

City of Sydney
Town Hall House
456 Kent Street
Sydney NSW 2000

Telephone +61 2 9265 9333
council@cityofsydney.nsw.gov.au

GPO Box 1591 Sydney NSW 2001
cityofsydney.nsw.gov.au

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COAG Energy Council
energycouncil@environment.gov.au
cc: sarea.coates@environment.gov.au

To whom it may concern,

City of Sydney submission to Facilitating Access to Consumer Energy Data - Consultation Paper

The City of Sydney supports the process being undertaken by the COAG Energy Council to improve the efficiency, consistency and protocols around access to electricity data.

Improved access to electricity data by consumers, governments and businesses can lead to better sustainability and customer outcomes. For example, energy efficiency and renewable energy product offerings may be informed by better access to electricity data.

In 2017 the City endorsed a target for its local government area to be net zero emissions by 2050 in line with the Paris Agreement. Sector strategies have been developed to identify actions required by the community toward this goal. Measuring and managing stationary energy and emissions is a high priority and key for achieving this target.

The City also has significant experience running sustainability initiatives such as the Better Buildings Partnership, CitySwitch Green Office and Smart Green Apartments. These programs show that most businesses, strata management companies, building owners and residents need support to analyse energy bills and to seek opportunities to increase energy productivity and reduce emissions.

Our programs typically gather energy data in bespoke and often time consuming ways. Being national, CitySwitch faces additional challenges to collect data from different cities and states. Examples of the varied ways in which data is collected include scans of bills, smart meter feeds, screen shots of retailer login portals, access to metering providers and spreadsheets from distribution companies.

The COAG Energy Council proposal to improve access to data by customers and intermediaries in a consistent and transparent way is supported by the City as it should improve how energy data is collected and at a scale and format that is consistent and able to be benchmarked, analysed and aggregated.

The City recommends provisions that would allow cities, companies or jurisdictions access to aggregated and anonymised data by geographic area and customer type. Ideally privacy concerns may be overcome by aggregation.

Any protocol should be a readily usable format and consistent with the requirements of key sustainability initiatives including NABERS Energy, CitySwitch, and the NSW Energy Savings Scheme.

city of villages

It is recommended that accredited entities be allowed to request data in bulk and over multi-year periods to reduce administrative burden. Approved recipients should receive regular data feeds in a suitable format. The role of energy meter providers will be critical for providing NMI level data.

In closing, improved access to energy data at scale would enable building owners, managers, tenants and others to benchmark and identify strategies for better energy management.

Please contact the City's Carbon Strategy Manager, Nik Midlam on 02 9265-9847 or at nmidlam@cityofsydney.nsw.gov.au for any questions regarding this submission.

Yours Sincerely,



Chris Derksema
Sustainability Director