

25 September 2019



The Manager
Consumer Data Right
Structural Reform Division
The Treasury
Langton Crescent
PARKES ACT 2600

By email to data@treasury.gov.au

Dear Sir/Madam

Consumer Data Right - Priority Energy Datasets Consultation

Energy Queensland Limited (Energy Queensland) appreciates the opportunity to provide a submission to Treasury in response to the *Priority Energy Datasets* consultation for the Consumer Data Right (CDR).

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers (DNSPs), Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);
- A regional service delivery retailer, Ergon Energy Queensland Limited (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd including its subsidiary Metering Dynamics Pty Ltd.

Energy Queensland acknowledges that the CDR is intended to be designated to the energy sector, and will place obligations on our group of businesses to provide customers with access to their own data, and the right to provide that data to accredited third parties so that they are able to make informed product choices. In our view, this is not significantly different to the service Energy Queensland already makes available to its customers.

While Energy Queensland largely concurs with the datasets proposed to be made available under the CDR, we take this opportunity to raise concern with the Distributed Energy Resources (DER) Register data being considered a priority dataset. In particular, Energy Queensland notes the following paragraph as published in the consultation paper:

Treasury considers that these data could also support accelerated uptake of DER, by enabling CDR participants to target specific consumer groups with analysis of the costs and benefits of adopting DER (e.g. integrated solar PV [photovoltaics] and battery storage systems).¹

We interpret this statement to mean that the Treasury is of the understanding that the DER Register will be accessible by any CDR participant seeking data on DER.

Individual DER data is likely to be of particularly high value to any DER salesperson liaising with a prospective customer who has an existing DER installation and wishing to upgrade that installation. We anticipate that a proportion of DER salespeople will apply to be a Data Recipient, allowing them to request DER data for a premise on behalf of their prospective customer.

We also highlight that the data available from the DER Register is limited in that the Register excludes:

- DER on isolated networks;
- DER greater than 30 megawatts and/or which is registered with the Australian Energy Market Operator (AEMO);
- Solar network tariff allocations; and
- Metering data.

As such, we are concerned that the energy CDR may create an unintended obligation on DNSPs and/or electricity retailers to provide DER data that exists outside the DER Register.

To highlight, as at August 2019 Ergon Energy Network and Energex had approximately 160,000 and 400,000 PV systems installed in their respective distribution areas. Consequently, we are concerned that applying the CDR to the relatively new DER Register could inadvertently place a significant obligation on all DNSPs, as well as AEMO, to service thousands of DER data requests each year from PV salespeople (Data Recipients) who have been authorised by a customer to access their DER data, as well as from customers directly. Such a process will be costly and resource intensive for energy businesses, particularly as there is no fee payable by the customer (or their agent) to offset the costs of this process.

It is therefore Energy Queensland's preference that the CDR be applied in a staged approach to enable energy companies to embed CDR processes for existing datasets, ahead of new datasets being captured. In our view the CDR could be applied initially to metering data, customer provided data, billing data and retail product data, all of which is already made available by electricity entities (mostly retailers). However, access to new datasets that are still under development (such as the DER Register) should occur over time to mitigate any risk of private, incomplete or even incorrect data being inadvertently released.

Further, as the Australian Competition and Consumer Commission (ACCC) has only recently announced the "Gateway Model" as the preferred CDR model for the energy sector, the staging of data available via this new model (platform) will ensure it is

¹ The Treasury, *Priority Energy Datasets Consultation: Consumer Data Right*, 29 August 2019, p. 9.

capable of responding to the significant number of data requests expected to be received from customers and their agents upon the designation of the energy sector.

Finally, we reiterate our previous advice to the ACCC that we are concerned that delivering the CDR while other significant legislated changes (such as five-minute settlements) are being simultaneously delivered will impact the ability of data providers to remain compliant with all legislated obligations.

In addition to the concerns raised above, Energy Queensland also provides specific comments to the questions raised in Treasury's consultation paper in the table attached to this submission.

We appreciate the extensive consultation Treasury has undertaken on this initiative, and remain committed to contributing further to the discussion on the application of the CDR to the energy sector.

Should you require any additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me on (07) 3664 4105 or Andrea Wold on (07) 3664 4970.

Yours sincerely

A handwritten signature in black ink that reads "C. G. Martin". The signature is written in a cursive style with a large initial 'C'.

Charmain Martin
Acting Manager Policy and Regulatory Reform

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Encl: Energy Queensland's response to Consultation Paper Questions

Treasury consultation question	Energy Queensland comments
1 What other NMI datasets should be designated to support basic comparison and switching use cases?	Energy Queensland is of the view that the current specified data sets will be sufficient to support basic comparison as well as customer switching queries.
2 What advanced use cases could be supported by additional NMI standing data fields, and what fields are these?	We are of the view the NMI standing data fields are appropriate to support advanced use cases.
3 Should the priority datasets designation cover all meter types? If not, which datasets should be outside the scope of the initial designation, and why?	The current datasets for meter types provided in the standing data are sufficient. Data not currently provided by metering providers to retailers should be considered out of scope.
4 What advanced CDR use cases might more frequent smart or interval meter reads support?	We provide no comment.
5 Would the proposed data sets support the use cases identified above? What other use cases could smart meter data support and what specific datasets would be required?	The datasets as proposed will allow for the completion of the identified use cases noted on page 6 of the consultation paper.
6 How can the above privacy risks be balanced against the significant potential consumer benefits of supporting new use cases?	The privacy risks associated with the use cases identified could be ameliorated through the use of individual sign-on to ensure access is limited to the customer identified data.
7 How long do retailers and/or metering data providers store metering data on a specific customer or site?	Energy Queensland's retail business, Ergon Energy Retail, retains metering data for specific customers or sites for a period of 24 months. The suggested porting of historic metering data to a new service provider will only be relevant where the customer is porting information for the same meter. Meter data related to alternate meter identifications and types will not allow for direct comparison of usage.

Treasury consultation question	Energy Queensland comments
8 Is there commercial value in allowing consumers to port their historic metering data (and other data as appropriate) to a new retail service provider when they switch to a new product? Are there other solutions that may be more appropriate?	As per our response to question 7 above.
9 What data do market participants use to on-board a customer and what data is required to support efficient switching between different retail electricity service providers?	Customer provided data as identified in the consultation paper is utilised to on-board customers. Other data regarding the meter identification, location and type are required to determine the products available to the switching customer.
10 How is retail customer billing data shared between market participants now, and is there a general industry standard for billing information?	Retail customer billing data is not currently shared between market participants. Consequently, there is no industry standard which provides for the consistent understanding of billing data should it be provided to other market participants.
11 What consumer use cases might the priority designation of retail billing data support through the CDR?	We provide no comment.
12 Would designation of all product data classes currently held by the AER and Victorian EnergyCompare be sufficient to support basic comparison and switching use cases? Should product information tailored to individual consumers also be designated?	We are of the view that the current product data classes would be sufficient to support basic comparison and switching use cases. However, we note the data Ergon Energy Retail holds on products will not directly correlate with the data presented on the <i>Victorian Energy Compare</i> .
13 What other use cases do stakeholders consider may be supported by the designation of the Distributed Energy Resources Register as a priority dataset?	We provide no comment.
14 Does this table accurately map the holders of the various classes of data described in this paper? If not, what classes	Energy Queensland believes the table on pages 10 and 11 of the consultation paper accurately maps the holders of information. However, the detailed

Treasury consultation question

Energy Queensland comments

of data do you not hold, or what qualifications would you place on the categories of data held?

information held will not be consistent across all retailers / entities, particularly as they relate to customer and product data. We believe that even the meter data options fed to different jurisdictions within the National Electricity Market will be inconsistent due to prudency of information required to undertake billing and or products.

15 What other datasets do stakeholders believe should be considered for future implementation? Is there a strong case for bringing implementation of these datasets forward?

We provide no comment.