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19 August 2022

Ms Anna Collyer
Chair Energy Security Board
GPO Box 2603
SYDNEY NSW 2001

By email: info@esb.org.au

Dear Ms Collyer,

EWOQ and EWOSA Response - ESB Data Strategy Initial Reforms Consultation paper– June 2022

Thank you for the opportunity to comment on the Energy Security Board Data Strategy – Initial Reforms Consultation Paper (**the consultation paper**) released July 2022.

The comments set out in this letter reflect the views of the Energy and Water Ombudsman Queensland (EWOQ) and the Energy & Water Ombudsman South Australia (EWOSA). We are the industry-based external dispute resolution schemes for the energy and water industries in Queensland and South Australia.

We have collectively reviewed the consultation paper and have provided comments targeted at improved data access outcomes for us and consumers more widely.

We support the reforms designed to remove regulatory barriers to enable more effective access for Ombudsman to existing AEMO data for effective decision making in a timely manner.

We would like to take this opportunity to outline to the ESB why Ombudsman would need greater access to AEMO data and what sorts of specific data access and services could be beneficial for us.

From a case management perspective, greater first hand access to data (meter data, B2B info etc) stored by AEMO will assist with the progression of cases more efficiently and effectively. These reforms mean we can access information from the source, rather than third-hand.

Currently we are blind to this information, which we rely completely on the Retailer/Distributor to provide to us, and often this will have to be provided from a fourth party (the meter data provider - MDP).

Energy and Water Ombudsman have no jurisdiction with meter data providers and delays in getting information results in aged cases and penalties (escalations) for retailers.

- The limited access we have to MSATS data means that the majority of the time we need to wait for a scheme participant to respond and they ultimately provide us with screen shots of

what they can see in MSATS. If we could have greater access to MSATS data it would assist in understanding why a transfer has been delayed, why a transfer didn't occur or was refused.

Similarly, we have no access to information the Australian Energy Market Operation (AEMO) manages about the Gas industry/network. This lack of transparency with this information is limiting in terms of real-time information we can provide a customer.

In summary the benefits for Ombudsman is:

- Improved efficiencies with case management
- Improved knowledge and ability to provide quality of information in our service delivery
- Ability to access and independently assess information first-hand

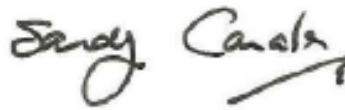
Specific data access and services that could be beneficial for us include data that supports EV visibility, Virtual Power Plants, DER registers and bill transparency data. These would certainly be beneficial as we transition to integrated, new energy data services. From this access we have an opportunity to proactively develop processes / pre-empt changes in the industry from a complaints perspective.

If you require any further information regarding our submission, please contact Mr Jeremy Inglis, Principal Policy Officer (EWOQ) on 07 3087 9423 or Ms Jo De Silva, Policy and Communications Lead (EWOSA) on 08 8216 1851.

Yours sincerely



Jane Pires
Energy and Water Ombudsman Queensland



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