

Submission on Discussion Paper

Introduction

Accenture is delighted to respond to the Department's discussion paper: *Technical Guidelines for the Estimation of Greenhouse Emissions and Energy at Facility Level*. In particular we have provided a response to the statements in section 1.3 Online System for Comprehensive Activity Statement reporting.

Our Response to section 1.3

We strongly believe that the Commonwealth should enable an online solution for the reporting of activities, and we are pleased to see that this is reflected in section 1.3 of the paper.

We understand and acknowledge that the OSCAR system is already developed and has been used to support the Greenhouse Challenge programme for some time, and as such represents a solution that may contribute towards the final solution. However, Accenture would like to suggest that there are several additional elements should be considered when determining the final solution(s) to enabling online activity reporting. These are discussed below.

Whole of Government Authentication Solution

The Australian Government has invested (and is investing) in a common authentication and identity solution associated with the submission of confidential information from Business to Government. Pioneered by the Australian Taxation Office, this authentication and security solution has been developed to ensure a high degree of certainty in the identification of the originator of a communication from a specific business (and its authorised officers). This solution is currently being reviewed as a potential pre-cursor to the broader online security and authentication solution for the Standard Business Reporting (SBR) programme.

We note that in section 1.3 of the discussion paper that a 'logon and password' for OSCAR can be obtained from the industry advisor. While use of a 'logon and password' will provide a level of security, it is by no means as comprehensive as the PKI and digital credential enabled solutions already in place for other areas of business to government interaction and is inconsistent with the stated direction of online policy.

Accenture believes that the Commonwealth should consider using the common security and authentication solution (as deployed by the SBR programme) for the reporting of activities as defined in the discussion paper. As the SBR becomes the standard way that most businesses interact with Government, a failure to integrate with a common security and authentication solution could become an area of criticism; especially in an environment of additional red-tape as necessitated by emissions and energy use reporting.

Business Systems Integration

Accenture anticipates that as the AETS (Australian Emissions Trading Scheme) is deployed in full, that many businesses and companies will seek to integrate activity reporting obligations close to, or within, the same area that will manage their investment in Emissions Permits or Sequestration Credits; mostly likely within Corporate Finance or Treasury units.

As such, it is easy to envisage situations where businesses will seek to consolidate and aggregate emissions and related activities data for their own commercial purposes and that

Submission on Discussion Paper

they will, therefore, seek to invest in information technology solutions that provide this capability. Indeed the major financial and enterprise systems vendors have already commenced to market relevant functionality.

Accordingly, Accenture recommends that the Commonwealth consider enabling a 'System to System' solution (in addition to the existing capabilities offered by OSCAR) that would allow business and companies who have or will invest in such technology, to use these solutions to report their emissions or energy activities to the Government. Such a solution would allow businesses or companies to directly submit data to the relevant Government agency without the need to manually 'login' to a solution like OSCAR, and would allow them to avoid the cost and potential for error in transcribing activity data from internal systems into OSCAR.

Many contemporary examples of direct System to System solutions exist in other areas of business to Government reporting. For example, Medicare Australia has for many years operated solutions which leverage the data entered into medical practice and hospital administration systems for claiming, and the ATO has invested heavily in similar solutions for business taxation and activity reporting (e.g. Business Activity Statements).

Benefits

By combining OSCAR with a 'whole of Government authentication solution' and the option of a 'System to System' interface (for those businesses that have appropriate technologies), the Commonwealth will be aligning the new arrangements for emissions and energy reporting with the direction taken by other agencies and with the broader initiatives underway to reduce the red tape burden for business in reporting to Government; most notably the recent investment by in the SBR programme. And, by taking time now to develop a consistent and comprehensive technology strategy with respect to this new reporting obligation, the Commonwealth will likely reduce the risk of creating avoidable red-tape, will promote greater acceptance by business and will help all stakeholders, both internal to Government and externally within the Australian business community, plan future investments in this area with confidence.

Submission on Discussion Paper

About Accenture

Accenture is a global management consulting, technology services and outsourcing company. We are focused on delivering innovation, and collaborate with our clients to help them become high-performance businesses and governments. Accenture has industry and business experience, global resources and a proven track record of success. Accenture offers a wide range of services including:

- Management Consulting;
- Systems Integration;
- Technology Consulting; and
- Outsourcing.

Accenture has practice areas dedicated to the delivery of services across five major industry groups including:

- Public Service (Government);
- Financial Services;
- Resources (and Utilities);
- Products (and manufacturing); and
- Communications and High Technology.