

Wattwatchers Response to the ESB's Data Strategy Initial Reforms Consultation Paper June 2022

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STATUS: For release as a public submission

Introduction to our submission

Wattwatchers Digital Energy (Wattwatchers) appreciates this opportunity to respond to this first instalment in the Energy Security Board (ESB) reforms of data strategy for the energy sector.

We anticipate the subsequent stages of this data strategy reform process, including a focus on data services, will be of greater relevance to Wattwatchers than this limited initial stage.

Wattwatchers did, however, want to make submissions in regard to a core topic for this initial stage, and we assume subsequent stages, which relates to who can access data (i.e. currently Class A and Class B bodies as proposed at this stage).

We respectfully submit that the ESB should broaden its thinking in regard to access to data in order to ensure that technology innovation is directly targeted, is well supported, and can be accelerated to help deliver an orderly and successful energy transition.

In suggesting this course of action, we are not merely proposing a one-way flow of data from official or industry sources to innovators, commercial or otherwise. Significant energy data resources increasingly are being created by technology players, including Wattwatchers, and it is important to establish both commercial and public interest channels for securely sharing such data, and potentially for data exchanges as well.

Who we are

Wattwatchers is Australia's leading digital energy platform, enabling fast, powerful and scalable solutions to monitor, analyse and control electrical circuits in real time – maximising the benefits from renewable electricity, sustainable building and energy management.

Our solutions suite spans devices, datasets, analytics, software and Internet of Things (IoT) connectivity, for energy and non-energy applications across home, community, commercial and industrial, and utility use cases.

Our open business model promotes technology collaborations, with dozens of third-party partner integrations with our REST API - in Australia, and internationally. Product brands include Wattwatchers (hardware and data to the cloud), MyEnergy (mobile app) and ADEPT (agile IoT platform for managing multi-technology fleets in real-time).

Data is effectively the DNA of our business. We create and contribute to an energy solutions ecosystem in which vital data and insights are readily available to multiple stakeholders, and can be easily shared between a choice of services and applications, while protecting cybersecurity and consumer data rights including privacy, security and accessibility.

Our data resources

Aside from our business as usual, Wattwatchers has considerable field experience with data sharing and security/privacy issues - spanning customer and system-relevant data - through our two major grant projects:

- My Energy Marketplace (MEM) supported by grant funding from the Australian Renewable Energy Agency (ARENA)¹;
- and the Heyfield MyTown Microgrid project², with grant funding from the Australian Government through the Regional and Remote Communities Reliability Fund (RRCRF), and the Victorian Government through the Latrobe Valley Authority (LVA).

Among other objectives, the MEM is creating a major new energy dataset with granular, real-time and historical electricity data for homes (up to 5000 around Australia), small businesses and schools, with end-customer pre-approval for data sharing under user-friendly terms and conditions (personally-identifying information is excluded without further express authorisation).

This MEM data is already being accessed for a range of government, industry, research and community project purposes, providing hard-to-obtain data from behind the utility meter, down to individual circuit level (e.g. whole-of-site grid imports and exports, solar generation

¹ The My Energy Marketplace project is receiving funding from ARENA as part of ARENA's Advancing Renewables Program. The views expressed herein are not necessarily the views of the Australian Government, and the Australian Government does not accept responsibility for any information or advice contained herein. <https://arena.gov.au/projects/wattwatchers-my-energy-marketplace/>

² <https://www.uts.edu.au/isf/explore-research/projects/mytown-microgrid-heyfield-victoria>

if applicable, and major loads such as air-conditioning, electric hot water, pool pumps, EV charging etc.)

Via other projects and arrangements, data from Wattwatchers devices has been used extensively by AEMO, working with researchers, to support the integration of small-scale solar generation into the electricity grid³.

Access to data

Wattwatchers submits that greater access to data for commercial operators, especially those developing technology and data-driven solutions, is vital for a fit-for-purpose energy system in the 21st century.

In the Grid 1.0 past, a narrow set of known industry players (e.g. Class A) and recognised researchers (e.g. Class B) may have covered the field for an inner circle for data sharing purposes. In the new Grid 2.0 era, however, data-driven energy technologies, business models and solutions will feature, and these will be developed in many cases beyond the 'usual suspects', by both energy and non-energy commercial players, and by a wide range of software/app developers.

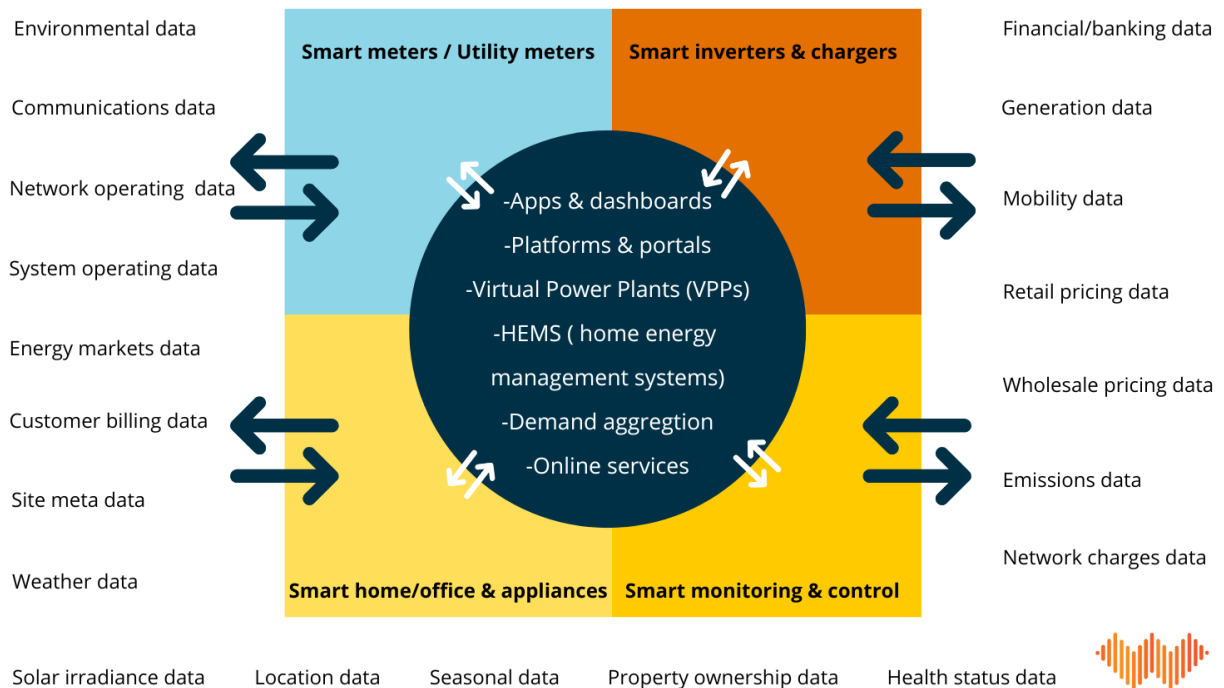
The graphic below (Figure 1) indicates the very broad view we have in regard to what data is relevant for the energy transition and the data-driven solutions that will support customers, communities, researchers, the industry, regulators, markets and a broad range of commercial solution developers and providers.

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<https://arena.gov.au/projects/enhanced-reliability-through-short-time-resolution-data-around-voltage-disturbances/>

Figure 1:

NEW DATA ECOSYSTEM FOR LOW VOLTAGE ELECTRICITY NETWORKS



Responses to consultation questions

Questions 1-11: Whether for this initial reform consultation, or also for future stages of the ESB’s data strategy, we urge consideration of including a further category of ‘Class C bodies’ which would cover commercial and non-commercial entities that are engaged in the development and delivery of energy-related solutions, or non-energy solutions that use energy data.

In our submission the current exclusive focus on a narrow set of apparently ‘trust by default’ industry bodies as Class A bodies, and researchers as Class B bodies (potentially with additional security requirements), will hold back innovation for the energy transition.

We accept that the entities we believe should be included in a 'Class C bodies' category may still be excluded from some especially sensitive system data, and would be required to demonstrate their *bona fides*, but nonetheless contend that this discussion should be opened up by the ESB in the context of its data strategy consultations.

Question 12: In terms of other improvements in the status quo that the ESB should be considering, Wattwatchers urges a break with the regulatory tradition that is evident in the current nomination of Class A and Class B bodies, and the apparent resistance to opening up data access for legitimate innovators. This should be embedded into more in-depth design of the new fit-for-purpose regime.

Question 13: Our position is that the objective in opening up access to AEMO data should also be extended to other bodies including the AEMC and the AER. We submit that such bodies will benefit through engagement with a range of data users, especially for innovation around new solutions (which by definition can require access to data to help frame potential solutions, and testing at the 'proof of concept' stage, as well as up to and including commercial productization).

Question 14: Yes, we submit that Class B bodies should be permitted to disclose relevant protected information to specified industry research partners.

We agree that failure to allow this in a substantial way may largely invalidate the sharing of AEMO data with Class B bodies.

As an example, the partners in the Heyfield MyTown Microgrid project - which for-profit Wattwatchers co-leads with the not-for-profit Heyfield Community Resource Centre (HCRC) and the UTS Institute for Sustainable Futures (UTS ISF) - include three universities (UTS, Federation University and RMIT), a network business (Ausnet Services), a state government agency (LVA), and three not-for-profit community organisations (the HCRC, the Public Interest Advocacy Centre and the Community Power Agency).

The RRCRF grant program actively encouraged broad-based collaborations for its Microgrid Project, as is also the case for many other such programs including ARENA and cooperative research centres like RACE for 2030 (10-year CRC).

Such collaborations already face many challenges doing energy-related projects in a regulatory and operating environment that is clearly not fit-for-purpose. If bona fide research partners are the approved gateway (i.e. as Class B bodies) for gaining access to

otherwise protected data that can assist projects, then they should be able to sensibly and responsibly share that data with project partners, including commercial operators.

To do otherwise will make already difficult projects even more unwieldy, and this in turn will suppress innovation and the collaborations that help to drive innovation.

Conclusion

We thank the ESB for this opportunity.

As outlined above, our main point in this submission is the need for a 'Class C bodies' category to open up greater potential for useful data to flow to and from the innovation sector, and we urge the ESB to consider this further as part of its ongoing data strategy policy development work.

Wattwatchers would welcome further opportunities to engage on this and related topics, including how a 'Class C bodies' category could be implemented.

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