



Consumer Data Right

Incorporating C&I and Collective Billing

Billing and Invoicing – General (all segments)



AGL are seeking confirmation from the DSB that our interpretation of these data sets is correct.

The following details the basis to our interpretation for the data sets across all customer segments, with further explanation of how Collectives are managed by AGL on page 3. We have interpreted each data set individually on pages 4 – 7 with questions raised in each. To further assist your understanding and confirmation that AGL is aligned with the proposed definitions, we have provided examples of bills for C&I, consumer and collective accounts on pages 8 - 12. We look forward to the DSB's clarification and confirmation on the questions raised.

We understand an overarching principle for the Billing and Invoicing data is provide this as it is displayed on the customers bill.

- Billing data – is intended to be all individual line items that appear on the customers invoice, including adjustments and payments.
- Invoicing data – is a summary view, summing up all lines from billing, with one total per category. Plus account balance and payment status.

Applicable charges vary from state to state/customer to customer, however we have understood guiding principles of:

“Usage” = Charges for peak, off peak, controlled load, shoulder and solar (noting solar moves under “Generation” for invoicing)

“Other” = C&I renewable energy & environmental charges. Green charges such as carbon neutral fees.

“Once Off” = Everything else including Network Charges, AEMO Fees, Metering Fees, Demand, Supply Charge, Service Order Fees. Discounts and credits (noting these move under “TotalDiscounts” for invoicing).

AGL notes that the data fields are currently quite vague in description and open to interpretation. Therefore we request confirmation that we are aligned to the DSB intent, as outlined above.

AGL further notes that a number of questions from retailers on github have not been answered to date, or have been answered but with inconsistent advice provided in github for the same field (for example supply charge is answered by DSB in DP-116, DP-149 and DP-173 with three different fields indicated for this value “totalonceoffcharges”, “totalaccountcharges” or “totalusagecharges”).

AGL therefore requests definitions of each billing and invoicing field are more clearly articulated, including which charges sit under each category. We have included specific questions that require clarification in the following slides.

Whilst we have outlined our interpretation within this pack and in the examples provided to confirm alignment (slides 8-12), this is based on AGL's understanding, which may differ to other retailers. We are concerned that the ambiguity within the description and inconsistent advice, may result in each retailer interpreting and categorising data differently. This will cause variation in the data across the industry and will diminish the quality of CDR data, impacting the end customer benefit. This will also effect the ability for ADRs to utilise this information for the purposes of comparison, as it will not be comparing like for like.

Billing and Invoicing – Collectives



AGL notes there is significant complexity in providing collective billing & invoicing information. AGL issue invoices to customers only at a parent level, not at an individual child level. This means invoice number, invoice total, account balance, payments etc are all held at the parent level only. This information is not available for child sites on their invoice. (An example is provided on slide 12).

Therefore, we will only be able to provide billing and invoicing information with consent of the parent account holder. Child sites will not be able to access billing and invoicing information specific only to their individual site.

As collective billing arrangements can include thousands of child sites, the data provided when a parent requests CDR data will be equivalent to a bulk request. Billing information will contain every individual line item that makes up the parent invoice. For example if there is 1000 child sites this would mean 1000 x peak line items, 1000 x off peak lines, 1000 x shoulder lines etc. [Please confirm all billing fields will be repeatable to allow for this.](#)

When providing invoice data however, we will need to sum all the individual line items relevant to that category i.e. TotalUsage for this example would be the sum of 3000 Peak/Off Peak/Shoulder line items, provided as a single dollar value total. The ServicePointID field in invoicing will contain all relevant sites – in this example 1000 NMIs. [Please confirm this field will be able to cater for this.](#)

The start and end date for the invoicing period is again complex. The supply period varies at a child level. Therefore to provide an invoice period at a parent level, this will need to be derived with the start date = last bill issue date and the end date = the date this invoice was issued.

AGL further notes that each retailer has their own customised way of billing this unique segment, with some retailers invoicing at a child level. Therefore, there will not be consistency in the data provided across retailers, limiting the ability for this data to be used for comparison purposes. Also diminishing the value and benefit for customers.

Introducing rules that mandate all collective billing data to be provided at a consistent level, i.e. all retailers provide data at a child invoice level, or all retailers provide data at a parent invoice level, will create additional complexity, increase cost and time to build and may contain inaccuracies where this does not align to how retailers bill. This will also create inconsistencies for customers, as the data available on their invoice, digital platforms and via CDR will vary.

[AGL seeks confirmation that the proposed approach outlined above is aligned to the DSB expectation, in relation to provision of AGL's Collective Billing information.](#)

Billing and Invoicing – Specific Data



1. Supply Charges

AGL notes there is currently no field indicated in either billing or invoicing data sets for daily Supply Charge or demand. These are however noted in the plan detail. These charges (and the equivalent unbundled network charges/Metering and AEMO charges in C&I space) are key components of an energy bill.

If these will not be included as a standalone field, [AGL requests confirmation that these charges fall under “onceoffcharges” in billing and the equivalent total for invoicing.](#)

We note this has been asked on github with inconsistency in response – refer to DP-116, DP-149 and DP-173 github threads, where different fields (“totalonceoffcharges”, “totalaccountcharges” or “totalusagecharges”) have been indicated for this value.

2. Under Invoice Data - “InvoiceAmount”

[AGL require further clarification on this field.](#) Clarification was requested on github under DP-116 and the response given indicated the opposite expectation of the field description, creating a contradiction between the standards and advice on github.

Field description in standards: “The net amount due for this invoice regardless of previous balance”.

Github Question: This could be taken to mean the account balance as at the date the bill is issued (including that bill) with adjustments applied, or it could mean the amount for that single, current bill. DSB Response: “It is intended to be the former. The amount due with current balance incorporated.”

[Please confirm the expectation and update the field description if applicable?](#) If github is correct, is this not exactly the same information as the “balanceAtIssue” field? (desc “the account balance at the time the invoice was issued, including the current bill amount and adjustments on the account”.)

Perhaps “InvoiceAmount” should be the net amount of this invoice (i.e. total new charges including adjustments), not including the account balance?

3. Under Invoice Data - “TotalOnceOffDiscounts”

AGL notes the total invoice amount can include concession credits and government rebate amounts. These are not currently listed under any field in the invoicing data set. [Can DSB please provide clarification.](#)

Should these amounts should be included in the following, “TotalOnceOffDiscounts” and “TotalAccountDiscounts” under invoicing, and in “OnceOff” as a credit under billing. Or excluded completely from the data, only considered in the overall invoice total and account balance?

Billing and Invoicing – Specific Data



4. Under Invoice Data - “TotalAmount”

This has appeared in the latest documentation but was not mentioned in the changes. The description says *“The aggregate total of charges other than usage and once off charges”*

It is not clear what information is expected in this field. Can DSB please clarify this? Is this intended to be a combination of all remaining charges not listed elsewhere that contribute to the total invoice amount payable, i.e. balance brought forward, adjustments?

5. GST

AGL notes that very little guidance has been provided to date in relation to GST, with only a few fields indicating they require the NET amount. Therefore, AGL intend to provide all dollar values within billing and invoicing data sets as they appear on the customer's invoice.

In effect, this means all values will be GST exclusive, except for the invoice total amount, opening balance and current account balance which will be GST inclusive. With the exception of VIC consumer invoices, where all values are displayed as GST inclusive. Accordingly, rates for plans will also be provided as GST excl, except for VIC which will be GST incl. Unless otherwise indicated specifically in the data standards. [Please confirm this aligns to expectation.](#)

If amounts are provided GST exclusive, should the GST amount be provided as a charge in bill and invoice data, perhaps under “Other”?

6. Revised Bills and Adjustments

AGL notes the DSB has previously provided advice on this topic, however request confirmation we have correctly understood. DSB advice on github was: ‘The API is expected to provide a point in time response. Cancelled and re-issued invoices should be presented in their correct form at the time the API is called.’

We understand this to mean that if a bill is cancelled and reissued, we only need to provide the latest version of the bill/invoice as at the time the API call is made. There is therefore no requirement to provide any reversal data. Furthermore, as a new invoice has been issued, this scenario will not be reflected in the adjustments data field.

AGL will populate the adjustment section only when a prior bill period is “adjusted” or corrected (i.e. due to revised usage data) and a revised invoice is not issued. In this scenario the adjusted charges appears on the next cyclic invoice, in addition to new charges. Although this charge relates to a prior period, the invoice it is first displayed on is when it becomes charged and payable, making it an applicable component of the invoice total.

[Please confirm this aligns to expectation.](#)

Billing and Invoicing – Specific Data



7. Under Billing Data - "timeofusetype"

The field description indicates it is for usage and generation. It is however currently missing labels of "CONTROLLED_LOAD" and "SOLAR". We note this is included in plan details, but was missed in the billing data set.

Can these two labels be added to this field?

8. Under Account Data - "PricingModel"

AGL requests further clarification on when to utilise attributes of QUOTA, FLEXIBLE and FLEXIBLE_CONT_LOAD. [Can you please clarify the definition?](#)

Does quota apply to stepped tariffs for example?

Also the field descriptions says "Contracts for electricity must use SINGLE_RATE". We believe this should be removed as not all elec/gas contracts will be single rate. There may also be multiple meters each with a single rate.

Can DSB remove the restriction around only single rate and ensure this is a repeatable field?

9. Under Account Data - "CreationDate"

[Please confirm if AGL interpretation below is correct.](#)

AGL interpret this to mean the account/contract start date (i.e. move in date, or FRMP date/first day a retailer will bill a customer for their consumption at this site), which for clarity purposes is not the date the customer makes contact to open/create an account (can vary by as much as +/- 3 months).

Or is this intended to be the date a new plan commences? AGL note, we do not create a new account each time a customer swaps plan, instead we append the new plan details to the existing account. We note this differs to the process articulated by another participant under DP 114, so DSB clarification will assist with consistency in this field.

10. Under Account Data - "unitprice"

[Can you please clarify if C&I rates provided should be inclusive of energy loss factors where applicable \(note this includes both MLF and DLF\) or if the rates should exclude these factors.](#)

We pass both rates in our contract and bill as GST exclusive. Confirmation is required to ensure we provide the correct information, consistently across the industry.

Billing and Invoicing – Specific Data



11. Under Account Data - "meteringCharges"

Metering Charges are not plan specific but currently are listed under the plan detail segment. [Can this be moved down a level, under "tariff" section instead?](#)

We intend to provide solar metering service charge rate where applicable for consumer market and the metering charge specified in the contract for C&I. [Please advise if there is an alternative intent of this field?](#)

[Where should rate information for DUOS, TOUS, AEMO Pool Fees, AEMO Ancillary Charges go?](#) We don't believe there is a category for this information, so "Other" may need to be added under tariff section to capture this.

We interpret "GreenPower" to include renewable energy and environmental scheme rates, in addition to retailers green power or carbon neutral offerings i.e. inclusive of LRET, SRES, VEET, ESC, GEC, EEC, VERS. [Please advise if this is not correct.](#)

Example - C&I VIC



AGL has provided the following samples of our invoice types across customer segments, to illustrate our understanding of how the bill and invoice data will be categorised under CDR. [We seek confirmation from DSB that these examples are aligned to the data standards expectation.](#)

We advise visual representation of an invoice mapping to the relevant categories or a list of the line items that are relevant under each field, would greatly assist in ensuring consistency of the data provided across the energy industry.

	Days	Quantity	Rate	Rate (incl. Energy losses)	Charge
Energy Charges					
USAGE		7821.535 kWh	/ kWh	/kWh	
		5737.908 kWh	/ kWh	/kWh	
	Sub-total				
Network Charges					
ONCE OFF		7403.871 kWh	/kWh		
		6155.572 kWh	/kWh		
		52.208 kW	/W		
		30 days	day		
Sub-total					
Renewable Energy Charges					
OTHER		13559.443 kWh	kWh	/kWh	
		13559.443 kWh	kWh	/kWh	
		13559.443 kWh	kWh	/kWh	
Sub-total					
Other Charges					
ONCE OFF		13559.443 kWh	/ kWh	/kWh	
		13559.443 kWh	/ kWh	/kWh	
		1	day		
		1	/month		
Sub-total					
Total GST					

Example - C&I QLD



USAGE

ONCE OFF

OTHER

ONCE OFF

	Days	Quantity	Rate	Rate (incl. Energy losses)	Charge
Energy Charges					
Peak		16828.4 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
Off Peak		13697.4 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
Sub-total					
Network Charges					
TUOS Energy Charge		30525.8 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
DUOS Energy Charge		30525.8 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
TUOS Fixed Charge	30 days		[REDACTED] / day	[REDACTED] / day	[REDACTED]
DUOS Fixed Charge	30 days		[REDACTED] / day	[REDACTED] / day	[REDACTED]
Jurisdictional Scheme - Volume		30525.8 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
Jurisdictional Scheme - Fixed	30 days		[REDACTED] / day	[REDACTED] / day	[REDACTED]
Network Adjustment		0			
DUOS Threshold Demand Charge		71.4 kVA	[REDACTED] / kVA	[REDACTED] / kVA	[REDACTED]
TUOS Threshold Capacity Charge		71.4 kVA	[REDACTED] / kVA	[REDACTED] / kVA	[REDACTED]
Sub-total					
Renewable Energy Charges					
E&REC - LRET Flexi Renewable		30525.8 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
E&REC - SRES Flexi Renewable		30525.8 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
Sub-total					
Other Charges					
AEMO Pool Fees		30525.8 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
AEMO Ancillary Charge		30525.8 kWh	[REDACTED] / kWh	[REDACTED] / kWh	[REDACTED]
Metering Charges		1	[REDACTED] / day	[REDACTED] / day	[REDACTED]
Retail Service Fee		1	[REDACTED] / month	[REDACTED] / month	[REDACTED]
Sub-total					
Total GST					
Total current charges (incl. GST)					

Example - Elec Consumer Bill (VIC)

(GST incl)



How we've worked out your bill.

Previous balance and payments.

		Total
Previous balance	\$201.64cr	
Balance brought forward		\$201.64cr

New charges and credits.

Usage and supply charges	Units	Price	Amount		
General Usage	298.318kWh				
Supply charge	90 days				
<i>Total charges</i>				+	\$146.08
Credits					
Service To Property Concession					
Annual Electricity Concession					
<i>Total credits</i>				-	\$30.34cr
<i>Total new charges and credits</i>				=	\$115.74
<i>Total GST included in new charges and credits</i>					\$10.53
Account balance				=	\$85.90cr
(includes GST)					

All items subject to and inclusive of GST.

Adjustment Note

Reason: Bill Correction

Tax Invoice 20 Mar 2021 to 17 Jun 2021 issued 21 Jun 2021

Original Invoice Charges including \$13.44 GST \$147.82

Revised Invoice Charges including \$10.53 GST \$115.74

Net Adjustment includes GST \$32.08cr

GST Adjustment \$2.91cr

USAGE
ONCE OFF

ONCE OFF

Example - Elec Consumer Bill (Non VIC)

(GST excl)



How we've worked out your bill.			
Previous balance and payments.			Total
Previous balance		\$453.00	
28 Sep 21 payment		\$453.00cr	
Balance brought forward			\$0.00
<hr/>			
New charges and credits.			
Usage and supply charges	Units	Price	Amount
Aug Peak Demand (normalised for 31 days)	.16.42kVA		
Peak	388.179kWh		
Off peak	461.217kWh		
Supply charge 28 days			
<i>Total charges</i>			+ \$529.78
Credits			
Standard Feed-in Tariff	855.638kWh		
25% Guaranteed Discount			
<i>Total credits</i>			- \$167.25cr
<i>Total new charges and credits</i>			= \$362.53
<i>Total GST</i>			+ \$36.25
Total due (includes GST)			= \$398.78

BILL DATA

ONCE OFF

USAGE

ONCE OFF

USAGE

ONCE OFF

OTHER

INVOICE DATA

= TOTAL ONCE OFF

= TOTAL USAGE

= TOTAL GENERATION

= TOTAL DISCOUNTS

= TOTAL OTHER CHARGES

= BALANCE AT ISSUE

Example - Collective Billing

Bill data would be all individual line items from the invoice, i.e. all line items from each child within this invoice.

Invoice data would be the total of each category at a parent level (similar to parent invoice first page below) i.e. all 100s/1000s of child line items within each category summated together, to provide 1 total for each category per invoice.

BILL DATA
USAGE
ONCE OFF

Account Name	W*****	Parent Invoice First Page - xyz
Collective Invoice	Multiple Service Addresses	
Electricity Account Summary		
Opening Balance	\$56465.63	
Payment Received	\$7487.27cr	
Balance Carried Forward	\$48978.36	
Usage and Supply Charges (see over for details)	\$502384.70	
Total Other Charges (see over for details)	\$23371.56cr	
Current Charges (including GST of \$43546.66)	\$479013.14	
Total Amount Due	\$527991.50	
<i>Amounts are inclusive of GST</i>		

Account No.	88 [REDACTED]
Due Date	3 May 2021
Total Amount Due	\$527991.50
Overdue Balance Due Now	\$48978.36
The Victorian Default Offer is a reasonably priced electricity offer set by Victoria's independent regulator. Contact us on 1300 757 384 to discuss the suitability of this plan for you.	

Usage Details Parent Invoice xyz – child site 1

Supply Period: 21 Dec 2020 to 20 Mar 2021
Next Scheduled Reading: 15 Dec 2021

Service Address: 5*****

Tariff Description	Meter Number	Reading Type	Bill Days	Current Reading	Previous Reading	Usage kWh
POW MLS BUS ELEC BN SP AUSNET	4637263	Actual	90			10141.164
POW MLS BUS ELEC BN SP AUSNET	4637263	Actual	90			10499.438

Old Rate Prorate 21 Dec 2020 to 31 Dec 2020 11 days

Peak 1173.433 kWh	\$503.79
Off peak 1284.049 kWh	\$297.32
Dec Demand 13.29 kW (normalised for 31 days)	\$86.33
Supply charge	\$18.41
New Rate Prorate 1 Jan 2021 31 days	
Jan Demand 16.838 kW (normalised for 31 days)	\$130.45
New Rate Prorate 1 Feb 2021 28 days	
Feb Demand 14.134 kW (normalised for 28 days)	\$98.90
New Rate Prorate 1 Jan 2021 79 days	
Peak 8967.731 kWh	\$2820.26
Off peak 9215.389 kWh	\$1637.11
Supply charge	\$91.98
Guaranteed Discount	\$620.46cr
Guaranteed Discount	\$360.16cr
Guaranteed Discount	\$20.24cr
	€43c 7p

How much power have you used?

USAGE
Average usage per day in this billing period: **229.34kWh**
Same time last year: **228.79kWh**

Your greenhouse gas emissions

TOTAL ESTIMATED GREENHOUSE GAS EMISSIONS FOR THIS BILL: **23.3 tonnes**

Usage Details Parent Invoice xyz – child site 2

Supply Period: 23 Feb 2021 to 24 Mar 2021
Next Scheduled Reading: 23 Apr 21 to 29 Apr 21

Service Address: 5*****

Tariff Description	Meter Number	Reading Type	Bill Days	Current Reading	Previous Reading	Usage kWh
POW MLS BUS ELEC BN AUSGRID	31727	Substituted	30			1210.943
POW MLS BUS ELEC BN AUSGRID	31727	Substituted	30			988.383
POW MLS BUS ELEC BN AUSGRID	31727	Substituted	30			2012.619

Demand 11.35 kW

Peak 988.383 kW	\$294.24
Off peak 2012.61	\$274.72
Shoulder 1210.94	\$298.26
	€206.58

How much power have you used?

Average cost per day: **\$30.57**

Parent Invoice xyz - summary

Acct. Number	NMI Number	Site Location	From	To	Bill Days	Bill Description	Usage Charges (Incl GST)	Supply Charges (Incl GST)	GST on Usage & Supply Charges	Other Charges (Incl GST)	GST on Other Charges	Total Amount (Incl GST)	GST	Net Adj	Reading Type	Peak kWh	Peak Next kWh	Off Peak kWh	Shoulder kWh	Billed Demand kW	Actual Demand kW	Reversal Reason	
Faults and Emergencies 131 280																							
70	[REDACTED]	610	[REDACTED]	5*****	31 Dec 2020	30 Mar 2021	90	New Bill	\$5632.52	\$122.37	\$523.27	0	0	\$5755.89	\$523.27	A	42	344.04	0	0	0	0	
70	[REDACTED]	610	[REDACTED]	5*****	31 Dec 2020	30 Mar 2021	90	New Bill	0	0	0	0	0	0	A	3708	28387.11	0	0	0	0	0	
70	[REDACTED]	610	[REDACTED]	5*****	2 Oct 2020	30 Dec 2020	90	New Bill	\$2279.92	\$99.89	\$216.34	0	0	\$2379.81	\$216.34	A	3750	29901.56	0	0	0	0	
70	[REDACTED]	610	[REDACTED]	0*****	2 Dec 2020	1 Mar 2021	90	New Bill	\$6191.83	\$540.65	\$612.04	0	0	\$6732.48	\$612.04	A	4722.156	0	4937.272	0	0	61.624	0
70	[REDACTED]	610	[REDACTED]	0*****	2 Dec 2020	1 Mar 2021	90	New Bill	0	0	0	0	0	0	A	0	0	0	0	0	0	61.624	0
70	[REDACTED]	610	[REDACTED]	0*****	2 Dec 2020	1 Mar 2021	90	New Bill	0	0	0	0	0	0	A	0	0	0	0	0	0	61.624	0
70	[REDACTED]	610	[REDACTED]	0*****	2 Dec 2020	1 Mar 2021	90	New Bill	0	0	0	0	0	0	A	9831.52	0	10891.998	0	0	0	61.624	0
70	[REDACTED]	610	[REDACTED]	1*****	9 Nov 2020	6 Feb 2021	90	New Bill	\$3376.47	\$632.17	\$364.41	0	0	\$4008.64	\$364.41	A	6373.233	0	5809.342	0	0	56.094	0
70	[REDACTED]	610	[REDACTED]	1*****	9 Nov 2020	6 Feb 2021	90	New Bill	0	0	0	0	0	0	A	0	0	0	0	0	0	56.094	0
70	[REDACTED]	610	[REDACTED]	1*****	9 Nov 2020	6 Feb 2021	90	New Bill	0	0	0	0	0	0	A	0	0	0	0	0	0	56.094	0
70	[REDACTED]	610	[REDACTED]	1*****	9 Nov 2020	6 Feb 2021	90	New Bill	0	0	0	0	0	0	A	4302.386	0	4605.775	0	0	0	56.094	0
70	[REDACTED]	610	[REDACTED]	1*****	9 Nov 2020	6 Feb 2021	90	New Bill	0	0	0	0	0	0	A	0	0	0	0	0	0	56.094	0
70	[REDACTED]	610	[REDACTED]	1*****	19 Oct 2020	8 Jan 2021	90	New Bill	\$64.75cr	\$146.12	\$7.40	0	0	\$81.37	\$7.40	A	103.725	0	119.658	0	0	0	0
70	[REDACTED]	610	[REDACTED]	1*****	19 Oct 2020	8 Jan 2021	90	New Bill	0	0	0	0	0	0	A	7.972	0	7.992	0	0	0	0	0