

THE CHAPEL GROUP

C L E A N T E C H N O L O G Y . M A D E S I M P L E .

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Dear sir/madam,

Facilitating Access to Consumer Energy Data - Consultation Paper

Thank you for the opportunity to provide feedback on the above consultation paper. I hope the following observations will assist in delivering an outcome that is in the best interests of the consumer and the broader community. I agree we should leverage existing structures and rules to expedite the implementation of this requirement, but only where it is in the best long-term interests of the consumer.

Why is the DNSP sourcing and sending the metering data to AEMO, and not the MDP?

In today's market the Meter Data Provider, or MDP, 'sources and sends' meter data, making it available to the appropriate Retailers and Distributors, or DNSPs. The MDP would seem to be the logical choice to be responsible to 'source and send' meter data to AEMO for access by approved third parties and individual consumers. Is there a reason you recommend the DNSP and not the MDP for this role?

It was not clear from the report that MDP's were invited to participate in this consultation. What input has MDP's had into this proposed design?

There are many advantages to the MDP being responsible for sourcing and sending meter data, as opposed to the DNSP. These being:

- > The 'sourcing and sending' of meter data is an MDP's core business, it is not a DNSP's.
- > There will likely be fewer MDP's than DNSP's, making it a simpler model for AEMO to manage.
- > Smart meters can collect all sorts of information that a DNSP has no intention to capture for its own business. For a DNSP to provide this to AEMO, they may need to enter into an agreement with the MDP to capture the data, and then forward it on to AEMO. This additional step introduces costs, complexity, and time delays and delivers no additional value.
- > The DNSP may have reasons to 'cleanse' data as it passes through its systems. This 'cleansing' is specifically designed for the DNSP's business processes. A third party is likely to want the raw data from the meters. The raw data can be obtained from the MDP.
- > The MDP has a natural incentive to make the vast array of smart metering data available at very competitive pricing as this will create new revenue streams for them. The DNSP does not.
- > The MDP has no conflict of interest in providing the data to anyone who is approved to access it. A DNSP may have a conflict of interest if they see a request from an organization who they perceive as a competitor. For example, a micro-grid operator, a distributed energy resources provider, etc.

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Why is AEMO storing all metering data, as opposed to managing the market transactions?

I agree with the role proposed for AEMO, but I question the value of them creating a centralised database of all energy data, as opposed to managing the transactions. The report references a 0.5% take up, where people are requesting access to energy data. Even if this grows exponentially to 20%, this still means 80% of metering data will be collected and need to be managed and yet never accessed. Capturing and managing so much data and never using it creates an unnecessary cost to the consumer. Could it be a more cost-effective approach for AEMO to only manage and store the transactions taking place to ensure the integrity of the process?

To what extent has Green Button been embraced to open the US market to Australian start-ups?

A lot of the challenges being described in this paper have been overcome by The Green Button initiative in the US. Whilst I acknowledge our markets are different, a lot of the mechanisms such as standardized data formats, verification of sources, accreditation of third parties, etc. will have already been resolved. It is not clear that the lessons from The Green Button have been incorporated into this analysis. If we align with the Green Button standard it means Australian start-ups have immediate access to export their services to the much larger US market. What consideration has been given to this?

How much data can be accessed, and how often?

It is unclear as to the timeliness, granularity, and frequency in which the data is made available to third parties and individual consumers. I would suggest the objective is the data should be of the same timeliness, granularity, and frequency that the MDP makes it available to the Retailer and DNSP. If a third party or consumer wants something different this could be commercially negotiated with the MDP. It does not need to be part of the initial phase.

I hope these observations are useful, I would be more than happy to elaborate on them on request.

Yours sincerely,



Wayne Pales
Director