



Clean Energy Council submission to the ACCC Consultation Paper

Data Access Models for Energy Data

Executive Summary

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on the consultation paper on the data access models for energy data for the Consumer Data Right (CDR) in energy.

The CEC is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in solar, wind, hydro, bioenergy, marine and geothermal energy, energy storage and energy efficiency along with more than 6,000 solar installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC strongly supports the proposal to develop a consumer electricity data access scheme with the aim of providing Australian customer's with streamlined access to their electricity retail information.

The current framework for access to consumer data is slow and cumbersome and this is a significant barrier to improving energy services for consumers. The data access scheme would dramatically improve the ability to design distributed energy resources (DER) systems that are sized appropriately for the customer's load profile.

Robust verification and consent processes will be key to the success of the data access scheme. The standards for accreditation of 'data seekers' should be set high, at least initially, to ensure the scheme's integrity and to protect its reputation.

Data needs to be provided in a consistent format to facilitate ease of use. Inclusion of tariff information in the proposed scope would make the data access scheme very useful and powerful for consumers.

The Consumer Data Right cannot be developed in isolation. There must be consideration of current and proposed regulatory arrangements to ensure integration with future reforms.

We strongly recommend broad industry consultation in the development of the industry specific rules and regulations. It would be helpful to undertake a cost-benefit analysis of the three models. Coordination with the Australian Energy Market Commission (AEMC) rule change processes and other electricity industry reform processes would be highly desirable.

We would be very happy to discuss these issues in further detail. We look forward to contributing further to this important area for policy development.

Responses to questions raised in the Consultation Paper

Are there any other assessment criteria or relevant considerations which the ACCC should use to determine a preferred model for consumers to access their energy data under the CDR?

Yes.

The CEC strongly supports the original objective for the data access scheme:

To facilitate on-demand access by retail customers or a customer's authorised representative to consumer electricity data.

The crucial aspect of this proposal is to enable *timely* access to consumer electricity data, with delays of no more than a few minutes. Customers often lose interest when data is not available for days or weeks.

In the implementation of the Consumer Data Right in the energy sector, the ACCC should focus on the data that provides the greatest benefit for customers. It would be helpful to undertake a cost-benefit analysis of the three models. There should also be consideration of the regulatory impact of the models on businesses. It is understood that the estimated incremental cost of designating AEMO as the only data provider would be around \$1.3 million to \$4.6 million in present value terms over the next 20 years. However, it is unclear how these costs were estimated and whether the estimate includes the additional regulatory impost on businesses. An understanding of the total sector cost of making data for each customer available through a gateway would enable a more informed judgement of how much information should be made available and through who.

We urge the ACCC to undertake and publish additional analysis to ensure the lowest cost method is employed. The Consumer Data Right is a significant reform and better understanding of the total supply chain cost is needed before final decisions are made.

There must be consideration of current and proposed regulatory arrangements to ensure integration with future reforms. For example, AEMO's DER register, AEMO's VPP arrangements and the AEMO/ENA Open Energy Networks process are likely to change the flow of data between energy sector participants. The Consumer Data Right cannot be developed in isolation. Processes should be aligned as much as possible to ensure consistency in the market for customers and accredited data recipients.

Having regard to the assessment criteria, what are the advantages and disadvantages of each of the models?

Based on the information provided it is difficult to assess the likely costs and benefits of the models. We would urge the ACCC to undertake additional assessment of the regulatory impacts and costs of each of the proposed models.

Even though the right of consumers to allow third party access to data theoretically already exists in the energy sector, the usefulness of this right is undermined by the time it takes for third parties to be granted access.

What are the likely implementation/compliance costs for market participants (including accredited data recipients) under each of the models, including costs associated with IT system changes or data storage?

There is insufficient information to form a considered judgement.

What additional requirements should the ACCC consider including in the CDR rules for the energy sector if the gateway model is adopted?

Data collection processes should be fit for purpose and collection of 'nice to have' data should be avoided. Data collection without a demonstrable benefit will result in additional costs to industry and consumers.

Data needs to be provided in a consistent format to facilitate ease of use.

What emerging technologies do stakeholders believe will have an impact on the energy sector with respect to the CDR?

The decentralisation and digitalisation of Australia's electricity system is proceeding rapidly. There will be an ever-increasing volume of data shared by customers and their agents. A system that is fit for purpose today could become a barrier to innovation tomorrow.

What are the cost differences to participants of providing data once a day (to an AEMO repository) or on demand?

This is a crucial question that should be addressed before final decisions are made. Customers will ultimately bear the costs of the data access framework that the ACCC chooses.

What is the competitive impact, if any, of accessing data through AEMO rather than through a retailer?

The CEC periodically receives complaints from distributed energy resource (DER) system vendors regarding electricity retailers who purportedly either undermine sales to customers requesting energy data (eg. through lengthy delays in data provision) or who attempt to sell DER systems to customers requesting electricity data. Enabling data access via AEMO would prevent this sort of anti-competitive behaviour.

Are there any other issues that stakeholders wish to raise?

Certain data in addition to the customer's metering data will be required to ensure the access scheme is functional and fit for purpose. For example, the meter type needs to be known. Certain electricity tariffs are available only to customers with appropriate meters.

Pricing data would be immensely valuable. At present, retailers' bills remain indecipherable even for solar retailers, let alone customers. Having solar retailers enter this information accurately is a real barrier to accurate savings calculations, which can mean it's not done, or it's done wrongly, with potential for misleading customers. Having access to pricing information would speed up this process, make it more accurate and enable more services to be added.

Providing pricing data should not be overly burdensome for electricity retailers. Even though there are a plethora of retail offers available, they all have their own 'Plan ID'. Having the 'Plan ID' available to the customer - even on the bill or preferably via the data access scheme – would significantly enhance the capacity for energy companies to improve their customer services.