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Facilitating access to consumer electricity data – Draft Report

AusNet Services welcomes this opportunity to contribute to the COAG Energy Council's consultation on facilitating access to consumer electricity data.

As Victoria's largest energy services delivery business, AusNet Services delivers safe and reliable gas and electricity to more than 1.3 million Victorian customers. We own and operate approximately \$11 billion of assets across three networks: electricity distribution and transmission and gas distribution.

AusNet Services sees its purpose as empowering customers and their energy future. This includes supporting improved consumer access to their energy data, as this information can provide a powerful tool for customers making decisions about energy products, service providers and their own behaviour.

AusNet Services' customers can access their own data via the, recently updated, myHomeEnergy web portal. We support the efforts of this COAG Energy Council project to improve the value customers get from their meter data, by enabling greater access of third parties.

This submission focuses on three aspects of the proposed scheme for third party data access: customer attitudes; the legal framework for managing privacy protection; and, scheme costs.

Customer attitudes

Customers are the intended beneficiaries of improved energy data access for third parties, and as such their voices should be the most important in shaping any future scheme. It is important that customer attitudes are tested in relation to key aspects such as satisfaction with arrangements for sharing personal information (privacy and security) and the value placed on improved data access and willingness to pay associated costs.

Legal framework for managing privacy protection

As identified by HoustonKemp, the key issues for increasing data availability from the perspective of a network business are associated with managing privacy risks. This includes concerns for meeting customer expectations regarding how their personal information will be safeguarded and legal obligations.

AusNet Services agrees that changes to the National Electricity Rules could remove barriers to distribution networks providing data to third parties. This is particularly the case if the approach is consistent with the proposals of the Open Banking Review. In the electricity sector, a similar reform would likely include changes to the National Electricity Rules establishing a consumer data authorisation process and specifying legal responsibilities for each party. This would ultimately provide the necessary trust for distributors and retailers in quickly providing high value, interval metering data with confidence.

A centralised approach to accreditation and authorisation of third parties is a sensible recommendation. AusNet Services has previously supported distributor based model for data provision. However, cost efficiency is an important priority, so we could likely support a centralised model (e.g. via AEMO) if costs are expected to be significantly lower.

Scheme costs

The report identifies costs for the preferred approach of a centralised database that handles data requests. Aspects of the centralised approach that have not been fully clarified could affect the cost of an eventual scheme, and should be further reviewed.

Scheme design elements that will affect the network costs include:

- The scope of data that is included and the data format (i.e. do these exceed what is currently collected and provided to AEMO);
- Processes for transacting with the centralised scheme, and whether these differ from existing processes and transaction volumes;
- Ongoing requirements for distribution networks to provide individual customers with their data (i.e. will current data portals need to be maintained);
- The extent to which Rule changes remove distributors liability for data breaches that may occur from the centralised data base (e.g. illegitimate access or use of data);
- Any new activity associated with the scheme (e.g. outbound emails or SMSs to customers alerting them to releases of their data); and
- Whether customers are to be provided an opt-out from the centralised data scheme.

Broadly, costs should be minimised, and the selection of any more costly scheme specifications should be justified by an evaluation of the probable incremental value that is to be generated (e.g. from leading to customer savings, or better economic decisions and energy investments).

A final point of relevance to scheme costs is to note the interaction with other data-focused initiatives, such as the ones called out in the report (e.g. the Victorian Energy Data hub). Timing and implementation of this scheme should consider opportunities to reduce costs through coordination of initiatives.

For any questions in relation to this submission, please contact me at katie.yates@ausnetservices.com.au or (03) 9695 6622.

Sincerely,



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