6 June 2015

Mr Matt Zema
Australian Energy Market Operator,
GPO Box 2008,
Melbourne Victoria 3000

Metering Data Provision Procedures

Dear Mr Zema

ENA welcomes the opportunity to comment on AEMO's draft Metering Data Provision Procedures and AEMO's consultation process, including workshops, to engage with stakeholders in developing the procedures.

ENA notes that the direction for these procedures arose from the Australian Energy Market Commission (AEMC) determination on customer access to their energy consumption data. ENA strongly supports the importance of customers having the ability to access information to enable them to make informed choices about their energy use. The implementation of major reforms underway in the energy sector, including tariff reform and expanding competition in metering, are vitally dependent on strong customer engagement and support for informed-decision making.

In this context, ENA has recently released two publications[1] related to the support available for customers during the transformation of the energy system currently underway. ENA's proposed *Industry Standard for Network Tariff Reform* is designed to support tariff development, co-operative approaches for retailer pass through of network tariffs assistance to vulnerable customers during the transition to cost-reflective network tariffs, and the development of information and decision making tools for customers. Additionally, ENA has outlined a series of options to enhance support for vulnerable energy customers.

ENA recognises the importance of establishing clear guidelines and procedures to support the manner in which information is presented to customers and their authorised representatives. An important prerequisite before information is released, is to ensure privacy and confidentiality requirements are met, including companies meeting their obligation under legislation and regulation. The first step should be ensuring that the applicant for access to this information is verified as the authorised recipient. Unless the verification is successfully undertaken, energy businesses would be unable to supply this important information. ENA understands that resolution of this matter is outside the scope of the AEMO procedures, and ENA agrees with AEMO's view that, if not addressed, this issue could impact the effectiveness of the Procedures in meeting the policy objective[2].

[1] ENA, *Towards a national approach to electricity tariff reform*, December 2014; ENA information paper, *Supporting vulnerable energy customers*, May 2015
[2] AEMO, Metering Data Provision Procedures: consultation paper, 30 April 2015, p.6

In this response, ENA addresses some key issues of concern, noting that ENA members are likely to respond on the detail of the procedures.

Timescales to respond

Regarding responses to bulk information requests from customer agents, ENA supports the AEMO proposal that:

> "*customer authorised representatives and retailers and DNSPs must agree on the delivery timeframe. This provides flexibility for parties to negotiate reasonable timeframes for individual circumstances*"[3]

ENA does not support establishment of maximum timeframe for response to bulk requests from customer authorised representatives, nor to a sliding scale, as the variability of these requests (and the individual customer requests) is too great to predict and apply to a meaningful standard 'maximum' timeframe.

Tariff rates

In the AEMO strawman, Appendix B Interval Metering Data Summary Format, the file format requires information to be provided on "Energy Flow Type: Peak, shoulder, off-peak, controlled load, generation energy flows and Demand". It further specifies that "Time of use (peak, shoulder, off-peak) are as per the ***retail tariff definition" (****emphasis added****)***. ENA considers that it is highly unlikely that distribution businesses would be aware of the retail tariff assignment for customers, as this is the responsibility of a retailer and is likely to be commercial in confidence. There would be no way for distribution businesses to verify this information and ENA considers that this requirement cannot apply to distribution businesses.

ENA consider that these new procedures are the minimum data requirements and should focus on clear, unambiguous provision of raw data.

File formats

In addition, it is difficult to see how meaningful and clear information may be provided to customers in the standard formats, taking into account where energy flow types (peak, shoulder, off-peak, etc) may vary throughout the time period and how the format may take account of gross versus net energy use in calculation or presentation of information.

The proposed interval metering data detailed format is likely to be very challenging for customers to understand.

Meter changes

Where there have been changes to meters within the period for which information is requested, this may necessitate several files being formed to meet an individual data request. Scenarios where this may occur include, for example: a type 6 accumulation meter which is exchanged for a type 5 interval meter; or a type 4 advanced meter which later has solar added. In these circumstances, this could require multiple file constructions which will impact both on the timeframe and presentation of data. This should be acknowledged in the procedures.

[3] Ibid, p. 8

For further information on this matter, please contact Susan Streeter at ENA on 0439 177 032 or sstreeter@ena.asn.au.

Yours sincerely

John Bradley
Chief Executive Officer