

Energy Security Board
Review Panel
By email: info@esb.org.au

19 August 2022



EASTERN ALLIANCE
FOR GREENHOUSE ACTION

C/O - MAROONDAH CITY COUNCIL
179 MAROONDAH HWY
RINGWOOD VIC 3134
WURUNDJERI LAND
WWW.EAGA.COM.AU

Dear review panel,

Re: Response Data Strategy Initial Reforms Consultation Paper June 2022

The Eastern Alliance for Greenhouse Action (EAGA) eight member councils welcome the opportunity to respond to the Energy Security Board's (ESB) consultation paper on a set of targeted, initial reforms designed to remove regulatory barriers and enable more effective access to existing energy market data. EAGA is a formal Alliance of councils in Melbourne's East, committed to delivering climate change mitigation and adaptation projects and advocating for initiatives that support sustainable, low carbon communities.

We urge the ESB to include Local Governments under the definitions of "Class B bodies" under the market's regulations to ensure that councils can have timely and accurate access to existing energy data. This data will primarily be used by councils for quantifying municipal greenhouse gas emission profiles and monitoring and evaluating the impact of community emission reduction initiatives. This includes (but is not limited to) neighbourhood battery projects, precinct planning and energy efficiency programs. We consider it appropriate that relevant bodies (including network operators, AEMO etc) disclose monthly postcode level data (kWh/MJ), segmented by industrial/residential/commercial customers and number of users. This data should be made available to councils on an annual basis. Importantly, this information will enable councils to better fulfil their obligations under the *Local Government Act 2020* and give proper consideration to climate change in their decision making.

For further context, I attach a recent letter provided to the Victorian Department of Environment, Land, Water and Planning (DELWP) which outlines the (long standing) issues councils have faced in accessing data for these purposes. If you have any questions or queries relating to this letter, please contact Scott McKenry, EAGA Executive Officer, on scott.mckenry@maroondah.vic.gov.au or 0431 133 592.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jude Dwight', is written over a light blue horizontal line.

Cr Jude Dwight
Executive Committee Chair
Eastern Alliance for Greenhouse Action
Councillor, Knox City Council



This letter has been approved through EAGA's formal governance structure as described in the EAGA Memorandum of Understanding 2021-25. The submission may not have been formally considered by individual member councils.

Anh Mai
Acting Deputy Secretary Energy
Department of Environment, Land, Water and Planning (DELWP)
2 Lonsdale St
MELBOURNE VIC 3000

19 July 2022

By email:
anh.mai@delwp.vic.gov.au
CC:
lyn.bowring@delwp.vic.gov.au
kim.lecerf@delwp.vic.gov.au

Dear Anh,

Re: Public access to Distribution Network Service Provider (DNSP) data for all Victorian councils and communities

On behalf of our member councils, the Victorian Greenhouse Alliances (VGA) and the Municipal Association of Victoria (MAV) are seeking DELWP's assistance to ensure Distributed Network Service Providers (DNSPs) provide free and accessible postcode level consumption data to better enable emissions reporting, improve understanding of community-wide consumption patterns and to establish monitoring and evaluation of effective emissions reduction programs.

Summary

This letter has been prepared to resolve ongoing data accessibility issues for all 79 Victorian councils. The lived experience of councils demonstrates the lack of easily accessible DNSP data has held back progress on a number of key climate programs and initiatives undertaken across the local government sector. We request DELWP's assistance to remove this barrier by establishing a consistent national framework for energy and emissions data accessibility.

Specifically, we urge DELWP to work with DNSPs to provide freely available postcode level consumption data, segmented by market category, at daily, monthly and yearly intervals. This should be provided in a consistent manner with existing data services available in [other jurisdictions](#).

Why is the data valuable?

Providing DNSP energy data for residential, commercial and industrial sectors will enable users to track energy consumption and emissions generated across regions and sectors, providing genuine value to Victorian councils and communities in line with emissions reduction targets and pledges to DELWP under the *Climate Change Act 2017*.

DNSP data allows regular monitoring to track progress on emissions and energy consumption, the success/failure of relevant interventions and provides a feedback loop for community and business stakeholders for engagement and understanding.

Real activity data (as opposed to modelled information) improves the accuracy of emissions profiles for all councils. Providing this data to all users avoids a bespoke, council by council response – instead bringing the whole sector a big step forward.



C4NET

The Centre for New Energy Technologies (C4NET) currently manages third party access to Victorian DNSP data. C4NET provides aggregate electricity data to councils, which costs \$2,000 in the first year and \$750 per annum in subsequent years. This cost is prohibitive for even the most well-resourced councils and is preventing equitable access to information and related decision making.

Whilst it is recognised that the provision of data access services comes at a cost, the current user-pays approach should not be applied to public-good resources. Enabling all councils and key stakeholders to access the data will help C4NET meet its goal of serving Australia's energy consumers to collaborate across the sector.

Streamlining data provision

Avoiding single requests for data to either DNSPs, C4NET or DELWP will streamline the process for all concerned. Providing information annually in a consistent, reviewed and user-based format will save all organisations, as well as all the requestees' time and hassle dealing with requests for information.

Data quality

There needs to be a transparent process to ensure quality and consistency of data from one year to the next. Ensuring the data is in a consistent format and universally checked for any issues/accuracy will improve data literacy and capacity to monitor and inform decisions.

Consistent data formatting and providing data updates regularly can improve processes, ensure quality control and enable direct comparison between councils, sectors and regions of interest.

Until councils have access to this activity data, there will continue to be questions around the accuracy and granularity of information which impacts on climate action and decision-making and prevents councils from using emissions profiles to track progress towards climate goals over time.

DNSP data precedent

The Queensland DNSP provider Energex has adopted the Queensland Government's 'Right to Information' approach for providing the community with greater access to information. They have developed a model of open and accountable data provision while protecting the confidentiality of commercially sensitive information and privacy requirements.

Data is updated quarterly and includes energy consumption data by yearly and monthly breakdown in kWh, and by domestic & business customers. Data is provided at postcode, LGA or regional scale.¹

User-friendly climate data

Data could be housed by a third party (for example SV or DELWP) and made accessible to all councils and communities via a user-friendly portal like Snapshot Climate tool. DNSP data could be integrated into such a portal on an annual basis, providing accessible, free and standardised community emissions profiles for every council and community in Australia.

Ironbark Sustainability has a precedent for integration of Tier 2 data into Snapshot with Google's Environmental Insights Explorer. Through a partnership with Google, more detailed and accurate activity data was made available for councils throughout Victoria and Australia, replacing high-level modelled data. This data is provided by Google for free and made available for all relevant councils on Snapshot.

¹ <https://www.energex.com.au/about-us/company-information/our-network/energy-usage-data-to-share>

DELWP is supporting enhanced detail and accuracy of the Snapshot Climate tool but it currently still relies on modelled energy data. Assessment of Tier 2 activity data is a requirement for many of the next steps in understanding and delivering effective climate and energy programs.

Small intervention

The Alliances are aware that DELWP has had many discussions with councils regarding this challenge, including internally, within Alliances and across departments. Without removing this barrier – and providing ready access to DNSP data – councils, communities and key stakeholders will not have the most appropriate information on which to base their decision making. We hope that this relatively small intervention can lead to big changes and increase capacity to tackle climate challenges more effectively.

We would welcome the opportunity to speak with you directly regarding the above proposal and how we can leverage the respective capabilities and resources of both levels of government to ensure the best outcomes for Victorian communities.

Key contacts

- Municipal Association of Victoria (MAV), Claire Dunn, Manager – Built and Natural Environment, cdunn@mav.asn.au
- Barwon South West Climate Alliance (BSWCA), David Collins, Chair, David Collins, david.collins@gplains.vic.gov.au
- Central Victorian Greenhouse Alliance (CVGA), Annika Kearton, Chief Executive Officer, ceo@cvga.org.au
- Eastern Alliance for Greenhouse Action (EAGA), Scott McKenry, Executive Officer, scott.mckenry@maroondah.vic.gov.au
- Goulburn Murray Climate Alliance (GMCA), Carole Hammond, Executive Officer, eo@gmca.org.au
- Northern Alliance for Greenhouse Action (NAGA), Karen Gardham, Project Manager, karen@naga.org.au
- South East Councils Climate Change Alliance (SECCCA), Dan Pleiter, Acting Chief Executive Officer, dpleiter@seccca.org.au
- Western Alliance for Greenhouse Action (WAGA) Fran Macdonald, Executive Officer, franm@brimbank.vic.gov.au

This letter has been approved through the Greenhouse formal governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all councils.