



10 June 2014

Mr Richard Owens  
AEMC acting Senior Director  
Australian Energy market Commission

By Electronic On-line Submission

Dear Mr Owens

**Customer access to information about their energy consumption  
SP AusNet Submission**

SP AusNet welcomes the opportunity to make a submission to the AEMC consultation paper on Customer access to information about their energy consumption.

Attached are SP AusNet's responses to the Questions set out in the Consultation Paper.

SP AusNet consider that these responses cover most of the input which SP AusNet desire to make with respect to this proposed consultation.

One further aspect of the proposed change on which SP AusNet have some input, is with respect to the potential program and time schedule for implementation. The Rule change process detailed in the Consultation Paper sets out an expected timeframe with publication of the Final Rule Determination in November 2014.

There is no suggested time schedule for the necessary further steps following the Final Rule Determination. This will potentially involve drafting work by AEMO (and industry) of the necessary subordinate regulatory documents including those defining the two data formats and the customer "How electricity consumption data is used" document. Once this is in place there will be an industry initiative to develop the necessary operational processes and system changes and to implement these.

As we have implied in our answers to a number of the Consultation Paper questions this will be a relatively significant industry effort. Until more details of the proposed Rules framework are known it is difficult to speculate in any detail re the time period for these further steps. However this is likely to extend well into 2015 and maybe to 2016. Over this period a number of the other Power of Choice (POC) initiatives will also be moving through their development, and some potentially may be into their implementation stages. Most of these initiatives, including the subject customer metering data provision proposal, will involve changes to the same or related industry procedures, processes, and systems.

It is the SP AusNet contention that there will be valuable cost and resource savings and reduced risks if these POC programs are co-ordinated into well planned releases so that advantage can be taken of the synergies between these changes, and of the achievable efficiencies of minimising the number of times systems are exposed to development programs.

SP AusNet recommend that the AEMC and the COAG Energy Council join with AEMO and the industry to establish an agreed time schedule for the co-ordination of the POC initiatives through to implementation. Whilst this program would be potentially subject to change, any revisions would be informed by the interdependencies and time spans recognised by the above group of key stakeholders.

If you have any question with respect to this submission please contact myself on 9695 6629.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Peter Sallin". The signature is written in a cursive style with a large initial "P" and "S".

Market Services Manager

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No	Issue	Question	SP AusNet response
1	<b>4.1.2 proposed assessment framework under the NEL</b>	<b>a) Do you consider that the proposed issues to consider are appropriate for this rule change request? Are there any other issues that we should consider?</b>	<p>SP AusNet broadly support the four issues to be considered as outlined in the Consultation Paper as being appropriate issues to measure the Rules changes against the NEO.</p> <p>Whilst we strongly understand and support the desire to provide customers with the information to better manage their energy usage and their interfacing with the industry, we consider that the goal as expressed by Issue 4 should be to ensure that the regime and arrangements established are as effective and efficient as possible in achieving the desired customer outcomes. The strong aim should be to overcome any issues without inappropriately high industry regulatory and financial burden.</p> <p>Consequently, careful consideration must be given to assessing the inter-dependencies between the four issues outlined.</p>
2 a)	<b>4.2 Proposed assessment framework under the NERL</b>	<b>a) Do you consider that it is appropriate that the proposed issues to consider, which we will use as a basis to assess whether the proposed rule meets the NERO, should be the same as those used for assessment against the NEO?</b>	<p>We consider that the other issue not specifically identified and considered within the Paper is that of privacy of customer's Personal Information.</p>

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<b>2 (b)</b>	<b>As above</b>	<b>b) Are consumer protections that relate to the provision of information to customers the relevant class of consumer protections for consideration in this rule change request? Are there any other relevant classes of consumer protections that we should consider?</b>	<p>The consumer protections in Appendix B of the Consultation Paper which are proposed as those relevant to be considered for this Rules change do not clearly identify the potential issues associated with privacy of customers' Personal Information and consistency with the Australian Privacy Principles (APPs), published through the Office of the Australian Information Commission (OAIC).</p> <p>SP AusNet are somewhat surprised that the Paper does not clearly recognise that the customer meter readings which are anticipated to be provided under the proposed Rules are generally consider to be Personal Information as defined in the APPs. The work done by Lockstep Consulting for the Victorian Department of Primary Industries and by Seed Advisory for the SCER Energy market Reform Working Group recommended that this should be assumed as a prudent approach to handling of metering data in the market, in particular interval metering data.</p> <p>The APPs provide a series of principles for the collection, handling, and exchange of personnel information and the OAIC's Australian Privacy Principles Guidelines provide some further interpretative details. However neither provides specific guidance directly applicable to metering data as Personal Information and in particular with respect to the approach to the identification of the customer (or their "agent") seeking access to metering data.</p> <p>The Retailer of a customer presumably takes from their customers information sufficient to identify the customer during the billing establishment process. This includes birthdates, secret identification questions, and financial records to ensure the positive identification of customers requesting access to their Personal Information including metering data.</p> <p>However, Distributors do not have access to all these details as they do not generally have the need for a level of customer contact which involves access to Personal Information. Most Distributors' contact with, and services to, customers are based on site details only. The customer details available to Distributors from Retailers through a regulated B2B transaction are limited to: customer name, postal address, and where available phone number(s). Although specifically related to outage notifications for most individual customers this will also be the retail account holder. SP AusNet have already</p>
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			<p>vetted cases of “inappropriate persons” looking to secure the metering data details of others e.g. landlord versus tenant issues.</p> <p>The quality of this detail provided by Retailers is somewhat variable and Distributor use of the detail on postal items results in a percentage of non deliveries including for reason of “person not known at the address”. Hence the use of this detail for validation of requests for metering data will lead to a percentage of rejections due to a non match with name details held by the Distributor.</p> <p>Further there are a material number of revisions made to the contact name provided by Retailers. Any change in the contact name will impact customer access to their metering data. Hence:</p> <ul style="list-style-type: none"> <li>• a customer validated to get portal access will lose that access if their Retailer notifies of a contact name change.</li> <li>• a customer requesting metering data for a period during which their contact name changed, will only be validated to get metering data back in time to that name change date.</li> </ul> <p>Hence Distributors approached by customers seeking access to their metering data will need to have in place a validation methodology based on the limited and variable quality contact data identified above.</p> <p>One approach for this customer data access framework would be for each Distributor to establish what they assess is an APP compliant approach based on their own interpretation of the requirements. This could lead to multiple APP interpretations and non-consistent processes across the NEM.</p> <p>Further the Privacy Act and the APPs only applies to those organisations with an annual turnover of more than \$3 million in the last financial year. If small Retailers (or with reference to Q9 “authorised agents”), whose turnover is less than \$3m, are providing metering data then the APPs will not be applicable.</p>
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			<p>The alternative would be for the framework to establish (potentially with the involvement of the OAIC) some principles that are more specific to metering data than the broad APPs. This would provide more comfort to Distributors that their approach meets the APPs and the OAIC's views with respect to the metering data privacy, and result in a more uniform approach across the NEM. These specific principles could possibly be contained within the OAIC's Guideline.</p> <p>An alternative would be for the industry to develop an APP code under the Privacy Act as has been done by other industries. This can be registered with the OAIC and would then be binding. It can be expressed to apply to "a specified industry or profession, or a specified class of industry sectors or professions" (s 26C(4)) and would sit outside of the Rules. One of the matters the APP Code could deal with is how the requirement to notify customers is to be dealt with. It can also be used to explain how the APPs are to be applied or complied with (s 26C(2)).</p> <p>Whatever the approach it will need to be recognised by stakeholders and Retailers that because Distributors have only the limited and variable quality contact data detailed above as the basis of customer validation, a percentage of customers will not be validated at their first attempt and will need to go to their Retailer to obtain the contact details to match that in the Distributors' systems.<sup>1</sup></p> <p>Access to customers data by customer's agents presents even more issues with respect to the APPs as discussed under Q 9</p>
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<sup>1</sup> When logging on to the SP AusNet energy portal (My Home Energy) the validation of customers uses the contact data as described above. About 25% of log-on attempts fail this validation and require the customer to contact their retailer.

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<b>3 (a)</b>	<b>5.2 Obtaining access to electricity consumption data</b>	<b>a) Do you think it is appropriate that the NER be amended to allow a customer to access its consumption data by requesting that data from its DNSP?</b>	<p>Under an OIC to the Electricity Industry Act, Distributors in Victoria are already required to provide a customer with its interval consumption data upon request for input into the Victorian Government’s home energy advisory portal (My Power Planner ). Further as per the Consultation Paper the National Energy Customer Framework (NECF) already places obligations on Distributors for provision of metering data to customers when requested.</p> <p>Given these regulatory obligations on Distributors already in place, it would seem very desirable to remove the anomaly in the NER and ensure a consistent regulatory regime.</p> <p>However, there is some “sense” in the NECF drafting with respect to this matter, that the prime contact for customers obtaining access to metering data should be their Retailer. Whilst this is not clearly articulated, there is a clear emphasis in the NECF on the Retailer provision of data.</p> <p>Given:</p> <ul style="list-style-type: none"> <li>• that a reasonable percentage of customer data requests will be driven by, or lead to, billing queries; and hence lead to Retailer / customer consideration of the metering data, and</li> <li>• the issues identified in Q 2(b) re Distributor validation of customers</li> </ul> <p>it would be advantageous if the Rules (and associated framework) resulting from this consultation, gave primacy of data provision by Retailers, with the Distributor recognised as a less desirable backstop.</p>
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<b>3 (b)</b>	<b>As above</b>	<b>b) Should MDPs be able to provide electricity consumption data directly to customers or their agents?</b>	<p>Currently, small customers do not have a direct relationship with the MDP handling their metering data and hence do not have access to the customer details required to validate a customer’s request, except where the MDP is acting as an “internal agent” of a Distributor and responding on behalf of that Distributor. As such it would be difficult to envisage how a MDP could validate small customers making direct data requests in a manner consistent with the APPs, let alone the customers’ agent.</p> <p>There is therefore a privacy risk if MDPs were authorised to provide small customers’ data directly to customers or their agents without rigorous regulatory guidelines being in place.</p> <p>It should be noted that compared with the mass of small customers, large customers often have a role in choosing their MDP through their nominated Retailer (FRMP). As such the customer in these situations has to some extent a commercial relationship with their MDP. Further, “large” customers are typically businesses and the APPs only apply to individuals. Hence any regulatory guideline developed would need to be flexible enough to allow MDPs in these circumstances to provide electricity consumption data directly to customers or their agents through commercial arrangements. Appropriate changes to the NER would be required to enable this.</p> <p>We note also that the AEMC’s “expanding competition in metering and related services” rule change is proposing a regime where small customers could establish relationship with metering service providers. If this is the regime established then the impact of this on metering data provision directly to small customers will need to be taken into account.</p>
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<p>4 (a)</p>	<p><b>5.3.1 Minimum format requirements for electricity consumption data</b></p>	<p><b>a) What is the nature and magnitude of costs on market participants of providing data in raw format and summary format to their customers?</b></p>	<p>The costs of meeting the requirements for metering data provision proposed in this Consultation Paper will depend on a number of factors. The costs will consist of the process and system establishment costs, and the ongoing running costs.</p> <p>Each of these will be impacted by factors such as:</p> <ul style="list-style-type: none"> <li>• How complicated and how clearly defined the data formats are, and how closely they are based on the established market data formats.</li> <li>• The specifics of the delivery methods and the degree of alignment with current Distributor customer data provision approach (if in place).</li> <li>• The number of requests allowed from a customer in a period.</li> <li>• The acceptable customer validation approach and the quality of contact data in Distributors' system as provided by Retailers.</li> <li>• The uptake of the customers requesting the service.</li> <li>• The commitment to, and success of, the customer communications plan to ensure effective and efficient customer interactions.</li> <li>• The relative number of customers using portal access versus the number using email or hard copy. Once validated for portal access ongoing multiple queries can be done without revalidation. Each email request will likely required separate validation to maintain security and privacy.</li> <li>• The degree of automation which can be established and hence the level of manual involvement will be dependent on a number of these factors.</li> </ul> <p>Businesses will need Customer Service staff resource to interact with customers; and data analysts and systems development to manipulate the data into the required format and match data to identify customers. Data manipulation costs could be minimised by using the existing raw NEM12 data specification, as specified by AEMO.</p>
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<b>4 (b)</b>	<b>As above</b>	<b>b) What information should be required in the summary data format?</b>	<p>SP AusNet have no firm view with respect to the detail of the summary data format.</p> <p>Our consideration of customer requirements when developing our My Home Energy web portal lead to a design which provides:</p> <ul style="list-style-type: none"> <li>• data in the form of bar and line charts with the consumption for either 30 minute intervals or 5 minute demand,</li> <li>• summaries over various periods including 12 hrs, 24 hrs, 7 days and 30 days<sup>2</sup>.</li> <li>• metering data in the Victorian Government’s My Power Planner format, and in a NEM12 format as specified by AEMO, Note this process is not fully automated.</li> </ul> <p>Some factors which should be given consideration are:</p> <ul style="list-style-type: none"> <li>• Different delivery methods may need different consideration. Whereas a portal may offer more flexibility and options, the emailed, or postal format probably needs to be reasonably defined and firm.</li> <li>• Having a relatively simple format with simple “algorithms” will reduce development costs, make consistent outcomes from different participants easier to achieve, and hence result in more comparable outcomes (eg Distributor and Retailer for the same data).</li> </ul> <p>Note that there are international standards being developed for metering data access, such as Green Button, which have the potential to enable new applications. Green Button defines data formats but also defines protocols for the exchange of energy information between parties.</p>
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<sup>2</sup> Note the metering data utilised is un-validated, is direct from the smart meters, and does not constitute data intended for market use.

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<p>4 (c)</p>	<p><b>As above</b></p>	<p><b>c) Should the NER stipulate a specific period of time in relation to which the electricity consumption data must cover? If so, what is the appropriate period of time?</b></p>	<p>There are practical constraints on the period of metering data which is available and/or can be provided. Hence yes the regime needs to specify periods of time and customers must be made aware of the constraints.</p> <p>The period of time for which metering data can be made available to a customer by an entity is restricted by:</p> <ul style="list-style-type: none"> <li>• data availability           <p>A Retailer will not have the metering data for a date range where it is not the nominated Retailer for the site. A Retailer or a Distributor does not have the right to provide data for a period where there was another customer at the site.</p> </li> <li>• practicality constraints           <p>Under the NER and related service level documents, MDPs are only required to maintain metering data in <u>readily</u> accessible systems for 13 months, after which time data is stored in accessible but not necessarily readily downloadable archive facilities for 7 years. These periods are to meet market requirements for data. An MDP accessing archive facilities is time consuming and this is envisaged as being only required to resolve a billing dispute not for “routine” data requests.</p> <p>We recognise customers may have a legitimate need for meter data to compare this year’s consumption with the previous year. Therefore it may be beneficial to customers to have 2 years of meter data available.</p> <p>If there was a requirement for MDPs to provide metering data for more than 13 months as the basis of meeting Distributors’ and Retailers’ metering data provision obligations, than this would represent a step change in MDP obligations. Potentially in at least some cases this would require a major increase in storage capacity and maybe even in storage management. A transitional period may be required to enable these IT system changes to be made.</p> <p>Note also the longer the meter data provision period the greater the likelihood that a contact name change will have occurred which will significantly increase the administrative burden in verifying if the applicant is indeed entitled to the data. Refer</p> </li> </ul>
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			<p>comments in Q2(b).</p> <p>When considering the specific period of time in relation to which the electricity consumption data must cover, the AEMC should consider that 2 years of interval data can take nearly 1000 A4 pages when printed. So it may be appropriate to provide meter data summary information only, or to restrict periods, when the information is requested in a printed format.</p>
5	<b>5.3.2 Time frame to respond to a request for electricity consumption data</b>	<b>a) Is 10 business days an appropriate time frame for market participants to respond to a request from their customers for their electricity consumption data?</b>	<p>If businesses are appropriately resourced with customer service and data analyst staff and have made system changes appropriate for the expected uptake by customers, then 10 business days represents an appropriate time frame to respond for a request for electricity consumption data.</p> <p>However it should be recognised that teething problems early in this regime may extend the timeframe. Further if capabilities are established on the basis of meeting 10 days under normal loading, then at times of peak loading, maybe a change of tariffs, some extension of this timeframe may be experienced.</p> <p>As discussed under Q4(c) retrieving data from archiving facilities will take longer and 10 business days is not long enough in that circumstance. .</p> <p>Further where the initial customer identification validation fails, then the time required for data delivery will be extended by the time taken for the customer to contact their Retailer to obtain their customer name as provided to the Distributor.</p>

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<b>6 (a)</b>	<b>5.3.3 Fees payable by a customer</b>	<b>a) How often should customers be able to request their energy consumption information free of charge in the NERR?</b>	<p>Apart from the situation involving multiple searches on a portal, there is a cost associated with every instance of providing customers with energy consumption information. Hence there needs to be a mechanism which disincentives multiple nuisance requests for data. In the SP AusNet support of the Victorian Government's home energy advisory portal (My Power Planner ) we note that often the same customers request the same sets of data multiple times. We would seek to manage unnecessarily repeated requests for meter data.</p> <p>Hence:</p> <ul style="list-style-type: none"> <li>• Requests for meter data must be for a minimum number of months if the data is available from the entity to minimise the need for multiple requests;</li> <li>• Unless the data provision process is fully automated through a portal, multiple requests for metering data covering the same period, or requests more frequently than three monthly should, at the discretion of the Participant, be subject to a service fee.</li> </ul>
<b>6 (b)</b>	<b>As above</b>	<b>b) Are there any other consumer protections we should take into account when assessing this aspect of the rule change request?</b>	<p>There should be an expectation that customers have the fundamental capabilities to retain metering data provided. Whether emailed data or hard copy metering data, customers should not expect to get a duplicate set at no cost where they have lost or misplaced the previously provided metering data.</p>

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7 (a)	<b>5.3.4 Time frame for making and revising the data provision guidelines</b>	<b>a) When should the first data provision guidelines be published?</b>	<p>SP AusNet are satisfied that, with reference to the industry through the relevant industry/AEMO working groups, AEMO are the right party to be defining the technical requirements for the two data formats.</p> <p>However SP AusNet is concerned by the proposal that AEMO will develop the Data Provision Guidelines. As we understand the concept of the Guidelines, these will define more than the technical file but rather the customer interfacing requirements, etc. AEMO is an organisation that is industry facing and does not have any engagement interfaces with customers. What basis would AEMO have for ascertaining whether the metering data provision process is meeting customer expectations and requirements?</p>
7 (b)	<b>As above</b>	<b>b) Should there be an obligation review these guidelines? If so, how often should such reviews take place?</b>	<p>We acknowledge that customer understanding and usage of interval metering data is at an early stage and hence establishing the data format and processes will be based on minimal operational experience. However, whilst accepting that this will necessitate the need for ongoing review, we also consider that once investments are made in systems and processes that there should be a period of stability for these to be thoroughly tested in operation. So further reviews should occur based on extensive customer surveys and should occur no more often than absolutely required.</p>
8	<b>5.3.5 Request from large customers to provide electricity consumption data</b>	<b>a) Should proposed rule 56A of the NERR only apply to small customers or should it apply to all customers, which would include large customers?</b>	<p>Generally large customers have a role in choosing their MDP through their nominated Retailer (FRMP). We understand this choice is often made on the basis of what the customer assesses are desirable attributes of the metering data direct provision arrangements offered by the MDP. Hence generally large customers will not need to use the proposed regulated arrangements.</p> <p>Hence, whilst it could be argued that the incremental industry cost of large customers using the free regulated metering data provision requirements might be relatively small, it is SP AusNet's view that passing these costs to all customers through the use of the regulated access is inappropriate, when these customers have access to more direct relationships with MDPs to obtain this data.</p>

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<b>9 (a)</b>	<b>6.2 Access by authorised agents or service providers to their customers' electricity consumption information</b>	<b>Question 9</b> <b>a) What is the appropriate term to refer to these third parties (eg agents, authorised parties) in the NER?</b>	<p>SP AusNet does not consider that the choice of term is critical, however consider that “authorised agent” does impart the understanding that this is an “agent” acting on behalf of the customer and has been “authorised” to act in that capacity.</p> <p>It is understood that the COAG Energy Council are currently considering the appropriate framework for the regulation of third party energy service providers. Terminology for third parties in the market is likely to be part of these considerations. The terms for the party considered in this Question and for other third parties should be compatible.</p>
<b>9 (b)</b>	<b>As above</b>	<b>b) Beyond existing privacy laws, should the NER specify:</b> <ul style="list-style-type: none"> <li>• the nature of consent a customer must give to authorise a person to access its data; and</li> <li>• any additional privacy obligations on authorised parties, retailers or DNSPs in relation to the disclosure of electricity consumption data?</li> </ul>	<p>In response to Q2(b), SP AusNet have expressed a view with respect to the issues associated with identification of customers when they request metering data from Distributors.</p> <p>The situation with respect to industry providing metering data other than directly to the customer is even more fraught with issues.</p> <p>The Distributor (or Retailer) must not only validate that the party requesting metering data is “who they say are”, but also be comfortable that the necessary nature of consent has been provided by the customer to that party.</p> <p>"Consent" is defined in the Privacy Act as "express consent or implied consent". Although neither term is defined in the APPs, these concepts have been around for a while so people generally have a good idea of what it is required in order to obtain consent. SP AusNet has no firm position with respect to the nature of the consent required to be given by the customer, however consistent with comments under Q2(b), consider that the proposed Rules change (and associated framework) should specify this rather than relying on individual interpretations of the APPs.</p> <p>However whatever the nature of the consent, the Rules change (and associated framework) must provide the necessary level of immunity and protection for the Distributor (or Retailer) acting in compliance with the regulatory framework against a breach of the APPs in disclosing metering data to an “authorised agent” including with respect to</p>

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			<p>subsequent use of that data by the agent. An example of the latter might be where the authorised party is located overseas and the disclosure of the consumption data constitutes a cross-border disclosure of personal information. Depending on the circumstances, APP 8 may mean the industry participant is liable for the way the authorised party handles the consumption data, even though the participant has no control over this.</p> <p>As detailed in response to Q2(b), current validation of customers requesting metering data is via the alignment of their name (and other details) given by the customer against the contact details provided to the Distributor by the customer's Retailer. This mechanism is of course not available where the request is from an agent authorised by the customer.</p> <p>Currently SP AusNet in this circumstance requires to sight an authorisation from the customer in writing and signed by the customer. Whilst SP AusNet recognises that this is a relatively arduous arrangement, and resource intensive for all concerned, to move away from this approach introduces further risk of metering data, as Personal Information under the APPs, being provided to an unauthorised party. SP AusNet have no suggestion as to how this process could be streamlined, however as stated above any simplification should be specifically detailed in the proposed Rules change (and associated framework) and the industry participant should suffer no regulatory risk if they follow the specified approach.</p> <p>Again as detailed in response to Q2(b) there is a genuine possibility that Retailers/Distributors will receive different advice about how the APPs apply to their businesses such that there will be regulatory uncertainty, and the customer experience may differ depending on who the customer is dealing with. If the AEMC is concerned to promote consistency, the key components of what is considered an effective and efficient industry approach to dealing with customers agents should be defined in the Rules change (and associated framework).</p>
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<b>10 (a)</b>	<b>7.2 Informing customers about the uses of their electricity consumption data</b>	<b>a) Is there a significant risk or problem in the NEM that necessitates the publication of standard information on the websites of retailers and DNSPs about how electricity consumption data is used? What are the benefits associated with this proposal? Are there examples where a similar approach has been applied in other industries?</b>	<p>It seems unnecessary to mandate that Retailers/Distributors explain how consumption data is used. If the COAG Energy Council and AEMC consider there is an information gap and consumers may get some benefit from understanding what consumption data is and how it's used, the AEMC's suggestion that AEMO drafting a standard explanation/fact sheet is a more sensible approach.</p> <p>However Retailers/Distributors should not be discouraged from providing their own information in addition, should they choose to. This information could be an extension of their obligation under the APPs that each business explain how it uses metering data in situations where the metering data is Personal Information.</p>
<b>10 (b)</b>	<b>As above</b>	<b>b) Is it appropriate for energy-specific regulations to be used to extend privacy law by requiring information about how electricity consumption data is used to be published on the websites of retailers and DNSPs?</b>	<p>Refer the SP AusNet response to Q10(a).</p>

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<b>10 (c)</b>	<b>As above</b>	<b>c) Is there a significant risk or problem in the NEM that would require the creation of 'metering data common terminology guidelines' ? What are the benefits associated with this proposal? Are there examples where a similar approach has been applied in other industries?</b>	<p>Refer the SP AusNet response to Q10(a). If AEMO were to produce a “How electricity consumption data is used” document, then a terminology glossary would be part of that document.</p> <p>Any terminology used should be consistent with the benchmark understanding in the industry. For example the industry term used in metrology regulatory documents is “metering data” not “energy consumption data” and “instantaneous data” is not a term utilised. Also the terminology should be restricted to that necessary. For example the concept of “settlement ready data” is not required to be understood by a customer.</p>
<b>10 (d)</b>	<b>7.2 Informing customers about the uses of their electricity consumption data</b>	<b>d) Are there any other consumer protections we should also take into account?</b>	<p>It would be appropriate for the “How electricity consumption data is used” document to include a customer orientated view of the various regulatory arrangements covered in the questions above including those dealing with privacy and customer validation; and use and authorisation of agents.</p>