Ausgrid Response
Energy Security Board Data Strategy Consultation Paper
November 2020
2 December 2020

Dr Kerry Schott AO
Independent Chair
Energy Security Board

Submitted by email: info@esb.org

Dear Dr Schott,

Ausgrid is pleased to provide this submission to the Energy Security Board’s (ESB’s) Data Strategy Consultation Paper.

There are significant changes occurring across the energy market in Australia. We are moving from a system dominated by one-way flows of energy from large-scale power generators towards a more distributed energy market, where small-scale generation forms an important part of the energy mix and consumers of energy have greater power and control to reduce costs across the energy and supply chain.

These changes are driving the need for more flexible and timely access to data, and we support the ESB’s recognition of the need to develop a comprehensive and structured data strategy. Such a strategy will ensure that the energy market transformation meets the needs of our customers in a cost-effective manner.

The key points that we wish to highlight are:

- We are supportive of the high-level framework developed by the ESB, which clearly articulates four strategy pillars. These pillars effectively cover the key issues for data reform in the energy sector. Given the breadth of the strategy, we believe that it will be important to develop a comprehensive action plan in order to achieve the outcomes sought for each pillar. This action plan would preferably include clear tasks, timelines and milestones, as well as an understanding of the costs and benefits of each task. Our costs are ultimately passed through to our customers, as such it is important to ensure that any increases in cost are efficient, justified and transparent.

- The need to improve visibility of the low voltage network and connected DER is becoming increasingly important as the penetration of DER increases. The expectations of our customers being able to access innovative energy services in order to derive value from their assets is also increasing. Access to services and markets will largely depend on the ability of networks such as Ausgrid to access low-cost real-time data and information in order to efficiently, effectively and flexibly manage the distribution network. The strategy recommends that networks should have “minimum meter data access rights” where appropriate, such as neutral integrity detection. A similar conclusion was reached in the recent Energy Networks Australia report on Data
Opportunities for Smarter Networks\(^1\) where it recommended that a cost benefit analysis be undertaken to identify the value in minimum data sharing standards to networks. We are supportive of improving the ability and certainty of networks to more easily access this type of data and would be pleased to engage further on this topic.

- Networks are subject to a number of different data collection and reporting requirements. These are fast evolving in line with the energy transition, such as those related to DER that were recently proposed by the Independent Pricing and Regulatory Tribunal New South Wales. We note the importance of ensuring that any new data governance requirements are aligned with existing obligations to ensure consistency in reporting and a reduction in resources required. We also wish to highlight the opportunities that should be explored to improve the quality of DER data through accessing information held by government programs or market bodies. Some examples include:
  - Sharing of Clean Energy Regulator solar PV information with AEMO and networks to improve the data quality of DER standing data in the national DER Register.
  - AEMO sharing Demand Side Participation Information and Wholesale Demand Response information with market participants for connection points they are responsible for.

- We agree that frameworks for data management, access and sharing often lack flexibility to respond to rapid change, as well as clear and consistent principles and guidelines. In order to achieve the outcomes sought in the strategy it will be important to articulate a comprehensive landscape of these frameworks, including jurisdictional instruments such as the Critical Infrastructure Licence Conditions that we are subject to. These conditions may impact Ausgrid’s ability to share data.

Should you have any questions in relation to this submission, please contact Alex Moran, Manager – Network Innovation & Intelligence on (02) 9269 7205 or alex.moran@ausgrid.com.au.

Yours sincerely

Junayd Hollis
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Thank you