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TO WHOM IT MAY CONCERN

Zepben welcomes the opportunity to contribute and comment on the development as well as implementation of the Energy Security Boards Data Strategy, specifically around streamlining access to existing data.

Zepben is an Australian technology company that develops and provides software and services for Distribution Network Service Providers (DNSPs) to model at scale the performance of their distribution network. We specialise in dealing with network information at scale and working with DNSP customers to develop tools and techniques that utilise often incomplete datasets.

In addition to DNSPs, Australian Universities also make use of our software to streamline their research, spending less time collecting the required data and more time developing new insights to push the Australian energy knowledge base forward.

While Zepben does not currently make use of data directly from AEMO we expect this will change in the future as the type and scale of data collected by AEMO continues to progress at a rapid rate, driven by the rapid decarbonisation and decentralisation of the grid. In the future as decision making become increasingly complex and automated, we expect a greater need for Zepben to incorporate data from AEMO into modelling of distribution network performance.

Currently we do make use of similar data that is provided to us via our DNSP customers, we therefore welcome moves to standardise around and simplify access to some of this information as a way for energy consumers to access greater value from the data produced by their energy system.



The following dot points capture our general position and feedback on the **Data Strategy – Initial reforms – Consultation paper**:

- There are likely to be new market entrants that provide data services to both market participants and energy consumers. This category of data users, while hard to define are likely to add significant value to the raw data that is collected as part of operating the National Electricity Market.
- We have no concerns with disclosure to class A bodies
- We are supportive of an initial definition of class B as proposed, but caution that there is likely to be the need for review of this as the energy market develops, including consideration of new trusted data services providers.
- We note it is important that Class B bodies are able to with appropriate controls easily make shared data available to their sub-contractors for the purposes of conducting energy research.
- We support the requirement for research being required to be related to energy.
- We expect the defined bodies will likely need to change over time, and so we are supportive of a flexible approach to revision of class A & B bodies
- In our experience, in practice often ambiguity in the definition of rules and regulations around data sharing stifles information sharing and collaboration. Therefore, whatever positions are defined within the updated regulations, it is critical that these are extremely clear. This may require additional guidelines to convey both a description and the intent of the rules and regulation.
- Working with energy system data has also identified the importance of being clear with definition of what data is being covered, and to some extent the purpose of the protection of the data. In our experience different DNSPs often include varying types of data under



different data sharing controls. This limits the ability of the industry to source consistent system wide datasets that enable third party product development.

- Limiting the ability of Class B bodies to disclose protected information to specified industry research partners, will limit the value of AEMO data sharing. For example, with the increasing complexity of the energy system, there is increased need for specialist software tools to efficiently store, access and gain insight from energy system data. Our research customers use our Energy Workbench product to combine multiple sources of information with the context of the connectivity of the system in order to be able to efficiently conduct their research. Gone are the days where excel sheets operated on a single desktop computer are the tooling used to undertake energy research. As such research organisations often depend on or are supported by industry research partners.

Yours faithfully,

A handwritten signature in black ink, appearing to read "A White". The signature is written in a cursive style with a long horizontal stroke at the end.

Adam White.
General Manager Customer and Strategy, Zepben