

Supporting consumers' access to their energy data

Position Paper

Efficient and timely access to smart meter energy consumption data and associated services, for both individual consumers and third party service providers they may engage (henceforth referred to as "Customer Authorised Representatives"), is critical for Victorian consumers to achieve the full benefits of the smart meter rollout and participate in the emerging energy market. Customers own their smart meter data and they need to be able to authorise others to use it in order to fully realise potential benefits. In particular, people facing poverty and disadvantage often require assistance from third parties to help them better understand and manage their energy usage in order to lower their energy costs.

We have an immediate and extremely low-cost opportunity in Victoria to enable third party service providers to make use of the distributor portals on behalf of consumers. This would significantly improve the uptake of innovative smart meter data services and deliver greater benefits to Victorians faster.

Why is smart meter data important?

Since 2009, Victorian small energy consumers have been paying in the order of \$25 to \$50 per quarter extra on their energy bills for the Victorian Advanced Metering Infrastructure (AMI) program.

At the start of 2016, these costs total around \$1,000 each for 2.5 million households and other small users.

From a consumer perspective, besides the system operational benefits of remote reading, remote disconnect/re-connect and related services (benefits that are yet to be realised by many Victorians), the key benefits of smart meters are:

- at the system level: better granularity of energy consumption data, allowing for more cost reflective pricing; and
- for the end-user, the use of that detailed data for deeper understanding of consumption patterns, and for financial benefit (bill reduction) through retailer switching and optimisation of energy efficiency and other energy management measures, pursued by the consumer directly or financial counsellors and energy services providers on their behalf.

The latter is not only important to individual consumers in managing their day-to-day energy use, it is critical in the context of ensuring effective competition in the Victorian energy market.

The retail component of Victorian offers - in particular, those associated with standing offers in which disengaged consumers are overrepresented¹ - remain inexplicably high²; around double those of other jurisdictions.

¹ https://www.vinnies.org.au/icms_docs/221190_Victorian_Energy_Prices_July_2015.pdf

² <http://www.esc.vic.gov.au/getattachment/fc947897-7d4f-4772-97c9-959e3baad0db/If-the-retail-energy-market-is-competitive-then-is.pdf>

At the same time, many new technologies in energy efficiency, demand management and distributed generation have fallen in cost on a per-kWh basis to below the level of retail tariff rates. The uptake of these is a relatively easy way to drive down costs for Victorian energy users.

Access to Data: NEM-wide

The Australian Energy Market Operator (AEMO) was tasked with developing a procedure for Customer Access to Data which came into effect on 1st March 2016. Consumer organisations and Customer Authorised Representatives engaged in the process were frustrated by AEMO's reluctance to support a comprehensive outcome that meets the National Electricity Objective to promote the long term interest of consumers.

Despite strong submissions from a number of consumer organisations and Customer Authorised Representatives in relation to verification, data formats (both summary and detailed), consumer engagement and the process governing data acquisition, AEMO have put forward a path:

- of minimal intervention, without standardisation of data formats or verification processes;
- that will still result in a highly inefficient and ineffective process for Victorian consumers and their Customer Authorised Representatives to access their AMI data; and
- that does not provide guidance on issues of capturing and auditing consumer consent between Customer Authorised Representatives, retailers and distributors

The final link in the supply chain to allow information flows between consumers and their smart meters and “unlock” the value of the AMI program for Victorians, **is not enabled by the AEMO process.**

Access to Data: Victoria-wide

As at May 2016, three out of five³ of the Victorian distribution network businesses have introduced web-portals through which consumers can access their energy consumption data. These are useful tools however require the customer to have a level of understanding of the electricity industry and a degree of technical sophistication that many consumers do not have.

Our experience with consumers who are interested in obtaining their energy consumption data for purposes of price comparison, for example, is that many are unable to easily do so. Even technologically savvy consumers find the process confusing and prone to error. For example:

- a) Consumers who save data on Macs rather than PCs can inadvertently change the file format, rendering it invalid for comparison sites;
- b) Obtaining data via a portal is a long process (more than ten minutes) for a customer who doesn't actually want the data in itself, but rather wants to compare their energy plans.

Jemena and United Energy have a single portal which does not enable Customer Authorised Representatives to legitimately access data on the customer's behalf⁴, due to:

³ Jemena, UED, AusNet

⁴ Refer to Appendix.



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- i. terms and conditions requiring the applicant to be the inhabitant of the property; and
- ii. a sign-up process which involves a confirmation email sent to the consumer's email address.

AusNet Services has two portals:

- 1) A customer portal which excludes Customer Authorised Representatives from using it, similar to Jemena and UED above, and
- 2) A portal specifically designed for Customer Authorised Representatives. However this portal currently requires a "wet signature" consent form to be signed by the customer (despite this not being required on their customer portal) and as such does not facilitate *easy* access to data for a consumer going through this process.

CitiPower / Powercor do not currently have a portal but we understand that they are releasing a portal in mid-2016 that will address the issues raised above⁵.

In summary, whilst Victoria has self-service capabilities for access to meter data across the State, **in practical experience this does not yet translate to easy access for all consumers.**

Issues for Consideration in a Proposed Solution

Security

It is important that security and privacy of consumer personal information is safeguarded. By enabling Customer Authorised Representatives to register on a consumer's behalf, *using the same information as a consumer would require if doing it themselves*, the same security provisions are kept in place. Currently, a malicious individual could impersonate a consumer and register directly on a distributor web portal, armed with the NMI, meter serial number, address, consumer name and phone number. This does not change if Customer Authorised Representatives gain the ability to register on a customer's behalf.

Note additionally that the two impediments (terms and conditions, and email confirmations) that currently exist for Customer Authorised Representatives on distributor customer portals do not add any additional security to deter a malicious individual – such a person would ignore the terms and conditions and would simply create a new email address (note that the email address is not validated by the networks as they don't possess that information). The impediments simply affect legitimate authorised representatives.

Consumer Consent

We believe that consumer consent to usage of their energy consumption information is important and that the responsibility and accountability for obtaining and storing consumer consent lies with the Customer Authorised Representative obtaining it. A distribution network cannot effectively and cost-effectively police this, and any attempt to do so negatively impacts consumers' ability to *legitimately* obtain their meter data via Customer Authorised Representatives.

⁵ Based on a meeting on 11 April between David Rofo (CitiPower), Peter Wallace (Powercor) Damien Moysse (ATA), Dom Mendonca (Energy Tailors)



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For example, requiring Customer Authorised Representatives to provide a “wet signature” of a consumer does not provide any additional security, as the distribution network does not have the signature of the consumer to validate against in the first place. Yet it forms a significant barrier for innovative Customer Authorised Representatives trying to reach as many consumers as possible.

As such we believe that Customer Authorised Representatives should be responsible for obtaining and storing Explicit Informed Consent⁶ from a consumer, in a process approved by the network business based on their own process for obtaining explicit informed consent. This would be a requirement network businesses place on Consumer Authorised representatives as a condition of using their service, and is necessary because currently Customer Authorised representatives are outside the scope of the National Retail Law and the Victorian Energy Retail Code. which Explicit Informed Consent can be obtained in person via a wet signature, over the phone via a voice recording, or over the internet via a checkbox which must be clicked before continuing (this is the same approach as Victorian networks take when obtaining direct customer consent for their customer portals currently), and would be able to be provided to the network businesses for verification on request. Customer Authorised Representatives would, *only upon initially engaging with the Victorian networks*, agree that they would do so in order to use their service.

Recommended Solutions

We believe that this situation could be remedied in Victoria with minimal cost impacts to industry or consumers. We propose two options:

Option A:

The web portals already developed by the Victorian networks could be enhanced to enable Customer Authorised Representatives to register on behalf of consumers. In particular:

- a) The text in the “Terms and Conditions” requiring the applicant to be an inhabitant of the property should be widened to include Customer Authorised Representatives acting on an inhabitant’s behalf.
- b) The sign-up process should be able to be legitimately completed by the third party without requiring the inhabitant to access their email account to verify.

The Victorian networks could develop a mechanism for third parties to authenticate themselves and log onto the website, and then submit via the website the same verification information required by the consumer when registering directly. The consumer’s meter data would then be returned to the Customer Authorised Representative and an audit log kept. It would be the Customer Authorised Representative’s responsibility to obtain and store customer consent, which could be provided to the network on request.

Option B:

⁶ Explicit Informed Consent is defined in the National Electricity Rules.



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Alternatively, Victorian networks could develop a separate Customer Authorised Representative portal or avenue for Customer Authorised Representatives (as distinct from the customer portal)⁷. This Customer Authorised Representative portal would enable and require the third party to:

- a) Attest to terms and conditions, including that they are a registered third party and that they have the customer's consent;
- b) Enter credentials authenticating themselves as a registered third party (via a pre-arranged username and password)
- c) Enter the same verification information required by the consumer when registering directly
- d) Either enable the network to request for proof of customer consent from the third party OR provide the proof of customer consent as part of the request (whichever form of consent is appropriate given the channel that the customer has gone through – either voice, internet or in person)
- e) Gain access to the consumer's meter data upon successful registration

The benefits of both these approaches are:

- a) The IT development required is very simple⁸;
- b) There is no lessening of security under this approach, security information is required of Customer Authorised Representatives just as for individuals;
- c) An audit log can be kept of Customer Authorised Representatives registering on behalf of consumers. There is a measure of control that the networks have in terms of notifying consumers when registrations have taken place;
- d) A third party must enter all the requisite information for registration to a customer's account, when they want to login to see that customer's details. Therefore if the third party's security credentials were compromised, this does not of itself compromise all consumer data.

In conclusion, we see easy access by Customer Authorised Representatives to energy consumption information on behalf of a consumer as a critical pre-requisite to enabling consumers to realise the benefits of smart meters through innovative services. We believe that this could and should be very simply enabled in Victoria through minor enhancements to the distribution network web portals.

(insert signatures here)

⁷ This might be an approach that AusNet Services, who have already built a Customer Authorised Representative portal, might take.

⁸ Noting that the entirety of the Jemena/UED portal was built for approx. \$300,000, presumably the enhancement to enable Customer Authorised Representative registration on a customer behalf would be a very small fraction of that cost, multiplied across three web portals.



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Appendix: Registration Processes of each distributor

JEMENA:

Required Information to Register:

- NMI, Meter serial number, phone number, address, Customer name

Problematic Terms and Conditions:

- Clause 3: "In submitting a registration request, you represent that you are the occupier of the premises connected to the smart meter nominated in your registration details in respect of which you are requesting access to energy consumption data"
- Clause 6a: "You are provided with access to the Portal and/or IHD only for your personal use. "
- Clause 6e(1): "You must not attempt to use or misuse the Portal and/or IHD: for any unauthorised commercial purpose;"

Confirmation Email required?

- Yes, requires an email (username) to be provided up front, to which a confirmation email is sent. Upon clicking the link in the confirmation email, registration can continue

UNITED ENERGY:

Required Information to Register:

- NMI, Meter serial number, phone number, address, Customer name

Problematic Terms and Conditions:

- Clause 3: "In submitting a registration request, you represent that you are the occupier of the premises connected to the smart meter nominated in your registration details in respect of which you are requesting access to energy consumption data"
- Clause 6a: "You are provided with access to the Portal and/or IHD only for your personal use. "
- Clause 6e(1): "You must not attempt to use or misuse the Portal and/or IHD: for any unauthorised commercial purpose;"

Confirmation Email required?

- Yes, requires an email (username) to be provided up front, to which a confirmation email is sent. Upon clicking the link in the confirmation email, registration can continue

Consent Agreement:

- Seems to allow for Customer Authorised Representatives
-



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“You must check this box to proceed. By checking this box, you confirm that you are the owner-occupier of the premises connected to the meter nominated in your registration form. If you are not the owner-occupier, you confirm that you have obtained consent from the tenants of the premises to access the metering and electricity data relating to that premises. You also acknowledge that you have read the end user terms of use and understand how we handle your personal information.”

AUSNET SERVICES:

Customer Portal:

Required Information to Register:

- NMI, meter number, site address, customer name, email address, phone number, DoB (as security question for lost password), Free-form question and answer (as security question for lost password)

Problematic Terms and Conditions⁹:

In “Registration”:

- “In submitting a registration application, you warrant that you are the occupier of the property nominated in your registration details in respect of which you are requesting access to energy consumption data.”

At end of reading terms and conditions, tickbox to confirm:

“I [Customer Name] confirm that I am the authorised account holder and accept these Terms of Use”

Confirmation Email required?

- Yes, requires an email to be provided up front, to which a confirmation email is sent to confirm registration.

Customer Authorised Representatives Portal:

This portal has been developed by AusNet Services for Customer Authorised Representatives to submit meter data requests. This portal automates part of the process of obtaining customer data however still requires wet signatures by customers and manual action by AusNet Services once the request has been submitted. Hence this does not solve the issues identified in this paper of easy access to data.

CITIPOWER / POWERCOR

Based on conversations with CitiPower / Powercor, we understand that they will enable Customer Authorised Representatives to obtain consumer data upon providing the required authorisation information. We understand that this is:

- NMI, meter number, site address, customer name

⁹ We understand from AusNet Services that this is on purpose – that is, the portal is intended purely for direct customer access, not for access by Customer Authorised Representatives
