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Australian Energy Market Commission
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Customer access to information about their energy consumption – Energy Conservation Submission on Rule Change Request

Energy Conservation is an energy and resource efficiency consultancy which provides business clients with analysis and audits to assist reductions in energy costs and consumption. We also operate as an Accredited Certificate Provider under the NSW Energy Savings Scheme. In our work we frequently need to contact electricity retailers on behalf of our clients to access energy consumption data. This data is an important resource for identifying how customers can reduce their demand during peak consumption periods and for establishing the most cost effective means by which they can achieve overall energy savings.

Energy Conservation welcomes the Standing Council on Energy and Resources Rule Change Request regarding customer access to information about their energy consumption. We believe that, by clarifying the information rights of customers and their authorized agents, implementation of the requested rule changes will improve the provision of timely access to energy data.

Our experience of dealing with retailers to obtain our customers energy data has been

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varied. In some cases customers already have on-line access to their data, energy brokers are able to provide quality reporting information, or retailers can supply raw data to authorized parties through a standardized process in a fairly short timeframe. However in other cases we have found that retailers do not respond to written requests and follow up through their call centres is required. In the worst cases, this has involved waiting for up to two hours on the phone to receive an inconclusive reply, followed by further extended delays before data is provided.

Additionally, our experience has been that retailers consider they have no obligation to provide customers with data about their historic consumption if the customer has subsequently changed to another retailer. This can make it impossible to assess a customer's consumption over a reasonable period for comparative analysis (eg 12 or 24 months). We believe that the customer is co-owner of their energy consumption data and should have the right to access this data regardless of what changes they choose to make in their retail purchase arrangements.

In regard to this point, Energy Conservation would like to raise the question of whether the proposed rule changes effectively ensure that retailers should provide energy data for relevant periods over the last two years to ex-customers who have changed their contract. The SCER rule change proposal refers to the desirability of clarifying this issue on page 7, but the actual rule change request in section 7.7 does not seem to specify that requirements for financially responsible market participants include any obligation regarding provision of data to former customers.

We would like to submit the following responses to some of the questions raised in the AEMC Consultation Paper of 8 May:

Q1&2 – Do you consider that the proposed issues to consider are appropriate for this rule change request? Are there any other issues that we should consider?

The proposed issues to consider are all appropriate. A broader issue to consider might be that steps to enable consumers and their agents to have easier access to energy consumption information should make the electricity system more efficient. By enabling better informed advice to consumers and more informed consumer choices, the rule change improves the potential to reduce consumer peak demand and to reduce overall consumption, thereby delivering a more efficient system which uses less unnecessary resources in terms of transmission and non-renewable fuels.

Question 3 Obtaining access to electricity consumption data

b) Should MDPs be able to provide electricity consumption data directly to customers or their agents?

MDPs should be able to provide electricity consumption data directly to customers or their agents. Independent MDPs, like independent energy efficiency consultants, do not have a vested interest in the volumes of power which a customer consumes and this independence may encourage a business model where MDPs, in their own right or in association with other independent service companies, can pro-actively work with customers to meter customer demand; inform customers of the volume and characteristics of their demand; and assist customers to interpret what the data means and to take measures to reduce their peak demand and overall consumption. Such a business model could provide greater market competition and customer choice and improve the efficiency of the electricity system in terms of avoiding unnecessary use of resources.

Over time there could also be cost benefits in allowing MDPS to provide data direct to customers and their agents, as they are well placed to support on-line access to metered data or direct interface by customers with their own meter. This point is discussed further in our response to Question 4.

Question 4 Minimum format requirements for electricity consumption data

a) What is the nature and magnitude of costs on market participants of providing data in raw format and summary format to their customers?

Assessing the current costs of providing data in response to email or telephone requests by consumers and agents is clearly a topic best addressed by the organizations responsible for the task. However we believe that as well as considering current costs, forward looking assessment should be made of the potential cost benefits of providing customers with on-line access to their energy data. Some retailers are already providing large customers with on-line access their energy consumption data and it would be technically possible to develop electronic platforms which would allow authorized parties – including customers or their agents – on-line access to available energy consumption data for any specific account. However the costs and security issues involved in developing a system enabling external authorized on-line access to the massive numbers of customer accounts managed by retailers or DSNPs may prohibit development of such platforms in the near term.

An alternative approach to facilitating on-line access is for MDPs to assist customers to extract data collected by their own meters in real time. Large scale roll-out of this method

of access would reduce the costs for other market participants in providing customers with energy data.

b) What information should be required in the summary data format?

Summary data should include:

- Total kWh consumed over the period requested
- Total kWh consumed by Time of Use period
- The five highest demand points in kWh and kVA over the period, with time of occurrence and power factor at time of occurrence

c) Should the NER stipulate a specific period of time in relation to which the electricity consumption data must cover? If so, what is the appropriate period of time?

To assure that data can be obtained which allows sound comparison of trends and analysis, 2 years of data should be available. However if requests are made for data covering shorter periods there is no need to provide a full 2 years.

Question 5 Time frame to respond to a request for electricity consumption data

a) Is 10 business days an appropriate time frame for market participants to respond to a request from their customers for their electricity consumption data?

Ten days is a reasonable and appropriate time for market participants to respond to requests for energy data. As suggested in answers to question 3 and 4, on-line access to energy data would enable immediate access.

Question 6 Fees payable by a customer

a) How often should customers be able to request their energy consumption information free of charge in the NERR?

Under current arrangements, the proposal that one free of charge request per billing period – ie quarterly or monthly – should be enabled is reasonable. On-line access would provide unlimited access to data.

Question 7 Time frame for making and revising the data provision guidelines

b) Should there be an obligation review these guidelines? If so, how often should such reviews take place?

Given rapid development of energy market offerings and technologies such as metering and data management software, there should be an obligation to review the guidelines every 2-3 years.

Question 8 Request from large customers to provide electricity consumption data

a) Should proposed rule 56A of the NERR only apply to small customers or should it apply to all customers, which would include large customers

Energy users should be considered co-owners of their consumption data. All customers have an equal right to prompt free access to their energy data and should be covered by the rule.

Question 9 Access by authorised agents or service providers to their customers' electricity consumption information

b) Beyond existing privacy laws, should the NER specify:

- **the nature of consent a customer must give to authorise a person to access its data –**

Any specification of "the nature of consent a customer must give to authorise a person to access its data" made in the NER should be limited to a high level statement of principle rather than a prescriptive statement. The extended process required to change a rule means that the rule is not a suitable mechanism for exact specification of the type of consent required for authorisation.

Question 10 Informing customers about the uses of their electricity consumption data

a) Is there a significant risk or problem in the NEM that necessitates the publication of standard information on the websites of retailers and DNSPs about how electricity consumption data is used? What are the benefits associated with this proposal? Are there examples where a similar approach has been applied in other industries?

Information of how electricity data is used would benefit from inclusion of positive statements about how consumers can use their own data. Rather than take a purely "defensive" position of outlining how other organisations use a customer's data, standard information should seek to educate consumers how analysis of their own data can help them to save costs and improve their carbon footprint.

Thank you for the opportunity to comment on the proposed rule change

Yours sincerely



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