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Submitted by email: [NetworkVisibility@aer.gov.au](mailto:NetworkVisibility@aer.gov.au)

Dear Mr. Desai,

**RE: Benefits of increased visibility of networks - Consultation paper**

Origin appreciates the opportunity to respond to the AER's consultation on the release of the Energy Security Board (ESB) *Benefits of increased visibility of networks* consultation paper (the Paper). Origin does not consider that the use case for the data types discussed in the Paper has been made.

Fundamentally, the quest for greater data visibility is a response to uncertainty. Changes to data collection and sharing will only result in better market outcomes if it is designed thoughtfully. The current race to data collection without sufficient consideration of data security is worrying; there does not appear to be any technical standards for the transfer of data between parties. We acknowledge that this is potentially the remit of a different workstream.

We note that there are currently two consultations underway with the Australian Energy Market Commission (AEMC), proposed by the Australian Energy Market Operator (AEMO), that attempt to justify the greater visibility of data from Customer Energy Resources (CER) within the National Energy Market (NEM). We consider that whilst these proposals from AEMO are better described and thought out than the Paper, they also do not convincingly make the case that greater visibility of data is the salve for the difficulties the market is currently facing.

We consider that a better articulation of a problem statement would be beneficial to attaining the right information and outcomes. Origin has responded to the questions set out in the Paper, below.

*Appendix 6.4 – use cases and scope*

Origin supports efforts to ensure the benefits of customer energy resources are available to customers. We are less supportive of initiatives which would obtain large volumes of customer energy data and share this with third parties, particularly where there is no clear understanding from the consumer (or data provider) of the volume and type of data shared and for what purpose. Consumers are increasingly concerned about their data, privacy, and data protection. Nebulous data collection sharing rights or obligations held by large organisations, government or otherwise, are likely to be of concern to individuals.

We consider that Appendix 6.4 does consider all the use cases that the groups consulted would likely want to provide or use data for; however, the lack of consultation with the groups who are ultimately the source of the data (or a representative set of customer advocates) is concerning. Origin considers that a broader representation of consumer advocate groups ought to be involved in the development phase of any data sharing initiative.

In addition, we consider that much of the information for these proposed use-cases can be obtained under current arrangements if there were a desire or need for that information. The Paper does not

consider why there has been a lack of innovation or priority for greater access to data that already exists. We consider that some attention to this area, for instance by providing a consistent framework for networks to develop and provide data, represents a good test case for the development of a pathway to deliver greater network visibility.

### *Framing and parameters*

Origin considers that the framing parameters are appropriate, aside from our concern that key data providers (i.e. individual consumers or bodies who represent them) were represented by a single stakeholder during the workshops.

Some of the assumptions that appear to underpin the Paper are also questionable. For instance:

- that more data would result in better decision making at a business or end-user level, or,
- that the incremental cost of including data types or providers is low, or,
- that the data currently available is inherently lacking.

We consider that these assumptions are bold, given the increasing moves by regulators to narrow choice-options for customers who are believed to experience decision fatigue under current arrangements and the lack of evidence that the current sources and forms of data are insufficient for the use cases set out in the Paper. It is more likely that the framework for requesting or providing data is insufficient than the data itself.

### *Relevance of identified datasets*

We consider that what is 'needed' relies significantly on what the market and end consumer want. Since we do not consider that the case has been sufficiently made for the expansion of data collection and sharing, we do not consider that any of the datasets outlined are specifically 'needed' for a clear purpose.

As a matter of principle, we consider that any expansion of data to be collected should be justified by the proponent against the likely benefit.

### *Need for real-time data*

Origin agrees that the general provision of real-time data is not justified. Where a relevant use case does exist (these were limited to emergency services and utilities like NBN or Telstra) the information (data) that these would benefit from already exists but is not available in a consistent form and is difficult to engage with systemically. This reinforces our view that the framework for requesting or providing data is insufficient, not the data available. A review of the framework for data sharing may result in greater benefits than the continued expansion of collected datasets.

### *Consumer protections and reasonableness of data collection*

Origin does not consider that any of the current proposals for 'customer benefits from CER' or 'integration of CER' or 'network visibility' convincingly make the case that greater visibility of data is the solution to the difficulties the market is currently facing. Certainly, none of them are truly about customer benefit. Rather, they attempt to reassure large organisations that they have enough information, but do not present a robust case for how they would actively use that information to benefit anyone.

We consider the lack of engagement with various consumer representative organisations (only one being listed in the stakeholders table) a significant oversight and likely to result in poor balance between customer protection and reasonable data collection. Community buy-in on what is reasonable is important when the data ultimately relates to individuals and these individuals have limited options for how their data is collected or used.

For instance, there remains community opposition to smart meters because community buy-in was not obtained when the decision was made to undertake this nation-wide upgrade of metering, and as a

result those affected do not trust the decision makers. This is an example we should learn from going forward.

#### *Dataset criteria and information availability*

The criteria established when putting together the Paper were: value, quality, availability, and cost. The Paper does acknowledge that there are a range of potential uses for the data, but that the number of *actual* uses of the data is significantly smaller.

The Paper development process was intended to identify relevant data sets that should be considered further through trials. We agree that it has identified potential datasets, but not that these provide any objectively valuable end use. We consider that a limited approach to improving the framework of network data collection and publication or delivery would fit within the 'trial' template and go some way to demonstrating what, if any, data is currently lacking.

We would query what value means in this context. As we observe in considering the rule changes proposed in the CER space more broadly, what might be considered 'value' varies greatly between technology type and the expectations and needs of the end customer or user.

Similarly, the Paper discusses the quality and availability aspects of existing data. Origin observes that small customers metering data is made available in specified file formats, making it consistent regardless of which provider the customer chooses. Outside of small user application, it is usually the responsibility of a business obtaining data to then manipulate it to discover any further insight hidden within. We do not see why this should be different for energy related data. We consider that instead of vastly increasing the volume of data available, it may be more prudent to develop a similar, consistent, framework for the sharing of data already collected with other parties to ensure that it can be used once delivered.

Origin additionally considers that the Paper ought to refine what it means by 'the public'. In the Paper, "the public" refers to AEMO and other regulators, data users (described in a manner consistent with businesses), telecom providers and researchers. Origin does not consider that these are what a layperson would understand 'the public' to mean. A person would instead think of ordinary people in general, i.e. the community. This is clearly not the intended audience of this type of data and the Paper ought to be clear on this matter.

We do not object to the data that is available because of improved data collection initiatives being made available to AEMO and other regulators, data users (i.e. businesses), telecom providers and researchers so long as there is an appropriate framework for the sharing and protection of data in place to support this.

If you have any questions regarding this submission, please contact Courtney Markham in the first instance on [REDACTED] or at [REDACTED]

Yours sincerely

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