
	A limit on the number of requests per day should be included to prevent customer authorised representatives avoiding retailers and DNSPs charging.	AGL, CitiPower, Origin
	Support that it should be negotiated and agreed between customer authorised representatives and the retailer and DNSP.	Aurora, CitiPower, ENA, Energex, Ergon, Jemena, Lumo Energy, Momentum, NSW DNSPs, Origin, Simply, SA Power Networks
	Should commence after payment is received.	Lumo Energy
	Does not support applying a sliding scale to customer authorised representative requests.	Ergon, ENA, Energex, Lumo Energy, Momentum, NSW DNSPs, Origin, Simply
	Support a sliding scale, subject to conditions.	ActewAGL, AusNet, Jemena
	Supports 10 days to three months.	CitiPower
Delivery method for summary data format – Section 4.13	Summary data formats should not include the requirement to provide it “physically” to the retail customer or customer authorised representative.	Energy Australia, Lumo Energy
	Clarify the requirement to provide the summary data format in CSV format.	Energy Australia, Momentum
Definition of retail customer – Section 4.14	Define retail customer, small customer and large customer.	Momentum
Other – Section 4.15	Include a section in the Procedure to provide clarity for charging a reasonable charge and identify who the charge is levied on.	Origin
	The MDPP needs to make references to two years historical data clearer.	Simply
	Interval summary data formats should include average daily load profile by season and weekday/weekend and maximum demand.	DOI&S, ATA, CALC, CUAC



4. DISCUSSION OF ISSUES

4.1 Introduction

In this section, issues are grouped according to the broad headings used in the Consultation Paper:

- Data formats.
- Delivery timeframes.
- Delivery method.

For each issue, this section summarises the issue and feedback received during consultation, AEMO's assessment of the issue, and AEMO's conclusion.

For details of all feedback, see Appendix A: Consolidated Summary of Responses.⁹

4.2 Proposed data formats from Strawman MDPP

NER clause 7.16 requires AEMO to specify the minimum requirements for the accumulation and interval summary data formats, and interval detailed data format.

- The summary data formats are primarily for small retail customers to better understand their electricity consumption data, to use this information to inform their decisions about their energy consumption.¹⁰
- The interval detailed data format is to be primarily used by customer authorised representatives to provide services to their customers.¹¹

AEMO published the Strawman MDPP to facilitate consultation on the development of the MDPP.¹² This included proposed minimum requirements that AEMO considered retailers and DNSPs must provide, which are set out below. The Strawman MDPP presented example data formats for those retailers and DNSPs who wished to use them.

4.2.1 Summary formats

For the accumulation summary data format, AEMO proposed that retailers and DNSPs include:

- The nature and extent of energy usage.
- A diagrammatic representation of the usage information over the requested time period.

For the interval summary data format, AEMO proposed that retailers and DNSPs include:

- The nature and extent of energy usage for daily time periods.
- A usage profile over a specified period.
- A diagrammatic representation of the information over the requested time period.

For the accumulation and interval summary data format, the following minimum requirements were proposed:

- National Metering Identifier (NMI).
- Meter Serial Number.
- Unit of Measure (UOM) for the Energy Flow Type.
- Data quality indication.
- Read Date, monthly for interval metering data or when read for accumulation metering data.

⁹ Available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.

¹⁰ AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, p. 25.

¹¹ Ibid.

¹² Available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



- Energy Flow Types:
 - Peak, shoulder, off-peak usage.
 - Controlled load usage.
 - Generation (only if applicable).

4.2.2 Detailed data format

For the interval detailed data format, the following minimum requirements were proposed:

- NMI.
- Meter Serial Number.
- UOM for the Energy Flow Type.
- Data quality indication.
- Read Date.
- Energy Flow Types:
 - Peak.
 - Shoulder, off-peak, controlled load and/or generation (only if applicable).

4.3 Standardising data formats

In response to a retail customer's or customer authorised representative's request for a retail customer's metering data, AEMO has considered whether it is appropriate for the MDPP to require retailers and DNSPs to provide standardised data formats¹³ or set out the minimum requirements¹⁴ for both accumulation and interval summary data formats, and an interval detailed data format.

Stakeholders have different views on whether the MDPP should mandate standardised metering data formats or minimum metering data requirements. This is discussed below for the accumulation and interval summary data formats, and detailed data format.

4.3.1 Summary data formats

Issue summary and submissions

ATA, CALC and CUAC's submission supported provision of standardised summary data formats to retail customers and customer authorised representatives. This submission noted that the minimum requirements should include:

- Non-solar and solar summary data formats should be required.
- Summary data being based on all the billed quantities that affect how a consumer pays for energy.¹⁵

The majority of retailers supported the MDPP including minimum metering data requirements to allow for competition to deliver more innovative services.¹⁶ Additionally, Origin commented that applying sophisticated analysis to interval (or basic) consumption data would add significantly to the cost of summary data delivery.¹⁷

The stakeholder discussion on 18 June 2015 confirmed that there were divergent views over the MDPP providing standardised summary formats. Stakeholder views indicated that:

¹³ Standardised data formats would be presented exactly the same way by each retailer or DNSP.

¹⁴ Setting out minimum requirements in the MDPP requires retailers and DNSPs to provide this information. This allows retailers and DNSPs to present the minimum requirements differently to cater for their retail customer's preferences or needs.

¹⁵ Refer to Appendix A: Consolidated Summary of Responses, pp. 75-76.

¹⁶ Ibid., pp. 5-6, 9-11, and 32.

¹⁷ Ibid., p. 92.



- While it would be useful for the summary data format to be standardised, it was acknowledged that many retailers and DNSPs are already providing the information retail customers need, as a part of their service.
- Standardising the summary data format could be costly, and these costs would be passed through to retail customers. It may also dampen retailer or DNSP innovation.

AEMO's assessment

The NER requires the MDPP to specify the minimum requirements retailers and DNSPs must meet in response to a retail customer or customer authorised representative's request for accumulation or interval metering data. This information is to help retail customers better understand their electricity consumption data to inform their decisions. In setting minimum requirements, AEMO has considered a balance between what would benefit retail customers and the potential cost of providing this information.

AEMO has considered whether the MDPP should require retailers and DNSPs to provide standardised accumulation and interval summary data formats or meet a set minimum requirements.

AEMO does not consider the Draft MDPP should require retailers and DNSPs to provide standardised accumulation and interval summary data formats. Instead, AEMO considers that specifying the minimum requirements would allow retail customers (in particular) to obtain the appropriate level of information they need to assess their consumption while still allowing retailers and DNSPs the opportunity to provide innovative data formats to differentiate their service. Many retailers and DNSPs already provide the minimum information AEMO considers necessary. However these are provided in different ways. Retailers and DNSPs are incentivised to provide this information in a presentable, usable and understandable format to their customers to provide a good customer experience.

ATA, CALC and CUAC suggested that there should be a non-solar and solar interval summary data format.¹⁸ Different summary data formats for solar and non-solar retail customers is information that AEMO considers to be above the minimum requirement as it would cater for a specific category of retail customer. While there are an increasing number of solar customers, AEMO considers that setting minimum requirements provides the opportunity for retailers and DNSPs to differentiate themselves by offering a higher level of service to retail customers with solar and interval meters. This also provides opportunities for third party service providers to offer an array of analytical tools that assist retail customers better understand their consumption.

AEMO's conclusion

For accumulation and interval summary data requirements, the Draft MDPP proposes that retailers and DNSPs deliver the specified minimum metering data requirements to retail customers or customer authorised representatives.

These are set out in Section 4 of the Draft MDPP.

4.3.2 Detailed data format

Issue summary and submissions

Stakeholders have provided various views on whether the MDPP should mandate minimum requirements for the detailed data format or provide a standardised detailed data format. At the 18 June 2015 stakeholder meeting, participants showed considerable support for having a standardised detailed data format.

¹⁸ Refer to Appendix A: Consolidated Summary of Responses, pp. 75-76.



While some retailers and DNSPs supported the minimum requirements for the detailed data format AEMO set out in the Strawman MDPP, DOI&S, most DNSPs, some retailers, and Enernoc suggested that AEMO should mandate an existing market format (for example, the NEM12 file or one of the My Power Planner formats required in Victoria).¹⁹

Using an existing market format is seen as beneficial because it is more cost-effective and efficient than establishing a new detailed data format.

AEMO's assessment

AEMO has considered whether retailers and DNSPs must provide the requestor with the retail customer's interval metering data for the detailed data format in a standardised format or an individually developed format that meets minimum requirements.

AEMO understands that the primary purpose of the interval detailed data format is to provide raw metering data for a retail customer to make more informed choices about their consumption, this information is likely to be used in by third parties assisting retail customers. This view is informed by the AEMC's policy intent, which states "We consider that a detailed format would be particularly useful for authorised parties to provide services to their customers...".²⁰

The interval detailed data format, whether requested by the retail customer or customer authorised representative, is most likely to be used in a third party's 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.

AEMO considers that the Draft MDPP should require retailers and DNSPs to provide a standardised interval detailed data format, since this promotes greater long-term market efficiencies. A standardised interval detailed data format that is provided to all retail customers and customer authorised representatives eliminates the need for customers and their representatives to have to accommodate multiple formats. In particular, this is more efficient for third parties requiring raw metering data, as their systems and processes will only need to deal with that single interval detailed data format. It is also less confusing for retail customers if a standard format is made available for the interval detailed data format.

The Draft MDPP proposes that retailers and DNSPs provide a standardised interval detailed data format to be provided to retail customers and customer authorised representatives. Further, AEMO considers that an existing industry format should be specified, as this may minimise overall costs to retailers and DNSPs in implementing the interval detailed data format. AEMO understands that developing and implementing a new interval detailed data format may not outweigh the incremental benefit to retail customers 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 in the National Electricity Market, whereas the My Power Planner files are only used by those operating in Victoria.

AEMO acknowledges that the NEM12 file is not an easy format for retail customers to understand and access. As discussed, AEMO expects a limited number of retail customers to individually use this format. These retail customers are likely to be "technically-motivated customers" who understand the NEM12 file. Nevertheless, to account for retail customers who may not be familiar with or understand the NEM12 file, AEMO proposes that retailers and DNSPs should provide a guide to help retail customers understand and use the NEM12 file. In the proposed retail customer guide, at a minimum,

¹⁹ Refer to Appendix A: Consolidated Summary of Responses, pp. 6, 9, 30, 62-63, 80, 91, 97, and 103-105.

²⁰ AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, p. 25.



retailers and distributors must explain how usage, generation or controlled load is represented and accessed.

AEMO's conclusion

The Draft MDPP proposes that retailers and DNSPs provide one NEM12 file as the interval detailed data format in response to a retail customer's or customer authorised representative's request.

To avoid confusion, the Draft MDPP proposes that, where a retail customer's metering installation configuration has changed (this includes a change from a tariff or from an accumulation meter to an interval meter), a separate NEM12 file may be provided for the relevant metering installation configuration period.

The Draft MDPP also proposes that retailers and DNSPs must make a NEM12 retail customer guide available to help retail customers understand and interpret the data included in the NEM12 file. At a minimum, this guide must explain usage, generation or controlled load.

This is set out in Section 4 of the Draft MDPP.

4.4 Alternate data formats

Issue summary and submissions

A number of stakeholders considered that the interval summary data format should include different information than the Strawman MDPP included.

ATA, CALC and CUAC's submissions included an example interval summary data format provided by CUAC that included:

- Average daily and monthly usage.
- Lowest and highest average usage per day.
- Average usage patterns on weekday, weekends, public holidays and weekends.
- Average seasonal usage patterns.²¹

With CUAC's consent, AEMO shared this example with stakeholders at the first AEMO-led workshop on 13 April 2015. As the CUAC example was circulated before the first round submission closing date (5 June 2015), some stakeholders commented on it. These comments included:

- DOI&S recommended average daily load profile by season and weekday/weekend (and by tariff segment, if appropriate), and maximum demand (where available).²²
- AusNet suggested that the MDPP includes a simplified monthly chart with only usage and generation average daily totals, and, where interval metering data is available, provide extra charts, similar to the graphs provided by CUAC.²³

Simply also suggested that the MDPP should allow retailers the flexibility to provide data formats that are different from those required by the MDPP.²⁴

AEMO's assessment

AEMO considers that the interval summary data format minimum requirements provided in the Draft MDPP would better inform retail customers about their consumption patterns. This information is based on a representation of actual data related to a specific time period (this could be monthly or when the

²¹ CUAC, CALC, ATA joint submission, Metering Data Provision Procedures – Consultation Paper, 30 April 2015, pp. 5-6.

²² Refer to Appendix A: Consolidated Summary of Responses, p. 52.

²³ Ibid., p. 3.

²⁴ Ibid., p. 65.



interval meter is manually read), instead of being based on average usage information. Retail customers have the flexibility to use the interval detailed data format to obtain further analytics on their specific information to meet their specific needs. Further, AEMO considers that third parties will provide analytic tools to provide specific information needed.

AEMO understands there may be circumstances where a retail customer or customer authorised representative requests an alternative data format that does not meet the minimum requirements set out in Section 4 of the Draft MDPP. AEMO considers that the MDPP should not limit a retail customer's or authorised customer representative's ability to receive an alternative data format, if this is requested by the customer or customer authorised representative and agreed with a retailer or DNSP.

AEMO's conclusion

AEMO proposes that the interval summary data format should be based on a representation of actual data related to a specific time period rather than present average usage information. AEMO's response to the inclusion of time of use information and demand is also discussed in Section 4.5 of this report.

The Draft MDPP proposes including a new Section 4.5, to allow retailers and DNSPs to provide an alternative data format that does not meet the minimum requirements set out in Section 4 of the Draft MDPP, if requested by a retail customer or customer authorised representative.

4.5 Energy flow types and demand

Issue summary and submissions

Some retailers and DNSPs did not support the inclusion of time of use or flexible pricing (for example, peak, shoulder and off-peak information).²⁵ This is mainly due to concerns over the potential mis-match between retailer tariffs and network tariffs, which could potentially lead to difficulties reconciling tariffs and retail customer confusion. AGL did not support constructs such as peak, shoulder, off-peak and generation.²⁶

CitiPower and SA Power Networks supported combining peak, shoulder and off-peak into a general consumption category.²⁷

NSW DNSPs supported including the following energy flow types: general supply, controlled load, and generation.²⁸

DOI&S, ATA, CALC and CUAC supported the summary data formats showing both consumption (in kilowatt hours) and demand (in kilowatts) information where this is available for demand or capacity-based tariffs that may become more widely available.²⁹

AEMO's assessment

AEMO understands that retail customers with tariff information may result in a mis-match information between retail tariffs and network tariffs when these are defined differently among retailers. In addition, DNSPs do not have visibility of time of use of information to provide it.

AEMO proposes only requiring retailers to provide with time of use information and demand information. AEMO proposes that the interval summary data format provided by retailers should show energy usage and demand or capacity information to support a retail customer's analysis of whether it is suitable for

²⁵ Refer to Appendix A: Consolidated Summary of Responses, pp. 1, 48, 73, 77, 79, and 85-87.

²⁶ Ibid., p. 48.

²⁷ Ibid., pp. 81, 83-84 and 88.

²⁸ Ibid., p. 77.

²⁹ Ibid., pp. 52 and 93.



them to change to a demand tariff. Demand or capacity is required only if it is applicable. Retailers will also need to clarify how these are defined.

As minimum requirements, AEMO proposes that DNSPs provide energy usage, controlled load and generation. This is information that DNSPs usually have available.

AEMO considers that time of use or flexible pricing (for example, peak, shoulder and off-peak information) is the minimum information that retail customers need to understand their consumption patterns. Further, NER clause 7.16(c)(2)(i) requires the interval summary data format to include the nature and extent of energy usage for daily time periods.

AEMO's conclusion

The Draft MDPP proposes that only retailers include time of use or flexible pricing (for example, peak, shoulder and off-peak) and demand information in the interval summary data format.

The Draft MDPP also proposes that DNSPs provide energy usage, controlled load and generation.

This is set out in Section 4 of the Draft MDPP.

4.6 Data quality indication

Issue summary and submissions

AGL and Momentum suggested that the data quality indication should be referred to as “substituted” or “actual” to create more meaning.³⁰

AEMO's assessment

AEMO agrees with AGL and Momentum that it would be better for the data quality indication to refer to “substituted” or “actual”, instead of indicating that a “yes” or “no” response is required. As discussed in Section 4.3.2, since AEMO is requiring the NEM12 file to be provided as the interval detailed data format, the data indication in that file will be used.

AEMO reviewed the need for a data quality indication in the accumulation and interval summary data formats and considers that these add no value since the data is summarised over a period of time and still reflects the nature of the retail customer's consumption pattern. This information is appropriately supplied in the interval detailed data format as they are assigned to the individual data intervals. Note that the Draft MDPP requires retailers and DNSPs to provide the NEM12 file or the interval detailed data format (see Section 4.3.2 of this Draft Report).

In the summary data formats, the Draft MDPP requires retailers and DNSPs to note whether all the data presented in the formats is actual.

AEMO's conclusion

As AEMO is proposing that the NEM12 file is to be provided as the interval detailed data format, the data quality indication used in that file will be used.

AEMO proposes that the accumulation and interval summary data formats must include a note identifying whether all the data presented in the formats is actual. AEMO proposes this replacing the requirement to include a data quality indication.

This is set out in Section 4 of the Draft MDPP.

³⁰ Refer to Appendix A: Consolidated Summary of Responses, pp. 8, 48 and 57.



4.7 Network tariff code

Issue summary and submissions

Energy Tailors suggested the network tariff code should be included in the interval detailed data format.³¹

AEMO's assessment

Network tariff codes are available in the market system as standing data. While AEMO understands Energy Tailor's view that network tariff codes should be included, the MDPP is to establish requirements for the manner and form in which metering data, not existing standing data, is to be provided. Therefore, it is not appropriate for the Draft MDPP to specify that standing data be included in the data formats.

AEMO's conclusion

AEMO proposes not to include networks tariff codes in the interval detailed data format.

4.8 Testing data formats and plain English

Issue summary and submissions

ATA, CALC, CUAC suggested the summary data formats should be tested with broader consumers using focus groups.³² Enernoc suggested the consumer representatives and data visualisation professionals work together to design the appropriate summary data format.³³ CUAC also provided an example interval summary data format.³⁴

ATA, CALC and CUAC also suggested that the language in the summary formats should be plain English and accessible to a broad audience.³⁵

AEMO's assessment

Considering the Draft MDPP requires retailers and DNSPs to meet minimum requirements for accumulation and interval summary data formats, and this allows them the flexibility to decide on the best way to present the information to their customers, AEMO does not consider it appropriate to separately test these summary data formats with retail customers. Meanwhile, AEMO continues to engage with stakeholders on all aspects of the MDPP.

Where practical, AEMO agrees that the accumulation and interval summary data formats should use plain English and be accessible to a broad audience. AEMO encourages retailers and DNSPs to ensure the language used in their summary data formats is accessible and understandable for retail customers.

AEMO's conclusion

For the summary data formats, the Draft MDPP proposes that retailers and DNSPs meet the minimum requirements specified in Section 4 of the Draft MDPP. AEMO does not propose to mandate the presentation of these. This allows retailers and DNSPs the flexibility to decide how this should be presented to their customers while ensuring minimum requirements are met.

³¹ Refer to Appendix A: Consolidated Summary of Responses, p. 91.

³² Ibid., pp. 100-101.

³³ Ibid., p. 103.

³⁴ CUAC, CALC, ATA joint submission, Metering Data Provision Procedures – Consultation Paper, 30 April 2015, pp. 5-6.

³⁵ Refer to Appendix A: Consolidated Summary of Responses, p. 101.

4.9 Inclusion of diagrams for accumulated summary data format

Issue summary and submissions

Energy Australia and NSW DNSPs do not support including diagrams in the accumulation summary data format in the MDPP because they consider this requires more than the minimum requirements specified in NER clause 7.16.³⁶

AEMO's assessment

While the NER does not specify that the accumulation summary data format needs to provide a diagram, it does not exclude it. Instead NER clause 7.16(3) requires AEMO to specify a summary data format for accumulated metering data, and AEMO considers that to improve retail customer access and make the information easier for retail customers to understand, it is appropriate to present it graphically. The information should also be presented so retail customers can readily determine the numerical information.

AEMO's conclusion

AEMO proposes that the accumulation summary data format must be presented diagrammatically and numerically.

This is set out in Section 4 of the Draft MDPP.

4.10 Customer request

Issue summary and submissions

In response to the Consultation Paper's question about whether there was a need to define a customer request, stakeholders expressed divergent views, including:

- ActewAGL and AusNet agreed this should be defined and different methods should be available, for example by phone and writing.³⁷
- Aurora, Energy Australia, Momentum, Origin, Simply and United suggested a customer request did not need to be defined.³⁸
- Energy Australia and Lumo Energy suggested the MDPP needs to define customer authorised representative requests, suggesting the following need to be covered:
 - The retail customer has provided authorisation (e.g. explicit informed consent).
 - Definition of the requesting party.
 - That sufficient information for verification of retail customer must be provided to a retailer or DNSP.
 - Clarify how long the authorisation is valid, with the start and end periods defined.³⁹
- Energy Tailors suggested that a communication protocol for retail customers and customer authorised representatives was needed.⁴⁰

³⁶ Refer to Appendix A: Consolidated Summary of Responses, pp. 53-54.

³⁷ Ibid., pp. 24-26.

³⁸ Ibid., pp. 24-25 and 28-29.

³⁹ Ibid., pp. 26-28.

⁴⁰ Ibid., p. 27.



AEMO's assessment

AEMO considers that it would be beneficial for the Draft MDPP to propose that a retailer or DNSP must identify and publish the accepted method the retail customer or customer authorised representative must use to submit a request. This makes the requesting method clear to requestors and allows retailers and DNSPs to determine the acceptable method, and provides flexibility for this to change as needed.

The NER framework, and consequent procedures, specify rights and place obligations on Market Participants. Customer authorised representatives (third parties) are not directly a part of this framework. Given the changing electricity market dynamics which see more third parties involved in the market processes, AEMO understands that a voluntary industry communication protocol would be useful. AEMO considers this to be outside the Draft MDPP's scope.

AEMO also considers it is outside the MDPP's scope to specify how long an authorisation is valid for. This type of information would be useful to include in a voluntary industry communication protocol.

Information needed for verification is discussed in Section 4.11 of this Draft Report.

AEMO's conclusion

The Draft MDPP proposes to include a requirement on retailers and DNSPs to identify and publish the accepted method the retail customer or customer authorised representative must use to submit a request. This is set out in Section 2 of the Draft MDPP.

The communication protocol, and specifying how long an authorisation is valid for, is outside the MDPP's scope.

4.11 Delivery timeframe commencement

Issue summary and submissions

Some retailers and DNSPs stated that the delivery timeframes should only commence once all completed information required to verify a retail customer or customer authorised representative has been received.⁴¹ Stakeholders are concerned that commencing the delivery timeframe from the time it is requested, and in the absence of all completed verification information:

- Provides inadequate time to verify that a request is legitimate, particularly in the case of a request from a customer authorised representative.
- May affect their ability to deliver a request within the specified delivery timeframes.

AEMO's assessment

In accordance with the NER, the delivery timeframes in the MDPP commence following a retail customer or customer authorised representative's request for information under NER clause 7.7(a). It is a retailer's and DNSP's responsibility to meet their Privacy Act 1988 (Commonwealth) obligations.

AEMO understand stakeholders' concerns over the impact that their inability to verify a retail customer or customer authorised representative in a reasonable time period may have on their ability to meet the delivery timeframes, despite this being a reasonable endeavours obligation. There may be circumstances where a lack of clarity over verifying the identity of a retail customer or customer authorised representative may represent challenges in meeting the delivery timeframe, and could result in claims that the timeframe had not been met, even though the circumstances were beyond a retailer or DNSP's control.

⁴¹ Refer to Appendix A: Consolidated Summary of Responses, pp. 18, 67 and 70-72.

To account for the issues raised by stakeholders while also protecting retail customers and customer authorised representatives by prescribing reasonable timeframes to respond to requests, AEMO proposes to include new requirements in Section 2 of the Draft MDPP, which are set out in the Section 4.12 of this Draft Report.

AEMO's conclusion

The MDPP proposes the following requirements:

- **As a minimum, retailers and DNSPs must identify and publish the following information that a retail customer or customer authorised representative must provide when requesting metering data:**
 - **The minimum information required to meet identity verification.**
 - **The relevant consents.**
 - **The method to request the metering data.**
 - **The ways the retailer and DNSP will provide the requestor with the metering data.**
- **If a retail customer or customer authorised representative has provided insufficient information, a retailer or DNSP must notify the retail customer or customer authorised representative within three business days that insufficient verification information and consent has been provided.**
- **The retailer's or DNSP's notification to the retail customer or customer authorised representative closes the initial request for metering data.**
- **When the customer or customer authorised representative returns with the complete verification information, a new metering data request is received.**

This is set out in Section 2 of the Draft MDPP.

4.12 Delivery timeframe of more than one retail customer request

Issue summary and submissions

The Strawman MDPP indicated that where there is more than one retail customer request, retailers and DNSPs and customer authorised representatives were required to negotiate the delivery timeframe.

The Consultation Paper raised a number of questions to test this further, including whether:

- A maximum delivery timeframe should be included.
- A sliding scale approach should be used to provide delivery timeframes for bulk retail customer requests.

A number of retailers and DNSPs supported the delivery timeframe being negotiated between them and customer authorised representatives, and did not support the use of a sliding scale.⁴² ActewAGL, AusNet and Jemena supported the use of a sliding scale, subject to certain conditions.⁴³ CitiPower suggested that the delivery timeframe should be negotiable where there are a large number of requests (greater than 100 NMIs), and a daily processing limit should be considered.⁴⁴

The DOI&S supported a maximum delivery timeframe being included, while the ENA, Ergon and Energy Australia did not support this.⁴⁵

⁴² Refer to Appendix A: Consolidated Summary of Responses, pp. 18 and 21- 24.

⁴³ Ibid., pp. 20-22.

⁴⁴ Ibid., p. 22.

⁴⁵ Ibid., pp. 16, 18 and 22.

AGL, Origin and CitiPower suggested that a daily limit be included in the MDPP to limit the number of customer requests included in customer authorised representative's request.⁴⁶ There are a number of reasons this was identified, including:

- To provide retailers and DNSPs a means of controlling the number of customer requests to balance their ability to provide this information within the delivery timeframes.
- Limiting the customer authorised representative to one retail customer request per business day to avoid the charge a retailer or DNSP can apply for more than one request.

Lumo Energy suggested the delivery timeframe should commence after payment is received.⁴⁷

AEMO's assessment

In determining an appropriate delivery timeframe, AEMO considers the following factors make it difficult to put a 'one size fits all' solution in place:

- 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.

AEMO considers it appropriate for retailers and DNSPs and customer authorised representatives to negotiate the appropriate delivery timeframes for a customer authorised representative's request that contains more than 100 retail customer's metering data requests. AEMO needs to ensure it places a reasonable requirement on retailers and DNSPs given uncertainty about the potential volume of retail customer's metering data requests included in a customer authorised representative's request. If large volumes of retail customer metering data requests are received on a business day (which could occur at short notice), limitations on existing business resources may affect a retailer's or DNSP's ability to deliver within a maximum delivery timeframe.

While AEMO has proposed a 100 NMI per business day limit in the Draft MDPP, it does not have sufficient information to assess whether this is an appropriate limit. The Draft MDPP included the 100 NMI per business day limit as suggested by CitiPower.⁴⁸ Stakeholders are encouraged to identify an appropriate limit and provide their reasons.

AEMO also considers it appropriate to place a 20 business day maximum delivery timeframe for a customer authorised representative's request containing one to 100 retail customer's metering data. This is considered necessary in case the negotiation fails to deliver reasonable delivery outcomes. It is in the interests of retail customers for their information to be provided to their customer authorised representative in a reasonable timeframe.

AEMO does not consider it appropriate or necessary for the delivery timeframe to commence prior to payment being received. NER clause 7.16 does not include any requirement for the MDPP to include provisions relating to payment of charges.

Rules 28, 56A, 56B and 86A of the NERR deal with charging arrangements for more than one retail customer request, rather than under the NER which includes the MDPP requirements. Further, the MDPP are to establish requirements for the manner and form for providing data. AEMO considers issues relating to the right to charge for providing metering data as outside the scope of the MDPP.

⁴⁶ Refer to Appendix A: Consolidated Summary of Responses, pp. 19, 22 and 96.

⁴⁷ Ibid., p. 71.

⁴⁸ Ibid., p. 22.



AEMO's conclusion

AEMO is including the following requirements in Section 2 of the Draft MDPP for a request for more than one retail customer's metering data:

- A 20 business day maximum delivery timeframe when a request relates to more than one but less than 100 retail customers.
- Where a request relates to more than 100 retail customers' metering data, the retailer and DNSP and customer authorised representative must negotiate the delivery timeframe.

4.13 Delivery method for summary data format

Issue summary and submissions

The Strawman MDPP proposed that summary metering data formats "...must be able to be offered in a Portable Document Format (PDF) and/or Comma Separated Values (CSV) format, unless otherwise agreed with the *retail customer* or *customer authorised representative*."⁴⁹

Energy Australia and Momentum suggested that AEMO clarify the requirement for the summary data format to be provided in CSV format, due to graphs not being able to be presented in CSV format.⁵⁰

The Strawman MDPP also required that the summary data format could be provided electronically or physically to a retail customer or customer authorised representative. Energy Australia, Lumo Energy and NSW DNSPs did not support the MDPP mandating that summary data formats must be provided physically to the retail customer or customer authorised representative as agreed with the retail customer or customer authorised representative.⁵¹

AEMO's assessment

As the CSV format cannot present a graph, it is only appropriate for presenting raw data. The requirement for the summary data format to be presented in a CSV format is removed.

The summary data format needs to primarily be suitable for a broad range of retail customers, noting this must also be provided to customer authorised representatives. Stakeholders did not provide a rationale to explain why they did not support the MDPP mandating that summary data formats be provided physically to the retail customer or customer authorised representative as agreed with the retail customer or customer authorised representative.

AEMO considers it appropriate to make this format available both electronically and physically to ensure a broad range of retail customers have access to this information, for example, retail customers that do not have access to, or the ability to use a computer.

AEMO's conclusion

Retailers and DNSPs must be able to offer the summary data format in a PDF format, or as otherwise agreed with a retail customer or customer authorised representative.

This is set out in Section 3 of the Draft MDPP.

⁴⁹ Available on AEMO's website at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.

⁵⁰ Refer to Appendix A: Consolidated Summary of Responses, pp. 7 and 53.

⁵¹ Ibid., pp. 73-74 and 76.

4.14 Definition of retail customer

Issue summary and submissions

The Consultation Paper raised a question about whether it is appropriate to include demand in the interval detailed data format for large retail customers.

This question prompted Momentum to ask AEMO to clarify or define what it meant by retail customer, small customer and large customer, and AusNet asked what definition of large retail customers AEMO was using.⁵² ActewAGL also asked AEMO clarify the definition of retail customer.⁵³

AEMO's assessment

AEMO acknowledges the question included in the Consultation Paper about “large retail customers” increased confusion about the intent of what size retail customer the MDPP refers to. The MDPP uses the NER definition of retail customer.

AEMO does not consider it appropriate or necessary for the MDPP to define the retail customer size further, as this is dealt with under the National Energy Retail Rules (see 56A and 86A of the National Energy Retail Rules, which apply to requests by small customers and customers respectively).

AEMO's conclusion

The MDPP includes only the NER definition of retail customer. It is not necessary or appropriate for the MDPP to define terms under the NERR.

4.15 Other

Issue summary and submissions

Section 3.1 of the Strawman MDPP identified requirements under the NERR, which AEMO initially considered provided context for retailers and DNSPs. Stakeholders suggested the following MDPP amendments that involve NERR requirements:

- Origin suggested AEMO include a section in the MDPP to clarify what a reasonable charge is and identify who the charge is to be levied on.⁵⁴
- AGL suggested placing a limit of one single customer request per day on a customer authorised representative, to prevent them from putting in numerous single customer requests to avoid paying a reasonable charge.⁵⁵
- Simply suggested, the MDPP should make it clear that up to two years of historical metering data can be requested by the retail customer or customer authorised representative.⁵⁶

AEMO's assessment

AEMO understands stakeholders' concern about the need for more clarity about the charging arrangements, and the reason stakeholders consider the MDPP needs to make the two-year metering data requirement clear. Since these requirements are dealt with under the NERR, rather than under the NER which includes the MDPP requirement, AEMO considers it unnecessary or inappropriate for the Draft MDPP to address these issues.

⁵² Refer to Appendix A: Consolidated Summary of Responses, pp. 5-6.

⁵³ Ibid., p. 24.

⁵⁴ Ibid., pp. 71-72.

⁵⁵ Ibid., p. 96.

⁵⁶ Ibid., p. 19.



The MDPP will establish requirements for the manner and form of providing data. AEMO considers issues relating to the right to charge for providing metering data outside the MDPP scope.

AEMO's conclusion

The MDPP removes information about the charging arrangements as the NERR deals with this. Section 3.1 of the Strawman MDPP has been removed.



APPENDIX A. CONSOLIDATED SUMMARY OF RESPONSES

A consolidation of issues raised by Consulted Persons in submissions, together with AEMO's responses, is published on AEMO's website at:

<http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



ABBREVIATIONS

Abbreviation	Expanded name
AEMC	Australian Energy Market Commission
ATA	Alternative Technology Association
CALC	Consumer Action Law Centre
CSV	Comma separated values
CUAC	Consumer Utilities Advocacy Centre Ltd
DOI&S	Department of Industry and Science
DNSPs	Distribution network service providers
ENA	Electricity Networks Association
MDPP	Metering Data Provision Procedures
NER	National Electricity Rules
NERR	National Energy Retail Rules
NMI	National metering identifier
PDF	Portable Document Format
VRC	Victorian Retail Code

