

SEER DATA & ANALYTICS RESPONSE DATA STRATEGY INITIAL REFORMS

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Seer Data & Analytics (Seer Data, we) is pleased to contribute to the Energy Security Board data reform consultation.

The Seer Data Platform is a data access, sharing, and storytelling platform for people of all skillsets. We empower hundreds of grassroots organisations and thousands of people around Australia using data for better decisions in local communities. We predominately work in regional and rural communities, in low-income places, and places transitioning from traditional industry such as resources and mining to new economies. Many federal and state Government agencies are safely sharing both aggregate and Unit Record Level (URL) data assets through the Seer Data Platform to local communities including First Nations organisations, not-for-profits, service providers, small businesses, and local Councils.

The purpose of sharing data with local communities is to enable community-led solutions and change. When data is available at a local level in a way that people can use it, the public benefit is significant and leads to community empowerment, improved collaborative decision making, greater efficiency in delivery of services, and better outcomes.

In the last 12 months, more than 800 not-for-profits (NFPs), community organisations, Government agencies, philanthropic grant makers and businesses have created more than 30,000 Insights, shared 5,500 Suitcases (of Insights) and data storytelling dashboards through the Seer Data Platform. We have empowered 35 communities with data sharing capabilities to make data-informed decisions and take actions for better outcomes in their communities.

Energy Security Board Initial Reforms for a Data Strategy

Seer Data welcomes the introduction of a Data Strategy for the Energy Security Board (ESB) and fully supports data access and sharing for public benefit. A strategy enabling data sharing is timely and much needed to maximise the value of energy data assets for public benefit in order to drive efficiencies and innovation, particularly from the community energy and start-up communities aimed toward community-led change for energy reduction

We also acknowledge the ESB's goal for the Data Strategy is to facilitate greater data access needed to support policy makers, planners, and research in the energy market transition.

However, we see limitations in the Data Strategy that we believe will mean key stakeholders are not enabled to support the energy market transition.

Most importantly, the NFP sector and industry have been precluded from participating in the data sharing reform, which we believe will limit the potential of the proposed reform significantly because of the contributions these sectors can make in the transition of the energy market. The Data Availability & Transparency Act (DATA) scheme is under review and through this review process it is anticipated the Act will be amended to include the NFP and private sector in the scheme. The timing for this is slated for 2024, however, through our ongoing dialogue with the Department of

Finance, we anticipate the review will be much sooner and this is being driven by the new Labor Government.

Consequently, it is our view that not only does the Energy Security Board have an opportunity to increase the public benefit outcomes of sharing data with industry partners and NFP sectors, but indeed it is likely the reforms within the Data Strategy will be outdated as soon as any legislative amendments are passed due to the DATA scheme review process.

Through our work in communities around Australia, it is our view that Australia is on the cusp of a data revolution. Local organisations, start-up businesses, investors, industry partners and community collaborations are mobilising and ready to use data to research, identify, and build solutions to address the energy crisis through the transition to a sustainable energy future. Communities are already coming together to respond to fundamental challenges.

Non-Government Organisations (NGOs), community service providers, and policy makers are increasingly concerned about energy poverty for vulnerable people, including people in low-income areas, older people living in poverty, and families. Energy poverty exists when well-being is negatively affected by very low consumption of energy.

Why remove barriers to data access for the NFP sector and industry partners?

The impact of multiple crises has led to policy and funding approaches that are aimed at empowering local communities to lead recovery efforts, and build resilience. Significant investment at all levels of Government has been driven into place-based approaches to drive economic development, improved social outcomes and place-based policy. The philanthropic community is responding with similar funding approaches, with major investments in local, community led change efforts and community empowerment. One example is the philanthropic investment from the Paul Ramsay Foundation of \$75m in the Fire to Flourish program.

Another example is the grassroots work of Community Power Agency, a not-for-profit that works with local communities coming together to initiate, develop, operate, own and/or benefit from a renewable energy or energy efficiency project. Projects vary by technology, size, structure, governance and funding options. They grow from the diverse needs and available resources of a local community (or community of interest) and might be anything from solar panels on a school roof, to a small wind farm on the edge of town, to a micro hydro system owned by two nearby townships.

WFor completeness, despite prior awareness of the Energy Security Board, there are a number of cleantech start up incubators, scale up programs and investment initiatives supporting technology Founders to build new models and solutions to address the energy crisis. The cleantech start up community is funded by angel investors, venture capital and early stage impact and institutional investors. These innovators together with industry partners will offer new models for energy transition.

Data access and availability is fundamental to the work of tech companies. It is also a huge enabler for community-led change, and by not having access to relevant data assets significantly hampers the capability and speed to which community leaders can mobilise and drive tangible actions, and potentially policy change, for public benefit.

What are the current challenges for community-led initiatives when attempting to access data?

The case studies outlined in the Data Strategy initial reforms highlight the significant data access and sharing challenges for Government agencies, such as the Australian Bureau of Statistics. The challenge is amplified significantly for NFPs, particularly those operating locally to initiate community power initiatives.

This is illustrated through Sustainability Victoria's Community Power Hubs program, a program that has funded NFPs and social enterprises to form and operate a Community Power Hub in their respective regions. The aim of the program is to increase the access to and involvement in community renewable energy throughout Victoria.

The funding was available to not for profits or social enterprises to:

- establish and operate a Community Power Hub; and
- deliver implementation-ready community energy projects that have gone through feasibility and/or business cases and have obtained approvals.

One of the learnings of the program was the major barriers NFPs, NGOs and community groups experienced when requesting and seeking approval to access relevant energy data from Distribution Network Service Providers (DNSPs).

Requesting data for Community Power Hub projects is a resource intensive process, and from Sustainability Victoria's review (which is also the experience of Seer Data having working with hundreds of local organisations), the data capability skillset required for this complex task does not readily exist within these organisations.

There is no easy, established avenue for accessing data directly from DNSPs. Data requests of this type are currently channelled through the community engagement department of the DNSPs – these organisations not have a designated role for “data stewardship”. The information which NFPs, NGOs, and community energy groups request is highly specific and technical, and is required to inform detailed feasibility studies. This includes data such as actual energy flows at the distribution substation level, voltage levels and total solar exports.

Currently, the only way for NFPs, NGOs, and community energy groups to get energy data from distributors is to pay an expensive and experienced consultant or building auditor to access the data on behalf of the community. These consultants have established relationships and contacts at DNSPs. However, despite this, the process for data requests is arduous, time consuming and expensive, and often can be prohibitive for the community sector when designing and implementing community-led solutions and innovations.

Consequently, the slow provision of useful, local data impedes community organisations and initiatives to conduct feasibility studies for community batteries, solar farms, and solar panels, and to develop these projects.

Sustainability Victoria has offered specific examples of challenges faced by communities when accessing data:

1. Gippsland - Mallacoota feasibility study for the community solar garden;
2. Phillip Island Solar farm on Phillip Island;
3. Battery feasibility study for Port Phillip;
4. Battery feasibility study for Flinders; and
5. Yarra Valley Community Power Hub, a sub-region of metro Melbourne, for community batteries, solar farms and solar panels on an aged care home.

In all of the above cases, consultants were engaged to request and access the data, which was an expensive and slow process.

Data Access for evaluation of the Victorian Healthy Homes Program, the first randomised control research study of its kind in Australia

Sustainability Victoria together with community partners initiated the first randomised control trial in Australia designed to measure whether making a home warmer and drier during winter leads to improved health outcomes for people experiencing chronic illnesses.

The outcome of the study, which saw one thousand Victorian homes receive free energy upgrades, was published last week,

Targeting homes in Melbourne's western suburbs and the Goulburn Valley, the Victorian Government initiative set out to both improve indoor temperatures and reduce energy bills during winter for Victorians who live with complex healthcare needs and have low incomes.

Victoria has a temperate climate, but the combination of cold winters and thermally inefficient housing stock creates a serious population health risk.

Over a 4-year period, the Healthy Homes program rolled out upgrades like draught proofing, ceiling or sub-floor insulation, high-efficiency heating and cooling appliances and window coverings.

In order to understand the potential for policy change, it was designed as a randomised controlled trial to measure and monetise health benefits of improved warmth and energy efficiency. The results have demonstrated the following outcomes:

- \$972 was saved on average by the 1000 participating households
- upgrades increased indoor temperatures over winter, reducing time spent exposed to cold by 43 minutes a day.
- For every \$1 saved in energy costs, more than \$10 was saved in healthcare costs.

- As a result of the upgrades, gas use was reduced by an average of 7.1kWh a day, condensation decreased, and the likelihood of perceived warmth was doubled.

Sustainability Victoria also faced significant challenges of access to the relevant data and spent significant resources and time to establish relevant data sharing agreements. It is evident that the rollout of this program in other locations and jurisdictions will require data access and sharing, in particular to community partners and not for profits operating to deliver services to people in low-income areas with poor health outcomes.

The Healthy Homes Program demonstrates the intersection of energy poverty and health outcomes. Critical access to relevant local data will be important for scaling a program such as this and supporting not-for-profit service delivery and health organisations to better understand and intervene to support the needs of the Australian community whilst reducing energy consumption and healthcare costs.

What could be the role of a data sharing intermediary for ESB to share data to communities?

Seer Data is proving the value of safely sharing data with NFPs as a private data service provider or intermediary, We are seeking inclusion in the ESB initial reforms as a potential service provider that can facilitate sharing and access to effectively “loosen the data reins” to enable communities to take greater control of their local challenges and contribute to the energy transition solution.

Notwithstanding our conviction that private sector participation in the data sharing reforms is crucial to realising to benefit of community data sharing envisioned by the ESB, we also recognise the need for appropriate standards and protocols to regulate access for the ESB to satisfy its obligations for protection of the data. We realise that robust standards and protocols are best developed on the basis of experience which takes time to accumulate.

Therefore, Seer Data is seeking to participate as a private sector intermediary. We are already working closely with policymakers and Government agencies sharing data with community organisations through the Seer Data Platform. We wish to make our experience and learnings from this endeavour available for the benefit of policymakers and to accelerate maturation of the ESB data strategy initial reforms, working in partnership with Government initiatives and communities.

We believe the community data sovereignty movement in Australia offers enormous opportunity to democratise and share data with the communities that can benefit from it most, which will provide greater transparency, data-informed decisions and better outcomes for the energy transition. It also is an enabler toward greater community-led and place-based driven funding, and policy and programming, which is emerging in its importance for the future of all communities around Australia.

Summary

Seer Data believes Community has been excluded from the data collaboration and sharing opportunity presented by the Energy Security Board.

We share the perspective adopted by open data and data collaboration policy leaders around the world, and originally outlined by OpenNorth.ca, a Canadian organisation working with public, private and research partners as well as community stakeholders to foster effective, responsible and collaborative use of data and technology to solve complex problems. This perspective is that the effective nexus of public interest data collaboration includes three sectors:

- Community,
- Government,
- Academia.

In order to ensure data-informed policy actually works on the ground, communities must be empowered with data and technology to be able to realise the benefits.

Due to the fact that the Energy Security Board Data Strategy in its current form excludes access to data to NFPs and industry partners, First Nations organisations and data intermediaries such as Seer Data & Analytics to act on behalf of its community of users means community cannot be fully enabled or informed. It also means that a trust deficit may develop or widen further. Community members and citizens want agency and sovereignty over the data that can inform policy decisions and local energy solutions.

We do not believe policy makers, data stewards or data analytics teams within Government are well informed about the community data sovereignty movement and we encourage stronger collaboration with not for profits, start-ups and the tech community, First Nations and communities (including place-based initiatives and collective impact backbone teams and collaborations) to better understand the importance of data for shared learning to lead to systems change and ultimately better outcomes.

We would also like to see guaranteed availability of APIs (data connectors) from all new and updated data access platforms to ensure that data can be quickly and easily used in applications and platforms such as the Seer Data Platform.

To support the notion of ease of extraction value from data, self-service data platforms that make it possible to search and build insights from shared data assets are a disruptive technology that give equal and fast access to information for people of all skillsets and all sectors of society. APIs will help companies like Seer Data increase the speed and usability of ESB data.

About Seer Data & Analytics

Seer Data & Analytics is a Sydney-based technology company turning data into action for people creating a better world. We are creating a global business at scale that allows a broad range of people and organisations to use data to solve significant social problems and lead to better outcomes in client communities.

Our mission is to make data accessible, usable, and shareable for people of all backgrounds. Our vision is to be the world's problem-solving platform for local communities.

The Seer Data Platform is a self-service data platform for data sharing. We are a data intermediary providing the discovery, exploration, and analysis of Domain Data Products within a Data Mesh architecture, and helping organisations build and share data assets for better decision making.

Seer Data hosts a catalogue of Open Data alongside customers' private data, data that has been shared and data products generated by Seer Data. Users are assisted in generating their own data products by our self-service data collection and ingestion tools, and in discovery of insights by our AI-assisted querying and Smart Insight features. Users collaborate on analyses and share their discoveries in data collaboration.

Our unique value proposition is to provide data access and sharing through safe and trusted data sharing and intermediation for local intelligence and problem solving for people of all skillsets.

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