

27 November 2020

Dr Kerry Schott AO  
Energy Security Board

Via email: [info@esb.org.au](mailto:info@esb.org.au)

Dear Dr Schott

## **RE Energy Security Board Data Strategy – Consultation Paper**

TasNetworks welcomes the opportunity to respond to the Energy Security Board's (**ESB**) Data Strategy consultation paper.

TasNetworks is the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner in Tasmania. TasNetworks is also the proponent for Marinus Link, a new interconnector between Tasmania and Victoria. The focus in all of these roles is to deliver safe, secure and reliable electricity network services to Tasmanian and National Electricity Market (**NEM**) customers at the lowest sustainable prices. TasNetworks therefore supports efforts to develop a Data Strategy for data management in the NEM that promotes market objectives and contributes to improved consumer outcomes.

TasNetworks supports Energy Networks Australia's (**ENA**) submission and would like to make several further comments from a Tasmanian perspective.

TasNetworks supports the intent to develop a Data Strategy to help guide all stakeholders through the digital evolution of the energy industry. Digital data and analytical capacity, while valuable, does come at significant cost. As exemplified in our strategic goals, consideration of customer impact is important to TasNetworks, especially understanding cost impacts, and should be a primary factor driving data reform.

The Data Strategy is wide ranging across timeframes and issues. TasNetworks' comments in this submission concentrate on the data concerns and recommendations relating to the visibility of the performance of low voltage (**LV**) segments of the distribution network and integration of distributed energy resources (**DER**) (within Pillar 1, Needs Today of the Data Strategy). TasNetworks' role is to facilitate DER uptake in a way that maintains a safe, reliable and affordable service that does not disadvantage customers without DER.

## **Data supports network reliability and stability**

Growing DER makes it more difficult to manage the reliability and stability of the network. New data, for example from network LV monitoring equipment, will assist in managing the network as well as modelling future needs, compared to the current challenges posed from relying on a largely blind static LV network model. TasNetworks agrees that there is a need for networks to build new tools and analytic capabilities to support LV visibility and DER.

## **Metering requirements**

The Data Strategy recommends that the upcoming AEMC review of competitive metering should consider a range of LV-DER visibility issues. Increasing access to advanced meter data would provide benefits for network visibility. Following the Power of Choice reform, retailers and their Metering Coordinators (**MCs**) are responsible for metering and therefore advanced meter data. In the long term interests of customers, TasNetworks supports timely, affordable and reliable access to advanced meter data to maximise the potential value of the data.

TasNetworks recognises the advantages of having access to advanced meter data. It is seen as a cost effective way to gain improved visibility of the LV Network. As the volumes of advanced meter data increases so will costs, as a result of data transfer, processing and storage. There may be benefit in working towards a standard data transfer protocol so DNSPs are not required to establish bespoke processes with each MC.

With increased recognition of the important role that advanced meter data provides in managing LV networks as DER penetration increases, there may be benefits in setting a revised minimum standard of advanced meter data availability to DNSPs.<sup>1</sup> Expanding the minimum information made available to DNSPs would not only improve LV network visibility, but would also benefit LV data opportunities unrelated to DER. Improved LV network visibility would provide advantages for network connectivity, outage management, and asset management.

## **Electric Vehicle Data**

The Data Strategy acknowledges that electric vehicle (**EV**) data needs remain complex, crossing several sectors, and are not currently included in the DER register. Currently EV data is not widely available or captured outside of commercial EV providers. This presents a challenge, given the anticipated uptake of EVs and the uncertainty in timing. Planning for this increased uptake is difficult without data or trials to help understand their behaviour and system impacts. A key concern is around EV charging behaviours and demand on the network.

TasNetworks recognises the challenges around EV data access. Currently TasNetworks has access to postcode data for battery EVs and plug-in hybrid EVs registered in Tasmania. However, the data is at a high level and does not capture charging and consumption related specifications, such as maximum kW charging capacity, kWh storage capacity or range.

Capturing charging and consumption related data would provide TasNetworks with valuable information for forecasting future demand on the network.

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<sup>1</sup> Energy Networks Australia and ENEA Consulting, 'Data opportunities for smarter networks' (October 2020) 41 < <https://www.energynetworks.com.au/resources/reports/2020-reports-and-publications/data-opportunities-for-smarter-networks/>>.

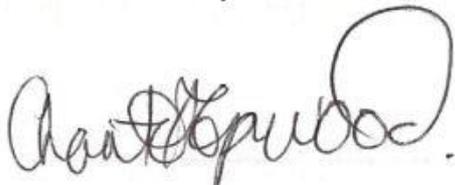
## Customer impact

Additional resources, including information technology tools and analytical capacity, will be required by DNSPs to manage more complex data systems. As such, TasNetworks would expect the Data Strategy to place upward pressure on costs. The concern is that these costs may outweigh the customer benefits expected to be realised through competition, innovation, mobilising and valuing flexible demand and efficiencies and offsetting network augmentation.

If consumer benefit can be gained by DNSPs facilitating the integration of DER it is important cost allocation aligns with the beneficiaries as much as practical. That is, the customers that benefit the most are the ones paying for the increased investment required to be made by DNSPs. This is not only a way to protect customers unable to enter the DER market but those customers in areas where the impacts of DER are not causing issues. For example, in Tasmania the benefit realisation from the Data Strategy recommendations, particularly relating to LV DER, are not likely to be realised in the short term as the state's distribution network is not yet facing the challenges being experienced by other DNSPs. This is due to the slower pace and penetration of DER uptake in Tasmania compared to other parts of Australia. This means that additional costs placed on TasNetworks, for example to publish DER hosting capacity information, may outweigh the benefits seen by Tasmanian customers.

Should you have any questions, please contact Tim Astley, Network Reform and Regulatory Compliance Team Leader, via email ([tim.astley@tasnetworks.com.au](mailto:tim.astley@tasnetworks.com.au)) or by phone on (03) 6271 6151.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chantal Hopwood', with a large, stylized loop at the end of the name.

Chantal Hopwood

Leader Regulation