AEMC

Via website

10th Feb 2021

AEMC Review of the regulatory framework for metering services.

Solar Analytics welcome the opportunity to provide input to AEMC on the above consultation paper.

About Solar Analytics

Solar Analytics is an Australian company founded by solar industry veterans, scientists, developers and passionate photovoltaic (PV) experts. We design, develop and supply intelligent rooftop solar and energy management solutions for residential households and commercial businesses. With 35 staff and 50,000 customers across Australia, we are the leading provider of rooftop solar management in Australia. Our fleet of Distributed Energy Resources (DER) across Australia have real time solar generation and energy consumption measurement that enables us to provide energy management services for our customers. We also provide extracts from our unique data set to seven DNSPs, plus AEMO, ESB, universities and energy regulators.

Leveraging this 16 TB of energy data, Solar Analytics deliver actionable insights and services to our customers, and through these interactions we have unique insights into their energy and metering needs. We note that approximately half of our customers provide us their energy data through Smart Meters, and half using our own additional high data granularity hardware device.

Current Market Status

AEMC review states that you are examining how to give consumers greater value from their smart meter data. According to the AEMC terms of reference, the competition in metering rule is intended to facilitate consumers to drive the uptake of smart meters, and innovation, through their choice of new products and services.

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To date, smart meters have not significantly increased choice in new products and services. Despite almost 100% smart meter penetration in Victoria for many years, the only benefit offered to customers has been the recent availability of energy retailer online portals that allow the customers limited access to their own energy data. This has not resulted in any significant consumer benefit, new services, or a transition to more dynamic time of use arrangements.

The key impediment to both the increased rollout of smart meters nationally, and more importantly the delivery of value to consumers from smart meters, is that the energy retailer acts as a gatekeeper for the smart meter and its data. Under present regulations, a customer or a new service provider can only access this data via the energy retailer, and then in the format and timeframe determined by the energy retailer. Furthermore, the energy retailers have an interest in preventing any such release of energy data to third parties as it threatens their incumbent business model.

This prevents customers being able to freely share their energy data with third parties who wish to provide new energy services.

The second issue is that smart meters are poorly utilised. These devices are capable of sub second measurement across dozens of energy parameters. Yet they are effectively constrained today to only be set up for the bare minimum required for customer billing. This lack of access to the richer data (even at a cost) prevents the delivery of advanced services.

Recommendations

The energy retailer should not be able to block or put additional costs or barriers on either the installation of a smart meter or the sharing of smart meter data with third parties.

Consumers should be able to permit other third parties to receive their smart meter data, where the third party may pay reasonable costs to the metering coordinator. For example this is done very effectively and securely in California using Green Button. This has directly led to the creation of dozens of companies such as Energy Worx, Ohm Connect, Utility API and many others who offer consumers innovative new energy services.

It is essential that this data is able to be received by these new entities in an automated near real time manner, with a fully online digital sign up process. This requires either the energy retailers, or much more viably the Meter Data Providers, to provide secure API access to the energy data. Where additional data is required beyond the standard NEM-13 data, the MDP and third party would need to negotiate a reasonable price for the additional costs incurred. Solar Analytics have already established relationship with two of the leading MDPs who are willing to offer this service when it is permitted by the energy retailer.

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The impact of implementing the above ability for consumers to decide who can access their data would allow companies to provide new products and services, including:

- accurate quoting for solar, batteries and other energy services
- accurate estimation of alternative energy retail plans
- energy and solar monitoring and fault detection
- estimation of losses associated with export limits, over-voltage
- demand response participation
- solar PPA and billing services
- enhanced and integrated portals for consumers utility bills
- security and safety monitoring applications

Our specific recommendations are:

1. Consumers should be given real **choice over who has access to their energy data**. This requires either a central Green Button like arrangement, or more simply a provision that a consumer may provide an entity with the authorisation to approach Meter Data Providers (MDP) for access to their data. This data should be free for the standard NEM-13 data, or at a negotiated cost for increased data.
2. MDP should be required to provide an **agreed data set to AEMO and DNSPs**, allowing more effective and efficient management and planning of LV networks.
3. With customer consent, third parties are able to receive the **energy data directly from MDPs via API** so that they can deliver these new services.
4. Where any new data format requirements are considered, they are aligned with the industry endorsed **DER Visibility and Monitoring Best Practice Guide** - https://www.dermonitoring.guide/.

We understand that some of these requirements may overlap with the objectives of the consumer data right. We propose that the AEMC reviews the objectives and progress of CDR to assess its impact on the value consumers see from their smart meter data and that the AEMC should aim to complement CDR through the metering review.

We would not support an active increase in the roll-out of smart meters until consumers have control over data sharing as proposed above, whether through CDR or through a NER rule change.

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Benefits

The key benefits of implementing these recommendations are:

- Delivers the power of choice to the consumer
- Will rapidly accelerate the smart meter rollout
- Delivers innovative new energy services for consumers
- Provides LV visibility to DNSPs, AEMO and other industry bodies
- Smooths the inevitable transition to a high penetration DER grid and future two sided market post 2025

Regards

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