



The Hon Josh Frydenberg MP  
Minister for the Environment and Energy  
Chair  
COAG Energy Council  
c/o COAG Energy Council Secretariat  
GPO Box 797  
Canberra  
ACT 2601

energycouncil@environment.gov.au

Our Ref: JC 2018-056

22 March 2018

Dear Minister,

**S&C Electric Company response to the COAG Energy Council Facilitating Access to Consumer Energy Data Consultation**

S&C Electric Company welcomes the opportunity to provide a response to the COAG Energy Council consultation on access to the energy data of consumers.

S&C Electric Company has been supporting the operation of electricity utilities in Australia for over 60 years, while S&C Electric Company in the USA has been supporting the delivery of secure electricity systems for over 100 years. S&C Electric Company not only supports the “wires and poles” activities of the networks, but has delivered over 8 GW wind, over 1 GW of solar and over 45 MW of electricity storage globally, including several battery projects in Australia.

S&C Electric are particularly interested in facilitating the development of markets and standards that deliver secure, low carbon and low-cost networks and would be very happy to provide further support to the COAG Energy Council on the treatment and potential of emerging technologies and approaches.

Yours Sincerely

Dr. Jill Cainey  
Global Applications Director  
Email: [jill.caineysandc.com](mailto:jill.caineysandc.com)  
Mobile: 0467 001 102



## General Comments

We strongly support facilitating access to energy data to appropriate parties and support the proposal to develop a scheme, with the responsibility given to AEMO as they are best placed to deliver and operate the scheme.

How does the proposed scheme for the sharing of meter data link or interact with the Register of Distributed Energy Resources (also to be developed by AEMO)? If Distributed Energy Resources (DERs) are to provide services to the system or market, then it may be useful to ensure that there is a link between the Register and Scheme to, for example, facilitate the reconciliation of service provision from DERs.

Metering data and the Register will be critically important for DNSPs to help manage networks and we fully support the need for DNSPs have a strong, direct and active role in accessing and delivering data, as well as facilitating the deployment of DERs.

We also note that there is a Treasury consultation on data access that will also encompasses energy data (Review in Open Banking) and a further consultation on a Strategy for data has been released by the COAG Energy Council (National Electricity Market Data Strategy). It is not immediately clear how these various approaches will link to form one cohesive approach for energy data in Australia.

While not in scope for this consultation, consideration is urgently required on the communications requirements and standards to ensure interoperability. E.g. sending signals to activate DERs. Proprietary communication protocols may “lock-out” or restrict access to DERs, limiting competition.