

Submitted via email to: [info@esb.org.au](mailto:info@esb.org.au)

Dear Energy Security Board (ESB) Team,

**ESB – Data Services Delivery Model Consultation Paper**

PLUS ES welcomes the opportunity to provide feedback to the ESB's Consultation Paper – Data Services Delivery Model.

PLUS ES is a registered Metering Co-ordinator (MC) and an accredited Metering Provider (MP) and Metering Data Provider (MDP) in the National Electricity Market (NEM). Our skilled, workforce provides metering services across Australia. Our customers range from small residential customers through to Australia's largest manufacturers and mining operators.

We acknowledge that data access is important and required for the electricity industry. We support:

- Conceptually the provisioning of currently held AEMO data, to bodies that have a role in developing or administering energy policy or regulation or are involved in research and development, with the appropriate protections.
- ESB's proposed phased approach for early benefits.

As a competitive service provider, we have reservations that future data services delivery models and the potential increase in the scope of metering data collected, have the potential to negatively impact our ability to earn a return on our investment to implement the infrastructure to collect, administer and disseminate metering data to the industry as required. Our feedback has been noted below for your consideration:

- **Equitable contestable/competitive model** - A large portion of the metering data held by AEMO is provided by contestable parties and this volume will continue to grow proportionally with the installation of smart metering. A logical assumption is that the scope of metering data will expand as technology progresses and the industry need for data sharing increases. Consideration needs to be given to the contestable/competitive model and ensure that the reforms are equitable.
- **Funding for the data services delivery model** – PLUS ES supports a beneficiary-pays model. Due diligence is required to ensure operationalisation of the data services delivery

model, does not result in market bodies/participants being charged multiple times. For example, participants/market bodies are already paying directly or via commercial agreements for the provisioning of the metering data to AEMO. Furthermore, when off-market data is required to supplement a data set requirement, there needs to be a pathway for the data collector/provider to be enabled to provide the data and remunerated for their services.

- **Advisory group** - The contestable metering provider should also be represented in the advisory group. They should also be stakeholders in all data strategy workshops, forums, initiatives where metering data and services are a scope item of those discussions. Regulated network representation of the contestable metering service provider is not representative of the sector for the New South Wales, South Australia, Queensland, and Tasmania jurisdictions.
- **Different optimal models for the short and longer term** – We support the phased approach proposed by the ESB for the short term and the requirement of a review for medium term adaptation. We believe that two to three years is a short review term especially following implementation. It would not allow enough time for an accurate assessment of the data service delivery model and its responsiveness to evolving customer requirements, especially if the review will consider migrating the unit to another body or structure.

PLUS ES would welcome further discussions in relation to this submission or any other item relating to ESB's data strategy. If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at [Helen.vassos@pluses.com.au](mailto:Helen.vassos@pluses.com.au).

Sincerely,



**Jason Clark**  
Executive General Manager