

13 February 2023



Ms Anna Collyer
Chair
Energy Security Board
COAG Energy Council Secretariat
King Edward Terrace
PARKES ACT 2600

Email to: info@esb.org.au

Dear Ms Collyer

Data Services Delivery Model

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Energy Security Board (ESB) in response to its Data Services Delivery Model consultation paper (the consultation paper).

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution Network Service Providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network);
- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Metering Dynamics Pty Ltd trading as Yurika Metering.

Energy Queensland supports a data strategy that enables the energy transition, is in the interests of customers, delivers community benefit and facilitates energy market reform. However, we consider that any data strategy must prioritise customer privacy and protect commercially sensitive information with effective cyber security and regulatory requirements, ahead of potential benefits. We therefore question whether a robust case has been sufficiently made to support the disclosure of this information to Class B Bodies. We also consider that the risks of data disclosure to recipients, other than those with prescribed statutory functions, may outweigh any perceived benefits. We therefore consider it critical that appropriate governance around disclosure arrangements be implemented.

Energy Queensland agrees with the ESB that any proposed data strategy must not only efficiently contribute to ensuring the future delivery of safe, secure, and reliable power, but must also address subsequent risks to affordability. While we acknowledge the five delivery models proposed by the ESB, we suggest that the costs associated in funding the preferred model are the most efficient and cost-effective for all parties provided that the benefits of sharing the data exceed the costs incurred by businesses and customers in sharing the data. Until additional detail related to establishment and operating costs are made public, it is difficult to say with certainty whether consumer benefits will exceed these costs.

We also agree with the ESB that delivery models should consider services to different classes of data user who could support the realisation of consumer benefits. However, in our opinion market participants are best placed to manage the services reviewed. Many of the challenges that the proposed data services attempt to address could be effectively addressed by enabling data users the option to engage directly with the data source. We consider this direct approach could help to identify and address existing gaps in consumer needs and provide an effective mechanism to support innovative trials developed by researchers.

However, if the preferred view is for a delivery model with one data holder being responsible for disclosing data, data protection arrangements must be considered to ensure there are no unintended consequences.

In relation to the priority data services missing from the analysis, Energy Queensland considers there is a greater need to clearly articulate which service(s) will deliver data standards (including shared terminology, shared data models and shared definition of data quality requirements) to enable effective data sharing between participants, preferably by using international industry standards. Energy Queensland also suggests that facilities should exist, incorporated in one of the proposed data services or as an additional data service, to integrate shared data with participants' own data analytics capabilities for the purposes of contextualised analytics with internal data, which is currently not specifically mentioned in the consultation paper.

Finally, data sharing should provide reciprocal benefits. Energy Queensland notes that data acquisition, collection, and preparation for sharing is resource-intensive, and this should be appropriately considered to prevent costs incurred by data providers from being passed to consumers. For example, any expansion of data sets will incur additional administrative and system costs for market participants. To ensure accurate and consistent information, particularly with respect to legacy data, we suggest it is important that any model is fit-for purpose and provides cost effective consumer benefits. Given this, we support a data-sharing regime that delivers broad community benefits.

Should the ESB require additional information or wish to discuss any aspect of this response, please contact me on 0429 394 855 or Laura Males on 0429 954 346.

Yours sincerely



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