Energy Security Board

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Response Data Services Delivery Model Consultation Paper December 2022

Thank you for the opportunity to comment on the proposed ESB Data Services Delivery Model released in December 2022.

The data services delivery model provides a comprehensive overview of data services that could support broader access to AEMO data, and ABS are supportive of this development. The services proposed would be welcomed by a range of research partners with a spectrum of different internal capabilities and data management maturities.

It is noted that agencies such as the ABS, who have more sophisticated data management practices, technologies and skills would appreciate tailored approaches to unlock the full value from the data held by AEMO. ABS's core business is data, with well-established security and privacy approaches. As the future model develops, ABS would like to have the option to ingest and manage AEMO data to enhance the production of official statistics and support statistical solutions.

The focus of the current consultation paper is on governance and delivery, with implementation out of scope. The proposal is to set up a new unit within 6 months with 3-5 staff to cover business analysis, data engineering, analysis, and visualisation. Without details about the proposed implementation (eg. infrastructure, tools, methods, datasets etc), the ABS experience would indicate that this a very ambitious plan. Phasing, prioritisation and resources over time will likely need further consideration.

ABS agrees that a phased, adaptive approach (eg. dedicated unit within AEMO initially followed by a review) will lead to the best outcomes in establishing and developing the data service delivery capabilities.

ABS agrees with the need for specialist skills to be developed, and for partnerships to help organisations make the most out of the available data

Answers to some specific questions are provided below.

Q 1: Are there any priority data services missing from the analysis?

The ABS recognises the challenge for data custodians to provide data with maximum utility while maintaining confidentiality. The Five Safes Framework used by the ABS is fundamental to this.

Q 2: Are there other barriers that inhibit data services not identified here? Can you provide examples or case studies of these barriers or are there examples of where data services are addressing any key barriers?

For researchers to make the best use of the AEMO data they will at times need access to the raw data. It is not clear from the proposal if this will be possible or if only de-identified data will be available in the DataLab for approved users. The principle that the model should not provide "data science research capabilities" because Universities and other bodies are already strong in this area relies on researchers being able to access the raw data. The ABS, as well as other statistical agencies, have shifted the focus

more towards trusted users rather than de-identification using the [Five Safes Framework](#). Data de-identification is an area where the ABS Datalab experience could add value.

Q 5: Are there other data service delivery models that could be considered?

A future round of consultation could include Statistics New Zealand who also have experience with data sharing.

Yours sincerely

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