Mr. Scott Farrell  
Chair  
Review into Open Banking in Australia  
The Treasury  
Langton Crescent  
Parkes  
ACT 2600  
data@treasury.gov.au  

Our Ref: JC 2018-061  

23 March 2018  

Dear Mr. Farrell,


S&C Electric Company welcomes the opportunity to provide a response to the Treasury’s review into Open Banking in regard to how this may apply to the energy sector in Australia.

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 Treasury on the treatment and potential of emerging technologies and approaches.

Yours Sincerely

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General Comments


It is not immediately clear how these various approaches will link to form one cohesive approach for energy data in Australia and it’s not clear who has overarching responsibility for ensuring one consistent approach, although the Open Banking approach, via legislation, will over-ride most other approaches.

Facilitating Access to Consumer Energy Data outlines the processes, responsible parties, including the Australian Energy Market Operator to administer the scheme, and data elements that might be of interest. This represents a significant amount of work that has already made progress towards some of the aims detailed in the Review of Open Banking in Australia. Care is needed to ensure that the Recommendations in Chapter 2 do not compromise this initial approach.

Recommendations

The Recommendations detailed in Chapter 2, represent the high-level principles of data access and seem broadly appropriate for the energy industry, but significant consultation with energy industry, including the Australian Energy Regulator and the Australian Energy Market Operator, will be needed to determine the specific technical details of any regulations that would apply to the industry.