

Response to Draft National Electricity and Draft National Energy Retail Amendment (Customer access to information about their energy consumption) Rule 2014

This response is jointly provided by doubleIQ and Energy Makeovers on the basis that both companies believe that the free exchange of data between all participants in the Australian energy market can only be a good thing. It will deliver value to customers but will also give rise to new business models.

Over the last four years doubleIQ and Energy Makeovers have worked together and separately on a number of energy industry related projects. doubleIQ from the orchestration of the data to enable customer value and Energy Makeovers in the energy efficiency space.

It's with this background that we understand the practical limitations that the energy industry would have in delivering the consumer data more rapidly and frequently given the current incumbent technology. Our focus in this response is then in ensuring this rule change enshrines the ability for consumers to build a data asset from which they can derive economic value, regardless of the timeliness of the data.

Our comments are that the draft rule does not go far enough in setting minimum delivery standards to achieve this outcome. We would like to see:

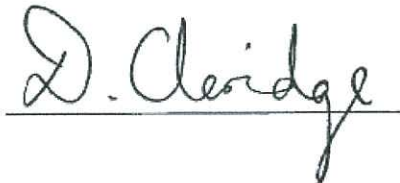
Item #	Comment	NER Ref	NERR Ref
1	Time for response to a minimum requirement data request shortened to inform the Customer purchasing process. We would like to see the current minimum requirement of 10 days shortened to 5 days to better align with this process.	7.16.d) 4 ii) modify to 5 days.	
2	Clarity in the rights of consumers to their data. In particular in a Customers ability to build and maintain their latest historical profile through time, without cost penalty. This should also apply to previous Retailer relationships.	7.7 extend to past relationships.	56B 2) remove reference to "reasonable charge".
3	Provision for a single Customer data request to specify recurrence i.e. data updates to be provided based upon billing cycle for a defined period. This would greatly enhance the ability for customers to build their own consumption record which would have true commercial value.	Extend 7.16 to include reference.	9.4A modify reference to Retailers being able to charge if information provided in the previous 3 months to the notion that they can only charge if exceeds the billing cycle minimum requirement.
4	Explicit need for both machine readable and human readable data formats. This distinction is important in supporting both	7.16 d) 5) include ref to machine and human	Extend 56A to include obligation to provide data in machine readable or human readable as

	the needs of individual Customers and their Agents.	readable formats.	deemed by you the customer.
5	Greater conformity of the data formats that will be provided to Customers or their Agents. AEMO should be given the authority to achieve this outcome. Thus enabling the building of historical consumption data across different Retailers with minimal cost to the Customer. This would also aid in the exchange of this data with other service providers.	Extend 7.16 to include the need for common minimum standards.	

Beyond the discussion of this draft ruling we would strongly support EMRWG submission outlining the need for an Energy Information Hub providing access to the AEMO data. To unlock the full economic value of this data stream, this same architecture should be extended to what AEMC has termed as “energy data”. This would enable business models based upon distributed demand side management, and beyond.

We would welcome any follow up by AEMC to the points raised within this response.

Regards



Dennis Claridge
 Business Director
 doubleIQ
 P: 03 9662 2600
 E: dennis.claridge@doubleiq.com



Bryn Dellar
 Managing Director
 Energy Makeovers
 P: 1300 901 416
 E: bryn@energymakeovers.com