

1 September 2023



Mr Hrishikesh Desai  
Chief Data Strategist  
Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601

Dear Mr Desai,

**Benefits of increased visibility of networks**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comments to the Australian Energy Regulator (AER) in response to the Energy Security Board's consultation paper *Benefits of increased visibility of networks* (the consultation paper).

This submission is provided by Energy Queensland on behalf of its distribution network service providers, Energex Limited and Ergon Energy Corporation Limited.

Energy Queensland supports the release of the consultation paper. However, broadly, we have some concerns regarding the types of data being sought and the frequency of data reporting, particularly in instances where such data is already reported under other processes/instruments. We are also concerned that increased administrative burden may will lead to increased costs for consumers.

Energy Queensland's further views are included in the more detailed responses to specific questions posed by the AER in the enclosed submissions template. Neither this cover letter nor our detailed responses to questions contain confidential information.

Should the AER require additional information or wish to discuss any aspect of this submission, please contact either myself, or Mark Simpson on [REDACTED]

Yours sincerely

[REDACTED]

Alena Christmas  
**Acting Manager Regulation**

Telephone: [REDACTED]

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## Consultation paper questions

Section of Paper	Question	Energy Queensland Comments
2.2 Examples of the analysis of use cases	1. Is the set of use cases in Appendix 6.4 representative of the use cases that you are aware of?	<p>Energy Queensland has concerns that the costs for distribution network service providers (DNSPs) to collect and collate some of the data sets identified from use cases set out in Appendix 6.4 may outweigh the benefits to consumers.</p> <p>For example, for an individual seeking to install consumer energy resources (CER), detailed knowledge of the network may not be required and reliance on data to make a decision to invest may be problematic. Past performance may not necessarily be indicative of future performance, and there may be implications if the data is not current. Without full context and understanding, the data could be misleading. As such, it is our view, that the usefulness of particular sets of data to consumers may be variable.</p> <p>For some of the use cases mentioned, organisations may already have access to the data. In such cases we have concerns around providing duplicated data and the potential additional cost implications this may have for consumers.</p> <p>Energy Queensland provides the following further comments:</p> <ul style="list-style-type: none"> <li>the identified use case for local and jurisdictional planners, is the opposite to how DNSP network planning is conducted in practice. Consumer need is identified first, and then a network (or non-network) solution is developed.</li> </ul>

		<ul style="list-style-type: none"> <li>It's worth noting, that under the <a href="#">AEMC metering framework review</a>, limited smart meter data is available for purchase by a DNSP for its use. The distribution provider is not the owner of the data for sharing with non-network stakeholders.</li> </ul>
	2. What additional use cases should be added?	No comment.
<b>3.7 Key considerations and learnings in defining the data sources to be used to populate the data sets</b>	3. Are there other sources of data that should be considered?	Energy Queensland is of the view that there may be benefit in further granularity of the data provided on AEMO's distributed energy resource data dashboards. For example, data at the postcode or suburb level, and generation size may be useful.
	4. Do you agree with the framing parameters that were used? If not, why, and what should have been included or left out?	<p>Energy Queensland is of the view, that currently, no standardised framework for measuring and reporting data sets exists. The result is that the accuracy and reliability of particular data sets may not necessarily be homogenous across, and within, networks and may differ between individual data points. Manual processes in the data lineage of a data set or the underlying network model data can impact these attributes. So can other data quality improvements like programmatic correction, calculation or inferring missing data sets.</p> <p>Energy Queensland supports the development of further guidance as to how the reliability and accuracy of data sets should best be measured and reported, to ensure that accurate comparison and interrogation can occur between substantially similar data sets.</p>
	5. Are the data sets that have been identified and prioritised the correct ones?	No comment.

	<ul style="list-style-type: none"> <li>• Are there others that are needed?</li> <li>• Are any listed not needed?</li> </ul>	
	<p>6. Do you agree with the conclusions reached regarding the need for real-time data?</p>	<p>Energy Queensland broadly agrees with the conclusions reached regarding the need for real-time data.</p> <p>However, it is our view that the needs for receiving real-time data should be carefully balanced against additional costs imposed on DNSPs to provide this data.</p>
	<p>7. Are there more issues that should be considered regarding the balance between customer protection and reasonable data collection?</p>	<p>Energy Queensland is of the view that balancing use cases with customer privacy should form a central consideration of how, and to whom, data is provided.</p> <p>For example, without granularity specific to an individual connection point, a homeowner may be unlikely to make any meaningful judgements about whether to install CER or on the existing CERs installed. At the same time, it would be incongruous with existing and expected customer data security for connection point data to be shared publicly or with third parties.</p> <p>Regarding Table 1, while a distribution transformer servicing one hundred customers can be easily anonymised, there are many distribution transformers shared by a handful or fewer customers (with some being dedicated). Ergon Energy Network and Energex already share transformer monitoring data, but only for transformers with more than 25 customers connected. Sharing certain data sets from transformers with low customer counts may raise privacy concerns.</p>

		<p>Provision and storage of the data must also be carefully considered to ensure legal obligations are complied with.</p>
	<p>8. Is there any other feedback on the data set definitions?</p>	<p>Energy Queensland is concerned around the level of duplication of data between these proposals, existing NER requirements, and AER requirements for export services data. This may increase costs to DNSPs, and therefore, costs to customers. To avoid duplication, it is our view that the consolidation of comparable data requirements should occur in tandem. Further, where data is already reported to AEMO or the AER, DNSPs should not be required to re-provide these data sets.</p> <p>There is a statement in section 3.4.2 of the consultation paper that export curtailment data that is collected by original equipment manufacturers (OEMs) can be provided to DNSPs. It may be that not all potential DNSP initiated or facilitated curtailment events will result in the DNSP naturally receiving data from the OEMs or even accurate telemetry on the response. Examples where this may not occur could include untelemetered backstop mechanisms or commercial arrangements where an aggregator facilitates export curtailment on behalf of a DNSP.</p> <p>It is our view, that there is risk in stating that the cost to DNSPs to collect, integrate, process, present and share data sets securely will be “low” or “minimal”. Depending on the existing data platform, cyber security and operational technology digital architectures in each DNSP, substantial investment might be required to enable data sharing at the scale within the anticipated framework. For this reason, Energy Queensland</p>

		strongly supports the intent stated in section 4 which that cost assumptions are validated in subsequent phases.
<b>4 Further consideration of the data sets</b>	9. Do you agree with the criteria?	Energy Queensland agrees that the costs to DNSPs to provide data sets is an important consideration. Additionally, it is our view that customer privacy considerations and obligations may also be a key criteria useful in assessing the overall value of data sets to the market.
	10. Do you see value in these data sets being made readily available to the public?	<p>Energy Queensland is of the view that if data sets are to be made readily available to the public, sufficient context needs to be provided to ensure that the data can be interpreted and applied accurately.</p> <p>The publishing of operational data (particularly in aggregate) may present a security risk for DNSPs and large customers. This information could be used to determine feeders and substations that are vulnerable or operationally important, or potentially reveal consumption information about large customers. A requirement to publish certain types of data may conflict with the risk management requirements placed on DNSPs under the <i>Security of Critical Infrastructure Act 2018</i>.</p>
	11. Is any important data missing?	No comment.