



FACILITATING ACCESS BY THIRD PARTY PROVIDERS TO CONSUMER ELECTRICITY DATA

SUBMISSION TO DEPARTMENT OF ENVIRONMENT AND
ENERGY CONSULTATION PAPER

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SUMMARY

AEMO is broadly supportive of the objectives proposed in the report authored by HoustonKemp, facilitating consumer data access for third-party service providers. The rules and processes for authorisation and associated processes to enable access to connection point data for current market participants are well established, transparent and efficient. Alternatively, processes for customers, their authorised representatives or any party who establishes a right to access connection point data are unwieldy in comparison.

AEMO recognizes the work being undertaken in parallel regarding the Open Banking Review and the Customer Data Right, and agrees that it will be important for the proposed scheme in the energy market to be consistent with these initiatives and more broadly to be considerate of the requirements of the Privacy Act.

THE PROPOSED SCHEME

Question 1 - Is the proposed objective for the consumer electricity data access scheme appropriate?

AEMO considers that the scheme proposed can meet the objectives identified in the report, and in particular address the impediments to accessing data by third parties, if implemented in accordance with the broader access to data arrangements in the National Electricity Market (NEM).

Access to historic data¹ can be established via either the aggregated or disaggregated models presented in the report, however with the pending changes to the source and volume of data to be held by AEMO resulting from changes to settlement framework, the aggregated model appears to have distinct advantages.

The existing B2B e-hub, used exclusively by registered and accredited parties in the energy market to securely transmit information, service requests and data between each other, provides a platform that can be capitalised upon for authorised parties to:

- obtain data directly from a hub;
- obtain data from disaggregated data holders;
- obtain services, including on-demand data delivery from service providers such as Metering Data Providers and Metering Coordinators; or
- any combination of the above.

AEMO considers that whilst the scheme may launch with a focus on the ability to access historic data, the e-hub capabilities may be leveraged in the future and that the scheme should not prevent this from developing organically.

RESPONSIBILITY FOR DEVELOPMENT OF DATA ACCESS

SCHEME

Question 2 - Should AEMO or an alternative agency be given responsibility for developing the consumer electricity data access scheme?

Rule 7.15.5(a) sets out who presently has rights to access the various types of data associated with a metering installation. AEMO considers that proposing an amendment to this clause would be the most appropriate way to establish the role of a third-party service provider under the National Electricity Rules (NER). Such an amendment could consider the rights and obligations on the role itself, as well as other market participants, providers and market bodies in supporting access to data and the

¹ i.e. data up to the point of the last collection, which may be a recent (e.g. 23.59 last night) or further back in time (e.g. 2 months ago in the case of a manual reading).



development of procedures and guidelines as necessary. Establishing the scheme through a rule change process would enable consultation with all interested parties and maintain the single source of truth (i.e. the NER) for access to data rights.

Further benefits of this approach are that:

- It provides clear direction to AEMO and the Australian Energy Regulator (AER) regarding the implementation timelines of any procedures, guidelines, systems and transitional arrangements, including registration and accreditation;
- Where possible, existing frameworks processes and systems can be leveraged; and
- Funding arrangements to support the framework can be determined.

TYPES OF DATA ACCESS

Question 7 - Should authorised and accredited third parties be given access to more than just a consumer's metering data upon the commencement of the data access scheme?

Question 8 - What are the arguments for and against providing third party access to retail and/or network tariff data?

There are two principle types of data for each connection point that are used in the Electricity Market by all market participants, including retailers for customer transfers and billing, distributors for the management of the distribution network and AEMO for energy settlements:

- NMI Standing Data – which comprises the attributes of the connection point, including the connection point address, NMI, network tariff, metering equipment identifiers and appointed market roles
- Metering Data – record of the flows of energy through the metering installation at a connection point, typically produced as 48 half hourly intervals of measurement across a 24 hour period, or a single accumulation reading measuring energy flows over a fixed period of approximately 3 calendar months

Metering data oscillates relative to the load and generation at a connection. On the other hand, NMI standing data is only created, amended and removed as a result of a specific planned action, such as the appointment of a new energy retailer, the installation of a new metering device, and change to the connection point address, e.g. as the result of a building site 'Lot number' changing to a street address following a new connection.

NMI Standing Data has various basic uses as a stand-alone data set (e.g. enabling retailers to identify a customer's NMI to commence the retailer transfer process), however for a connection point with anything other than a simple configuration, Metering Data is for the most part, irrelevant until it can be associated and interpreted based on the NMI Standing Data to which it pertains. Therefore, it is critical to consider the development of both Metering Data and NMI Standing Data when examining options for the further enhancement of the use, the format, storage and access to connection point data.

At present, the Network tariff is the closest thing to a configuration code associated with each connection point in the NEM. That is, it is the only element of standing data that provides information which indicates the likely configuration of the metering installation. Thus, the network tariff may be critical in interpreting a metering data file containing multiple data streams.

AEMO does not consider that there is value in the provision of the retail tariff through the scheme proposed in the consultation paper.

Question 9 - What changes are required to existing AEMO metering data formats to facilitate access by third parties to consumer electricity data?



As highlighted in the HoustonKemp report, and as indicated in the AEMO High Level Design document², AEMO intends to perform a review of data formats in line with the requirements and timeframes for implementation of five-minute settlement. AEMO recommends that interested parties consider this matter when AEMO commences consultation on market data formats, including the Metering Data File Format (MDFF – NEM12 & NEM13) in due course.

EXPECTED COSTS AND TIMEFRAMES FOR DEVELOPMENT

Question 10 – Are the estimated costs for development and ongoing maintenance a centralised or decentralised implementation of the system reasonable?

Question 11 - What are reasonable timeframes for implementation under each of the options considered?

Considering the alternatives of either a centralised or de-centralised solution, AEMO supports the assessment that a centralised solution would deliver a considerably more cost-effective solution to the provision of consumer data to third-party service providers. AEMO considers that the core proposition in the paper, that an aggregated/centralised approach would be more cost efficient than a de-centralised/disaggregated approach, is sound. The final cost structure and quantum would ultimately depend on the scope and requirements of a final solution. This same notion of scope and requirements applies equally to the development timeframe, a final determination on which isn't practical at this stage.

AEMO is interested in engaging further on the final scope for a potential Data Hub, including contributing to the development of an appropriate cost model and development timeframe.

² published by the Australian Energy Market Commission (AEMC) alongside their draft determination for the Five-Minute Settlement Rule.