



25th September 2014

Australian Energy Market Commission
P.O. Box A2449
Sydney South NSW 1235

To whom-it-may-concern

RE: ERC0171 Customer access to information about their energy consumption

We wish to raise concerns with the draft rule exhibited for consideration, specifically in relation to the standard format of the data as set out in Section 5.1.3/pg.21 of the AEMC Draft Rule Determination.

The Commission's non-prescriptive approach will fail to adequately address the market failure that underpins the case for regulatory intervention. The inability to access energy data is an example of imperfect information that prevents consumers from pursuing a range of measures that are in their interest. However, the variable and unwieldy responses that will be delivered under the Commission's draft determination will ensure this barrier persists for consumers.

PercepScion proposes that consideration be given to definition of a data schema for consumer energy data and where energy data is being monitored via a Smart Meter, it be made available through a harmonized data transfer approach based on a reference Application Programming Interface (API).

Our proposal is analogous to the framework provided by the Green Button initiative in the United States¹, with the distinction being that the U.S. approach is voluntary. The recommendation that the approach be mandatory recognises the lessons from Smart Meter deployments in the U.S. and Victoria, where public backlash was in part due to the unclear benefits for consumers. In these

¹ <http://energy.gov/data/green-button>

instances the non-prescriptive approach by regulators has led to high variability in the availability and format of energy data, along with significant barriers for service providers who may assist consumers reduce their electricity usage/costs (an outcome not in the best interests of the electricity providers). Suboptimal data transfer arrangements and the absence of guaranteed service levels inhibit technology solutions and business models, preventing efficient market operation and realisation of the consumer benefits underpinning the Smart Meter investment.

The benefits of our recommendation are evidenced by the widespread adoption of APIs as a means of promoting innovation by streamlining access to data. APIs have underpinned an explosion in creativity and delivered productivity gains across every walk of life. APIs have allowed individuals and companies to safely realise enormous value from data-sets that were previously locked away behind corporate firewalls.

Specific arguments that address potential concerns of key stakeholders as presented within the Draft Rule Determination include:

- Costs to providers – under the draft arrangements, energy providers are likely to automate data provision to consumers, for which the costs will approximate those associated with implementing a harmonized approach
- Technology barriers for consumers – consumers unwilling or unable to use internet or computing technologies will be better catered for by specialist intermediaries who can deliver service innovations and ultimately better outcomes more easily and cost-effectively than what would be possible in a “pen and paper” approach to the data analysis
- Prescription stifling innovation – a reference API does not prevent innovation from occurring either side of the interface, and in fact may promote it through the increased competition likely to evolve in a larger marketplace and the certainty provided to software developers (commercial and voluntary)



Percepacion proposes that as part of the instructions provided through the Commission's rule-making, the Australian Energy Market Operator (AEMO) be tasked with leading an industry working group to deliver an agreed data schema and harmonized data transfer framework underpinned by a reference API. The U.S. Green Button initiative should be benchmarked to inform design and deployment of the reference API. AEMO should be the custodian of the reference API and maintain the configuration management in line with any modifications deemed necessary by the stakeholder collective.

Should additional advice on this submission be sought, please don't hesitate to contact the undersigned via the means listed on the page one header.

A handwritten signature in blue ink, appearing to read 'K. Handberg'.

Kristian Handberg, Principal Consultant – Percepacion