



3 June 2015

Australian Energy Market Operator

By email: mdpp@aemo.com.au

Dear Sir/Madam

Re: Metering Data Provision Procedures – Consultation Paper

Thank you for the opportunity to comment on the Australian Energy Market Operator (AEMO) *Metering Data Provision Procedures – Consultation Paper*.

As an industry-based external dispute resolution scheme, the Energy and Water Ombudsman (Victoria) (EWOV) provides alternative dispute resolution services to Victorian energy and water customers by receiving, investigating and facilitating the resolution of complaints.

Our comments in this submission focus on the proposed minimum summary and detailed data formats and are based on our extensive case handling experience. EWOV handles a small number of cases specifically about customer's difficulties accessing metering data from their retailer or distributor. Typically, these customers complain about a refusal to provide requested data; delays in its provision; difficulty understanding the data; or the data being provided in a file type other than what they have requested. We also handle complaints that are primarily about other issues (such as a billing error) but in which the customer has sought access to their metering data.¹ Additionally, EWOV regularly requests and uses metering data as part of our own work investigating and resolving billing disputes between customers and their energy companies.

File type

The proposed Metering Data Provision Procedures require distributors and retailers to provide summary accumulation and interval data in a PDF "and/or" CSV file, while detailed interval metering data is to be provided in a CSV file.

PDF files are widely used and accessible with free software, but cannot easily be exported or converted into other file formats for analysis and graphing. CSV files, on the other hand, can be opened in Excel (and other data analysis programs) for manipulation. EWOV's experience is that customers sometimes specify their preferred file type when seeking metering data.

¹ For more detail on complaints about or related to metering data access, see our [June 2014 submission](#) to the Australian Energy Market Commission on its *Consultation Paper: National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014*.

The “and/or” wording in the Procedures may leave open to interpretation whether a provider has met its obligation if it provides data in (any) one of the specified file types – even if this is not what the customer prefers or has requested. EWOV believes that metering data should be made available either in both file types or in the customer’s preferred file type.

Estimated reads

AEMO’s proposed interval metering data detailed format identifies estimated readings in the data quality component, but only by date. Instead, files should identify the specific intervals that were estimated. This is useful and important information for customers attempting to reconcile billing with their metering data.

Index reads

The interval metering detailed format should also include a list of index reads. These start and end meter reads are what customers see on bills; listing them helps customers to understand their usage and adds legitimacy to billing.

We hope the above comments are helpful. Should you require further information or have any queries, please contact Caitlin Whiteman, Senior Research and Communications Advisor, on 03 8672 4273 or at caitlin.whiteman@ewov.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', followed by a stylized flourish.

Cynthia Gebert
Energy and Water Ombudsman (Victoria)