



9th February 2023

Level 2, 11 London Circuit
Canberra, ACT, 2601

Anthea Harris
Chief Executive Officer
Energy Security Board
Submitted electronically.

RE: Response to Data Services Delivery Model Consultation Paper December 2023

Dear Ms. Harris,

Zepben welcomes the opportunity to provide feedback to the Energy Security Board (ESB) consultation paper on Data Services Delivery Model.

Zepben is an Australian energy software company focused on maximising the communities' access to their local energy network. We do this by unlocking value from electricity distribution network data that is often 'stuck' in legacy enterprise systems.

Our Energy Workbench platform ingests, sanitizes and curates electrical distribution network asset data and consumer level time series power and voltage data. The network asset data is stored and delivered in the IEC Common Information Model (CIM) via a powerful Software Development Kit (SDK) that enables data scientists, software engineers and researchers to programmatically interact with a complete digital model of the distribution network.

We support ESBs work to develop and progress a national Data Strategy, we believe this is one of the missing enablers that the industry needs to effectively collaborate to deliver the energy transition.

We would like to provide the following specific feedback in response to the primary consultation questions raised by the paper:

Are there any priority data services missing from the analysis?

Broadly the categories cover the key service areas required however there is a risk that some areas may sit in between services and be missed. Zepben believes that specific services for data standards, data culture and data protection obligations should be considered.

- **Data Standards:** While the model for the provision of data services is important, data standardisation services extend beyond simply the standards that are applied to the data held by the data custodian. There is a broader service that should be provided to the industry where a data service provider publishes a set of data exchange standards across the full spectrum of identified data gaps. The impact of this would be that two parties separate from a data custodian such as AEMO could directly share datasets using a standard format established by the data services provider. Zepben believes this could be a light-touch way of enabling greater collaboration and data exchange in the short term while work is underway to extend the coverage of any established data service provider across the identified data gaps.
- **Data Culture:** In the same way the UK Open Data Model work has invested in driving a clear change of culture, where data is treated as open by default. Zepben believes that without specifically identifying the entity responsible for driving a change in culture around data, the data services developed run the risk of locking in the current risk-

averse culture around data exchange that is not in the long-term interest of energy consumers.

- **Data Protection Obligations:** While this may overlap with the identified 'Data Contracting' service, Zepben believes a light touch data service that would unlock value from existing data in the industry is a 'plain English' resource for understanding an entity's data protection obligations.

In practice, we find that the internal custodians of data are typically technical professionals, not legal professionals. In the absence of a clear, plain English resource about what data can be shared, a legal professional must be engaged, which is costly and time-consuming to begin with. More importantly, legal professionals will often not have a good appreciation of the technical aspects of the data in question, and so the legal advice will err on the side of caution – to the extent that a “share nothing” approach may be the result. An accessible 'plain English' resource would empower accountable data custodians within organisations to make decisions on the sharing of datasets they hold without needing to consult a legal professional. In particular, this would help resolve confusion about critical infrastructure protection legislation that relates to data about operational technology and large assets, and privacy protection legislation that relates to consumer level **energy data**. Consumer level **voltage data** and network level power and voltage data, and electrical distribution network asset data may not be the target of these laws – but in practice can often be lumped into the same category.

What are stakeholder views on the appropriate scope for data services in the short to medium term?

We recognise that to make progress, focusing the scope of data services on a limited set of data gaps is important in the short term. However, Zepben believes the ESB should consider including the currently out of scope **network visibility for market planning** data in the current round of work. This could be limited to developing standard formats for the exchange of **network hosting capacity data**. We believe this could enable organic improvements in the exchange of information within the industry without a high cost or the need to wait for future policy decisions.

The ESB welcomes stakeholder views on the initial assessment of the strengths and weaknesses of each model presented here?

Zepben believes the initial assessment captures the strengths and weakness of each model and supports to development of a **Dedicated unit within AEMO** as the most pragmatic model to progress.

If you wish to discuss any of the above submission, please do not hesitate to connect me.

Yours faithfully

A handwritten signature in black ink, appearing to read "Adam White".

Adam White
GM Strategy and Customer
Zeppelin Bend Pty Ltd