

26 September 2019

Daniel McAuliffe
Senior Advisor, Structural Reform Group
The Treasury
Langton Crescent
PARKES ACT 2600

By email: Data@treasury.gov.au

Dear Mr McAuliffe,

Consultation on Consumer Data Right: Priority Energy Datasets

Simply Energy welcomes the opportunity to provide feedback as part of the Priority Energy Datasets Consultation – Consumer Data Right (CDR).

Simply Energy is a leading second-tier energy retailer with over 720,000 customer accounts across Victoria, New South Wales, South Australia, Queensland and Western Australia. Simply Energy supports the CDR as a means of enabling greater competition and customer engagement in the energy market. With a consumer-centric approach in mind, Simply Energy considers the priority datasets should be defined in such a way that provides fit-for-purpose information to end-use consumers.

In exploring the requirements of the priority datasets, Simply Energy's submission briefly evaluates:

- appropriate data fields;
- sources of data; and
- proposed next steps.

Appropriate data fields in the proposed datasets

Six datasets have been proposed as part of the CDR for the energy sector. Since the datasets are broad in nature, Treasury needs to undertake a detailed assessment of each data field to determine whether there is in fact value for end-use consumers. For this reason, Simply Energy has evaluated each of the proposed datasets below:

➤ *National Metering Identifier (NMI) Standing Data Fields*

Since most of the data in the standing data repository (SDR) is static, NMI standing data can add significant value, provided it can be consolidated and tailored appropriately with the other datasets. In view of this, the Treasury needs to determine the minimum requirements for standing data, including a requirement for the relevant data holder to provide all mandatory data fields within Market Settlement and Transfer Solution (MSATS).

In the order of hierarchy these data fields include:

- NMI standing data;
- metering standing data (there could be multiple meters attached to one NMI);
- register standing data (there could be multiple registers linked to one meter. For example, in addition to metering installation type, standing data can also provide time-sliced information on dates of various meter installations/replacements, which can be valuable for various use-cases).

Given that this data is available in MSATS, the above listed data fields are readily available to support any advance use-cases that might emerge in the future.

➤ *Metering data*

Simply Energy is of the view that CDR framework is valuable for mass market including small to medium enterprises. That said, similar to Type 7 metered customers (commonly known as unmetered supply users), large industrial customers should be out of scope for the purposes of the CDR. Type 1-3 metered large customers are generally wholesale customers, interconnectors, generators or sample meters. Including these customers as part of the initial dataset could complicate and delay the implementation of the CDR for energy.

Moreover, most large customers have a 'Direct Metering Agreement'. This means that they can choose their own Metering Coordinator (MC). The ability to choose a MC provides these customers with access to metering analytics and value-added services. For this reason, the Treasury should seek to understand the data analytics derived from the large customer metering data to explore the use-cases that can be leveraged for mass market customers.

➤ *Customer provided data*

Simply Energy considers CDR will facilitate greater consumer insights, which will assist energy consumers to make informed decisions whether to switch energy retailers. Retailers currently attempt to make it as easy as possible for customers as possible to transfer. However, customers are still required to provide their personal information to any prospective retailer.

Retailers do not share or transfer personal customer data to ensure personal privacy is maintained. Simply Energy, therefore, considers that personal customer information should not be transferred between retailers under the CDR. Rather this information should continue to be provided directly by end-use customers to minimise the risk of an inadvertent privacy breach arising as part of the market transfer process.

➤ *Billing data*

Similar to customer data, billing data is not commonly shared between industry participants. For the purpose of CDR, billing data can be derived from a customer's metering and retail product data. As such, there is no value in having a standalone billing dataset.

Billing data is used to produce invoices, and invoices contain sensitive customer information, such as hardship details (payment plans), and account balance history. This information should not be in scope for the CDR, as there are processes that retailers and other interested are bound to adhere to in obtaining consumer credit information.

➤ *Retail product data*

Simply Energy supports the generally available retail product data being made available as part of the CDR framework. However, Simply Energy considers that non-generally available offer, such as staff and retention offers should be excluded from the CDR. Simply Energy considers that designation of all generally available data classes currently held by the Australian Energy Regulator (AER) and the Victorian Energy Compare (VEC) are sufficient to support plan comparisons and facilitate informed customer decision making.

➤ *Register of distributed energy resources (DERs)*

Simply Energy supports DER register information being made available under the CDR as this information can be used to facilitate greater awareness of complementary products and services created by the uptake of smart technologies. Simply Energy considers that since the DER register contains all active and passive DERs per NMI, this register could be interfaced with the CDR technical platform to maximise the benefits derived from the implementation of the CDR.

Source of data for priority datasets

Simply Energy acknowledges that while there is a clear 'ownership' for some of the datasets, such as NMI standing data, DER register data and customer data. There are also some datasets that require further clarity around their scope, especially metering and product data.

Simply Energy considers that each dataset should have a one-to-one relationship with the data provision obligation. For example, even though NMI standing data is held in multiple participant registers, MSATS contains the most recent and consolidated version. This, in turn, makes the Australian Energy Market Operator (AEMO) the most appropriate party to provide this dataset. Similarly, for metering dataset, this obligation currently sits with both retailers and distributors. However, the limitation for retailers is that they can only provide metering data for the duration of customer contract, whereas this limitation does not apply to distributors.

In relation to metering dataset, AEMO currently holds interval meter data, but not accumulated meter data. That said, AEMO will begin receiving this data as a result of the 5 minute and global settlement rule changes. Since the gateway model is based on the principle that *AEMO will only request the data that it does not hold itself*, it would be more efficient to designate AEMO to provide metering dataset once it has access to all relevant data. This would not only minimise the requirement for new technical interfaces to be built, but more importantly it would increase data transfer speeds. The transfer speed would be much faster as compared to extracting the same data from external systems (keeping in mind, metering data is likely to be largest of the proposed datasets, depending on the intervals and date range for the data request).

Similarly, for the product dataset, all retailers provide this data in a standard format to the AER and VEC, which makes these bodies the most appropriate data holder for generic product data. Simply Energy observes that requiring all retailers (more than 40) to interface with the CDR platform would be a very costly, particularly given that the same outcome can be achieved by designating AER/VEC as the data holder for product data.

Proposed Next Steps

Simply Energy considers that there needs to be substantially more industry consultation to fully scope industry-level requirements. Simply Energy would, therefore, welcome the opportunity to engage with Treasury, the Government, as well as other key stakeholders such as AEMO, the Australian Competition and Consumer Commission and Energy Consumers Australia on the technical issues to achieve the CDR in the most efficient and timely manner. Simply Energy is willing to contribute its expertise towards the drafting, finalisation as well as implementation of the priority datasets with a view of achieving the CDR in a cost efficient and timely manner.

Simply Energy looks forward to engaging with stakeholders on these matters. If you have any questions or would like to engage in discussions with Simply Energy, please contact Aakash Sembey, Industry Regulations Manager, on (03) 8807 1132 or Aakash.Sembey@simplyenergy.com.au.

Yours sincerely



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