

3 April 2018

COAG Energy Council Secretariat  
John Gorton Building  
King Edward Terrace  
Parkes, ACT 2600  
Australia  
[energycouncil@environment.gov.au](mailto:energycouncil@environment.gov.au)



Dear Secretariat

### **Draft report on Facilitating Access to Consumer Energy Data**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comments to the Council of Australian Governments (COAG) Energy Council's Draft Report prepared by HoustonKemp Economists on Facilitating Access to Consumer Energy Data.

Energy Queensland is a Queensland Government Owned Corporation that operates a group of businesses providing energy services across Queensland, including:

- Distribution Network Service Providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy);
- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- affiliated contestable business Energy Impact Pty Ltd (trading as Yurika).

Energy Queensland's purpose is to 'safely deliver secure, affordable and sustainable energy solutions with our communities and customers' and is focused on working across its portfolio of activities to deliver customers lower, more predictable power bills while maintaining a safe and reliable supply and a great customer experience.

Our distribution businesses, Energex and Ergon Energy, cover 1.7 million km<sup>2</sup> and supply 37,208 GWh of energy to 2.1 million homes and businesses. Ergon Energy Retail sells electricity to 740,000 customers.

Given the current transformation of Australia's energy system and the drive to empower consumers to make informed decisions regarding their energy consumption, it is important to ensure that a workable solution is developed to enable the intended benefits. Energy Queensland supports the intent of a consumer energy data access scheme (the scheme). However, we do not agree that the role of providing data should be centralised with a single provider at this point. Rather, we believe that a workable approach is for industry to develop and work towards a common approach. In the event that an industry led approach proves unsuccessful within a defined period, then the proposed centralised approach should be revisited. Also, Energy Queensland believes that a more comprehensive assessment of the cost and benefits should be

undertaken to ensure that the centralised provision to data approach will match the intended consumer benefits.

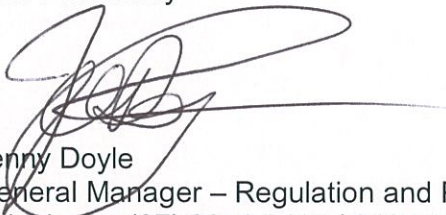
In addition, Energy Queensland makes the following comments for consideration:

- It is noted that the Draft Report fails to discuss how this scheme will interact with existing accredited/registered market participants (e.g. Metering Coordinators and Metering Data Providers) and the services provided by them in a contestable market. Further, the Draft Report seems to focus on ad hoc data requests which makes it difficult to understand the scope of the proposed scheme, for example, whether or not scheduled data delivery is excluded. The Draft Report is also silent on how long historical data is to be retained. As such, Energy Queensland would appreciate confirmation from the COAG Energy Council on how the scheme intends to deal with these matters.
- Energy Queensland understands that the proposed scheme will allow easier access to greater volumes of personal data. However, with greater access comes a significant privacy risk through the disclosure or misuse of personal information. Those privacy risks may increase considerably if this personal information is combined with data from other sources, such as banking transaction data. It is therefore critical that the proposed scheme balances these privacy concerns and associated risks.
- Where personal information is held jointly, an eligible data breach under the *Privacy Act 1988* (Cth) of one entity will also be considered an eligible data breach of other entities that hold the affected in
- formation. If the framework for the proposed scheme ensures that consumers are adequately protected from the risk of fraud, unauthorised access or theft, then the privacy risk should be mitigated. Alternatively, it may be appropriate to develop an Australian Privacy Principles Code to apply to access schemes.

Finally, Energy Queensland supports the Australian Energy Council submission when considering the proposed role of the Australian Energy Market Operator (AEMO) in establishing and administering the data access scheme. In our opinion, we do not consider that AEMO is best placed for administering the system and handling data requests, given that to date it has only provided an operational role to the operational requirements of the industry.

Energy Queensland looks forward to providing continued assistance to the COAG Energy Council. Should you require additional information or wish to discuss any aspect of Energy Queensland's submission, please do not hesitate to contact either myself or Trudy Fraser on (07) 3851 6787.

Yours Sincerely



Jenny Doyle  
General Manager – Regulation and Pricing  
Telephone: (07) 3851 6416 / 0427 156 897  
Email: [jenny.doyle@energyq.com.au](mailto:jenny.doyle@energyq.com.au)