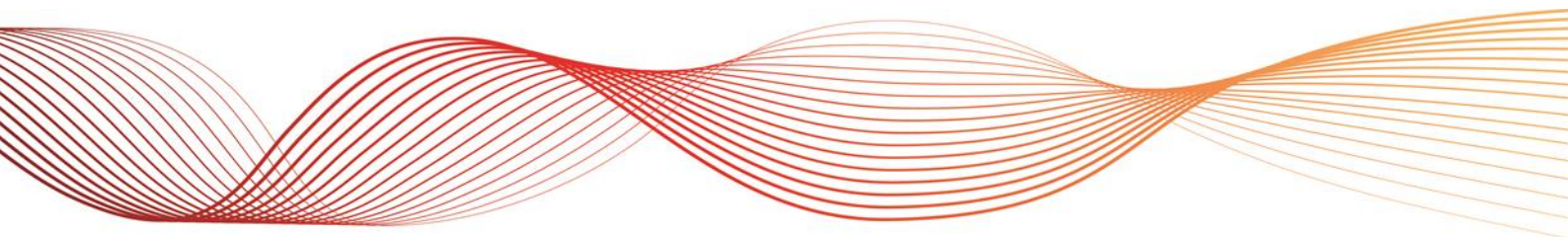




METERING DATA PROVISION PROCEDURES

FINAL REPORT AND DETERMINATION

Published: **September 2015**





NOTICE OF FINAL REPORT AND DETERMINATION – METERING DATA PROVISION PROCEDURES

National Electricity Rules – Rule 8.9

Date of Notice: 1 September 2015

This notice informs all Registered Participants and interested parties (**Consulted Persons**) that AEMO has completed its consultation on the **Metering Data Provision Procedures (MDPP)**.

This consultation was 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.

Determination and Publication

AEMO's final determination is to make the MDPP in the form published on AEMO's website.¹

In accordance with NER 11.69.2(b) the MDPP will commence on 1 March 2016.

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



EXECUTIVE SUMMARY

The publication of this Final Report and Determination (Final Report) concludes 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 and publish 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 6 July 2015, AEMO published its MDPP Draft Report and Determination (Draft Report) and Draft MDPP.²

While there was overall support for the Draft MDPP, stakeholders raised a number of issues, including:

- If the NEM12 file is required as the interval detailed data format, it should not include certain information that is not useful to customers. This should be a standardised approach.
- The interval summary metering data format should also include:
 - Average daily load profile information.
 - Demand information.
- The Draft MDPP is broader than the requirements specified in NER clause 7.16, and may be inconsistent with the Australian Energy Market Commission's (AEMC's) intent. Examples included:
 - Standardising the interval detailed data format.
 - The NEM12 retail customer guide that retailers and DNSPs are required to produce.
 - Retailers providing time of use information (peak, off-peak and shoulder information) in the summary data formats.
 - Requiring retailers and DNSPs to provide the requested metering data to the retail customer or their customer authorised representative within the delivery timeframe, instead of responding to the request.
 - Retailers and DNSPs publishing the information they require to verify customers and customer authorised representatives, and the requirement for them to notify retail customers or their authorised representatives within three business days of receipt of an incomplete request.
- Three business days is insufficient time to notify a retail customer or their customer authorised representative that incomplete information has been received.
- The delivery timeframe for multiple retail customer requests is too onerous:
 - The proposed 100 retail customer per business day request limit on customer authorised representatives' requests is too high and would be ineffective.

² Available at: http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures_



- The maximum timeframe for retailers and DNSPs to provide the requested metering data to a customer authorised representative is too short, and these requests should only be by negotiation.
- Customer authorised representatives should only be allowed to make one request per day.
- The MDPP should clarify payment obligations for provision of requested metering data.

After considering stakeholder submissions, and evaluating them against NER clause 7.16, AEMO determines that the Draft MDPP should be amended to incorporate the following:

- To satisfy the requirements for the interval detailed data format, retailers and DNSPs must provide the 200, 300 and 400 (where available) records of a NEM12 file, and this must comply with the Metering Data File Format Specification NEM12 and NEM13.³ This will provide a standardised interval detailed data format.
- To satisfy the requirements for the interval summary data format, retailers and DNSPs must:
 - Provide an average daily load profile for at least the most recent 12 months of metering data (if the metering data is requested for more than 12 months). Only retailers must include a summary of their general time of use or flexible pricing structures and identify where further information can be obtained to determine their time of use or flexible pricing structure.
 - Include maximum demand based on a retail customer's general supply (includes general light and power usage).
- For the retail customer and customer authorised representative identity verification process, the MDPP will:
 - Clarify that retailers and DNSPs are required to assess and notify a retail customer or customer authorised representative if the verification information supplied does not meet the retailer's or DNSP's published requirements under section 2.1 of the MDPP.
 - For multiple requests between 2 and 100, require retailers and DNSPs to notify a customer authorised representative within six business days if the verification information supplied does not meet the retailer's or DNSP's published requirements under section 2.1 of the MDPP.
 - For multiple requests more than 100, require retailers and DNSPs to notify a customer authorised representative within an agreed timeframe (at the time that the delivery timeframe is also agreed) if the verification information supplied does not meet the retailer's or DNSP's published requirements under section 2.1 of the MDPP.
 - Where metering data requests for multiple retail customers are made by a customer authorised representative and cannot be fully completed because incomplete verification information is supplied, retailers and DNSPs must provide the metering data for requests that can be completed within the relevant delivery timeframe.
 - Clarify that the delivery timeframe excludes time for postal delivery.

AEMO's final 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>.

³ Available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Open/Meter-Data-File-Format-Specification-NEM12-and-NEM13>.



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1. STAKEHOLDER CONSULTATION PROCESS

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

This Final Report is published in accordance with rule 8.9(k).

Note that there is a link to all submissions received during consultation at **Appendix A**. Issues raised in submissions are summarised in Table 1, and discussed in Section 4.

The 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

Below is the relevant rule (7.16) from the National Electricity Rules (NER). As noted in Section 2.2.1 below, this rule was added to the NER in National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014 No.7.

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 request⁴, the AEMC made rules⁵ that:

- Allow retail customers to obtain their metering data from DNSPs (the requirement on retailers was already included).
- Allow customer authorised parties to obtain metering data on behalf of retail customers.
- Require retailers and DNSPs to comply with the requirements included in the MDPP and the National Energy Retail Rules (NERR).
- Require 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 is 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.⁶

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.⁷

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 portable document format (PDF) or comma separated values (CSV), unless agreed otherwise.

⁴ Standing Council on Energy and Resources, Rule Change Proposal – Consumer Access to their Energy and Metering Data under the NER, October 2013.

⁵ 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.

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

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



- Detailed data format, which must be provided electronically to the retail customer or customer authorised representative and be constructed in a CSV file, which may be compressed into a “.zip” extension file.

In the first stage of consultation, AEMO received 23 written submissions and 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 an AEMO-led workshop, 13 April 2015.
- Discussions with stakeholders on the key stakeholder submission themes, 18 June 2015.

Copies of all written submissions (excluding any confidential information) have been published on AEMO’s website.⁸

2.4 Second stage consultation

On 6 July 2015, AEMO issued a Notice of Second Stage Consultation, and published the Draft Report and Draft MDPP. This information is available on AEMO’s website.⁹

The Draft MDPP proposed:

- 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 for retail customers to explain how this file is to be interpreted.
- 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 were added to Section 2 of the Draft MDPP, that:
 - Required 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.
 - Provided 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. This process 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.
 - Allowed 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.

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

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



- Clarified 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 representative's request for more than one retail customer's metering data, new clauses were added to Section 2 of the Draft MDPP, that required 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, in a delivery timeframe negotiated between the retailer and DNSP and customer authorised representative.

Section 3.1 of the Strawman MDPP, which included information about the NERR, was removed.

In the second stage of consultation, AEMO received 22 written submissions and held the following meetings with stakeholders:

- Monthly updates and discussion at the Retail Market Consultative Forum in June and July 2015.
- Discussions with stakeholders on the key stakeholder submission themes, 4 August 2015.
- Discussions with stakeholders on the inclusion of average daily load profile and maximum demand, 10 August 2015.

Copies of all written submissions (excluding any confidential information) have been published on AEMO's website.¹⁰

¹⁰ 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.
- Identity verification and data delivery timeframes.
- Data delivery method.
- Other issues.

A consolidation of issues raised by Consulted Persons in submissions, together with AEMO’s responses, is published on AEMO’s website.¹¹

Table 1 Summary of issues raised by Consulted Persons

Category	Issue	Raised by
Standardising data formats – Section 4.2.2	Supports standardised interval detailed data format.	Consumer Utilities Advocacy Centre Ltd (CUAC), Department of Industry and Science (DOI&S)
	A standardised interval detailed data format contravenes the AEMC’s determination.	Momentum Energy (Momentum)
	All data formats should be standardised.	Energex
Detailed data format – Section 4.2.3	Supports the NEM12 file.	CUAC, Enernoc, NSW DNSPs
	Supports the NEM12 file subject to amendment.	AusNet Services (AusNet), Electricity Networks Association (ENA), Energex, Electricity Retailers Association of Australia (ERAA), Origin Energy (Origin), United Energy (United) , AGL Limited (AGL)
	Supports NEM12 file if it only includes the 200 and 300 records.	Energy Australia, Origin
	Does not support the NEM12 file because it contains a substantial amount of data that is irrelevant.	Momentum
Retail customer guide – Section 4.2.4	Supports the development of a NEM12 retail customer guide.	CUAC
	The NEM12 guide could include the file naming convention in the retail customer guide.	Energy Tailors
	AEMO should develop the NEM12 retail customer guide.	AusNet, NSW DNSPs, AGL, Lumo Energy (Lumo), Red Energy (Red)
	Do not support the NEM12 retail customer guide.	Energy Australia, Momentum
Summary data formats – Section 4.2.5	Summary data formats should include diagrammatic and numerical representation.	CUAC
	Accumulated summary data format should not include a diagrammatic or numerical representation.	Energy Australia
	Accumulated summary data format – diagrammatic representation should not be mandatory.	ActewAGL

¹¹ Available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



Category	Issue	Raised by
	Supports the inclusion of average usage information, particularly average data for a month.	CUAC
	Supports retailers providing time of use information and demand/capacity information in the interval summary data format.	CUAC
	Supports the inclusion of an average daily load profile and maximum demand.	DOI&S
	Do not support the inclusion of peak, shoulder and off-peak information.	AGL, Energy Australia, Lumo, Origin, Red
	The inclusion of demand information is premature and complicates delivery by March 2016.	M2 Energy
Retail customer and customer authorised representatives – Section 4.3.1	The NER only requires retailers and DNSPs to respond to a request, rather than deliver the data. This terminology should be used consistently.	AGL, Energy Australia, Lumo, Momentum, Red
	Response or delivery should be a 'reasonable endeavours' option.	AusNet, Momentum
	Consistent with the NER, references to delivery should be deleted. Instead, it should reflect wording in cl. 7.16 – "respond to a request".	Momentum
	There should only be a response timeframe, not delivery.	Momentum
Identity verification process – Section 4.3.2	Supports the requirement on retailers and DNSPs to publish the verification information required and the way the request can be made.	DOI&S
	Supports the requirement to prescribe and publish the information to verify a customer.	Enernoc
	The Draft MDPP contains verification requirements that are beyond the scope of the NER.	AGL, ERAA
	Verification processes should be uniform for customers and the same for third parties.	CUAC, Energy Tailors
	Participants should allow for an electronic mode of request which is automated – for retail customers and CARs.	Energy Tailors
	Include a clause that clarifies that unless consent and verification is satisfied there is no obligation to provide the requested data.	ENA, Energex
	Clarify what occurs for all other customer requests (made by a CAR) if a verification cannot occur for other requests.	Momentum
Verification notification timeframe – Section 4.3.3	Do not support a three business day time to verify a customer.	AusNet, Citipower and Powercor, ENA, Energex, ERAA, NSW DNSPs, Lumo, Origin, Reg, SA Power Networks, United
Delivery timeframes – Section 4.3.4	Supports a maximum time limit for CAR requests. Suggested a sliding scale.	CUAC
	20 business days to provide metering data on up to 99 sites is unreasonable.	NSW DNSPs, Origin



Category	Issue	Raised by
	A 20 BD maximum time limit is an unreasonable period of time and does not satisfy the spirit of the procedure change.	Enemroc
	The MDPP should allow retailers and DNSPs to negotiate an agreed delivery timeframe after their first request.	Origin
	Response timeframes for multiple requests should be reduced to 30 national metering identifier (NMI) requests as it reduces the risk to small retailers.	M2 Energy
	Limit on CAR requests – 100 NMI per day too high.	AGL, ENA, Energex, Momentum, M2 Energy
	A clause should be included that states there is no obligation to provide the metering data unless consent and verification is satisfied.	United
	Clause 2.1(b) should be removed as retailers and DNSPs know that this is their responsibility.	Lumo, Red, United
	CARs should be limited to one (or single) request per business day.	AusNet Services, AGL, ENA, Momentum
	Clause 2(a) needs to recognise that there are two verification consents – customer verification for the time requested and customer consent to the CAR.	ENA, Energex
Delivering summary and detailed data formats – Section 4.4.1	File formats should be opened in a PDF or other common standard.	Lumo, Red
Naming convention of data format files –Section 4.4.2	The detailed data format file naming convention should include a reference to the organisation providing the file.	Energy Tailors
	The detailed data format file naming convention should be excluded.	NSW DNSPs
Alternative metering data formats – Section 4.4.3	Obtaining informed consent for an alternative data format is not reasonable.	ENA, Energex
	The requirement to provide a guide should be removed.	AGL
Customer Authorised Representatives providing a single daily request – Section 4.5.1	Customer Authorised Representatives should be limited to one request per day, instead of submitting multiple single requests.	AusNet, AGL, ENA, Momentum
Charges for a retail customer or Customer Authorised Representative request – Section 4.5.2	A section on charging a reasonable charge should be included.	Origin
Application to child metering – Section 4.5.3	The purpose and scope should make it clear that the licenced network does not need to provide child metering data.	ENA, United
Data quality indication – Section 4.5.4	Data quality should be in the tabular form “Y” or “N”. Not practical to provide a statement indicating the file includes estimated data.	Origin
	Define the data quality indication threshold.	AusNet



Category	Issue	Raised by
Requirements in Appendices – Section 4.5.5	Identified that requirements were included in Appendices A and B and text should be amended to reflect that these are examples, instead of requirements.	Lumo, Red

4. DISCUSSION OF ISSUES

4.1 Introduction

In this section, issues are again grouped under the broad headings used in the Consultation Paper:

- Data formats – section 4.2.
- Identity verification and data delivery timeframes – section 4.3.
- Data delivery method – section 4.4.
- Other issues – section 4.5.

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.¹²

4.2 Data formats

4.2.1 Introduction

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, so they can use this information to inform their decisions about their energy consumption.¹³
- The interval detailed data format is to be primarily used by customer authorised representatives to provide services to their customers.¹⁴

AEMO published the Draft MDPP to facilitate further consultation on the development of the MDPP.¹⁵ The Draft MDPP proposed minimum requirements (set out below) that AEMO considered retailers and DNSPs must provide retail customers and customer authorised representatives. The Draft MDPP also presented example summary data formats for those retailers and DNSPs who wished to use them.

Accumulation summary data 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 retailers, AEMO proposed the following:

- NMI.
- Meter Serial Number.
- Unit of Measure (UOM) for the Energy Flow Type.
- Data quality indication.
- Read Date for accumulated metering data (i.e. end of meter reading period).
- From Date (i.e. start of meter reading period).
- Energy Flow Types:
 - Total usage or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc..

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

¹³ AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, p. 25.

¹⁴ Ibid.

¹⁵ Available at: <http://www.aemo.com.au/Consultations/National-Electricity-Market/Metering-Data-Provision-Procedures>.



- Controlled Load usage (only if applicable).
- Generation (only if applicable).

For DNSPs, AEMO proposed the following:

- NMI.
- Meter Serial Number.
- UOM for the Energy Flow Type.
- Data quality indication.
- Read Date for accumulated metering data (i.e. end of meter reading period).
- From Date (i.e. start of meter reading period).
- Energy Flow Types:
 - Total usage.
 - Controlled Load usage (only if applicable).
 - Generation (only if applicable).

Interval summary data formats

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 interval summary data format, the following minimum requirements were proposed on retailers:

- NMI.
- Meter Serial Number.
- UOM for the Energy Flow Type.
- Data quality indication.
- Date, monthly for remotely read interval metering data or To Date for manually read interval metering data (i.e. end of meter reading period).
- From Date (i.e. start of meter reading period).
- Energy Flow Types:
 - Total usage or billing-related components, e.g. Peak, Shoulder, Off-Peak usage, etc.
 - Controlled Load (only if applicable).
 - Generation (only if applicable).
- Demand/Capacity (if applicable for billing or if requested by a retail customer, or customer authorised representative, and is available).

For the interval summary data format, the following minimum requirements were proposed on DNSPs:

- NMI.
- Meter Serial Number.
- UOM for the Energy Flow Type.
- Data quality indication.
- Date, monthly for remotely read interval metering data or To Date for manually read interval metering data (i.e. end of meter reading period).
- From Date (i.e. start of meter reading period).
- Energy Flow Types:



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

Detailed data format

For the interval detailed data format, AEMO proposed that the NEM12 file was to be provided to meet the minimum requirement.

4.2.2 Standardising data formats

Issue summary and submissions

Section 4 of the Draft MDPP proposed minimum requirements for the accumulation and interval summary data formats and specified the NEM12 file be provided as the standardised interval detailed data format.

CUAC and DOI&S supported retailers and DNSPs providing a standardised interval detailed data format.¹⁶ Momentum Energy suggested that it was inappropriate to standardise the interval detailed data format as this “contravenes the AEMC’s determination”.¹⁷ Further, Energex did “...not agree with AEMO’s decision not to mandate a standardised format for retailers and DNSPs to deliver accumulation and interval metering data to retail customers and customer authorised representatives”.¹⁸

In the stakeholder meetings held, the majority of stakeholders also indicated support for standardising the interval detailed data format, not the summary data formats.

AEMO’s assessment

AEMO has considered whether it is appropriate for the MDPP to require retailers and DNSPs to provide standardised data formats, or to only set out the minimum requirements for both accumulation and interval summary data formats, and an interval detailed data format.

As discussed in section 4.3.2 of the MDPP Draft Report, AEMO considers it is appropriate to standardise the detailed data format as the NEM12 file format (containing at a minimum, the 200, 300 and 400 records, discussed below). As this information is likely to be used by third parties assisting retail customers assess whether better pricing offers are available to them, AEMO considers it is important to standardise the interval detailed data format to support the development of efficient third party services to facilitate customer choice, and create greater long-term market efficiencies.

AEMO does not consider the MDPP should require retailers and DNSPs to provide standardised accumulation and interval summary data formats. Instead, AEMO has specified minimum requirements that retailers and DNSPs must provide to retail customers. Consistent with the AEMC’s Final Determination¹⁹, this will provide retail customers (in particular) with a minimum amount of information to assess their usage while allowing retailers and DNSPs the opportunity to provide innovative data formats to differentiate their service.

AEMO’s conclusion

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

¹⁶ CUAC and DOI&S

¹⁷ Momentum submission, Metering Data Provision Procedures – Draft Report and MDPP, 21 July 2015, p. 18.

¹⁸ Energex submission, Metering Data Provision Procedures – Draft Report and MDPP, 21 July 2015, p. 1.

¹⁹ AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, pp. 10, 25-26.



For the interval detailed data format, the MDPP requires retailers and DNSPs to deliver a standardised format, which is a NEM12 file format (containing at a minimum, the 200, 300 and 400 records, discussed below), to retail customers or customer authorised representatives.

These are set out in Section 4 of the MDPP.

4.2.3 Detailed data format

Issue summary and submissions

Section 4 of the Draft MDPP proposed a detailed interval metering data file be provided.

CUAC, DOI&S, Enernoc, and NSW DNSPs supported the Draft MDPP specifying data elements of the interval detailed metering data format must comply with the technical specification of the Meter Data File Format Specification NEM12 and NEM13.²⁰

AusNet Services, ENA, Energex, Energy Australia, ERAA, Momentum, Origin, United, and AGL indicated that the NEM12 file includes data that is irrelevant to retail customers and customer authorised representatives.²¹ Many of these stakeholders considered that only the 200 and 300 file records should be provided.

AEMO's assessment

The primary objective 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 by third parties assisting retail customers assess whether better pricing offers are available to them.

The NEM12 file is an existing format which provides a good basis for the interval detailed data format since industry stakeholders accept and understand its technical specifications and specifying an existing format may minimise overall costs to retailers and DNSPs in implementing the interval detailed data format. However, AEMO agrees that a NEM12 file containing a complete set of the 100-900 records specified in the Metering Data File Format NEM12 and NEM13 includes information that retail customers and customer authorised representatives do not require for a retail customer to make more informed choices about their consumption.

As discussed in section 4.2.2, the MDPP requires retailers and DNSPs to provide a standardised interval detailed data format, since this promotes greater long-term market efficiencies. AEMO considers that the detailed data format should be based on a NEM12 file but file records that are unnecessary for a retail customer to make more informed choices about their consumption need not be included in the interval detailed data format. This will ensure retail customers and customer authorised representatives are provided with the information necessary to achieve the primary objective of the interval detailed data format.

Table 2 provides AEMO's assessment of the NEM12 file records and fields that are needed for the interval detailed data format. AEMO has not included an example of the abridged NEM12 file in the MDPP. This is expected to be a standardised format since the Metering Data File Format Specification NEM12 and NEM13 must be complied with.

²⁰ Refer to Appendix A: Consolidated Summary of Responses, pp. 83, 85 and 89.

²¹ Ibid., pp. 79, 82- 89.

Table 2 Assessment of NEM12 file records and fields

NEM12 file record		Fields	AEMO's assessment
100	Header (mandatory)	Record Indicator, Version Header, Date Time, From Participant, To Participant	This information is not considered necessary for a retail customer or customer authorised representative to make more informed choices about consumption.
200	NMI data details (mandatory)	Record Indicator, NMI, NMI Configuration, Register ID, NMI Suffix, MDM Data Stream Identifier, Meter Serial Number, UOM, Interval Length, Next Scheduled Read Date	The majority of this record is needed as it provides details of the NMI and meter.
300	Interval data (mandatory)	Record Indicator, Interval Date, Interval Value 1 . . . Interval Value N, Quality Method, Reason Code, Reason Description, Update Date Time, MSATS Load Date Time	The majority of this record is needed as it provides the usage data which is needed.
400	Required in certain circumstances (required)	Record Indicator, Start Interval, End Interval, Quality Method, Reason Code, Reason Description	This record is needed as it identifies the data quality of the interval data.
500	Required in certain circumstances (required)	Record Indicator, Trans Code, Ret Service Order, Read Date Time, Index Read	This information is not considered necessary for a retail customer or customer authorised representative to make more informed choices about consumption.
900	End of data (mandatory)	Record Indicator	This information is not considered necessary for a retail customer or customer authorised representative to make more informed choices about consumption.

AEMO's conclusion

The MDPP requires retailers and DNSPs to provide an abridged NEM12 file as the interval detailed data format in response to a retail customer's or customer authorised representative's request. The 200, 300 and 400 NEM12 file records are the minimum records required.

The MDPP also allows retailers and DNSPs to provide an alternative format that does not meet minimum requirements if this is agreed with a retail customer or customer authorised representative.

This is set out in Section 4 of the MDPP.

4.2.4 Retail customer guide

Issue summary and submissions

Section 4.4 of the Draft MDPP proposed retailers and DNSPs provide a customer guide to help explain the detailed interval metering data file to retail customers.

CUAC supported the development of a customer guide.²² However, a number of retailer submissions questioned whether, under NER clause 7.16, AEMO had the power to require retailers and DNSPs to provide a retail customer guide, and therefore did not support it.²³ If the retail customer guide was to be required, most retailers' and DNSPs' submissions suggested that AEMO develop the guide in consultation with stakeholders.²⁴ At the 4 August 2015 meeting, the majority of stakeholders indicated that it would be most efficient for AEMO to develop the retail customer guide.²⁵

²² Refer to Appendix A: Consolidated Summary of Responses, pp. 81 – 82.

²³ Ibid., pp. 79, 89 – 94.

²⁴ Ibid., pp. 90 – 91.

²⁵ Refer to published meeting notes.

Energy Tailors suggested that the retail customer guide could also include the file naming convention.²⁶

AEMO's assessment

AEMO acknowledges that the NEM12 file, and the abridged version required and discussed in section 4.2.3, is not an easy format for retail customers to understand and access. Retail customers requesting the detailed interval metering data file are likely to be “technically-motivated customers” who have the ability to understand the NEM12 file. Nevertheless, to account for retail customers who may not be familiar with or understand the NEM12 file, the MDPP requires retailers and DNSPs to provide a retail customer guide to help retail customers interpret and understand the detailed data format.

Since the retail customer guide may include information specific to each retailer and DNSP, and this information (for example, how it treats multiple data streams) can be changed by retailers and DNSPs, AEMO considers it is more appropriate for each retailer and DNSP to produce the retail customer guide.

AEMO's conclusion

The MDPP requires retailers and DNSPs to make available a retail customer guide to help retail customers interpret and understand the metering data included in the detailed interval metering data file. At a minimum, this guide must explain how usage, generation or controlled load is represented in the metering data file.

This is set out in Section 4 of the MDPP.

4.2.5 Summary data formats

Issue summary and submissions

Section 4 of the Draft MDPP proposed the minimum requirements for accumulation and summary data formats. These are set out in section 4.2.1 of this report.

CUAC supported including diagrammatic and numerical representation in summary data formats, whereas Energy Australia did not support this. ActewAGL suggested that the diagrammatic representation should not be mandated. CUAC also supported retailers providing time of use or flexible pricing information (for example, peak, off-peak, shoulder information) and demand and capacity information in the summary data formats.

Consistent with its first round submission, DOI&S suggested that an average daily load profile should be a minimum requirement for the interval summary data format, and maximum demand was needed “...to allow customers to compare other tariff offers which may use maximum demand as a charging parameter”.²⁷ Additionally, DOI&S supported retailers providing information by tariff segment.²⁸

Similar to its first round submission (joint submission with the Alternative Technology Association and Consumer Action Law Centre), CUAC supported the inclusion of average usage information, particularly average data for a month.²⁹

Consistent with their first round submissions, most retailers did not support the inclusion of time of use or flexible pricing information (for example, peak, off-peak, shoulder information) in the summary data formats. The key reasons included:

- It was outside the scope of NER clause 7.16 and the AEMC's intent to require billing-related information in the summary data formats. It was suggested that only metering data can be included under NER clause 7.16.

²⁶ Refer to Appendix A: Consolidated Summary of Responses, p. 51.

²⁷ DOI&S submission, Metering Data Provision Procedures – Draft Report and MDPP, 21 July 2015, p. 3.

²⁸ Refer to Appendix A: Consolidated Summary of Responses, pp. 77 – 78

²⁹ Ibid., pp. 71 – 72.



- There are significant complexities and costs involved in providing billing related information.
- The requirement on retailers and DNSPs should be identical for the summary data formats, as placing a different requirement may lead to confusion for retail customers.

M2 Energy did not support the inclusion of demand information and suggested it is premature to include this until more is known about demand arrangements being offered.

AEMO's assessment

AEMO considers that NER clause 7.16 allows the MDPP to require retailers to provide time of use or flexible pricing information. Under this clause, the MDPP must establish the manner and form for detailed and summary data formats. NER clauses 7.16(c)(2)(i) and (ii) specifies that the interval summary data format should include, at a minimum, the:

- Nature and extent of energy usage for daily time periods.
- Usage or load profile over a specified period.

Further, the AEMC's final determination contemplated the provision of time of use or flexible pricing information.^{30 31}

AEMO considers that retail customers need information that is easy to understand and informs them about the relationship between their usage and the retail tariff they are on, as this allows them to more effectively assess whether a different offering is appropriate. From stakeholder discussions, AEMO agrees that retail customers only need to understand their current retail tariff offering as this applies to their usage, instead of different tariff structures that may have applied over the period the metering data is requested. AEMO understands from retailers that requiring retailers to only provide the current retail tariff offering would limit the level of complexity involved in system changes.

AEMO does not consider that the requirement on retailers and DNSPs needs to be identical.

The ATA, CUAC and CALC (joint submission) and DOI&S first round submissions suggested that retail consumers needed to understand average usage information and maximum demand information. The MDPP Draft Report noted that only actual data related to a specific time period should be presented in the summary data formats and further information can be accessed from the detailed data format.³² AEMO also suggested that analytic tools provided by third parties may provide this information for consumers.

DOI&S suggested that the summary data format in the Draft MDPP "...will not allow a customer to:

- Use their load profile to compare their usage to other tariffs on offer;
- Get a reliable indication of their potential for load shifting, especially if the peak tariff period is long, or there are multiple peak and shoulder periods; or
- Understand when their maximum demand is likely to occur".³³

AEMO has reconsidered whether the summary data format needs an average daily load profile and maximum demand to be included in the interval summary data format for retail customers to more effectively assess their usage. AEMO also re-assessed how this information can be presented in an easy to understand format that is not too complex for retailers and DNSPs to implement.

AEMO agrees that an average daily load profile would provide retail customers with information on the extent of their average energy usage for different daily time periods. Therefore AEMO has included a

³⁰ AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, pp. 22 and 50.

³¹ 4 August meeting notes.

³² AEMO, MDPP Draft Report and Determination, 30 April 2015, pp. 15 – 16.

³³ DOI&S submission, Metering Data Provision Procedures – Draft Report and MDPP, 21 July 2015, p. 3.



requirement on retailers and DNSPs to provide an average daily load profile based on at least the most recent 12 months of metering data. AEMO considers that providing the average daily load profile for this time period will provide a reasonable representation of a customer's average load profile since the time period covers all seasons. Maximum demand has been included so retail customers have their maximum demand information to compare demand tariff offers. AEMO understands that demand tariffs are being considered by some DNSPs and therefore does not agree it is premature to provide this information.

Since the average daily load profile shows a retail customer's average usage during each hour in a 24 hour period, AEMO considers this diagram can also be used to relate this usage to the time of use information or flexible pricing information in a simpler manner. Therefore, section 4 of the MDPP includes a requirement for the retailer provided average daily load profile graph to include a note that either provides the retail customer's current tariff time of use splits or directs them to a place that explains their current tariff arrangements. DNSPs are not required to provide time of use time splits as they do not have that information.

The representation of energy usage for retailers and DNSPs is simplified to include general supply, controlled load (where applicable), generation (where applicable), and maximum demand (monthly or the end of the meter read period).

An example average daily load profile with text included on the graph identifying tariff time of use splits and a revised time of use or flexible pricing information with a monthly maximum demand was presented to stakeholders on 10 August 2015. Stakeholders indicated this represented a better solution than the diagrams proposed in the Draft MDPP. Following this discussion, these diagrams have been refined further and provided as examples in Appendix A and B of the MDPP.

AEMO considers these changes will provide retail customers with information that is useful and understandable and better meets the National Electricity Objective, while also minimising industry costs.

AEMO considers that it is the responsibility of retailers and DNSPs to determine for themselves whether to include disclaimers or other explanatory wording and its content and position when providing metering data in accordance with the MDPP. The MDPP does not restrict retailers and DNSPs from including disclaimers and explanatory wording when providing metering data. To avoid doubt, AEMO has included sections 4.2(e) and 4.3(e) in the MDPP to clarify that retailers and DNSPs are not limited in relation to any disclaimer or other wording they consider necessary to include with the summary formats. In relation to the detailed format, retailers and DNSPs could include disclaimers or explanatory wording in the guide or in any other manner they consider necessary.

AEMO's conclusion

The MDPP includes a requirement on retailers and DNSPs to provide a table and diagram that presents a retail customer's energy flows (this includes general supply, controlled load (where applicable) and generation (where applicable)). A retail customer's maximum demand (in kilowatts), which can be presented monthly or quarterly depending on the end of the meter reading period, must be included.

This change is reflected in the definition of maximum demand, and new definitions for general supply and usage, in the glossary in 1.2.1 of the MDPP.

The MDPP includes a requirement on retailers and DNSPs to provide an average daily load profile graph for at least the most recent 12 months of metering data (if the request is for more than 12 months). Retailers must include a note on that average daily load profile graph that either provides the retail customer's current tariff time of use splits or directs them to a place that explains their tariff arrangements.

This change is reflected in the definition of average daily load profile in the glossary in 1.2.1 of the MDPP.

The following definitions are removed to support the requirements for the new diagrammatic representations of the retail customer’s metering data:

- **Daily time periods.**
- **Extent of energy usage.**
- **Load profile.**
- **Off-peak.**
- **Peak.**
- **Shoulder.**

This is set out in Section 1.2.1 and 4 of the MDPP.

4.3 Identity verification and data delivery timeframes

4.3.1 Retail customer and customer authorised representative requests

Issue summary and submissions

Some retailers suggested that the requirements in section 2.1 of the Draft MDPP were beyond the scope of NER clause 7.16, since this clause only requires retailers and DNSPs to respond to a request, rather than deliver the metering data to the requesting party. These retailers suggested that references to “delivery” should be deleted and be replaced to reflect wording in NER clause 7.16 – “respond to a request”.³⁴

AusNet, Momentum and NSW DNSPs also suggested that the requirement should be a ‘reasonable endeavours’ obligation, consistent with the wording in the NER.³⁵

AEMO’s assessment

NER clause 7.16(b) states the objective of the MDPP 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”.

NER clause 7.16(b) does not only refer to a ‘response to a request’, it clearly states that the objective of the MDPP is to place requirements on retailers and DNSPs to provide or deliver the requested metering data to a retail customer or customer authorised representative. This is also consistent with the Standing Council on Energy and Resources (now the COAG Energy Council) rule change intent and the AEMC’s Final Determination.³⁶

AEMO agrees that section 2.1(a) of the MDPP should refer to a reasonable endeavours requirement, consistent with wording in NER clause 7.16(c)(4).

AEMO’s conclusion

The MDPP refers to the delivery of the requested metering data to a retail customer or customer authorised representative.

³⁴ Refer to Appendix A: Consolidated Summary of Responses, pp. 23 – 25 and 30.

³⁵ Ibid., pp. 12, 17, 27-28, and 30.

³⁶ AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, pp. i and ii.



The requirement on a retailer or DNSP to advise a retail customer or customer authorised representative that the verification information they provided was incomplete is amended to be a reasonable endeavours obligation.

This is set out in section 2(a) of the MDPP.

4.3.2 Identity verification process

Issue summary and submissions

The following stakeholder comments were made on the verification requirements, in response to the Draft MDPP:

- DOI&S supported the verification requirements proposed in the Draft MDPP.
- Most retailers suggested that including these requirements was outside AEMO's scope.
- CUAC and Energy Tailors suggested the verification processes should be uniform for retail customers and customer authorised representatives.
- Energy Tailors suggested that an electronic mode of requesting the metering data should be automated for retail customers and customer authorised representatives, and the proposed timeframes were weighted towards existing participants.
- ENA and Energex suggested the MDPP should clarify that unless consent and verification is satisfied there is no obligation to provide the requested data.
- Momentum suggested that the MDPP should clarify what occurs for all other customer requests that are made by a customer authorised representative, if a verification cannot occur for other customer requests included in a multiple request.³⁷

AEMO's assessment

NER clause 7.16(c)(4) requires the MDPP to include timeframes on retailers and DNSPs to respond to requests. As discussed in section 4.3.1, the intent is to deliver the requested metering data in the timeframes in the MDPP.

AEMO considers that it is within its scope to include requirements to clarify the circumstances where verification cannot be achieved in a reasonable timeframe, since this is a necessary step in the process in delivering the requested metering data to a retail customer or customer authorised representative.

Conceptually, the suggestion that verification processes should be uniform for retailers and DNSPs may provide a more efficient process for customers, and their customer authorised representatives, as would automating requests for retail customers and customer authorised representatives. Despite this, AEMO does not have the scope to require this in the MDPP. It is for retailers and DNSPs to identify the information required to meet their privacy obligations and how it is implemented.

AEMO does not consider the MDPP needs to clarify that retailers and DNSPs do not have an obligation to provide the requested data format unless consent and verification requirements are met. This is because sections 2(c), (d) and (e) of the MDPP allows the retail customer or customer authorised representative request to be closed if they have not provided the verification information requested by a retailer or DNSP. This implies there is no further obligation to provide the requested metering data.

In the case of a request from a customer authorised representative relating to more than one retail customer, the draft MDPP did not specify what retailers and DNSPs should do if the information to meet their published verification requirements has been provided for some, but not all, of the retail customers included in the request. AEMO considers that it is reasonable to expect that a retailer or DNSP faced

³⁷ Refer to Appendix A: Consolidated Summary of Responses, pp. 11 – 23.



with this situation should still use reasonable endeavours to meet the delivery timeframe specified in section 2.3 of the MDPP in relation to the retail customers for which complete verification information has been provided. However, to prevent any misinterpretation and provide clarity on the compliance obligations of retailers and DNSPs, AEMO considers that a new clause should be included specifying that the metering data for the remaining retail customer requests (for which complete verification information has been provided) must be provided within the required delivery timeframe.

AEMO's conclusion

Where metering data requests for multiple retail customers are made by a customer authorised representative and cannot be fully completed because incomplete verification information is supplied for some of the retail customers, retailers and DNSPs must provide the metering data within the relevant delivery timeframe for the retail customers for which complete verification information has been supplied.

This is set out in section 2.3(d) of the MDPP.

4.3.3 Verification notification timeframe

Issue summary and submissions

The Draft MDPP proposed that retailers and DNSPs must notify a retail customer or customer authorised representative within three business days that insufficient verification information had been provided.

Most retailers and DNSPs did not support the three business days and suggested five business days is more appropriate.³⁸ There were two main reasons retailers and DNSPs considered this timeframe needed to be increased, including:

- More time was needed to allow retailers and DNSPs to verify retail customers included in a multiple request from customer authorised representative.
- In the case of postal requests, the timeframe should allow two days for postage.

AEMO's assessment

Stakeholder submissions and discussions indicated that the requirement in section 2.1(c) of the Draft MDPP is unclear. The intention of section 2.1(c) of the Draft MDPP was for retailers and DNSPs to assess whether a retail customer or customer authorised representative has provided all of the information to meet their published verification requirements and notify them if they have not provided all of the information to meet those requirements.

Discussions with retailers and DNSPs indicated that the majority of retail customer requests are expected to be made via telephone or electronically, and verification usually occurs at the time of the request, or shortly thereafter. For a request relating to a single retail customer, AEMO considers three business days is a reasonable period of time to confirm whether the request has included all their verification information and notify a retail customer or a customer authorised representative if they have not provided all of the information to meet their published verification requirements.

For a request from a customer authorised representative in relation to more than one and up to and including 100 retail customers, AEMO considers that three business days may provide insufficient time for retailers and DNSPs to assess and notify a customer authorised representatives due to limitations on existing business resources. AEMO considers that six business days provides a reasonable timeframe for retailers and DNSPs to respond to these requests and this will assist customer authorised representatives in managing their retail customers' expectations.

³⁸ Refer to Appendix A: Consolidated Summary of Responses, pp. 15 – 19.



Where a customer authorised representative's request is for more than 100 retail customers, AEMO considers that a customer authorised representative and retailer or DNSP should agree (at the time that the delivery timeframe is also agreed) to the timeframe to notify if the verification information supplied does not meet the retailer's or DNSP's published requirements.

The three and six business day requirement, and the agreed timeframe excludes postal timeframes as this is outside of the retailer's or DNSP's control.

It should be noted that retailers and DNSPs must use reasonable endeavours to achieve these timeframes.

AEMO's conclusion

The MDPP requires retailers and DNSPs to assess and notify a retailer customer or customer authorised representative where they have not provided all of the information to meet their published verification requirements.

For a single customer request, this must be within three business days of receiving the customer request.

For a request from a customer authorised representative in relation to:

- **More than one and up to 100 retail customers, this must be within six business days of receiving the multiple customer requests.**
- **More than 100 retail customers, this must be agreed between the customer authorised representative and retailer or DNSP.**

Postal delivery time is excluded from the timeframe.

This is set out in section 2.1(c), (d) and (e) of the MDPP.

4.3.4 Delivery timeframes

Issue summary and submissions

The Draft MDPP set out a maximum 10 business day timeframe from the date metering data is requested for a single retail customer for a retailer or DNSP to provide metering data to the retail customer or customer authorised representative. For requests made by a customer authorised representative relating to more than one retail customer, the Draft MDPP required retailers and DNSPs to use reasonable endeavours to:

- Deliver metering data to the customer authorised representative within 20 business days from the date that metering data is requested, where the customer authorised representative has made a request related to more than one and up to 100 retail customers.
- Agree the delivery timeframe where a customer authorised representative has made a request that relates to more than 100 retail customers are included in the customer authorised representative's request.

CUAC supported a maximum time limit for delivery of customer authorised representatives' requests, and suggested this should be based on a sliding scale.³⁹ Enernoc suggested that the 20 business day limit was an unreasonable period of time and did not satisfy the policy intent of the MDPP change.⁴⁰ New South Wales DNSPs and Origin suggested the 20 business day maximum time limit was too short a timeframe.⁴¹

³⁹ Refer to Appendix A: Consolidated Summary of Responses, p. 33.

⁴⁰ Ibid., p. 44.

⁴¹ Ibid., p. 34.



Some retailers considered it was only reasonable for retailers and DNSPs and customer authorised representatives to negotiate the delivery timeframe. Some retailers and DNSPs also considered that the NMI limit was too high and that this would have a resourcing impact on their business with resultant cost increases for consumers.

AEMO's assessment

AEMO understands retailers' and DNSPs' concerns over the potential number of retail customer requests and the number of retail customer requests sent in a customer authorised representative's requests. The potential number of retail customer requests is unknown, and estimates appear to be speculative.

Further, the key policy objective of the rule change (and the MDPP) is to provide retail customers access to their "electricity consumption data so that it is in an understandable format, received in a timely manner..."⁴², so this information is to assist retail customers make decisions to help them save on their energy costs. Therefore, the rule change and the MDPP is to facilitate increased competition in the market.

AEMO appreciates the uncertainty retailers and DNSPs face over the potential number of requests. The rule commenced in November 2014 and no stakeholder has provided AEMO with evidence that the number of requests imposes the resourcing pressures described in submissions. It is also worth noting that retailers and DNSPs raised these resourcing concerns in the AEMC's rule change process, and the rule change was made with the expectation that retailers and DNSPs will need to resource these new requirements.

AEMO considers that a 100 retail customer per business day request limit is appropriate and provides retailers and DNSPs with some protection from the potential number of retail customer requests submitted by a customer authorised representative in a business day. A sliding scale was discussed in the MDPP Consultation Paper and Draft Report, but was not supported by stakeholders. AEMO is not re-considering the sliding scale.

For similar reasons provided above, AEMO considers that customer authorised representative requests relating to more than one and up to 100 retail customers should be delivered by a retailer or DNSP within 20 business days and should not be by negotiation. As discussed in section 4.12 of the Draft Report, AEMO included this requirement to provide a degree of certainty for the customer authorised representatives and their retail customers in case the negotiation fails to deliver reasonable delivery outcomes.

AEMO's conclusion

The MDPP includes the following requirements on retailers and DNSPs for multiple requests for a retail customer's metering data:

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

This is set out in section 2 of the MDPP.

⁴² AEMC 2014, Customer access to information about their energy consumption, Final Rule Determination, 6 November 2014, Sydney, p. i



4.4 Data delivery method

4.4.1 Delivering summary and detailed data formats

Issue summary and submissions

Lumo, Momentum and Red suggested that the MDPP allows file formats to either be opened in a PDF or other common standard.⁴³

AEMO's assessment

Sections 3.1(b) and 3.2(b) of the Draft MDPP allowed retailers and DNSPs the flexibility to deliver the summary and interval detailed data formats to the retail customer or customer authorised representative in another form, where this is agreed. Additionally, Section 2.1(a)(iii) of the Draft MDPP required retailers and DNSPs to publish information as to the form in which that data would be provided.

AEMO considers this provides sufficient scope for retailers and DNSPs to reach agreement with retail customers or customer authorised representatives to provide summary data in a form other than PDF.

AEMO's conclusion

No change to the sections 3.1(b) and 3.2(b) of the MDPP.

4.4.2 Naming convention of data format files

Issue summary and submissions

Section 3.3 of the Draft MDPP included file naming conventions for the summary and detailed data format files.

Energy Tailors suggested that the naming convention required for the detailed data format should include a reference to the organisation "to enable a customer authorised representative to be able to interpret it".⁴⁴ The New South Wales DNSPs, Lumo and Red suggested the naming conventions be removed.⁴⁵

AEMO's assessment

The purpose of the naming convention for the interval detailed data format is to identify the retail customer file. Implementation of a naming convention provides a standardised approach. Including a reference to the organisation providing the file provides a way for a customer authorised representative to identify and subsequently interpret the representation of metering data provided by that organisation.

AEMO's conclusion

The MDPP has an amended naming convention for the interval detailed data format to include a reference to the organisation providing the file.

This is set out in Section 3.3 of the MDPP.

4.4.3 Alternative metering data formats

Issue summary and submissions

Section 4.5 of the Draft MDPP included provisions to allow retailers and DNSPs flexibility to provide alternative metering data formats to a retail customer or customer authorised representative where it is

⁴³ Refer to Appendix A: Consolidated Summary of Responses, pp. 45 – 48.

⁴⁴ Energy Tailors submission p. 5.

⁴⁵ Refer to Appendix A: Consolidated Summary of Responses, p. 51 – 52.



requested. This also included a requirement to provide a customer guide to explain the alternative data format.

ENA and Energex suggested that the reference to informed consent in section 4.5(d) of the Draft MDPP was not reasonable in this context.⁴⁶ AusNet, Lumo and Red suggested that the reference to informed consent should be deleted.⁴⁷

AGL suggested that the requirement in section 4.5(c) of the Draft MDPP should be removed, as this may stifle the provision of alternative data formats and imposes unnecessary costs.

AEMO's assessment

There are two circumstances where an alternative data format would be required:

1. Where less than the minimum requirements are requested.
2. Where more than the minimum requirements are requested.

This is clarified in the MDPP.

Where a retailer or DNSP is providing less than the MDPP minimum requirements to a retail customer or customer authorised representative, AEMO considers the retailer or DNSP must obtain the retail customer's or customer authorised representative's informed consent.

Where a retailer or DNSP is providing more than the MDPP minimum requirements to a retail customer or customer authorised representative, AEMO considers the retailer or DNSP does not need the retail customer's or customer authorised representative's informed consent.

AEMO considers that as the MDPP is a minimum requirements procedure, a customer guide would not stifle the provision of alternative data formats. It is appropriate for retailers and DNSPs to provide a customer guide to assist retail customers to interpret and understand the alternative data format.

AEMO's conclusion

The MDPP includes two new clauses in section 4.5 to clarify:

- **Where a retailer or DNSP is providing less than the MDPP minimum requirements to a retail customer or customer authorised representative, the retailer or DNSP must obtain the retail customer's or customer authorised representative's informed consent.**
- **Where a retailer or DNSP is providing more than the MDPP minimum requirements to a retail customer or customer authorised representative, the retailer or DNSP does not need the retail customer's or customer authorised representative's agreement.**

No change to the section 4.5(c) of the MDPP.

This is set out in Section 4 of the MDPP.

4.5 Other issues

4.5.1 Customer Authorised Representatives providing a single daily request

Issue summary and submissions

AusNet, AGL, ENA, and Momentum Energy suggested that the MDPP provides guidance on Customer Authorised Representatives being limited to one request per business day, instead of being allowed to submit multiple single requests, or that multiple single requests in a day be treated as part of a

⁴⁶ Ibid., pp. 96 and 99.

⁴⁷ Ibid., pp. 98 – 100.



request.⁴⁸ AGL suggested that the draft MDPP allows customer authorised representatives to submit bulk data requests as a series of single requests during a day, and this would require retailers and DNSPs to “...respond within tighter timeframes than those considered reasonable by the AEMC. This will lead to inefficient and costly work processes and practices being required to be implemented by Participants at no real benefit to end customers”.⁴⁹

AEMO’s assessment

AEMO understands the concerns raised by stakeholders however, AEMO considers that it is not within the scope of the MDPP to limit the number of requests that can be made or to treat multiple single requests as a bulk request.

Under the NER, a customer authorised representative is entitled to make a request for information and this could be done as either as a single or multiple customer request. AEMO does not consider it appropriate to include a provision in the MDPP limiting the number of requests that a customer authorised representative could make in a period, as this would be inconsistent with the entitlement that a customer authorised representative has under the NER to request information.

NERR clauses 56A(3)(c) and 86A(3)(c) allow a retailer and DNSP respectively to provide the information subject to a reasonable charge where it has been requested by a customer authorised representative as part of a request for information about more than one small customer or customer.

AEMO does not consider it appropriate to include a provision in the MDPP which treats or deems multiple single requests from a customer authorised representative as a bulk request, as this would allow retailers and DNSPs to charge for providing the requested information in circumstances that are not expressly permitted under the provisions in the NERR.

Given this, AEMO does not consider it appropriate to include provisions in the MDPP that would contravene provisions in the NER or the NERR.

AEMO’s conclusion

It is not appropriate for the MDPP to limit the number of requests a customer authorised representative can submit or treat multiple single requests as a bulk request.

4.5.2 Charges for a retail customer or customer authorised representative request

Issue summary and submissions

Origin suggested that the MDPP should include a section on charging a reasonable charge.⁵⁰

AEMO’s assessment

As discussed in section 4.12 of the Draft Report, 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 a retail customer’s or customer authorised representative’s request for metering data, rather than under the NER which includes the MDPP requirements. Further, the MDPP is to establish requirements for the manner and form for providing metering data. AEMO considers issues relating to the right to charge for providing metering data as outside the scope of the MDPP.

⁴⁸ Refer to Appendix A: Consolidated Summary of Responses, pp. 37 – 43.

⁴⁹ AGL submission, Metering Data Provision Procedures – Draft Report and MDPP, 22 July 2015, p. 4.

⁵⁰ Refer to Appendix A: Consolidated Summary of Responses, pp. 35 – 36.



AEMO's conclusion

It is not appropriate for the MDPP to include requirements relating to charging a retail customer or customer authorised representative.

4.5.3 Application to child metering data

Issue summary and submissions

ENA and United suggested that the purpose and scope should make it clear that the licenced network does not need to provide child metering data.⁵¹

AEMO's assessment

AEMO does not consider it appropriate to clarify that a licenced network does not need to provide child metering data in section 1.1 of the MDPP. Metering data can only be provided if the retailer or DNSP has the metering data and had a relationship, in accordance with NER clause 7.7(a), with the retail customer.

AEMO's conclusion

AEMO considers it is not appropriate for the MDPP to include requirements relating to whether metering data is provided for child connection point. The MDPP is only concerned with the manner and form in which metering data is provided.

This is set out in Section 2 of the MDPP.

4.5.4 Data quality indication

Issue summary and submissions

In sections 4.2 and 4.3 of the Draft MDPP, one of the minimum requirements for summary data formats required retailers and DNSPs to include a data quality indication. This was also included in Appendices A.1 and B.1 (file conditions), which stated "Provide a statement indicating whether the metering data file contains estimated data and specify which reading period(s) contain estimated data".

Origin suggested that the data quality indication should be in the tabular form "Y" or "N" since providing a statement indicating the file includes estimated data was not practical.⁵²

AusNet suggested that the MDPP should define the data quality indication threshold and refer to "actual, substituted, estimated and final substituted".⁵³

AEMO's assessment

AEMO considers that it is reasonable for retailers and DNSPs to include a statement on summary data formats that indicates whether the information presented is based on actual or substituted data. This provides a high level indication that the retail customer can use as a signal to identify whether they may need to investigate their detailed data format.

There is no need for the MDPP to define a data quality indication threshold. This is the information the metering data provider sends to the retailer or DNSP.

AEMO's conclusion

There is no change to the requirements in sections 4.2 and 4.3 of the MDPP.

⁵¹ Ibid., p. 3

⁵² Refer to Appendix A: Consolidated Summary of Responses, p. 64.

⁵³ Ibid., p. 104.



4.5.5 Requirements in Appendices

Issue summary and submissions

Lumo and Red suggested that text in Appendices A and B of the Draft MDPP should be amended to reflect that these are examples, instead of requirements.⁵⁴ They also identified that requirements were included in these appendices.

AEMO's assessment

AEMO agrees that the MDPP should clarify that Appendices A and B are examples only. The MDPP also needs to ensure that retailers' and DNSPs' requirements are in the MDPP, instead of the Appendices. To address this, AEMO has removed the File Conditions in Appendices A and B and transferred them to sections 4.2 and 4.3 of the MDPP.

AEMO's conclusion

Appendices A and B of the MDPP include "Example" in the section headings.

The File Conditions in Appendices A and B of the Draft MDPP are transferred to sections 4.2 and 4.3 of the MDPP.

⁵⁴ Ibid., p. 103.



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
ERAA	Energy Retailers Association of Australia
MDPP	Metering Data Provision Procedures
NER	National Electricity Rules
NERR	National Energy Retail Rules
NMI	National metering identifier
PDF	Portable document format