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Mr Hrishikesh Desai
Chief Data Strategist
Australian Energy Regulator

by email: NetworkVisibility@aer.gov.au

Dear Hrishikesh

Energy Security Board benefits of increased visibility of networks consultation paper – Submission

AusNet welcomes the opportunity to provide this submission to the Australian Energy Regulator (**AER**) on the Energy Security Board's (**ESB**) consultation paper on the benefits of increased visibility of networks.

We support the work the ESB has done so far, and the further work the AER will be progressing, on improving network data accessibility for decision making and informing future investment in new customer and generator assets.

In Victoria, distribution networks have access to rich dataset from a high penetration of smart meters, including power quality data that is not readily available from most contestable meters in other jurisdictions. This puts Victorian distributors in a favourable position regarding network visibility and ability to share useful data for our customers, communities, and other stakeholders. As a result, we have already significantly evolved our network data sharing frameworks in line with the proposed outputs from the consultation paper.

We discuss these in more detail below, while providing other relevant feedback.

LV network data and AusNet's Grid View portal

AusNet and other distributors have been sharing network constraints data with stakeholders through the Distribution Annual Planning Report (**DAPR**) for several years, which signals to non-network providers areas of network constraints and where non-network solutions may be considered as an alternative to network augmentation. This data is at the high voltage (**HV**) level, where most commercial customers and generators connect.

However, over time, we have received a growing number of requests for low voltage (**LV**) network data from communities looking at energy solutions at a localised level and for a small number of customers. The type of data requested is broadly aligned with the datasets provided in Figures 2 and 3 of the consultation paper.

In response, AusNet recently launched an online Grid View portal, which is accessible to registered users planning projects, or looking at connections, on AusNet's HV and LV network. The portal provides extensive network data and visibility which helps users understand areas of network constraint, growing customer and solar connections, voltage performance and similar. These datasets have been tested with key stakeholders for relevance and usability. Their overall feedback to date has been positive.

We would like to offer a demonstration of the portal to the AER as part of this engagement.

Expanding the LV network data set

We support further work on the type of data and granularity customers, communities and stakeholders may find useful, with the view of evolving our Grid View portal. However, we caution there are privacy limitations with sharing customer data broadly, even in an aggregated de-identified format. Any data that can be linked to one individual customer is private data and cannot be disclosed. Appropriate aggregation methods are required to reduce that risk—for example, any data for distribution transformers that have less than 10 customers as individual data points can be used to identify a single customer. Therefore, we do not publish aggregated data for distribution transformers that have fewer than 10 individual customers.

Of the proposed datasets in Figures 2 and 3, we note the network augmentation plans and the indicative annual deferral value can only be treated as guides, rather than indicators for commercial business decisions by communities and third parties. This is because network specifics can change frequently, especially in the LV network, and we cannot guarantee the currency of these values from the time when they are published—a proper assessment of augmentation plans and deferral values would need to be conducted for each project.

We would be interested to explore whether AusNet's current capabilities and experience to date are of interest to the AER as part of Phase 2 of the project (a formal pilot).

Cost-benefit analysis and formal classification of data provision as a distribution service

As data provision is inherently complex, with privacy and cyber security limitations, it can be costly to implement and maintain. We encourage the AER to undertake a cost-benefit analysis and usability assessment of the highlighted potential data sets in Figures 2 and 3 and the frequency at which these datasets would be required to be updated, prior to Phase 3 of this project (where the AER plans to propose a pathway for ongoing delivery of priority data sets to the market). This will ensure the framework is designed in a way that is meeting the needs of interested customers, communities and stakeholders while providing benefit to all energy consumers. The cost-benefit analysis should include consideration of how the data is delivered—e.g., whether a portal is more efficient compared to responding to individual user request.

Finally, given the demand for sharing of network data is growing and there can be costs associated with the provision of those datasets, we consider it important the AER formalise this as a distribution service that can be offered as a Standard Control Service (**SCS**) or an Alternative Control Service (**ACS**). We are currently engaging on this service classification with our key stakeholders, in preparation of our Framework and Approach paper proposal for the 2026-2031 regulatory period, due to the AER in October 2023.

Please do not hesitate to contact me or ▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇ about this submission, if you would like to review our Grid View portal or discuss Phase 2 of the project.

Sincerely,

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Sonja Lekovic
Regulatory Policy Manager
AusNet Services