

1 September 2023

Mr Hrishikesh Desai
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Dear Hrishikesh

RE Data visibility project - Network visibility (benefits of increased visibility of networks)

TasNetworks appreciates the opportunity to comment on the consultation paper developed by the Energy Security Board proposing the provision of data about the performance of low voltage (**LV**) electricity distribution networks to a variety of market and policy stakeholders. TasNetworks is the Distribution Network Service Provider (**DN**SP) in Tasmania and this submission focuses on the provision of the network information being sought by stakeholders.

Data availability

With levels of Consumer Energy Resources (**CER**) take-up by customers that are significantly lower than in other jurisdictions, much of the data stakeholders are seeking is not currently collected by TasNetworks. This may have flow on effects for some of the analytical metrics being sought by stakeholders, such as calculations of the network capacity available in any given locality to supply additional load or accept energy injected by customers.

It is expected that more data will become available in the future, gathered from advanced meters and the increasing use of sensors attached to network assets. TasNetworks supports the Australian Energy Market Commission's recommendation¹ that DNSPs be supplied with basic power quality data gathered by advanced meters, at no direct cost, as a major step forward for LV network visibility throughout the National Electricity Market.

However, for reasons of efficiency, it is likely that sensors will be only be deployed by TasNetworks in select locations around the network to investigate suspected power quality issues or constraints, meaning that some of the information being sought by stakeholders may not be available across TasNetworks' entire service area.

¹ AEMC, Review of the regulatory framework for metering services, Final report, 30 August 2023

Granularity and reporting intervals

The consultation paper notes that the data published by networks in support of Distribution Annual Planning Reports is insufficiently detailed to be of use to stakeholders and suggests that network data should be made available at the most granular level and shortest intervals possible.

However, much of the network performance data that is currently collected by TasNetworks is captured at an asset level, sometimes with multiple monitoring points for the same asset, meaning that it is potentially very 'granular'. Without an over-arching understanding of the network's topology to provide context, and a degree of aggregation in preparing the data for release, it may be difficult for stakeholders to draw meaningful insights from such granular data.

The provision of this contextual information is not necessarily a straight-forward exercise. For example, the topology of TasNetworks' distribution network is not constant, which adds an extra layer of complexity to the provision and interpretation of the contextual information needed to analyse raw network performance data. Tap changes can occur multiple times during the course of a year and there are population centres around Tasmania for which the feeder supplying the township can change on a seasonal basis. Asset replacement or network augmentation can also lead to changes in network topology as well as changes in the capacity of the network, which may complicate the analysis of historical time series. Capturing this variability in the data made available to stakeholders would add significant complexity to networks' obligations under the proposed data sharing arrangements, as well as significant cost.

TasNetworks also gathers some data at four second intervals using Supervisory Control and Data Acquisition (**SCADA**) services, which might be useful for the purposes of operating the network, but would generate an enormous volume of data if the proposal to provide stakeholders with network data for the shortest intervals possible were to be applied to its full extent. Further consideration of the intervals for which network performance data is provided to stakeholders is needed with all costs and benefits appropriately considered.

Customer confidentiality

There are commercial sensitivities for a number of large commercial, industrial and institutional customers throughout Tasmania. The provision of sufficiently granular network data to third parties might, in some situations, enable stakeholders with access to that data to deduce the load profiles and connection characteristics of those customers which would prevent sharing of that data.

Security of critical infrastructure

It is important that appropriate access controls and data protection measures are in place to:

- enable the secure provision of network performance data,
- ensure data does not include sensitive operational information, and
- make sure that only appropriately credentialed stakeholders are able to access the data,
- prevent the data being communicated to unauthorised parties.

Like other networks, TasNetworks is required to protect its assets and its critical customers. The due diligence, risk mitigation and governance measures required to ensure that the provision of network performance data to stakeholders does not compromise the security of those assets and customers is likely to involve investment by networks, as well as ongoing resources.

Costs and cost recovery

TasNetworks acknowledges the commitment in the consultation paper to addressing stakeholder information needs without increasing networks' costs, as well as the intent that networks not invest in additional equipment in order to provide the data stakeholders need.

Nonetheless, the measurement, capture, storage, management, retrieval, preparation and communication of network performance data to stakeholders in a secure manner is likely to require networks to incur potentially significant capital and operating expenditure on information and communications technology. For example, expenditure on the systems needed to extract and manipulate raw data to meet the granularity, timeframe and presentation requirements of different stakeholders, and fit that data to a standard schema.

Given that many of the use cases to which network-related data is to be applied relate to the installation and operation of CER, TasNetworks considers that it would be inequitable for the broader customer base to bear the cost of providing LV network data to market stakeholders, particularly when the primary beneficiaries are market participants such as aggregators, CER installers and advisers, and their clients.

With the consultation paper silent on the recovery of distribution networks' costs in providing LV network data to stakeholders, further work needs to be undertaken as part of the network visibility project to consider the mechanisms by which networks might recover the additional costs incurred in supplying market stakeholders with network-related data.

Once again, thank you for the opportunity to comment on the data visibility project. To discuss the views expressed in this letter, please contact Chris Noye, Leader Regulation, on [REDACTED] or at [REDACTED]

Yours sincerely



Chantal Hopwood
Head of Regulation