



Clean Energy Council submission to the Treasury Review into Open Banking and the Department of Energy & Environment discussion paper, *Facilitating access to consumer electricity data*

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on the Treasury Review into Open Banking and the Department of Energy and Environment discussion paper, *Facilitating access to consumer electricity data*.

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 5,000 solar installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC supports the proposed structure of the regulatory framework as outlined in Chapter 2 of the Treasury Review into Open Banking. We strongly recommend broad industry consultation in the development of the electricity industry specific rules and regulations. Coordination with Australian Energy Market Commission (AEMC) rule change processes and other electricity industry reform processes would be highly desirable.

The CEC strongly supports the proposal to develop a consumer electricity data access scheme. 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 PV 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.

Inclusion of tariff information in the proposed scope would make the data access scheme very useful and powerful for consumers.

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 Dept of Energy and Environment consultation paper

1. Is the proposed objective for the consumer electricity data access scheme appropriate?

The CEC strongly supports the proposed objective for the data access scheme, which is:

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.

2. Should AEMO or an alternative agency be given responsibility for developing the consumer electricity data access scheme?

CEC supports the proposal for the Australian Energy Market Operator (AEMO) to be given responsibility to develop the proposed centralised system, to maximise the opportunity to leverage existing systems. We note that the Australian Energy Market Commission (AEMC) is currently consulting on a rule change request for the establishment of a register of distributed energy resources. Clearly, there would be opportunities to utilise the proposed register to improve the information available as part of the Consumer Data Right initiative and the CEC will address this issue in greater detail in our submission to the AEMC consultation paper.

3. Are there additional elements that the scheme should incorporate to facilitate access to consumers' electricity data by authorised representatives?

Data needs to be presented in a consistent format to facilitate ease of use. The 'greenbutton' initiative in the USA is considered a leading example and should be considered in the design of the scheme¹.

4. What changes can be done in the short term without a rule change and what changes require a rule change to implement?

AEMO could commence the establishment of the proposed of an accreditation scheme for 'data seekers' without waiting for a rule change.

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.

The reforms needed to implement the Consumer Data Right could be enacted in the short term through amendments to the Corporations Act. Changes to the Corporations Act could proceed without waiting for a rule change. The rule changes could follow the amendments to

¹ See <http://www.greenbuttondata.org/>

the Corporations Act to ensure consistency and to ‘tidy up’ the National Energy Laws and National Energy Rules so that they comply with the requirements of the Corporations Act.

5. *Are there alternative approaches to managing verification of consumer identity and third-party authorisation that should be considered and which are consistent with the scheme objective of providing on-demand access to data by authorised third parties?*

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. Over time it is likely that approaches to streamlining the system will be identified and implemented. However, in the initial stages the emphasis should be on making the data access regime for accredited ‘data seekers’ as quick and seamless as possible while setting the bar high for companies seeking accreditation as ‘data seekers’.

6. *Should AEMO or another agency be given responsibility for accrediting third parties?*

The logical choices for accreditation agencies would be either AEMO or the Australian Energy Regulator (AER). Consideration should also be given to recognition of existing industry accreditation processes, where they have been demonstrated to be sufficiently rigorous and authorised by an appropriate organisation such as the Australian Competition and Consumer Commission (ACCC). For example, the Solar Retailer Code of Conduct could be considered in this regard. It has been in operation since 2013 and is authorised by the ACCC. The CEC would be happy to provide a briefing on the Code of Conduct for consideration by whichever government agency is tasked with responsibility for accrediting third parties.

7. *Should authorised and accredited third parties be given access to more than just a consumer’s metering data upon the commencement of the data access scheme?*

Yes, certain data in addition to the consumer’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 for customers with appropriate meters.

8. *What are the arguments for and against providing third party access to retail and/or network tariff data?*

Arguments against providing third party access to tariffs are likely to include the following:

- It is unnecessary because the information is available on the customer’s bill,
- It is overly burdensome for electricity retailers,
- It is anti-competitive.

The CEC disagrees with these arguments.

Pricing data would be immensely valuable. At present the retailers’ bills remain indecipherable even for solar retailers let alone end 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 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 – either on their bill or preferably via the data access scheme – would significantly improve the capacity for energy companies to improve their customer services. For example, if ongoing access is provided to price data, then a service could be provided along the lines of, "Hey, there's a better offer for you (specifically with your consumption profile) if you switch". This would clearly improve competition and services offerings for customers. It would empower consumers, provide greater transparency, improved accuracy of solar savings calculations and improved ease of comparing offers.

9. What changes are required to existing AEMO metering data formats to facilitate access by third parties to consumer electricity data?

Having to know the NMI presents a barrier as it requires a recent bill and most customers wouldn't know where to find the relevant information.

10. Are the estimated costs for development and ongoing maintenance a centralised or decentralised implementation of the system reasonable?

It seems reasonable that a centralised system will have significant cost advantages over a decentralised system. It makes sense to develop a single centralised system rather than requiring every distribution business and retailer to develop their own system. For third parties, it will be significantly simpler and cheaper to use a single centralised data hub, rather than attempting to access a plethora of hubs with varying degrees of data quality and accessibility.

11. What are reasonable timeframes for implementation under each of the options considered?

We understand that the Open Banking Review has proposed implementation commencing mid-2019. The CEC would support a similar timeframe for implementation in the energy sector.