



EnergyAustralia

LIGHT THE WAY

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Energy Senior Officials

By email: ElectricityConsultation@industry.gov.au

Dear Energy Senior Officials,

National Electricity Law and Rules Amendments (Consumer Data Right) – PUBLIC VERSION

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise 4,500MW of generation capacity.

We welcome the opportunity to provide this submission to the *National Electricity Law and Rules Amendments for the CDR*. We focus on the proposed changes to the *National Electricity Rules* (NER) regarding NMI Standing Data and the Metering Data Provision Procedures (MDPP).

1. Allowing consumers to access NMI Standing Data under the *National Electricity Rules*

The proposed amendments would amend Rule 7.15.5(d) to allow customers or their authorised representatives to access NMI Standing Data directly from their Retailer and/or Distributor under the NER. The Explanatory note for stakeholder consultation states that "as NMI Standing Data is included as a covered data set under the CDR, there is no reason for the NER to continue to limit access for consumers".

We question the extent to which customers will value NMI Standing Data and request it, especially with regard to mass market (residential and small business) customers. In contrast to Metering Data which has a clearer use case for customers, for example, to support energy plan recommendations or inform solar and battery purchasing decisions; the use cases for NMI Standing Data are less apparent. This is because except for a few fields, the majority of NMI Standing Data does not assist in interpreting the customer's consumption or tariff structure, but rather supports the operation of the National Electricity Market.

We also contend it is duplicative to require Retailers to build both NMI Standing Data access under the Consumer Data Right (CDR) and a separate channel for access under the NER. Where a business such as an energy broker were to seek access to NMI Standing Data (as a customer authorised representative), it seems far more likely that that business would invest in becoming an Accredited

Data Recipient (ADR) under the CDR. Compared to access under the NER, the CDR will have stronger benefits for ongoing and repeated access to data in large volumes. Specifically, the CDR will have industry-wide processes for businesses (ADRs) requesting consent from the customer to access data on their behalf in real time; whereas current authorisation processes under the NER may use email, SMS or post which are slower and cause more friction in the consumer experience. The other advantage of the CDR is that data will be received directly through APIs and data will be received much faster in real time (in contrast, data provision under the NER channel may be over email and the current MDPP timeframe for Metering Data provision is 10 business days). The CDR also provides better opportunities for businesses in terms of future data access as it will expand to new sectors.

In summary, the benefits are unclear as we doubt whether customers would find value in NMI Standing Data, and for businesses seeking data as the customer's authorised representative, those businesses are unlikely to choose to invest in the NER channel where they can choose to invest in the CDR.

On the other hand, there will be additional project and capital cost to Retailers in building the separate NER channel, even where solutions built for the CDR are leveraged to the greatest extent possible.

[Confidential:

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We emphasise these costs will be minimised where the NMI Standing Data that is requested under this new channel is exactly the same data and format as provided under the CDR. We strongly advocate that they should be the same. Maintaining consistent data will also align with the rationale for this change, which is to allow customers to access NMI Standing Data under this new channel because this data is accessible under the CDR. We also consider consistent data and format will also help to reduce customer confusion that would result from receiving different data, if they were to request the same type of data via the CDR and under the NER channel.

2. Changes to Metering Data Provision Procedures

The proposed amendments seek to remove the reference to 'minimum requirements' for Metering Data to encourage convergence over time to a single detailed data format. We suggest that consultation with current users of this data (primarily brokers advising Large or Commercial & Industrial Customers) would be helpful to understand if the current formats provided by Retailers could be improved or require change.

Should you have any questions in relation to this submission, please contact me (Selena.liu@energyaustralia.com.au or 03 9060 0761)

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