AEMC

ATTACHMENT 1
STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in this paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

ORGANISATION: Private Individual

CONTACT NAME: Nathaniel Sawyer

CHAPTER 4 – ASSESSMENT FRAMEWORK

1. Is the proposed assessment framework appropriate for considering the rule change request?	Yes
2. Are there other relevant considerations that should be included in the assessment framework?	N/A

CHAPTER 5 – SECTION 1 - ISSUES

3. To what extent is it an issue that a retailer is not required to provide to a small customer with an interval meter the start and end meter reading in the bill?	It is a minor issue when a retailer is unable to provide exact 'start' and 'end' readings for customers with interval meters, if the billed usage is consistent with a customer's historical usage. Where a customer is concerned of the accuracy of their energy usage, or where that has been an unexpected metering change, this issue becomes major. This is most relevant when a customer has made a significant investment in generation and/or battery storage and wishes to understand how their energy consumption is changing and therefore try and calculate their energy savings.
a. Is it any different for customers with advanced interval meters?	No, I don't believe there is a difference in this perspective for a customer with an AMI (Victorian Smart Meter) to any existing Interval or COMMS solutions. An Interval meter is any meter that records usage in fixed intervals.
4. With more advanced interval meters to be roll out and more digital near real-time solutions/tools available to customers, is it likely that this issue becomes more or less prevalent over time?	As technology progresses, additional technology such as check metering, in-home displays, and web portals should reduce the reliance on customers to obtain an 'accumulation' read value for a meter that is not designed to store an 'accumulation' read. More importantly, improvements and streamlining of communications equipment for all MRIM (AMI) and RRIM technology should reduce the need to users to query their

	metering data. Reduced substitution by a Metering Data Provider will, over time, increase consumer confidence that their energy usage is being accurately invoiced.
	It is important to note that, based on the almost real-time collection of metering data, retailers do have the ability to recognise when a customer's consumption has exceeded a threshold similar to how many telecommunications companies can manage a customer's data quota, and as most retailers also have their own web portals where customers can access their consumption data, concerned individuals are able to monitor and manage their energy consumption accordingly.
5. What are the tools offered to customers with advanced interval meters to understand their bill and energy consumption?	Most customers will have access to both their energy consumption from their distributor, and from their retailer, in both NEM12 raw consumption format or via web portals.
6. What are the tools offered to customers with interval meters (type 5)?	
7. How many complaints do stakeholders receive related to the issue raised in this rule change request?	

CHAPTER 5 – SECTION 2 – OTHER ISSUES

8. What tools are available to customers with advanced interval meters to understand their use, reading and installation?	
9. Do you consider that the information available for customers is adequate to understand advanced interval meter use, reading and installation?	No, I believe that for many consumers who are used to accumulation metering, there is limited understanding of how an interval meter works, how it functions, and more importantly how the consumption is provided to their retailer for billing. An example here is how interval meters can store consumption for an extended period, and even a type 5 Manually Read Interval Meter may store and transmit 12 months of data each time it is probed, which allows for true 'actual' readings to be sent to a retailer many months after substituted readings are received and billed.
10. What additional information should be publicly available for customers to understand advanced interval meter use, reading and installation?	As instructional material cannot be left at a site, particularly for renters, I believe a simple guide for different types of smart or interval metering should be available online, allowing users to understand each different screen's purpose when they push the buttons on their metering. This would allow users, in conjunction with their raw consumption data, to perform their own 'creep' testing, and to disconnect or connect appliances for fixed periods of the day to understand where their consumption is being generated

	from.
	A clearer understanding of how interval meters store consumption data, and how this is used for billing, should be available as well. These meters can be polled multiple times per day, in Victoria for example if a COMMS failure occurs at 4AM, a subsequent request at 8AM may obtain valid, Actual readings, which are then provided to a retailer, but this kind of knowledge is not common.
	More prominent information regarding how a customer's invoice will change would be helpful when a customer has an exchange from Accumulation to Interval metering, either as a billing message or a reference to an information page such as the AER's Smart Metering portal.

CHAPTER 5 – SECTION 3 – SOLUTIONS

11. What are the costs and benefits of eliminating the transitional rule?	I do not believe that eliminating the transitional rule will provide a better experience for customers.
	When a customer is billed on a tariff that does not correlate to an exact 1:1 Datastream to Retail Tariff relationship, it is already very difficult for a customer to verify their usage is accurate.
	Example:
	Customer has two separate data streams, an 'E1' and 'E2' combination. Both streams are being billed in a two-rate configuration by a retailer, where Off-Peak usage is billed at a separate rate to Peak usage.
	Meter E1 uses 100 units of energy, with a split of 25 Peak, 75 Off Peak. Meter E2 uses 200 units of energy, with a split of 150 Peak, 50 Off Peak.
	Example Index reads for the billing period: E1: Start 1000, End 1100 E2: Start 1200, End 1400
	While the customer can determine that 300 Units of energy were consumed and billed during this billing period, there is no ability for the customer to view Peak (175 units) or Off Peak (125 units).
	Retailers who acquire a customer through a market transfer are unable to determine the index reading/s for a meter upon change of FRMP through existing B2B processes. A retailer would be required to contact a distributor/meter data provider directly to obtain an index reading upon a

		completed transfer, and then attempt to create an 'accumulation' reading for each register from this point onwards. I view this as being a solution that would result in a high amount of potential error.
12.	What are the costs and benefits of adopting the Victorian solution?	It is very important to differentiate the source of the data for the Victorian solution.

As per the Energy Retail Code v12, "*index read in relation to smart meters has the meaning given under the Meter Data File Format Specification NEM 12 and NEM 13 published by the Australian Energy Market Operator*"

THE MDFF Specification documentation advises that an index reading for a 4A or type 5 metering installation is the total 'accumulated metering data' for a Datastream *at the time of collection*.

In my opinion, this leads to confusion.

If a meter data provider with an active Smart Meter provides interval data for 7th March on the 8th of March, at 10:00AM, the index provided is therefore the assumed accumulation value as of 10:00AM 8th March, meaning that a retailer either displays a 'end' index reading that is 15 hours 'ahead' of the billed consumption data, or builds a 'virtual' End Read based on the previous day's Index Read *+ any remaining intervals billed as part of that billing period*. |
| 13. | What are the reasons for retailers to exclude cumulative readings in the bills for other NEM jurisdictions when this information is disclosed in the bills in Victoria? | |
| 14. | Are there any alternative solutions to consider that may have greater benefits and/or lower costs? | Yes, I believe that a much cleaner solution would be to enhance the existing Meter Data File Format Specifications to ensure that the field 'IndexRead', provided in the 500 record of a NEM12 file, should be populated with the Index Reading for the Register ID/Interval Date *as of the end of the final interval of the Interval Date*, regardless of the time that the data was polled from the meter.

As retailers are unable to determine an Index for an Interval Meter upon becoming FRMP without a change to existing B2B/Market interactions, it would be the responsibility of a Metering Provider/Meter Data Provider to ensure that future metering does allow for the extraction and provision of Index Readings aligned to the end of each Calendar Day.

While there are limited benefits in providing index readings for customers where a single register/stream of data is split into separate retail tariffs (single register on a Peak/Off-Peak/Shoulder pricing structure, for example), I feel that allowing a user the ability to compare an 'end read' on their |

	invoice to a number that appears on their interval meter will provide more confidence in their electricity billing, based on the proviso that good advice is provided as to why the retail tariffs do not match the indexes, however the total consumption charged should match the indexes in the vast majority of cases. In these scenarios, customers will also be able to download their raw NEM12 meter reading data, and perform their own calculations based on the Peak, Off-Peak and Shoulder time periods to verify their billing is accurate, if appropriate instruction and assistance is available from retailers. Enhancing the Rules to ensure that a Retailer must display an index reading for each separate Register *if provided* as part of the NEM12 data, and either requiring the Retailer to publish the effective Read Date Time of the index reading or aligning the Read Date Time with the Interval Date provided in the 500 record, as discussed earlier, would result in greater customer satisfaction with their billing and read data.
15. To what extent, if any, will the Consumer Data Right reform address the issues raised in the rule change request?	