



**ENERGY
CONSUMERS
AUSTRALIA**

A Suite 2, Level 20, 570 George Street
Sydney NSW 2000
PO Box A989
Sydney South NSW 1235
T 02 9220 5500
W energyconsumersaustralia.com.au
T @energyvoiceau
in /energyconsumersaustralia
f /energyconsumersaustralia

ABN 96 603 931 326

31 August 2022

Anna Collyer
Chair,
Energy Security Board

By email: info@esb.org.au

SUBMISSION TO THE ENERGY SECURITY BOARD'S DATA STRATEGY – INITIAL REFORMS CONSULTATION PAPER

Dear Anna

Energy Consumers Australia thanks the Energy Security Board (ESB) for the opportunity to comment on proposed improvements in access to existing data as part of their Data Strategy reforms. We appreciate the ESB listing Energy Consumers Australia as a Class A Body and look forward to any opportunities this may present to enhance our policy, advocacy and research functions.

Energy Consumers Australia is the national voice of residential and small business energy consumers. We advocate for a modern, flexible, and resilient energy system that meets consumer values, expectations, and needs. As an evidence-based organisation, we believe data and information-sharing has a crucial role in the transformation of this energy system.

In our earlier [submission](#) to the ESB's Data Strategy, we argued that data is an important tool for innovation and will be fundamental in ensuring the Post 2025 Market Design unlocks value for consumers. These initial reforms are an important first step towards this goal. Reliable and accurate data allows decision-makers and advocates to identify emerging issues, draft solutions and evaluate their impacts. The importance of this is only amplified in a rapidly changing energy industry where Consumer Energy Resources (CER) are already impacting the ways consumers interact with energy systems and markets.

In this Consultation Paper, the ESB has noted a number of issues which exist due to current data access arrangements. We agree that complicated regulations around sharing and accessing data has led to undesirable outcomes such as duplication of the data as it is collected by multiple bodies, workarounds and data gaps. We also note that the work being done by the ESB echoes efforts being made more widely within the energy industry to ensure knowledge and information are shared efficiently to avoid such issues and encourage collaboration industry-wide.

For this reason, we thank the ESB for the opportunity to be listed as a Class A Body. While, to date, we have not had reason to access the data referred to in this paper, we do see value in being included, particularly when considering potential future uses. We also welcome the development of AEMO developing a Data Services capability which we believe would enhance our ability to use any requested data in our advocacy.

We also note that the ESB's broader Data Strategy has identified a number of existing data gaps which make evaluating current consumer experiences and potential solutions particularly difficult. Of interest to us is the possibility that future reforms may improve access around usage, tariff and billing data. Without access to this kind of data, it will be difficult for industry to understand how consumers are responding to the rapid increase in CER or events such as those of recent months which have seen consumer bills rise dramatically.

While improved access to and sharing of data will provide numerous positive outcomes for both industry and ultimately to consumers who benefit from evidence-based policy and advocacy, there is, of course, a continued need to protect privacy. We support AEMO continuing to have power over when to release data and would expect that conditions surrounding its release and use are made clear to the body accessing it, regardless of their status as Class A or B. This includes any regulation around secondary disclosure for example to research partners or consultants.

Once again, we believe these reforms are an important step towards building a system that places consumer needs at the centre and thank the ESB for their consideration of Energy Consumers Australia as a Class A Body. If you have any further questions regarding this submission, please contact Alice Gordon at alice.g@energyconsumersaustralia.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lynne Gallagher', written in a cursive style.

Lynne Gallagher
Chief Executive Officer