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Data Standards Body

Submitted online: <https://github.com/ConsumerDataStandardsAustralia/standards/issues/103>

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AGL submission - decision proposal 103 - Electricity End Point URIs

AGL Energy (**AGL**) would like to take this opportunity to respond to the Data Standards Body (**DSB**) Technical Working Group decision proposal 103 on electricity end point URIs.

We strongly encourage the DSB to consider pausing on the technical consultations until the energy industry is provided the appropriate information from Treasury and the Australian Competition and Consumer Commission (**ACCC**) on the expected framework and governance structure for the Consumer Data Right (**CDR**) in energy.

While we appreciate the DSB's proactive intentions with this consultation, we consider it is premature to commence technical consultation when energy market participants beyond the Australian Energy Market Operator (**AEMO**) are not appropriately informed of the expected impact these technical data consultations will have on their business.

We encourage the DSB to establish energy working groups similar to those that have been established in the banking sector, to help ensure energy market participants are informed, engaged and consulted thoroughly on energy matters.

In addition to a lack of clarity and direction for energy CDR, we also note that the current environment and uncertainty surrounding the COVID-19 pandemic will impact stakeholders' responses. It has impacted our ability to fully consider the consultation at this time and we offer only limited responses.

Given the above points, we would strongly encourage the DSB to consider pausing these technical consultations until a later date, when Treasury and the ACCC have provided more information – and businesses adjust to a *new* normal amongst the COVID-19 uncertainty.

If you have any questions in relation to this submission, please contact Kat Burela on 0498001328 or at kburela@agl.com.au.

Yours sincerely

Elizabeth Molyneux
GM of Energy Markets Regulation



Industry name

We recommend the data standards body use <Electricity> for the data clusters in relation to industry naming conventions. As the DSB highlights in the discussion paper, utilities may be used more broadly in the economy and encompass other sectors such as water. Given water is unlikely to be captured by the AEMO gateway, we encourage a clear industry name be used.

Not all retailers sell both gas and electricity – and businesses are looking to diversify. As the market shifts and businesses move to multi-product / multi-service models (such as selling a mixture of financial solutions, energy and/or telecommunication services), the need for clear delineation of each designated sector and data set increases. We therefore consider it is appropriate to refer to this industry as <Electricity> to provide the appropriate level of delineation between the designated sectors.

Account

The consultation paper includes a summary of electricity account, metering and customer endpoints. The metering endpoint include electricity specific calls – e.g. GET /energy/electricity/site, however the electricity account endpoints do not include electricity – e.g. GET /energy/accounts.

We do not agree with a generic consent for plan/product information. These endpoints should be fuel specific in line with what is expected to be included in the energy designation (that it is applicable to electricity). As we note above, not all retailers are both electricity and gas suppliers.

The impact of implementing GET /energy/accounts is that it could potentially capture both electricity and gas – without gas being designated at this stage. This is another reason we support the industry name being specific to the designation requirements (e.g. electricity now, gas at a later stage).

One question for further consideration by the DSB is that accounts can have multiple meters attached - how can a customer know if they are splitting out different assets/meters?

Hardship data

The full scope of the designated datasets will be exposed under the ACCC Rules and/or draft Treasury designation instrument. Until such time, it is unclear where hardship information would be captured for exposure under these endpoints.

We recommend that hardship information is excluded from this process (at least in this first round), particularly in light of the current COVID-19 pandemic that will likely see an increase in retailer hardship program supports. Retailers are required to tell customers if they are on the right energy plan or if there is



a better plan for them when they enter the hardship program, meaning these customers are less likely to require switching services for the purposes of acquiring a better deal.¹

Alternatively, we encourage the DSB to consider hardship information as a separate dedicated endpoint given the sensitive nature of this information. Customers should have the ability to exclude their status as a hardship customer if they so choose. There is a data ethics and informed consent consideration on the inclusion of hardship data more broadly. In terms of data ethics, there is the risk of misuse or inappropriate discrimination of customers with hardship indicators. This information may be misused by those receiving it, as certain inferences about the customer's credit, payment capacity and financial situation can be made. The other aspect is that hardship is a time-based indicator, it has a start date and (for most customers) an end date, which are important factors when interpreting data.

If it is captured data, and requires a customer to consent to it being shared, it will be important that this is appropriately explained to a customer (e.g. with obligations on the accredited data recipient to call out in simple and concise language that the personal and/or financial circumstances of that customer may be inferred by including this information in the captured CDR data sharing).

Relationship assumptions

The decision proposal states that a customer must be an individual or business. As we have previously raised through consultations with various decision-makers, we believe that large customers (including multisite customers) should be excluded from the CDR in the energy sector for the following key reasons:

- Structure of the National Energy Consumer Framework (**NECF**) is for residential and small business customers and as such our mass market systems and arrangements are set up to support these two categories.
- There is greater parity in the relative bargaining power of large customers and energy retailers.
- Bespoke arrangements are developed for large and multisite customers (and as such there is not generally available offers in the market for the purposes of comparison).
- There would be significant costs for setting up new systems to store, manage and provide these bespoke arrangements, and thus requires a significant level of complex development to provide them in a consistent manner across industry.

We note that these customers also receive bespoke metering and billing data tailored to their business needs. Multisite customers have aggregated usages that tend to expand beyond the thresholds of traditional small customers (residential and small businesses). As with large customers, multisite agreements are negotiated with the retailer and the current energy arrangements between participants for these customers do not work in the same way as they do for residential and small businesses. The

¹ See Australian Energy Regulator hardship guideline - <https://www.aer.gov.au/system/files/AER-Customer-Hardship-Policy-Guideline-March-2019.pdf>



comparison aims of the CDR would not be workable for these customers, particularly given the type of product reference information that is available on EME and VEC (e.g. generally available offers for small customers). Information on thresholds is available on the EnergyMadeEasy website.²

We also note that the number of meters for large customers/multisite are substantial - how do you differentiate which meter on site the request is for? Further, meter types for large customers are different compared to residential and small business – they use sophisticated smart meters (generally referred to as Type 1,2 or 3) whereas residential and small business smart meters are referred to generally as Type 4.

Comments on current recommendations

- *Obtaining specific account information will not include personal or contact information*
- *Obtaining metering site information*

On the one hand, DSB is recommending that personal/contact information be excluded from a request relating to specific account information. On the other hand, DSB is suggesting that personal information may be inadvertently supplied through metering site information (e.g. customer address can be inferred).

We encourage a consistent approach in ensuring that customers have the ability to select what type of information is disclosed to an accredited third party. Customer choice around what data is disclosed to third parties is paramount and explaining inadvertent disclosures to customers would not be a simple task. We encourage DSB to be mindful of the most vulnerable customers – including those who are culturally and linguistically diverse (CALD) in the setting of any standards that may impact customer choice and **informed** consent.

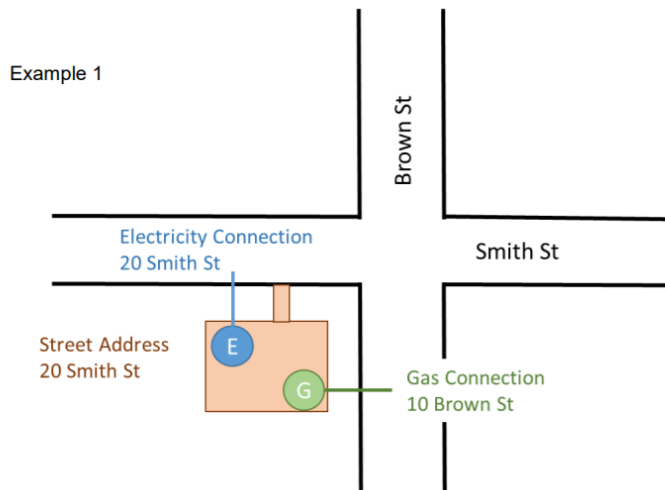
Defining the address

There are different types of addresses available (National Metering Identifier (**NMI**), billing (e.g. the address that the customer tells a retailer) and the address used by AusPost). The NMI address can be different to the billing address and again may be different to the records used through AusPost. This can be for a number of reasons including: multiple meters at one address, location of NMI physically away from the house, houses resting on suburb boundaries (cross over zone), where the customer provided information relating to suburb does not align with AusPost etc – see below examples.

Addresses can also relate to understanding the role of the DH - distributors may use the NMI address so they can read the meter, where a retailer will want the postal address of the customer so they can send a bill. The energy market has encountered several issues in the past regarding the recording of addresses against a customer account.

² <https://www.energymadeeasy.gov.au/get-energy-smart/energy-and-your-business/am-i-small-energy-customer>

Address examples and uses



Example 2

Real estate:	4/152 High St Elsternwick
Postal Address:	Unit 4, 150 High St, Ripponlea
Electricity Address:	4/150 High St, Elsternwick
Gas Address:	Unit 4, 150-154 High St, Ripponlea
All of these are correct and are for the same property	

Address inconsistency is a well-known issue, and a rule change was requested due to the known inaccuracies within Market Settlement and Transfer Solutions (**MSATS**). However, after considering the rule change request, the Australian Energy Market Commission (**AEMC**) did not make the rule change noting the cost and complexity to attempt to create a uniform standard.³

We envisage similar issues if a standard was attempted for the CDR and encourage flexibility on any chosen solution.

Products

³ See AEMC draft rule determination on improving the accuracy of customer transfers, 27 October 2016 which includes a table of address errors and assessment on whether an address standard would help alleviate these issues. The AEMC stated that the implementation of an address standard does not constitute a proportionate response to the issue raised in the rule change request. On balance, the costs and regulatory burden associated with implementing an address standard are likely to outweigh its limited benefits



We note the comments on GitHub from the Australian Energy Regulator (**AER**) regarding the use of postcodes or distribution zones. As highlighted by Jon Milne in his post on 17 March 2020 state:

partitioning is probably best handled within the payload. That way if a user wanted to collect all tariff data for a given retailer across all states/territories, then this can be done more efficiently. But it may also be worth considering partitioning further with an additional level below state/territory for more granularity for those who need it e.g. partition by state first, and then in those cases where it is relevant (i.e. NSW) option to further partition by supply area/distributor.

We agree with these comments and note that crossover zones (e.g. where distributor and postcodes overlap) are a known issue in the energy sector and can occur on jurisdictional lines/across postcodes. This can impact the product offers that a customer can see (e.g. through EnergyMadeEasy, Victorian Energy Compare, or retailer/third party websites). There are some overlaps with postcodes so these customers could be eligible for different offers (with different pricing). These matters will impact the way that product information is drawn and then presented to customers and need further consultation with the energy sector.

Considerations of *accounts* in energy

The *account* in the energy sector is different to an *account* in the banking sector. For banking, the account of the customer is associated with the product (e.g. a savings account, a debit account). However, in energy, the account is associated to the customer and can have many value propositions underneath it, this may be gas or electricity, but it can also include other products and services (such as telecommunications, data etc). As businesses diversify their models and service offerings, the concept of *account to customer* instead of *account to product* will become more complicated and the concept of *account* will introduce new challenges.

