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To The Treasury
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amaysim submission on Priority Energy Datasets Consultation (Consumer Data Right)

Introduction

This submission relates to the priority datasets that will be subject to the Treasurer's designation instrument pursuant to s56AC of the Treasury Laws Amendment (Consumer Data Right) Act 2019 (**CDR Act**) and is in response to the Priority Energy Datasets Consultation Paper published on 29 August 2019 (**Consultation Paper**).

amaysim aspires to be Australia's best customer-focused utilities service provider. amaysim is accordingly focused on developing innovative plans that put the customer first – access to quality data is key to achieving this. Our submission responds to each question asked in the Consultation Paper and contains suggestions (together with our reasons for them) for designating a number of datasets that will help to ensure the Consumer Data Right (**CDR**) is designed in a way that benefits Australian energy consumers.

We would be pleased to discuss this submission with you directly.

Background on the industry and amaysim

amaysim entered the energy market in 2017 when it acquired the Click Energy Group. We retail electricity and gas to over 200,000 residential and small business customers nationally.

amaysim is a tier two energy retailer offering innovative products in competition with the major energy retailers (including gentailers). Competition from tier two retailers is vital to ensuring a healthy energy market. As such information, data and innovation are key to the success of our business – setting us apart from other retailers in the market.

amaysim acknowledges that, as a retailer, it has access to all 6 of the priority datasets set out in the Consultation Paper. However, currently our access is provisioned via a multitude of systems and relationships including individual arrangements with metering data providers, access rights under the National Electricity Regulation for AEMO datasets and collection of data from customers and prospective customers themselves. These data arrangements are complex and often result in the provision of incomplete and low quality data. Further, participants in the energy industry currently refer to, understand and respond to common datasets in different ways. This lack of cogency results in participants disclosing data based on differing standards of quality, completeness and accuracy. An example of this is metering identification data – notably, the information from the current sources relating to meter number and meter type can often be inaccurate resulting in problematic

transfers between retailers and frustration for customers.

In contrast to the current data arrangements, the CDR regime will be purpose built for data-sharing – in this way, it is important that the CDR removes the road blocks and complexities associated with data sharing in the energy industry so that data can be harnessed to encourage innovation, foster competition and, most importantly, improve the customer experience. We encourage Treasury to ensure that the designation of the priority datasets does not rely on broad definitions of categories of data such as NMI Standing Data and Metering Data but rather is detailed and clear in its designation so that all participants are on the same page. To assist with this, we have provided a detailed example of how the priority datasets can be defined to ensure standardisation and consistency among data sharing participants in Annexure 1.

We acknowledge that an expansive designation of datasets will result in challenges for us (and other retailers) as a data holder (such as the cost associated with restructuring legacy datasets). However, it is our view that these challenges are outweighed by the potential opportunities that CDR presents by being able to access a larger pool of data in a more efficient and simplified way.

Responses to Consultation Paper questions

1 What other NMI datasets should be designated to support basic comparison and switching use cases?

Annexure 1 sets out the minimum data fields that should be designated to support comparison and switching use cases. These data fields are required to enable retailers to not only provide potential customers accurate and personalised quotes to ensure that they are receiving the best (and most relevant) plan but will also assist in faster and more efficient switching between retailers. In addition to the minimum data fields set out at Annexure 1, we recommend that the following data is also designated to facilitating faster switching times and improve the ability for retailers to recommend tailored plans to new customers:

- usage data by period of the day (peak, off-peak and shoulder);
- solar import data; and
- peak demand data so that retailers can adequately advise customers requesting demand management solutions.

Importantly, having access to this information improves the customer experience in four clear ways:

- it supports new retailers with onboarding – ensuring the right tariff, meter type and NMI are being provisioned;
- it enables retailers to 'personalise' energy plans ensuring that the customer is on the most relevant plan having regard to their historical energy use; and
- it ensures accountability and transparency in the market – putting control back into the hands of the customer; and
- provides consumers with a smoother and more accurate experience across the industry, improving customer sentiment and standardising the playing field across the industry.

Moreover, easy access to this information under the CDR will:

- remove the complexity of the MSATS regime and, by consequence, the various data quality issues currently observed by industry;
- enable data to be more ingestible and useable via an API (assuming an API is adopted); and
- give retailers more certainty and comfort in providing recommendations about suitable plans and pricing, knowing that the customer is actually asking us to explicitly

look at their data and give them a recommendation rather than having to draw inferences from incomplete data across various sources (if available).

2 What advanced use cases could be supported by additional NMI standing data fields, and what fields are these?

Our general view is that the more data that is shared among energy market participants, the better the outcome for the energy consumer. However, we wish to acknowledge that there should not be any obligation on data holders to provide:

- **Derived Data** – outputs or derivative works (such as reports, diagrams or analysis) that have been generated from the customers' raw data; and
- **Value Added Data** – data about an individual that has been combined with other datasets or information that has not been collected from the individual themselves.

For example, "base load" analysis may be of value to the customer, as this provides them information on how much their consumption is in a dormant household. However, this requires the retailer to generate a calculation based off the profiled usage at the customer level and this will involve additional analysis and cost to the retailer.

There are two key reasons we resist the designation of derived or value added data:

- it is difficult to extract derived or value added data from intellectual property, confidential information and other commercially sensitive information (including trade secrets). As such, the risk is that a designation of this data may stifle innovation in the energy sector as resources are diverted away from product innovation and into value added data analysis (for a purpose which is already achieved through the nominated NMI standing data fields). By contrast, we consider it would be appropriate to ensure that all organisations have access to the raw data that is required to generate these valuable insights and analysis to improve customer experience; and
- defining what raw data should be provided by a data holder is relatively black and white (ie it is or isn't the customer's metering installation type), whereas defining derived or value added data requires the data holder to make an inherently subjective determination as to whether that derived or value added data falls within the scope of what they are required to provide (ie is it an insight about the customer or is it an insight about the product). Uncertainty and lack of clarity as to the exact form data that should be disclosed under CDR has the potential to undermine the value of a standardised dataset and create inconsistencies in regards to data sharing practices among data holders.

3 Should the priority datasets designation cover all meter types? If not, which datasets should be outside the scope of the initial designation, and why?

We consider the priority datasets should have all metering types within scope. This is particularly important as each state and retailer varies in its read frequency.

It is particularly important that access to data from Types 4 and 5 meters is designated under the CDR. Currently, a 24 hour delay in receiving this information is common in the industry – despite the meters themselves being capable of being read every 5 minutes. The lack of real time data significantly reduces the ability to provide customers with innovative solutions that can act to interface with the market (such as local energy trading and demand management). While we are open to working with our metering data providers to obtain access to almost real time data for our customers, we believe that the benefits that can be generated from energy service providers having access to this information warrants daily meter reads being a designated dataset under CDR. By way of example, our subscription energy plans allow our customers to monitor their energy usage "near real time" via our customised amaysim app. We must disclose to our customers that there is a delay in their

usage record due to these 24 hour (or longer) industry delays. The ability for customers to monitor their energy usage "real time" not only keeps retailers accountable and transparent in their plans and pricing, it also empowers customers to alter their usage behaviour and see the immediate impact on the amount they pay for energy. This shifts the power imbalance currently seen in the energy market, back into the hands of the customer – enabling customers to make informed product choices.

It is also important that the CDR cover Type 6 meters as they still have the highest penetration in New South Wales, Queensland and South Australia. While we acknowledge that the granularity and therefore value of Type 6 meter data is significantly lower than their smart meter counterparts – it is still necessary for retailers to have visibility of Type 6 meter data for use cases such as comparison and switching.

An example use case for this data is our subscription energy plans (set out in detail in Annexure 2). To enhance our subscription energy plans for the benefit of our customers, we need:

- quick switching times, therefore increasing competition in the energy market; and
- the customer to be able to accurately compare our subscription plans with traditional plans based on actual consumption - reducing the risk of bill shock and ensuring energy consumers are not paying more for their energy.

4 What advanced CDR use cases might more frequent smart or interval meter reads support?

There are a number of potential use cases that are supported by more frequent meter reads, including:

- real time pricing by providing consumers with information that will allow them to respond to wholesale market prices and potentially "share" their kWh with other consumers through virtual power plant and local energy market solutions;
- developing innovative products that help the consumers to understand their household consumption on a granular level that may help change behaviour such as linking electricity price signalling directly to smart appliances. For example, encouraging/limiting users' ability to consume electricity within low demand timeslots by controlling the time they use their air conditioning or hot water systems;
- providing detailed customer information on electricity consumption patterns, enabling energy consumers to engage with their decisions to consume energy (including when, how and how much of it is consumed). Further, this would make it possible for retailers to sell more innovative and flexible plans (for example, depending on the time of the day, year or other external events such as the need to shed discretionary load); and
- encouraging consumers onto cleaner technologies that reduce pressure from the grid (for example the adoption of solar, battery storage and demand response technologies).

5 Would the proposed data sets support the use cases identified above? What other use cases could smart meter data support and what specific datasets would be required?

Datasets required for the above use cases are set out in Annexure 1. These datasets go beyond the NMI Standing Data proposed by Treasury.

In addition, we would also suggest the designation of aggregate datasets – ie datasets based on average/mean/median usage for local areas (ie by postcode or street), embedded networks and apartment buildings. This would enable modelling for testing virtual power plants and local energy market solutions.

6 How can the above privacy risks be balanced against the significant potential consumer benefits of supporting new use cases?

We acknowledge that data sharing carries with it significant privacy risks – this is a concern that we take very seriously. In particular, sharing granular consumption data can exacerbate privacy concerns as that data has the potential to reflect personally identifiable information.

In safeguarding against privacy risks, we support the use of privacy by design principles and consider that privacy should be considered in all stages of the CDR in Energy regime design process.

From a legal perspective, the Privacy Safeguards in the CDR Act and the current Australian Privacy Principles will act as a significant protection for the privacy of energy users. However, these principles are underpinned by consent of the individual and it is still not clear how authentication and verification will be addressed in CDR in Energy. A key question for us as a data holder is how will we ensure that the information we are asked to share about a particular individual has in fact been requested by that individual (particularly where the individual may not be the primary account holder)? There must be a standardised process that all participants must adhere to so that we are able to ensure that consumers trust all CDR participants. In this regard, we encourage Treasury to also consider the important work being carried out by various organisations, including the NSW Energy and Water Ombudsman in respect of protecting victims of family violence and the heightened importance of account authorisation and privacy in this context.

A key privacy consideration that must be weighed against the benefit to the consumer is what information a prospective retailer is able to access when someone is moving to a new house. To provide a realistic quote for movers, it would be useful to be able to use the consumption data of the new household. However, this data is not information about the mover. Rather, it relates to the consumption patterns for the individual about to move out. Should the retailer need to get the current resident's consent to use that information for the benefit of the prospective tenant or is it enough to rely on the fact that the data is deidentified (provided that the mover is not given access to the actual consumption data)?

We do not believe that Open Banking will provide all the answers here, particularly as banking has a very different authorisation and verification process currently – as such, we support further consultation on this issue. As a starting point, we encourage Treasury to include sufficient checks and balance requirements such that a data holder is:

- made aware of each data request;
- informed by whom that data request is made; and
- advised to whom the data is disclosed.

It is important that the industry is enabled to keep its customers informed when their data is being requested, used and by whom.

From a technical perspective, data protection and authorisation protocols should be agreed between industry participants as part of the design process of CDR in Energy to ensure that energy data is protected against unauthorised access. As a practical point, we do strongly encourage the use of anonymisation for datasets that can be used to easily identify individuals (for example, metering data as well as other key data sets such as tariff rates and GPS locations).

7 How long do retailers and/or metering data providers store metering data on a specific customer or site?

For CDR we suggest that access to 14-18 month profiles should be considered due to the seasonal nature of energy consumption. These 14-18 month profiles are extremely valuable for a number of use cases including:

- advising energy consumers on energy plans and plans that suit their actual annual

consumption patterns;

- modelling and testing new innovative plans to ensure success before bringing them to market; and
- providing accurate communications and compliant regulatory messaging to customers in regard to the most suitable plan for them based on their historical usage.

We also consider that it would be useful to have historical records tied to both customers and sites as this data can provide valuable insights into general energy consumption patterns over extended periods of time. We would suggest 5 years for metering data. However, we acknowledge that the cost of storage and security risk increase the longer data is retained. As such, we would suggest Treasury weigh up the benefits against the cost and risks for each data set individually to determine the appropriate timeframe.

8 Is there commercial value in allowing consumers to port their historic metering data (and other data as appropriate) to a new retail service provider when they switch to a new product? Are there other solutions that may be more appropriate?

We consider there is significant value in requiring the porting of historical customer data to a new retail service provider by a prospective or new customer. For example:

- historical metering data provides information about seasonal energy consumption which helps retailers in determining the most appropriate plan based on consumption patterns (ie peak/off peak favoured plans dependent on lifestyle);
- historical metering data creates the possibility to design personalised energy plans (ie switching between tariffs and subscription levels based on the season);
- historic metering data is also useful within the customer journey, in the event a consumer queries the accuracy of their meter read. This enables us to use previous readings to validate that the queries, which in turn helps with billing queries; and
- importing historical data allows for a better customer experience by allowing retailers to sell innovative plans faster and identify any change in patterns to a consumer profile. This knowledge can assist to lower short term tenure and improve commercial outcomes for industry.

We recommend that 14-18 months of historical metering data should be ported across when switching retailers.

An alternative to porting historical metering data could be for AEMO to hold the data on its own system (as is the case in the Netherlands under their data sharing platform EDSN) and allow the current retailer to have access to that platform.

9 What data do market participants use to on-board a customer and what data is required to support efficient switching between different retail electricity service providers?

The most important factor for onboarding is access to accurate, timely and standardised data at the individual meter level. The following information would also create efficiencies in the switching process:

- an industry standard set of identity verification data (including personal information and payment preferences such as credit card, PayPal and BPay). This would be useful when onboarding customers and importantly would save customers from re-entering their data;
- a dataset that identifies whether a meter/site is de-energised for non-payment. This would enable retailers to identify potential issues with customer credit as well as

observe issues in metering configuration;

- information about surrounding infrastructure to the meter (particularly outside of Victoria). For example, whether the meter is wall mounted, whether the site is an apartment block or standalone house and whether there are access issues. This would support manual meter reads and therefore switching times;
- additional information about the customer such as household size, consumption and billing frequency. This would be useful for speeding up the onboarding process, as currently these are questions we must ask the customer; and
- historical information regarding how many times the meter has churned. This would help us improve the customer experience and increase tenure based on improving their previous experience with other retailers.

Currently, information shared among industry participants (often by way of AEMO's MSATS database) is varied in detail, quality and completeness. In our experience, the major obstacle for switching has been the state of the MSATS database. As a result of the poor quality of data, we are often required to ask the onboarding customer for information. This reduces efficiencies and increases complexities associated with switching that results in a negative customer experience. As such, to avoid this problem going forward under the CDR, we encourage Treasury to be specific about the datasets that are to be designated and the parameters associated with the provision of the data (ie example datasets as we have set out in Annexure A) to avoid misunderstanding and confusion.

10 How is retail customer billing data shared between market participants now, and is there a general industry standard for billing information?

In practice, retail customer billing data is not typically shared between retailers directly, but is instead provided by customers by agreement (for example, as a part of a customised quote tool). We do recognise the right for every customer to get access to their historical billing records under the NERL, which they could in turn use to compare their own offers or provide to incoming retailers to inform personalised quotations. However, in our experience the number of customers that make use of this mechanism is low. We suggest that the CDR mechanism replace this right and provide a more realistic avenue for customers to get the benefit of data sharing without having to manually share that data themselves.

Retail billing data can help incoming retailers resolve customer complaints / queries regarding:

- a customer's first bill with the incoming retailer, as previous history can help the incoming retailer understand what read their last retailer billed them to;
- incorrect meter reads throughout the billing journey (particularly as manual meter readers can sometimes make mistakes during data entry);
- any payment arrangements or other requirements unique to a consumer to improve onboarding and minimise complaints; and
- any price rises or complicated discounts that the customer may have received previously but may or may not with their new retailer.

As a data holder, we sell innovative plans that will need to be specifically considered and catered for when designating particular datasets. The way these plans are structured make it difficult to provide detailed information without significant cost to the business. For example:

- our subscription energy plans utilises 'rollover', 'buckets' and 'top-ups' that can be purchased on an individual basis as compared to standard charges for usage and supply for large groups of customers; and
- bundled mobile and energy plans make it unclear what pricing information should be

given to what Accredited Data Recipient (ie if they have requested energy or mobile data).

We encourage Treasury to contemplate innovative and non-standard market plans when setting the granularity of the priority data sets, and allow for (as applicable) alternative data solutions where products and plans may not align with the standard data fields. This is important to ensure that the designation of datasets does not restrict the way that retailers sell energy – instead the designation should be flexible enough to accommodate all plans and products.

11 What consumer use cases might the priority designation of retail billing data support through the CDR?

Access to retail billing information promotes competition in the retail industry, on an individual level access to historical billing information can improve customer experience as it enables retailers to know more about their own customers 'energy journey' ensuring they can tailor plans to suit the individual customers' needs and provide data driven customer care.

In addition to the (what we consider essential) billing data set out in Annexure 1, we also suggest the following data be designated:

- usage data split by type for each billing period (peak, off-peak, controlled load 1, controlled load 2, shoulder etc);
- solar import;
- information relating to concessions;
- conditional and unconditional discounts offered to the customer;
- feed in tariff; and
- additional benefits offered by retailers (such as gift cards etc).

Current practice in the energy industry is to access a customer's credit information to build a risk assessment portfolio. This not only helps the retailer have visibility over bad debtor concerns but more importantly it ensures that:

- vulnerable customers are identified early and can be provided important information about our financial hardship policy, rebates and concessions, including the Utility Relief Grant Scheme;
- vulnerable customers are encouraged to take-up plans that best suit their personal circumstances; and
- we can proactively offer innovative payment solutions and payment plans to reduce bad debtor rates.

12 Would designation of all product data classes currently held by the AER and Victorian Energy Compare be sufficient to support basic comparison and switching use cases? Should product information tailored to individual consumers also be designated?

In addition to the VEC and EME data currently provided, we would also recommend the designation of the following data:

- if the customer is on a restricted product;
- any additional benefits other than decrease of rates (ie loyalty payments and incentives); and
- switching frequency in the last 2 years.

Access to this data would assist with use cases beyond just switching services. Having access to this information about the customer such as how often they have switched and actual household usage patterns (which we are able to derive from usage) is helpful to accurately assess comparative plans and make the onboarding process as seamless as possible for the customer.

As discussed earlier, data that is currently provided by the industry is variable in quality, detail and completeness. We encourage Treasury to be detailed in its designation of data. A clear example of this is retail product data. We have assumed this category includes price changes over time, discounting practices (when applied and how credits operate on a customer account), account credits and goodwill credits, rebates etc. In our view this is because an Accredited Data Recipient requires all these datasets to form a complete and accurate historical view of that customer.

Further, it is important that information be kept as up-to-date as possible – for this reason we suggest that the datasets be refreshed at least every few days, on a reasonable endeavours basis. 'Refresh' timeframes should be specified and tailored to the particular dataset as some datasets will require more frequent updating than others (for example retail product information may only need to be refreshed annually whereas metering data should be near real time).

13 What other use cases do stakeholders consider may be supported by the designation of the Distributed Energy Resources Register as a priority dataset?

The Distributed Energy Resources Register will support innovation in the distributed energy space, including virtual power plants and local energy trading. Importantly this will provide information about the technical characteristics of distributed energy resources such as the size, amount of energy stored by hour, make and model of different distributed resources such as such as solar, batteries and EVs. This information is valuable to retailers as it enables us to provide more tailored solar plans to our customers.

14 Does this table accurately map the holders of the various classes of data described in this paper? If not, what classes of data do you not hold, or what qualifications would you place on the categories of data held?

No comment.

15 What other datasets do stakeholders believe should be considered for future implementation? Is there a strong case for bringing implementation of these datasets forward?

We would like to see the following datasets designated at first instance:

- Gas metering and retail product data – access to this data would significantly support our bundled products, increase competition and innovation in the gas retail industry and ensure consistency of experience for all customers (this is particularly relevant to the onboarding process); and

- Embedded network data – access to datasets relating to embedded networks is crucial. Embedded networks are a rapidly growing sector of the market (ie there are just over 1,100 registered embedded network sites and 140,703 unregistered embedded network customers in Victoria alone[1]) and as evidenced by the recent AEMC

[1] https://www.esc.vic.gov.au/electricity-and-gas/licences-and-exemptions/electricity-licensing-exemptions/embedded-electricity-network-data-and-customer-numbers

rule change it is paramount that these customers have choice and access to competitive 'on-market' retail plans.

Conclusion

We support the objectives of the CDR in Energy and thank Treasury again for this opportunity to make this submission.

We would welcome the opportunity to discuss our recommendations with you. Please contact our Chief Strategy Officer, Alexander Feldman (whose email address has been provided separately) should you wish to do so.

Yours faithfully

Alexander Feldman
Chief Strategy Officer & General Counsel

Annexure 1 – Example data reporting

1 NMI Standing Data Fields

Data date	NMI	ADL (kwh)	Network tariff code	Control Load Present	Meter Type	Network
20/09/2019	31002131859	2.1	NEE001	Y/N	BASIC/COMMS/COMMS2 /COMMS3/COMMS4/COMMS4C/COMMS4D/MRAM/MRIM	SP AUSNET

2 Metering Data

Sourced for all meters from AEMO.

3 Customer Provided Data

Data date	NMI	Account number or unique identifier specific to retailer	Retailer	Full name	Email	Phone number	DOB	MOP	Invoice delivery method
20/09/2019	31002131859	516251235	Amaysim	Alex Smith	someone@yahoo.com.au	485654258	8/05/1990	DIRECT DEBIT/ CREDIT CARD / BPAY /POST PAY	EMAIL/MAIL

[FLAT_NUMBER]	[LEVEL_NUMBER]	[LOT_NUMBER]	[NUMBER_FIRST]	[STREET_NAME]	[STREET_TYPE_CODE]	[LOCALITY_NAME]	[STATE_ABBREVIATION]	[POSTCODE]	Concession status
1	2	5	253	Pitt	Street	Sydney	Syd	2000	Y/N

4 Billing Data

Data date	NMI	Account number or unique identifier specific to retailer	invoice reference	invoice date	trans description	unit quantity
20/09/2019	31002131859	516251235	2347196	20/09/2019	Off Peak Usage	2858

20/09/2019	31002131859	516251235	2347196	20/09/2019	Prompt payment discount	1
20/09/2019	31002131859	516251235	NULL	NULL	$50 Anniversary Rebate	1

unit rate	net amount $	tax rate %	reversed	transaction_start_date	transaction_end_date	start_read
0.03719	106.289	0.1	y/n	15/08/2019	20/09/2019	800299
NULL	10.62	0.1	y/n	NULL	NULL	NULL
	50	0.1	NULL	NULL	NULL	NULL

end_read	meter id	meter type
803157	4365	import/consumption
NULL	NULL	NULL
NULL	NULL	NULL

5 Retail Product Data

Data required for the Energy Made Easy website.

Annexure 2 – amaysim's new subscription product

In February 2019, amaysim announced that it had accelerated its investment in a new disruptive energy product suite, intended to assist in bringing much needed simplicity, customer centricity and transparency to the energy sector.

amaysim's new energy plan suite acts to remove many of the issues plaguing existing energy products and have now been launched in NSW, QLD and VIC. The energy market needs this type of innovation and businesses need CDR to be a regulatory framework which supports long-term investment for the benefit of consumers.

The new energy subscription plan suite have the following key features:

- plans are subscription-based and provide customers with a set amount of energy for a fixed monthly price;
- customers are able to retain the benefit of unused energy inclusions and know in advance the cost of top-ups if they need more energy in a period;
- customers receive notifications from amaysim if they would be better-off on a different plan (with less or more inclusions) and can monitor their usage relative to their inclusions online or on their mobile device;
- customers interact with the plan suite (and their energy usage) via the amaysim website or amaysim's smart phone applications, which is both empowering for the consumer and a step in the direction of the all-important CDR;
- the plan suite includes a fair and sustainable margin which does not bank on future price rises to remain viable (assuming relative stability of wholesale and distribution costs); and
- more customer centric features are in the pipeline for future roll-outs.