27 November 2020

Energy Security Board
Level 15
60 Castlereagh Street
SYDNEY NSW 2000

Submitted by email: info@esb.org.au

Dear Sir/Madam

Re: ATCO Response to Data Strategy Consultation Paper

Thank you for the opportunity to provide a submission to the consultation paper on the new data strategy for the national energy market published on 20 October 2020.

We recognise that this strategy will have wide ranging implications for the national economy and the energy sector. ATCO considers the national data strategy and data management approach are a reasonable response to the rapidly increasing volume of energy related data. The objectives recognise the role of data in planning future energy infrastructure and systems, policy and regulation and forecasts for energy consumption and demand.

The following comments are made in response to selected questions from the consultation paper.

Question 10: Energy data for research

Improvements in the coordination of energy data for research would be welcomed. ATCO has invested significantly in new energy technologies and has been fortunate to be the recipient of grant funding to help advance the development of new energy technologies, including hydrogen produced by means of solar electrolysis. Any requirement to share information with funding organisations needs to ensure information made available for research purposes takes into account the investment value of the intellectual property in the information. Any requirement to share information must not adversely impact or constrain the development of commercial prospects of funded research or trial projects.

Question 16: Access to meter data

As the owner and operator of the Midwest, Southwest, Kalgoorlie and Albany gas distribution networks in Western Australia, ATCO collects gas meter data as an intermediary to gas retailers pursuant to the retail market procedures operating in Western Australia.

ATCO agrees that the freedom to access gas meter data for the purpose of research and analysis should be made available for public-good projects with accredited trusted parties that have appropriate safeguards in place.
**Question 17: Gas metering**

ATCO disagrees with the assumption stated in the consultation paper that "as electricity de-carbonises and heat-exchange technologies continue to improve, it expected that gas appliances and industrial equipment will start to be replaced by electrical ones".\(^1\)

Gas has an ongoing role to play in the energy mix. It is a proven, cost effective, reliable energy source, making it an excellent enabler of intermittent, renewable forms of generation. In most markets it still provides a less carbon intensive option than other traditional fuel sources and new technologies, such as hydrogen and biogas, will continue to reduce its environmental impact.

Greater information is needed on the important linkage between gas and electricity consumption to ensure that the focus is getting the best overall energy outcome for consumer in terms of cost, reliability and security of supply. ATCO considers that future Whole of System plans, such as that developed by the WA Government for the South West Interconnected System and AEMO’s Integrated System Plan, need to consider the impact of gas and emergent technologies, on future energy consumption scenarios.

Should you have any queries in relation to this submission, please contact Simon Byrne, General Counsel on 08 6163 5440.

**About ATCO**

ATCO has been proudly operating in Australia and providing employment opportunities for almost 60 years. ATCO is a customer-focused global company that develops, builds, owns and operates a range of energy infrastructure assets, supporting residential, business and commercial consumers. ATCO is committed to investing in its people, innovation and technology to drive leading-edge application-based research.

In Australia, ATCO:

- owns and maintains the largest (Mid-West and South-West) gas distribution network in Western Australia, together with two non-regulated gas distribution networks in Albany (LPG) and Kalgoorlie (natural gas), servicing over 760,000 connections through more than 14,000 km of natural gas pipelines and associated infrastructure;
- owns an alternative electricity retailer (Source Energy Co.) in Western Australia that provides cleaner, affordable and innovative energy solutions to around 500 embedded network customers in strata developments through a combination of solar photovoltaic systems, grid purchases and battery storage;
- owns and operates two power generation facilities (a joint-owned facility in Adelaide and a wholly-owned facility in Karratha) with a combined capacity of 266 MW;
- is drawing on its established expertise in natural gas to explore the future role of hydrogen through a number of projects, including the Clean Energy Innovation Hub (an embedded hybrid microgrid system that incorporates renewable solar generation, battery storage, natural gas backup generation and blends green hydrogen produced with natural gas used onsite), are working in collaboration with Fortescue Metals Group to establish a hydrogen refuelling facility at the Hub, and are currently conducting a feasibility study into the development of a commercial scale renewably hydrogen production facility, the Clean Energy Innovation Park; and
- manufactures and delivers modular building solutions to a diverse group of customers.

\(^1\) Energy Security Board, Data Strategy Consultation Paper, October 2020, pg 103
ATCO's Australian businesses are part of the worldwide ATCO Group with approximately 6,500 employees and assets of $22 billion. ATCO is a diversified holding corporation with investments in Structures & Logistics (workforce housing, innovative modular facilities, construction, site support services, and logistics and operations management), Energy infrastructure (electricity generation, transmission and distribution; natural gas transmission, distribution and infrastructure development; energy storage and industrial water solutions; and electricity and natural gas retail sales), Transportation (ports and transportation logistics) and Commercial Real Estate.

Yours sincerely

J.D. Patrick Creaghan
Managing Director & Chief Operating Officer