

23/03/2018

COAG Energy Council Secretariat
Department of the Environment and Energy
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To The Secretariat,

Endeavour Energy is a 'poles and wires' business, responsible for the safe and reliable supply of electricity to 2.4 million people in households and businesses across Sydney's Greater West, the Blue Mountains, Southern Highlands, the Illawarra and the South Coast.

We thank you for the opportunity to respond to the "Facilitating Access to Consumer Energy Data Consultation Paper". Please find our response to your questions below.

We see promise in the Centralised approach; however, we believe there could be some modifications that could give the consumer more control over who accesses their data. We believe the Decentralised approach appears to place unnecessary cost on Market Participants and therefore the consumer, we do not believe this is a viable option.

Endeavour Energy looks forward to continuing to work with you to ensure affordable, sustainable and reliable energy for consumers and our economy

If you have any further questions please contact Ryan Moloney
(ryan.moloney@endeavourenergy.com.au)

Yours sincerely



Matthew Parker
MANAGER ASSET & METERING DATA

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

Endeavour Energy believes the scope to be appropriate.

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

We believe AEMO to be the most relevant organisation; however, the AER should also be considered as there may be synergies with the retail plan comparison website “Energy Made Easy”.

3. Are there additional elements that the scheme should incorporate to facilitate access to consumers’ electricity data by authorised representatives?

Our recommendations are outlined further in this document.

4. What changes can be done in the short term without a rule change and what changes require a rule change to implement?

Retailers could provide Consumers with direct access to metering data including current retailer tariffs or the AER Plan ID (a unique reference code generated by the AER’s ‘Energy Made Easy’). The consumer could then provide this data to their third party provider.

Also the MDP has an opportunity to offer value added services, by providing metering data to direct to the consumer, who could make this data available to their third party provider.

5. Are there alternative approaches to managing verification of consumer identity and third-party authorisation that should be considered and which are consistent with the scheme objective of providing on-demand access to data by authorised third parties?

In the US, there is a process labelled the “Green Button”. We believe this approach gives consumers the best options for controlling who can access their data and for how long (something that is missing in the current proposed processes).

In the Green Button process, the retailer would be the point of contact as they are in the best position to identify the consumer.

The consumer selects the type of data (electricity, natural gas, water), chooses the Date Range (start-and-end or a number of months), and whether to Download or Connect (share) data.

The data is then shared with a “third party” company for analysis or for providing daily or weekly services.

This model could work in Australia with very little modification to the “Centralised” approach.

The Retailer could provide Consumer data via CSDN (or similar) to AEMO for verification, at point of contract signing.

AEMO could then verify the consumer and give them the means of controlling who has access to their data and for how long.

6. Should AEMO or another agency be given responsibility for accrediting third parties?

We believe AEMO would be the most appropriate.

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?

We do not believe there is other necessary data, apart from what we have outlined.

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

The Network Tariff data is not relevant as this is not the figure that is used to calculate the consumer's bill.

The Retail Tariff is better as it is used to calculate the consumer's bill, but it may not take retailer discounts into consideration.

We believe the AER Plan ID is the most relevant data as this code takes all discounts into consideration. Also there has been considerable effort over the last few years to make consumers aware of the AER Plan ID and its usefulness.

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

AEMO do not currently use the MDFF file to receive data, so there will need to be system changes to allow for that.

There would also need to be an additional file required for non-consumption data (Tariff or AER Plan ID).

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

AEMO is currently looking to use MDFF for global settlements, with this project currently underway, set up and on-going costs should be minimal for the Centralised option.

The Decentralised costings in the proposal come from DNSPs for set up and on-going costs. It does not include the extra costs of Third party providers sending requests to multiple DNSPs and parties.

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

Global settlements are currently underway, so once this project has completed, we would expect an additional 6 months to complete the Centralised solution.



As for the Decentralised solution, it would require significant change from DNSPs and with current workload and activities it is expected that we would require approx. 18 months to complete the project.