



4 September 2023

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Sent via email: [NetworkVisibility@aer.gov.au](mailto:NetworkVisibility@aer.gov.au)

Dear Hrishikesh

RE: ESB Network Visibility Consultation

Shell Energy Australia Pty Ltd (**Shell Energy**) welcomes the opportunity to respond to the benefits of increased visibility of networks consultation paper.

### About Shell Energy in Australia

Shell Energy is Shell's renewables and energy solutions business in Australia, helping its customers to decarbonise and reduce their environmental footprint.

Shell Energy delivers business energy solutions and innovation across a portfolio of electricity, gas, environmental products and energy productivity for commercial and industrial customers, while our residential energy retailing business Powershop, acquired in 2022, serves households and small business customers in Australia.

As the second largest electricity provider to commercial and industrial businesses in Australia<sup>1</sup>, Shell Energy offers integrated solutions and market-leading<sup>2</sup> customer satisfaction, built on industry expertise and personalised relationships. The company's generation assets include 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and the 120-megawatt Gangarri solar energy development in Queensland.

Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy, while Powershop Australia Pty Ltd trades as Powershop. Further information about Shell Energy and our operations can be found on our website [here](#).

### General Comments

Shell Energy thanks the Australian Energy Regulator (**AER**) for the opportunity to respond to the Energy Security Boards (**ESB**) Network Visibility consultation paper.

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<sup>1</sup>By load, based on Shell Energy analysis of publicly available data.

<sup>2</sup> Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021.

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Shell Energy supports the intent of the paper and corresponding programme of works. Specifically, Shell Energy is interested in supporting the data sets which will assist in the development and deployment of behind the meter and other energy solutions which are generally connected to the low-voltage (LV) network.

As an aggregator, consumer energy resource (CER) investor, and retailer, Shell Energy sees the benefit of having greater visibility of network and considers this would be particularly beneficial to upscaling flexible demand, a key resource in Australia's energy transition.

Examples of data sets which Shell Energy sees as key enablers for greater management of behind the meter solutions are:

- Import capability at site
- Export capability at site
- Power system quality, primarily voltage, at the connection point
- Near real time network operational performance data

Shell Energy considers that access to such data sets and others could assist in better understanding output issues and whether these are on the network or customer side. More information on the status of the network can assist in providing further analysis ahead of location selection so that the best asset is chosen for the site. Alternatively, where issues are experienced, access to further information will assist in assessing the problem to be resolved in a more efficient manner. This means that both the customer and product owner would both benefit from access to greater information so that unnecessary costs are not borne by either party when electricity is not being used to its fullest extent.

From an energy solutions perspective, Shell Energy considers that major benefits would be felt for both large and small consumers with behind the meter technologies. As a provider of such investments, Shell Energy would benefit from understanding the export limit at a site before recommending a product to a customer. This would enable greater understanding of network constraints in advising which type or how large of an asset would provide the greatest benefit at a site. This may also provide the opportunity to use the asset to mitigate network congestion. Where there is greater visibility of the problem, there is more opportunity to be proactive with a solution. It also shifts the burden away from distribution network service providers as greater amounts of resources can be invested from other sections of the energy industry.

From a consumer perspective, Shell Energy considers that there will be benefits in a more streamlined network. The AER could also consider creating a form of data that would be available to consumers to use so that they can make more informed purchasing decisions around CER investments. This would however require a level of customer education which would require significant resource.

Shell Energy is interested in the latter phases of the Network Visibility project, specifically the development of the trials in Phase 2.

## Shell Energy Response to Consultation Questions

**Q1. Is the set of use cases in Appendix 6.4 representative of the use cases that you are aware of?**

Yes, Shell Energy would fall under several of the organisation types listed in Appendix 6.4 and agrees with the use cases. Particularly where these use cases intersect with the comments made above.

**Q6. Do you agree with the conclusions reached regarding the need for real-time data?**

Shell Energy agrees that the use cases for real time data would be limited and would support the notion that updated/ near-real time data which is able to identify trends over time would be the most beneficial for investment planning decisions.



If the AER were to pursue the case for real time data, Shell Energy seeks consideration on how the data would be presented, and who will bear the costs both initially and downstream. A full cost benefit analysis should be completed to determine whether this approach would be feasible, and whether any tangible benefits will be felt above and beyond the case for near-real time data.

**Conclusion**

Shell Energy is supportive of the AER undertaking the Network Visibility project to enable greater decision making from industry where network issues are concerned. Shell Energy would like to continue to engage with the AER on Network Visibility, particularly as the project progresses to the trials in Phase 2.

If you have any questions in relation to this submission, please do not hesitate to contact Shelby Macfarlane-Hill at [REDACTED]

Yours sincerely

Libby Hawker  
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