

Trevor Johnston  
Australian Energy Market Commission  
By web submission [www.aemc.gov.au](http://www.aemc.gov.au)

Friday, 24 May 2013

Dear Trevor,

### **Re Publication of zone substation data (Reference ERC0156)**

GDF Suez Australian Energy (GDFSAE) welcomes the opportunity to provide comment on the Rule change proposal to publish zone substation demand data.

Below we have provided brief responses to the questions posed in the consultation document.

*Question 1(g): Does the data need to be published in a standardised format (for example, in a spread sheet) for ease of access? If so, what is the preferred format?*

It is likely that a number of stakeholders will be interested in data for a wide geographic area, which would require access to data from a number of different DNSP sources. It is therefore important that all data be provided in a standardised format to facilitate consolidation. The data format should be simple to minimise the cost involved for the DNSPs in collecting and publishing the data.

The use of csv files has become well established in the NEM as it provides an effective balance between low cost provision and simplicity for users. It is therefore recommended that a csv file format be used for the zone substation data.

*Question 2:*

No response - question directed to DNSPs.

*Question 3 (a): Are there likely to be issues of confidentiality surrounding the publication of zone substation data? If so, at what disaggregated level (that is, in terms of number of customers) do such considerations come into play?*

GDF Suez anticipates that some large customers are likely to want to avoid having their load profile details made public, and therefore supports reasonable measures to achieve this. The approach suggested by AEMO of aggregating where there are three or fewer customers at a substation seems reasonable.

*Question 3 (b): Will aggregation of the data up to a certain number of customers avoid issues of confidentiality?*

Some consideration needs to be given to the relative size of the customer loads being aggregated. For example, aggregating one large load with two much smaller loads is unlikely to be successful in maintaining the confidentiality of the large customer.

*Question 3 (c): If so, what criteria should be used to aggregate the data? For example, should aggregation occur where there are five, three or less customers supplied from one zone substation?*

#### **GDF SUEZ Australian Energy**

Level 33, Rialto South Tower, 525 Collins Street  
Melbourne, Victoria 3000, Australia  
Tel. +61 3 9617 8400 Fax +61 3 9617 8301

[www.gdfsuezau.com](http://www.gdfsuezau.com)

INTERNATIONAL POWER (AUSTRALIA) PTY LTD  
ABN 59 092 560 793

As noted above, GDF Suez believes that aggregation where there are three or fewer customers at a substation is appropriate.

*Question 3 (d): Will aggregation reduce the usefulness of the data for demand forecasting and econometric studies? If so, what level of aggregation should be applied to avoid the issue of confidentiality while still retaining some degree of usefulness of the data?*

Aggregation will reduce the granularity of the data, and hence will have a detrimental impact on its usefulness in identifying geographic and sectorial trends. Aggregation is supported by GDF Suez to the extent necessary to preserve confidentiality, but cautions against an overly conservative approach, which would restrict the granularity and hence utility of the data.

*Question 3 (e): How should disputes arising from data confidentiality be resolved?*

It is expected that an outcome of this consultation process will be the establishment of defined obligations on DNSPs and AEMO for protecting customer confidentiality. A dispute is therefore most likely to be centred upon whether or not the DNSP or AEMO have adequately met their defined obligations. Disputes of this nature are best resolved using the existing NEM dispute resolution processes.

*Question 4 (a): What is the materiality of the benefits identified by the proponent?*

GDF Suez believes that substantial benefits are likely to be achieved through the provision of better granularity of customer demand. Information about relative demand growth for the various geographic areas, as well as information about categories of customers will better inform potential investors in both generation and demand side. It will also provide a greater transparency of data for industry stakeholders when assessing the merits of RIT-T proposals.

*Question 4 (b): What are your views on the value of historical and forward looking electricity demand information?*

The ability to properly understand historical trends in electricity demand, and to accurately predict future demand growth is of fundamental importance to all industry stakeholders. This has always been true, but is even more important today as the drivers on electricity demand are changing and becoming more volatile. For example, it is critically important that the industry have an accurate understanding of all demand met by non-scheduled generation sources such as PV solar and wind generators.

Another important aspect to the importance of understanding the nature of demand changes is the amount by which the different customer categories are contributing. For example, it is well known that the overall energy demand is currently falling, but it would be of interest to stakeholders to have better insights into the amount of change due to residential, commercial and industrial customer categories.

The publication of more granular customer data provides the opportunity for DNSPs and AEMO to present the data in a manner which reveals the trends across the different customer categories. GDFSAE suggests that the AEMC to include the requirement for DNSPs and AEMO to provide this demand breakdown.

*Question 4 (c): What other benefits of the proposed rule change can be expected that have not been identified by the proponent?*

The proposal has a good fit with the recommendations for Optional Firm Access (OFA), as set out in the AEMC's final report on the Transmission Frameworks Review. Under the proposed OFA mechanisms, generators considering firm access options will be able to make more informed decisions when they have greater insights into demand growth at the connection points of interest to them.

*Question 4 (d): Are these other benefits likely to be significant?*

GDF Suez believes that significant benefits are likely where data is being used to better inform major investment decisions such as new generation or transmission investment.

*Question 4 (e): Who are likely to be the recipients of these benefits?*

As noted above, the provision of the substation demand data is likely to lead to better investment decisions, which should benefit the investor in the first instance, and in turn would lead to benefits to the end use customers in the form of lower cost electricity.

*Question 5(a) Should there be a consistency of approach in publishing zone substation and connection point electricity demand data? Please provide reasons as to why there should/or should not be a consistent approach.*

As noted in response to question 1, GDFSAE believes that it is important that demand data is provided in a standardised and consistent manner for all substations. It is suggested that as well as each DNSP publishing their data on their own web site, all DNSPs should also be required to provide their standardised data files to AEMO, who would then be required to publish all DNSP data files in a common area on the AEMO web site. This would provide a "one stop shop" for industry stakeholders interested in capturing demand data for a number of different geographic areas.

The consolidation of the demand data by AEMO would also facilitate a break-up of the demand data into the various customer categories (residential, commercial and industrial), as noted in our response to question 4(b) above.

Please do not hesitate to contact me on 03 9617 8331 if you wish to discuss further any matters raised in this submission.

Yours sincerely,



Chris Deague  
Senior Market Specialist