



EnergyAustralia

LIGHT THE WAY

19 August 2022

Anthea Harris
Chief Executive
Energy Security Board
COAG Energy Council

Lodged electronically: info@esb.org.au

Dear Anthea

ESB Data Strategy Initial Reforms

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EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise 4,500MW of generation capacity.

EnergyAustralia appreciates the opportunity to participate in the ESB's consultation for the Initial Reforms of the Data Strategy (*the consultation paper*). Primarily, we support the intent of the initial reforms and agree there is a need for efficient and accessible data sharing between policy makers, to ensure that regulatory change is justified, and existing regulation remains fit for purpose, through the consideration of all available information.

However, we remain unconvinced that there is an information gap for policy makers - state energy departments, the Clean Energy Regulator, Australian Renewable Energy Agency, the Clean Energy Finance Corporation, and the Australian Bureau of Statistics – that, cannot be or is not currently, addressed via AEMO's existing publications (particularly those geared towards the energy transition e.g. ISP), Distribution Network Service Providers network planning information, and the wealth of information provided by retailers in the reporting obligations of energy regulators.

We accept that providing AEMO the capacity to provide its information to these agencies may reduce complexity and improve efficiency, and we therefore support providing AEMO the ability to provide policy makers AEMO's data upon request. We believe this should only be provided to the agencies that have a legislative role in policy making, as they have a clear directive as to the need and use of the information and are supported with robust processes for the handling of sensitive (privacy and commercially) information.

We do not believe there is a justifiable need for the non-policy makers to have access to AEMO's data via the method prescribed in the consultation paper. The consultation paper's examples of data gaps and inefficiencies outlined lengthy processes for researchers to obtain information from AEMO; however, each example eventually resulted in the researcher/agency obtaining the information that AEMO defined as suitable to provide, and the delay was only due to the time taken for AEMO to conduct the necessary security checks for providing it.

The consultation paper describes the cost and resource burden on AEMO if it were required to provide this information, particularly to 'Class B Bodies'. We agree that AEMO is not adequately resourced or suited to a role of enforcement for the data it is proposed to disclose; where it would be required to mandate and ensure appropriate controls are in place for the use and storage of sensitive information.

We do not believe that the proposed data sharing should include non-policy makers, as AEMO's cost in resourcing and developing the appropriate systems and processes would significantly outweigh any identifiable benefit; the 'benefit' described in the consultation paper was, *valuable energy data is not used as effectively as it could be*.

EnergyAustralia view is that non-policy makers, 'Class B bodies', the ECA, and state-based energy ombudsman, do not require increased and more timely access to AEMO's information. They have options available currently to access the information they require, and the existing checks and balances imposed on these entities are reasonable considering the cost of providing this service by AEMO, the minimal and sporadic propensity for the requests, and the inherent liability risks for handling sensitive information.

If you would like to discuss this submission, please contact me on 03 9060 1361 or Travis.Worsteling@energyaustralia.com.au.

Regards

Travis Worsteling

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