



Mr. Scott Farrell
Chair
Review into Open Banking in Australia
The Treasury
Langton Crescent
Parkes
ACT 2600

data@treasury.gov.au

Our Ref: JC 2018-061

23 March 2018

Dear Mr. Farrell,

S&C Electric Company response to the Review in Open Banking in Australia – Final Report

S&C Electric Company welcomes the opportunity to provide a response to the Treasury's review into Open Banking in regard to how this may apply to the energy sector in Australia.

S&C Electric Company has been supporting the operation of electricity utilities in Australia for over 60 years, while S&C Electric Company in the USA has been supporting the delivery of secure electricity systems for over 100 years. S&C Electric Company not only supports the "wires and poles" activities of the networks, but has delivered over 8 GW wind, over 1 GW of solar and over 45 MW of electricity storage globally, including several battery projects in Australia.

S&C Electric are particularly interested in facilitating the development of markets and standards that deliver secure, low carbon and low-cost networks and would be very happy to provide further support to the Treasury on the treatment and potential of emerging technologies and approaches.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Jill Cainey'.

Dr. Jill Cainey
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General Comments

We have already responded to the COAG Energy Council consultation “Facilitating Access to Consumer Energy Data – Consultation Paper”, which closes on 26 March. The COAG Energy Council – Energy Security Board issued a further data-related consultation on 20 March “National Electricity Market Data Strategy”, closing on April.

It is not immediately clear how these various approaches will link to form one cohesive approach for energy data in Australia and it’s not clear who has overarching responsibility for ensuring one consistent approach, although the Open Banking approach, via legislation, will over-ride most other approaches.

Facilitating Access to Consumer Energy Data outlines the processes, responsible parties, including the Australian Energy Market Operator to administer the scheme, and data elements that might be of interest. This represents a significant amount of work that has already made progress towards some of the aims detailed in the Review of Open Banking in Australia. Care is needed to ensure that the Recommendations in Chapter 2 do not compromise this initial approach.

Recommendations

The Recommendations detailed in Chapter 2, represent the high-level principles of data access and seem broadly appropriate for the energy industry, but significant consultation with energy industry, including the Australian Energy Regulator and the Australian Energy Market Operator, will be needed to determine the specific technical details of any regulations that would apply to the industry.