

EnergyAustralia submission: Data Standards Body Technical Working Group Decision Proposal 103 - Electricity End Point URIs

EnergyAustralia welcomes the opportunity to provide comment on the Decision Proposal 103 – Electricity End Point URIs (the Proposal).

While we appreciate this consultation, we strongly encourage the DSB to consider delaying the technical consultations until key policy decisions are made, at least on an in-principle basis, by Treasury and the Australian Competition and Consumer Commission. In particular, decisions on the priority data sets and the Consumer Data Right Rules (or a basic understanding of data flows, consent and authentication), would provide the necessary framework and assumptions for the technical consultations. In the absence of clear direction on these matters, industry will continue to raise questions that relate to these key policy considerations in the technical consultation. This would divert attention away from the technical aspects, and industry would then need to re-raise these issues with Treasury and the ACCC.

Our specific feedback on the Proposal is set out below.

Entity Relationship Assumptions

General comments

We highlight the importance of testing the Entity Relationship Assumptions (Assumptions) on page 2 of the Proposal with industry, to ensure that the Consumer Data Right (CDR) APIs are designed appropriately for the entire retail energy sector.

We emphasise that establishing the Assumptions is complex and not straightforward, due to:

- **Multiple concepts related to the “Customer”:** In contrast to the banking sector, electricity has more concepts which relate to the Customer – the person responsible for payment, the account holder, the NMI, and the persons consuming the electricity at a premises. The electricity market is designed around the National Metering Identifier (NMI), rather than a customer or an account which are concepts established by retailers. Further, as discussed below, there can be multiple people linked to an account in different capacities which makes it difficult to define the customer.
- **Different arrangements across retailers:** We set out EnergyAustralia’s views in this submission, but note that other retailers may have different arrangements regarding the concepts in the Assumptions e.g. customer, contracted plans, sites etc. These would likely be equally valid arrangements provided they are compliant with electricity market and other regulatory requirements. The CDR’s API design should be agnostic and accommodate all compliant energy retailer arrangements.
- **Exceptions/anomalies:** Energy retailers will be able to easily identify the typical customer arrangement for the Assumptions which will apply to the large majority of customers. However, there will be a group of exceptions or anomalies that will not align with the Assumptions. The DSB will need to test the magnitude of any exceptions and consider how the Assumptions reflect or de-scope them to avoid unintended consequences. We would suggest that some of the de-scoping decisions e.g. for unmetered sites, large customers, and off market embedded network connection points, are more appropriately dealt with in Treasury’s priority data set consultation. We understand that the next stage in this consultation is the Draft designation instrument which is yet to be released.

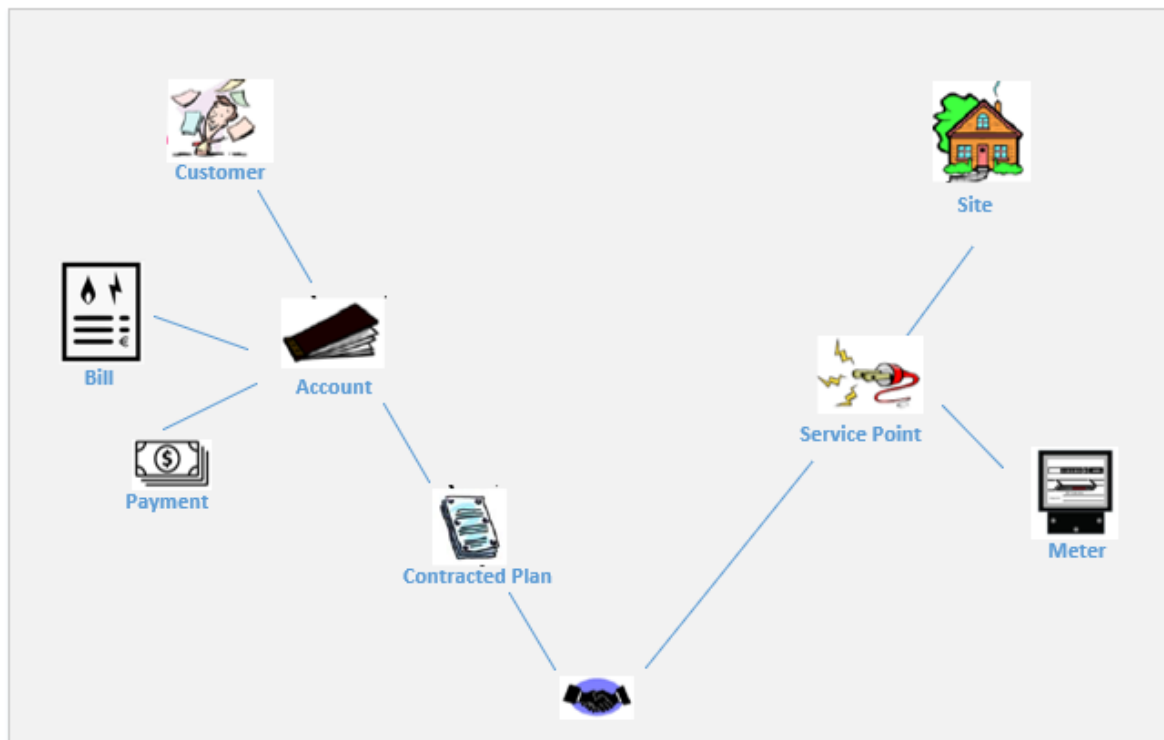
We also encourage the Data Standards body (DSB) to seek more engagement with the retail electricity sector if there are limited responses to the Proposal via Github. Workshops which allow for verbal discussion among electricity retailers would facilitate in depth consideration of the issues related to the Assumptions. Other consultations run by the DSB via Github may also benefit from verbal discussion.

Specific comments

Below is a diagram of EnergyAustralia's arrangements for the relationships between the relevant concepts. Please note:

- Contracted plan means contract rather than Account,
- A service point is identified by a NMI.
- Site means premises, not NMI.

This is our example of how the typical customer arrangements are set up for small, mass market residential and small business customers (where business accounts have not been aggregated into a single contract and bill i.e. not multisite accounts).



In the above diagram:

- A Customer can have one or more Accounts
- An Account can have one or more "Customers" associated with it (i.e. depending on how additional account holders are treated, see discussion below)
- A Service Point is associated with one Contracted Plan at any one time (so more including historical Contracted Plans)
- A Service Point can have one or more meters associated with it
- A Site (premises) can have one or more Service Points
- A Service Point is associated to only one Site

We broadly agree with the Assumptions set out in the Proposal on page 2 and 3, in the context of the typical small, mass market residential and small business customer, except for:

- Clarifications to the below Assumptions:

- Usage data is attributable to one, and only one, site (NMI) – while this statement is correct, it should be clarified that it is possible to have multiple streams of metering data for a NMI (i.e. under a NEM 12 data file) because of multiple meters at one NMI, and/or because of multiple data streams for one meter.
 - A contracted plan (i.e. Account) must have one, but may have many, associated sites (NMIs). EnergyAustralia’s typical arrangement is to have a one to one relationship between Account and NMI, but other retailers may have different arrangements.
 - Billing charges are attributable to one, and only one, contracted plan (i.e. Account) – While this reflects EnergyAustralia’s typical arrangement because billing charges are associated with one NMI which is associated with one account, this may need to be adjusted where a retailer has multiple NMIs associated with one account (as the one to one relationship does not apply across Account, NMI, and billing charges).
- Possible corrections for:
 - Exceptions/anomalies to the typical arrangement which should be considered/de-scoped from the Assumptions and the CDR designated data sets. For example, unmetered sites usually in the context of traffic and street lighting where the customer would be a local council.
 - Payments are attributable to one, and only one, customer
 - Current balance is attributable to one, and only one, customer

These last two points are discussed in turn below.

Payments and current balance are attributable to one, and only one, customer

Payments and current balance can be attributable to more than one customer, where there are more than one account holders assigned to an account; see below Account holder and Additional account holders – Financially responsible for payment and debt.

Account holders and additional account holders

For completeness, we have set out the different roles that people can have in relation to an account, both financial and non-financial, to highlight the difficulties in identifying who is the “customer”.

1. Account holder

Retailers typically have an account holder who has full control of the account to manage their electricity supply, and accountability for any debt that may incur on the account. Their name will appear on all bills and correspondence.

2. Additional account holders

Retailers may also have contractual arrangements to allow additional account holders to be assigned to an account, upon request and as approved by both the existing account holder and new additional account holder.

Additional account holders can be assigned varying levels of authority and responsibility. The below categories are an example only, different retailers may have different arrangements in place.

- Financially responsible for payment and debt: Person has the same level of authority as the Account Holder to manage the account e.g. arrange de-energisation and re-energisation. They may appear as a second person entry in the billing system. They are held accountable, alongside the Account Holder, for any debt that may incur on the

account. Their name appears on any bills and correspondence. They are also eligible to claim concessions/rebates.

- Fully authorised (not financially responsible) – Person can do everything on an account that the Account Holder or Financially Responsible person can, including arranging de-energisation and re-energisation service orders etc. However, this person is not Financially Responsible for the account and therefore not held accountable for any debt. Power of Attorney has this level of authority.
- Enquiry only (not financially responsible) – Person can discuss with their retailer and action the following: adding life support registration to an account, extend the bill due date, make balance enquiry, request general tariff/product information; request when the next scheduled read date is; discuss a bill/bill adjustment; apply a concession (if the retailer has the concession details); provide a credit card payment; raise a fault service order; make and record a payment and set up direct debit (but not responsible for the debt on an account).

Again, the above means that the Assumptions should be changed to reflect that payments and balance can be attributable to more than one person, in the case where the additional account holder is financially responsible. However, payments can be made by other persons who are not ultimately responsible for the debt (i.e. where they are fully authorised).

In addition to changing the Assumptions, we note that the above will be relevant in modelling how Joint Accounts are considered for data sharing authorisations for the CDR for the energy sector. We note the DSB's consultation regarding Joint Account Election and Authorisation which relates to the banking sector's implementation (released on 26 March 2020). While EA will consider this consultation paper, we consider that a separate consultation for joint accounts is required for energy given the different issues regarding energy data.

Other considerations

The DSB should consider if the Assumptions need to be designed so that the future design of the CDR can recognise family violence risk to people associated with an account, and related consumer protections. Family violence is relevant where there are multiple account holders and information may need to be kept secure from one account holder. Further, the inclusion of family violence information in account details, should be carefully considered and subject to more consultation given that this is sensitive information to the customer. Unlike the inclusion of financial hardship information (with the customer's consent) which is relevant to use cases relating to comparing electricity plans, there may be limited benefit in disclosing family violence information (unless it were to prevent disclosure of information that raises family violence risk).

Additionally, separate to the issues above, there are other non-financial roles recognised under energy regulation. For example, the National Energy Retail Rules recognises a "customer authorised representative" which allows a person to act on behalf of a small customer for the purposes of requesting energy consumption information. The Energy Retail Code recognises an "authorised representative" for the purposes of de-registering a life support customer on behalf of a customer.

Specific feedback on Electricity End Point URIs

We note that generally the proposed End Point URIs appropriately align with those established in asexml schema. We note some specific comments:

- On page 6 of the Proposal there are references to end points like "GET /energy/accounts/{accountId}/payment" and "GET /energy/electricity/site". Path resources should be in plural form for all resources e.g. payments instead of payment.
- The payment URI on page 8 of the Proposal is '/energy/accounts/{accountId}/payment'. However, the description only refers to payment method. Should this refer to payment details as well or should there be a separate URI for payment details? Further, the

description for the URI `/energy/accounts/billing` mentions payments and charges, which would appear to be more appropriate for the URI `/energy/accounts/{accountId}/payment`.

- In relation to the URI `/energy/accounts/{accountId}/billing` on page 9 of the Proposal, is "accountId" considered a PII data point (applied to other path parameters)? If so, please avoid (use synthetics) to avoid logging at termination SSL/TLS termination points
- The URI `/energy/electricity/sites` on page 10 of the Proposal has a title of 'Obtain a list of electricity meters'. Sites (or NMIs as defined by the Proposal) and meters are not technically the same.
- The URI `/energy/electricity/sites/{siteId}` on page 10 of the Proposal has a description that includes 'This end point provides detailed information for a specific meter'. Again, a site can have multiple meters so this should be changed to reflect this possible arrangement.