



20 May 2015

Taryn Maroney
Australian Energy Market Operator
GPO Box 2008
Melbourne
VIC 3000

By email: Taryn.Maroney@aemo.com.au

RE: Metering Data Provision Procedures – Consultation Paper 30.04.2015

Dear Taryn,

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

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

Consumer Action Law Centre (Consumer Action) is an independent, not-for-profit, campaign-focused casework and policy organisation. Consumer Action offers free legal advice, pursues consumer litigation and provides financial counselling to vulnerable and disadvantaged consumers across Victoria. Consumer Action is also a nationally-recognised and influential policy and research body, pursuing a law reform agenda across a range of important consumer issues at a governmental level, in the media, and in the community directly.

The Alternative Technology Association is a national, not-for-profit organisation representing consumers and communities in the renewable energy and energy efficiency marketplace. The organisation currently provides service to 6,000 members nationally who are actively engaged with sustainability energy projects, energy efficiency, and the national electricity market (NEM).

ATA provides an 'independent' consumer advice role, both to our members throughout Australia, and also more broadly to the general public. As we are neither funded by, nor have direct links with, industry or government, the ATA is a trusted source of independent advice for our membership and the general public in regards to the NEM.

Our organisations support the policy intent of the MDPP of providing information to retail customers that enables them to better assess their energy consumption information.¹ Development of the Procedures, in particular the data formats, requires clear understanding of the goal(s) being pursued. These should be aligned with the policy intent as closely as possible.

For example: a summary of metering data can be used for several purposes, including seeking a better electricity plan, resolving billing disputes, or obtaining a general understanding of a customer's energy usage. We believe the most appropriate purpose of the summary should be to give consumers a general understanding of their energy usage.

The summary format may meet other purposes. Indeed, for customers on accumulation meters, the summary format will provide all the energy data required for seeking competitive retail products. However, attempting to develop a single format that tries to be everything to everyone will not succeed. Other purposes should be able to be met through easy access to detailed data that can be further analysed as needed.

We acknowledge AEMO's efforts in constructing a set of 'strawman' procedures, including summary data formats. We append to this submission a summary data format CUAC has developed to complement AEMO's and other stakeholders' work. While the example format omits several pieces of information the MDPP must contain,² it illustrates the types of information most broadly useful for consumers to gain a general understanding of their energy usage. We stress that these are examples for further discussion and not a finished product.

In preparing the data formats and considering the process for customers to gain access to their data, it is critical that AEMO engage not just with consumer advocates, but with a range of consumers from different backgrounds that are representative of the broader population. This is best done through deliberative focus groups.

Consumers engaged by AEMO should include, without limitation:

- People of different levels of energy literacy and engagement;
- The aged;
- CALD and indigenous communities;
- People with disabilities, learning difficulties or low levels of education; and
- People with sight impairment (including with colour blindness).

As part of this consultation, we suggest that AEMO consider relevant literature on related studies here and abroad.³

As well as considering the options for layout and type of graphical tools to be used, the consumer consultation should consider the language in the summary with a view to it being in plain English and accessible to a broad audience, while still being accurate.

¹ AEMO – Metering Data Provision Procedures Consultation Paper, 30.04.2015, p. 6

² C.f. AEMO – Metering Data Provision Procedures Strawman for Consultation, 01.03.2015, §3.3

³ See, for example, http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2568716

The summary format should be designed to be of maximum use to most consumers and therefore use simple and clear terms that would ideally be consistent with those used across the retail market (as the consumer's primary point of contact with the NEM). We point to the AER's recent draft Retail Pricing Information Guideline for consultation, which we believe includes helpful analysis of simplified and consistent terminology.

Examples of language that we believe need consistency are:

- *Usage versus consumption*, noting that the AER is now recommending *usage* as more meaningful to consumers than *consumption*;
- *kWh*, which is increasingly expressed as *units of energy*; and
- *Import* and *export*, which are accurate for solar customers where *usage* and *consumption* are not – though *energy from the grid* and *energy sent to the grid* are possibly more widely understood.

These and other terms should be tested with real consumers as a priority to ensure they are meaningful and understood by the least sophisticated of energy consumers.

Where consumers have embedded generation (e.g. rooftop solar), the summary information provided will need to include both the energy imported and exported. This requires fundamentally different information that may need to be expressed in different terms to be meaningful to the consumer. Trying to provide a single summary format for solar and non-solar customers is likely to make the summary less useful for both groups of customers.

We therefore recommend that AEMO investigate providing different summaries for solar and non-solar customers, where the format remains similar but the level of detail differs, and different terminology used only to the extent that it is required.

We further consider:

- To be meaningful for consumers, data should be summarised across a whole home, rather than separate meters or elements. For example, data from two consumption elements, with one for general light and power and one for controlled load, should be included in a single summary report. (Consumers who wish to break their data down further should be able to disaggregate separate meters/elements using the detailed data format.)
- Information should always be presented in local time, not NEM time. This means adjusting for daylight savings outside of Queensland and for the time zone difference in South Australia.
- Summary data should be based on all the billed quantities that affect how a consumer pays for energy.
- Noting the above, peak demand or capacity based charging will be increasingly commonplace in coming years, and the representation of such charge will need to reflect the structure of the charges relevant to that specific consumers. For example, the monthly peak tariff that Jemena are proposing might require:
 - numerically, a table indicating the date, time, and consumed volume for each of the monthly peaks; and
 - graphically, a bar chart showing the above.

Tariffs in other networks may be different, and a different data structure will need to reflect this.

Feel free to get in touch with Martin Jones if you would like to discuss these issues further.

Yours sincerely,

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Customer Data Summary

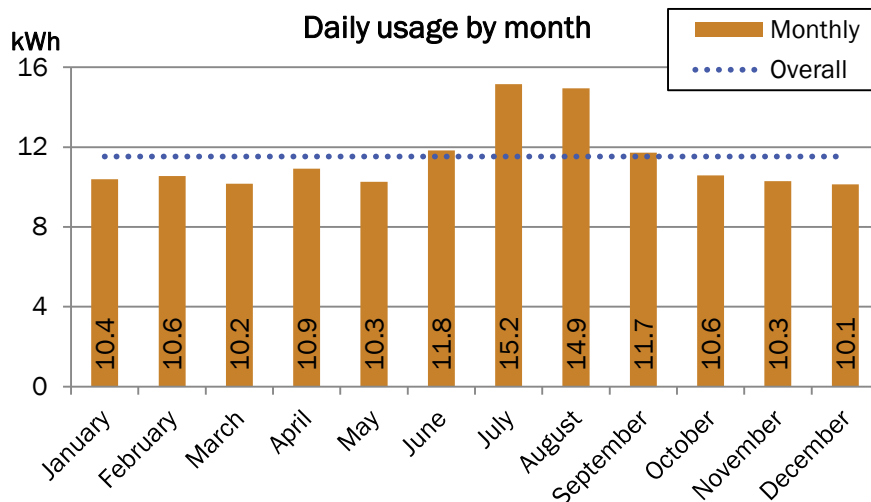
Ms. Josephine Blowe
249 Example St
East Suburbia
VIC 3057

NMI: 6103005000
Meter: A3336000
Data Period: 02/07/2013-28/02/2015
Number of days: 613

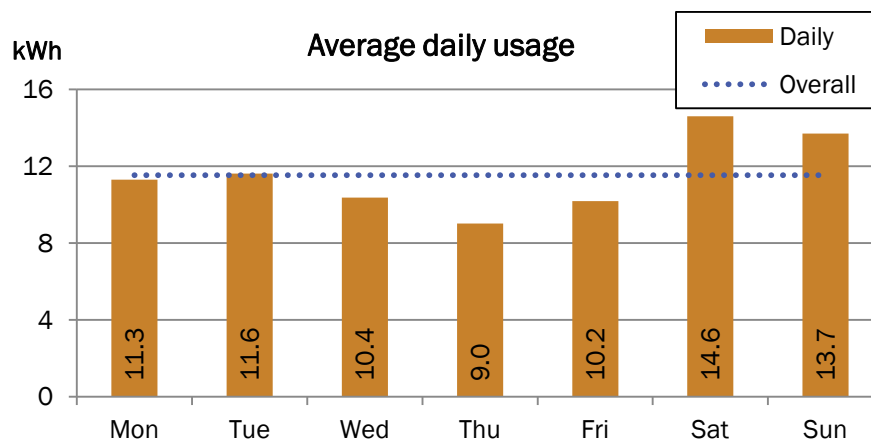
The information in this summary provides an overview of your electricity usage for the specified data period. It is designed to give you a general idea of when you use electricity, and how much you use. More advanced analysis can be obtained by requesting detailed usage data from your electricity retailer or distributor and using a third party tool such as My Power Planner (mpp.switchon.vic.gov.au) or Energy Made Easy (energymadeeasy.gov.au).

Your **average daily usage** is 11.5 kWh.

Your **highest average usage month** is July. Your **lowest average usage month** is December.
The graph below shows your average daily usage, by calendar month, over the data period.

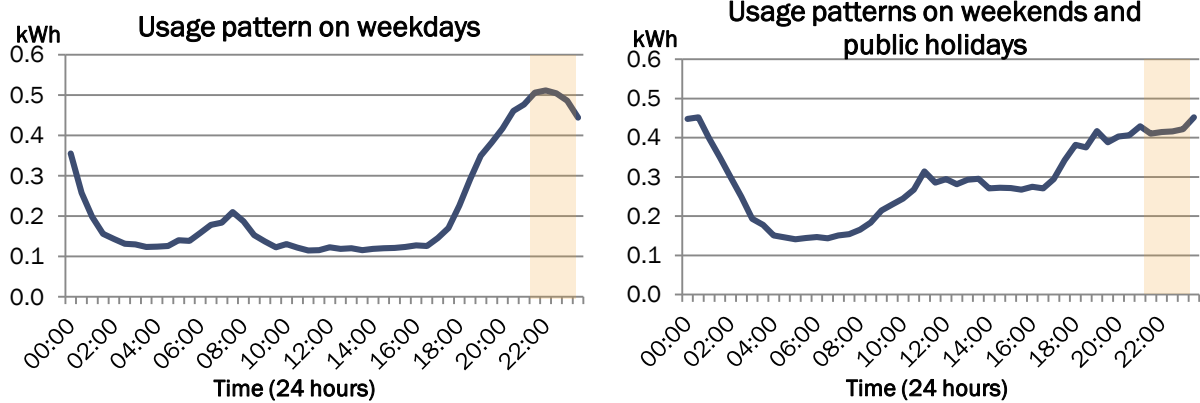


Your **highest average usage day** is Saturday. Your **lowest average usage day** is Thursday.
The graph below shows your average daily usage, by day, over the data period.



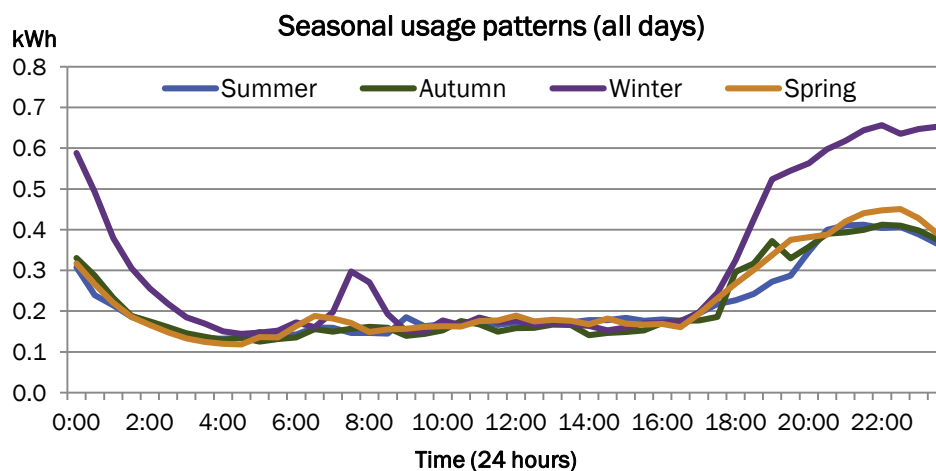
Different households use electricity at different times of the day. The graphs below show your household's **average usage patterns** every 30 minutes across the day.

Usage patterns are often different on weekdays (working days) than on weekends and public holidays, so they are displayed separately.



The time of day during which you use the most electricity is usually 9:30pm–11:30pm (shaded).

Your daily usage patterns can vary seasonally with heating and cooling requirements. The graphs below show your **average seasonal usage patterns** every 30 minutes across the day.



Summer = December to February; Autumn = March to May; Winter = June to August; Spring = September to November.