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Consumer Data Right Division

Treasury

Submitted via email to **data@treasury.gov.au**

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Consumer Data Right (CDR) – Draft energy rules and proposals for further consultation

AGL Energy (**AGL**) welcomes the opportunity to provide a response to the paper, CDR in the energy sector: Proposals for further consultation, August 2021 (**Consultation**), and feedback in relation to the proposed amendments to the *Competition and Consumer (Consumer Data Right) Rules 2020* (**General CDR Rules**) as set out in the *Competition and Consumer (Consumer Data Right) Amendment Rules (No. 2) 2021* exposure draft dated 17 August 2021 (**Draft Energy Rules**).

AGL is a leading integrated essential service provider, with a proud 184-year history of innovation and a passionate belief in progress – human and technological. We deliver 4.2 million gas, electricity, and telecommunications services to our residential, small and large business, and wholesale customers across Australia.

AGL has been a consistent and vocal supporter of the CDR regime as an economy wide model that enables consumers to have access to, and control over, data that directly relates to them. This should underpin industry innovation in service delivery both within and across the CDR sectors. The key to the success of CDR is consumer awareness and confidence in using the system. We have only one chance to get this right and it is critical we undertake a fulsome analysis and provide appropriate time for industry to properly set up the CDR eco-system. Failure in the framework design and implementation will have negative consequences for consumer trust.

After a lengthy delay in releasing and no visibility in the development of the Draft Energy Rules, we are disappointed with the short consultation period for energy retailers to respond to significant and impactful changes to our industry and businesses, and the lack of flexibility to accommodate an industry wide extension following feedback to that effect.

AGL, as with all energy retailers, is subject to a vast number of energy reforms across the wholesale and retail markets in the National Electricity Market (**NEM**), which is consuming available finite resources and impacts the capacity to respond to consultations. This has been exacerbated by COVID-19 impacts with a majority of our workforce in lock down and working from home. These are difficult times for businesses to navigate and policy makers need to be mindful and adjust accordingly to enable proper engagement on important economy wide reforms such as CDR.

As a result, our response is high level though with some important views and recommendations on the proposals detailed in the Consultation and we encourage Treasury to focus on getting the rules right following energy sector feedback, rather than meeting a deadline that is not based on any project management assessment for finalising the Draft Energy Rules.

As always, we are happy to engage further and discuss any issues or questions arising from our response. Our response is expanded upon in the Appendix, in brief we recommend:

- **Extension to *tranche 1 date*[1]** – we request an extension to the go live date for listed *initial retailers*[2] (Tier 1 energy retailers) from 1 October 2022 until at least 1 July 2023.
    - We recommend Treasury seek a detailed planning Gant Chart from AEMO to be made available to retailers to review and consult on the delivery timeline to fully implement CDR. This mapped engagement approach will ensure an implementation date is set that is achievable rather than a guess-estimate of a date. We believe 1 July 2023 provides a higher probability of implementing a well-functioning energy CDR framework and therefore a lower risk of having a negative customer impact, as opposed to 1 October 2022.
    - With the Draft Energy Rules yet to be finalised and with significant industry concerns to be addressed, we advise that, even if the Draft Energy Rules are enacted by the ambitious target of November 2021, a period of under 11 months is simply not enough time within which to implement significant systems and business changes, including allowing sufficient time for market testing of systems with AEMO and Accredited Data Recipients (**ADR**). The current implementation timeline increases the risks for the delivery of a CDR energy ecosystem which could result in poor customer outcomes and an overall lack of consumer trust in CDR.
- **Limitation on which NEM retail customers are eligible CDR consumers** – we strongly recommend that a limitation excluding large customers be placed on the NEM retail customers which are eligible to access the CDR regime.
    - We propose that this limitation align with AEMO's market classification requirements of large customers set out in the Market Settlement and Transfer (MSATS) Procedures[3] which all retailers' systems in the NEM comply with.
    - In addition, we recommend those customers who receive supply under a C&I contract and those customers part of a "collective billing arrangement[4]" be excluded from the definitions of *eligibility* and *eligible arrangement*[5] in the Draft Energy Rules.
    - We believe this is appropriate as the priority customer segments, all residential customers and the majority of small and medium enterprise customers (**SME**), would fall outside these excluded groups, and have access to the CDR regime. This supports the project principle used by Treasury and the ACCC in establishing the banking CDR framework and should also be used in the energy rules, being the development of minimum viable product (**MVP**)

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[1] As defined in the Draft Energy Rules, Schedule 4, Part 8, rule 8.1
[2] As defined in the Draft Energy Rules, Schedule 4 Part 8, rule 8.2
[3] https://aemo.com.au/-/media/files/electricity/nem/retail_and_metering/market_settlement_and_transfer_solutions/2020/msats-procedures---cats-v48.pdf?la=en and refer to the NMI Classification Code which distinguishes large customers from small customers across jurisdictions, page 42.
[4] A collective billed customer refers to a large use customer (parent account holder) who has multiple sites (each being a child account) which sit under this account holder's umbrella contract with the retailer. The parent account holder negotiates the energy supply on behalf of their child account holders even though these may be separate businesses, such as franchises. The franchisees may have limited access to things like energy bills and consumption data for their franchise or location but do not have account management access, like changing the umbrella product and service offering.
[5] As defined in the Draft Energy Rules, Schedule 4, Part 2, rule 2.1(1) and (2)

for tranche 1. Beyond the MVP, extending the CDR framework should be based on careful consideration on current arrangements and whether the CDR will improve consumer outcomes or merely introduce further industry costs without any commensurate consumer benefits.

  - Extension of the Draft Energy Rules to include large businesses, in particular commercial and industrial customers (**C&I**), does not reflect an understanding of how these customers interact with their energy retailers nor from an IT systems perspective in how these segments are managed and billed. Extension beyond the proposed limit would involve considerable IT system complexity and resourcing requirements to meet the proposed implementation deadline. We also believe CDR will not improve C&I customer outcomes because the current bespoke arrangements provide these customers access to far greater granular and tailored information than CDR would offer.
  - We propose in accordance with the principles of MVP, large customers, collectively billed customers, and C&I contracted customers be removed from this first iteration of the CDR and the need to include these customers be assessed once the CDR is established and working for the priority customer segments, residential and SME.

- **Correction of AEMO held CDR data** – AGL does not support the duplication of this obligation in the CDR regime for the reasons set out in the Appendix.
- **Concept of *secondary user*[6] and *account privileges*[7] for the energy sector –** AGL recommends the concept of *secondary user* for *eligible customers* in the energy sector be removed from the Draft Energy Rules for this first iteration of the CDR. Further, we advise that the *account privileges* meaning does not reflect business practice in the energy sector. This is expanded upon in the Appendix, but we recommend that in this first delivery of the energy rules it be excluded and can be further considered once the CDR regime is established and if a need for introducing this concept is proved.

As always, we are happy to discuss further if you have any questions in relation to AGL's response, please feel free to contact me or Sarah Silbert, Regulatory Strategy Manager on SSilbert@agl.com.au .

Kind regards,

(Submitted by email)

Con Hristodoulidis

Senior Manager Regulatory Strategy

[6] Secondary user as defined in General Energy Rules, Part 1, Division 1.3, rule 1.7 – in particular (a) "the person has account privileges in relation to the account;".
[7] As defined for the energy sector in Schedule 4, Part 2, rule 2.2(2).

APPENDIX

Extension to Tranche 1 Date

There are significant and multiple reasons to support revising the *tranche 1 date*[8] for *initial retailers* from 1 October 2022 to no earlier than **1 July 2023**. Our response justifies and supports this revised date and addresses Proposal 3 and Question 3 in the Consultation.

The reasons AGL does not agree that the staged implementation approach for *Tranche 1*[9] provides sufficient time to implement CDR is addressed as follows:

Industry wide concerns

- The release of the Draft Energy Rules was delayed by six months by Treasury from their scheduled release of February 2021, despite this, industry is not afforded (at a minimum) an equivalent extension to the implementation date. The delay appears to have occurred to allow Treasury time to consolidate ACCC and DSB CDR resources within Treasury.
- The Draft Energy Rules are still subject to change, Ministerial approval and being enacted. Industry remains sceptical that the final energy rules will not be confirmed (at the earliest) by November 2021, and realistically this may not occur before the end of the year. This concern arises due to previous delays both for banking and energy, plus wider and pressing economic and health related matters the Federal Government is currently addressing. We also consider the Draft Energy Rules need some significant work to finalise (as outlined below) and we would encourage Treasury to get the rules right as a priority rather than try and meet a deadline that is not based on any proper project management assessment.
- Even if the Draft Energy Rules are finalised by November 2021, the proposed *tranche 1 date* of 1 October 2022 allows less than 11 months to implement a significant industry wide change for *initial retailers*, AEMO and ADRs. If the final CDR energy rules are delayed beyond November 2021, this further heightens the risks for delivery of an effective and functioning CDR energy ecosystem.
- AGL is supportive of the CDR regime and acknowledges Treasury's focus on customers benefiting from CDR, however, a rushed timeframe to implement will only result in businesses not being able to comply with all requirements or prioritising certain parts which ultimately leads to poor customer experience. With a new regime, it is important it is rolled out effectively and consistently across industry participants, otherwise consumers may have a negative first experience with CDR and not continue to engage and receive the full benefits of CDR.
- Further, we refer to the limited customer uptake of CDR in the banking sector plus the slow accreditation of ADRs, which supports the position that there is no need to rush energy sector commencement as customer demand and ADR readiness does not require an expedited timeline.
- As Treasury will be aware, whilst CDR will provide real time access for consumers to their energy data, customers can currently access their data on request from energy retailers in accordance with the relevant energy regulations and can also access pricing and product information on comparator

[8] Any reference in italics refers to those terms or rules in the General CDR Rules and Draft Energy Rules as previously referenced in this submission.
[9] Draft Energy Rules, Schedule 4, Part 8, rule 8.5(2) and (3)

websites such as the Australian Government's Energy Made Easy and the Victorian Government's Victorian Energy Compare. Under these current arrangements, 1 in 4 or 1 in 5 customers on average change their retailer. CDR is likely to boost this churn, but we must ensure we get the framework and implementation right to ensure this outcome.

- This is not a reasonable timeframe for any business, in particular businesses significantly impacted by COVID-19 constraints with its work force, and access to IT personal being restricted in current conditions. This is an identified industry wide issue.

AEMO and industry wide changes

- We refer to AEMO's Regulatory Roadmap, Version 5[10] (**Regulatory Roadmap**) which sets out a number of significant industry wide projects to be completed within the next two-year period (not including CDR). The sheer volume of regulatory change raises serious concerns about the stability within systems and more broadly, the industry as a result. As set out on the Regulatory Roadmap, projects being implemented are: 5 Minute Settlement (**5MS**), Global Settlements, Faster Transfers, Gas B2B, Elec B2B, to highlight a few of the main ones.
- An appropriate timeframe to measure the CDR against would be to match implementation times allowed for Power of Choice (**PoC**) and 5MS. Both these projects involved significant changes, and we believe equivalent to CDR, across the market with multiple stakeholders. The time from final rule change (26 November 2015) to implementation of Power of Choice was 24 months (1 December 2017). For 5MS, a transition period of 3 years and 10 months was allowed from the final rule date (19 December 2017) until the commencement date of 1 October 2021.
- We seek advice from Treasury to confirm if AEMO has committed to a Gant Chart (process map) detailing how they will implement the changes required for CDR in the timeframe proposed. As noted above, AEMO have required a period far longer than 11 months (up to 4 years) to implement changes of similar scope.
- There are multiple external contingencies that retailers need to accommodate in its delivery timeline beyond system build and completion of internal business processes. For retailers, once internal quality assurance of their software solution is completed and system processes are ready, retailers will need to onboard as a data holder and satisfy conformance testing which can take 2 to 3 months[11]. In addition to this, another external dependency is AEMO delivering by the go live date. Retailers will need to test its data exchange systems with AEMO and with ADR's. External testing requires at least a lead time of 4 to 5 months before the commencement date of CDR

Implementation timeline - AGL specific feedback and issues

- Over the next 24 months, AGL has an extensive program of internal work to comply with the Regulatory Roadmap, and limited internal resources are already allocated and fully utilised on existing implementation matters. In addition to complying with the projects detailed under the

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[10] https://aemo.com.au/-/media/files/initiatives/regulatory-implementation-roadmap/v5/regulatory-implementation-roadmap-v5.xlsx?la=en

[11] https://cdr-support.zendesk.com/hc/en-us/articles/900002670886-How-long-will-the-on-boarding-process-take-

Regulatory Roadmap, AGL also must comply with uplift in IT systems and processes for cybersecurity (as well as physical assets) as required by the Security Legislation Amendment (Critical Infrastructure) Bill 2020[12] work.

- AGL has established a CDR project team to shape requirements and these experienced regulatory change project managers, who map delivery timeframes, recommend that a project the size of the CDR would require at least 18 months lead time to implement post final rule changes, and emphasised that even this time frame would require an expedited delivery. Also noting that there is a general industry lag/shut down over the months of December and January due to public holidays and generally a large portion of employees on annual leave.
- The CDR changes are not AGL's core capability, this is a new economy wide rather than energy specific regime, and as a result, we have not built system changes like this before. For example, the introduction of financial grade API's is a new requirement for the energy sector and will require expertise uplift in the appropriate personnel managing our IT systems to meet these requirements. By way of comparison, the banking industry already complied with these API's so did not have to upskill people to enable the system changes in that regard which saved both time and cost.
- Deleted due to confidentiality
- Partially deleted due to confidentiality Coupled with the backdrop of significant regulatory change as set out on the Regulatory Roadmap, AGL is currently in the process of structurally separating its business into two new entities by July 2022[13].

[12] Reference to the Bill and related information is set out here: https://www.homeaffairs.gov.au/reports-and-publications/submissions-and-discussion-papers/protecting-critical-infrastructure-systems

[13] Please refer to the attached AGL website media release to our submission email.

Limitation of eligible customers for the CDR regime

In response to Proposal 1 and Question 1 set out in the Consultation, AGL does not consider it appropriate to include all NEM retail customers, for all data sets, to access the CDR regime as contemplated by the drafting of rule 2.1, Schedule 4 of the Draft Energy Rules.

AGL provides the following information to support this position and sets out a more appropriate alternative:

- AGL recommends that large customers are excluded from the group of eligible NEM retail customers able to seek CDR data from their current electricity retailer. We propose that this limitation be set in accordance with AEMO's market classification thresholds in the MSATS Procedures[14] which distinguishes between large and small customers through the NMI Classification Codes. All electricity retailers operating in the NEM as market participants are aware, understand and have systems and process that work in line with these classifications.
- Further, we have separate billing systems for large and small customers which are programmed in accordance with these market classifications which would simplify the system build aspects for small customers eligible to access their billing data under the CDR regime.
- In addition to excluding large customers as set out above, we recommend those customers who receive supply under a C&I contract and those customers part of a "collective billing arrangement[15]" be excluded from the definitions of *eligibility* and *eligible arrangement*[16] in the Draft Energy Rules. When we refer to large customers, we include these customers unless otherwise specified.
- To support excluding those customers on a collective billing arrangement, we recommend this based on the following reasons:
    - these customers are established by a parent entity, which is the account holder, with multiple sites under this parent entity, known as child accounts;
    - this adds considerable complexity as the parent account holder negotiates the energy supply for its child accounts under a collective billing arrangement. If included within the eligible NEM retail customers, this creates significant risks around information security and the stability of IT systems. As these customers have multiple sites, following a data request it would be difficult to identify what billing data is being requested as retailers could not easily identify which site a collective customer is seeking data for, and if it is multiple sites then this data request would be extremely large and could impact the performance of data holders' systems as well as ADR systems;

[14] Refer to footnote 3

[15] A collective billed customer refers to a large use customer (parent account holder) who has multiple sites (each being a child account) which sit under this account holder's umbrella contract with the retailer. The parent account holder negotiates the energy supply on behalf of their child account holders even though these may be separate businesses, such as franchises. The franchisees may have limited access to things like energy bills and consumption data for their franchise or location but do not have account management access, like changing the umbrella product and service offering.

[16] As defined in the Draft Energy Rules, Schedule 4, Part 2, rule 2.1(1) and (2)

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- further, the CDR regime, and the current metering and billing designations would mean these customers would not benefit because like large customers, they already receive more granular level of detail for their sites than CDR would provide, with bespoke billing and reports available on their costs and consumption. To support this, attached is a de-identified collective billing account (E-file disaggregated bill that collective customers receive, to cater to the needs of the customer base and the industry (use of third party validators), the complexity of the customer arrangements (parent entities, with large volumes of small market sites across the nation), and a NIXON report (billing and usage data) collective customers receive also.

- From a project development point of view, it is important to understand that each customer segment (e.g., large and small, and then broken down into small: residential and SME; and large customers: C&I and collective billing arrangements) are separate structures from a project build point of view to satisfy CDR requirements. This is due to their unique nature and therefore the different systems and processes that underpin their onboarding and servicing, would require to 'open up' all the various systems and process and make them CDR compliant.
- As a result, each additional customer segment included in the CDR regime beyond the MVP of residential and SME customers, is effectively a whole new project with each its own costs and resourcing needs as each segment introduces its individual complexity and data requirements due to each being onboarded and configured differently and using different bill and reporting structures within our systems. There are no economies of scale to be realised by including all NEM retail customers. Therefore, based on the Draft Energy Rules, we are confident the CDR will not lead to better outcomes in terms of access to data for large customers. In fact, we believe the Draft Energy Rules combined with the designation tool is highly likely to lead to worse outcomes in many cases for large customers or collective billed arrangements.
- We recommend excluding large customers because of the unique manner in which these customers interact with their energy retailers and the access to billing and metering data beyond what the CDR regime will facilitate as stepped out here:
  - This group is often highly sophisticated in terms of determining their energy requirements and it is not unusual for large customers to engage through account managers to negotiate energy supply contracts, which can also be through a tender process, for fixed term supply.
  - This customer segment has access to their own digital portal to manage their accounts, which currently offer a greater level of detail in relation to their data than CDR would offer.
  - These customers have B2B relationships with retailers which means they have established contact points for direct servicing of complex and detailed enquiries around, for example, such matters as their energy usage, demand management and billing.
  - Large customers are billed with unbundled data which provides these customers with in-depth information on their billing data. We attach a de-identified bill from a residential customer and a large customer to display this difference from a billing perspective.
  - From a metering point of view, these customers are required to have different meters installed (compared to mass market customers) and these meters (COMMS meters) have significant capabilities which enable customers to access and have visibility over more

detailed and granular metering data than the CDR regime will provide. This is displayed in the attached COSS reports.

- Further to the points above, there are technical issues in extending the scope of *eligible customers* to large businesses, as this significantly increases the complexity and difficulty in building systems to meet the proposed CDR requirements as the current CX experience does not reflect large customers. The technical issues are:
  - Account numbers – the current CDR CX experience is designed for mass market customers as it is geared around an account number. An account number is easily identifiable to a small customer as it represents a house (or holiday house) or their small business. However, this is not the same for large customers and does not reflect their understanding as these customers are site orientated and an account number isn't readily recognisable for them, and in the CDR context they would not know what they are consenting to.
  - Authorised authority to act – for large customers, this must be done by contacting the retailer and is a back-office activity which needs to be manually configured with no self service capabilities via the customer's portal. Further, SMEs (who are non-individuals) understand who is authorised to act on their account, obtain bills and provide consent to obtain CDR data under the proposed framework of *nominated representatives*[17]. However, this does not reflect business processes for C&I customers nor the internal procure to pay process as a C&I customer may have numerous individuals across its business authorised to act on the account and may receive bills by individual sites or however the authorisation is mapped.
  - Metering data and off market information is not available from AEMO for the metering data sets specified under the Draft Energy Rules, and as a result, won't cover all the CDR information requested. Further, the proposed CDR data standards do not deal to the complexity of metering and NMI standing data and as a result, if data holders attempt to provide this data in accordance with the proposed standards, the ADR would receive incomplete and misleading data which would be largely ineffective for them to use and evaluate.
- As outlined by Treasury ay an industry forum, we understand including all NEM retail customers is to meet a request from energy brokers claiming metering data is sometimes delayed for large use customers. We do not agree with this, nor do we think that this customer segment being included under the CDR regime will increase the speed by which brokers obtain data as it does not reflect what happens in practice. This data is currently available but due to the price pathways having to replicate all the appropriate tariffs/pricing for a large customer across its data fields, this takes considerable time and is not possible to transfer in real time as required under the CDR framework.
- As stated above, we recommend acting on the principle of MVP and focusing on the priority customer segments to access the benefits of the CDR regime, being all residential customers and SME's in this first iteration. Once the CDR regime is established and functioning effectively with broad consumer engagement, then consideration of building it out to other customer segments could be reviewed and implemented if the need is justified.

[17] General Energy Rules, Part 1, Division 1.4, rule 1.13(1)(c).

Correction of AEMO held data

AGL does not agree with proposed mechanism changes for correction of AEMO-held data as set out in Proposal 2 of the Consultation and queried under Question 2. We base this on the following reasons:

- Energy retailers as *primary data holders* do not have visibility over *shared responsibility data* or *SR data* as essentially retailers are acting as a mailbox for any data sets to be provided by AEMO.
- *SR data* is passed on by the *primary data holder* to the *ADR* without opening the data envelope and as a result, the retailer does not have visibility as to whether the data provided is correct or not nor can it make this determination.
- The current process to correct data in the NEM should continue without duplication under the CDR regime.

Secondary user concept

AGL recommends the concept of *secondary user* for *eligible customers* in the energy sector be removed from the Draft Energy Rules for this first iteration of the CDR. Further, we advise that the *account privileges* meaning does not reflect business practice in the energy sector. In time, if the CDR regime establishes itself effectively functioning for the re-scoped *eligible customers* group as set out above, and there is considered a need, then this concept could be re-evaluated, however, as it is currently drafted it is not fit for purpose and will not improve customer outcomes, for the following reasons:

- For residential customers and SME customers (who are individuals):
  - our account management systems only allows a single primary account holder to be nominated for an account and this primary account holder is the only person able to make changes on the account;
  - a primary account holder can nominate an authorised person to be listed for the account but this authorised person can only make enquiries about the account, pay account bills and update their own personal information (for example, their contact number), this person cannot make changes to the account as contemplated under the concept of *account privileges*[18] ;
  - in any event, we query what "make changes" encompasses under the meaning of *account privileges* and advise that this is open ended and not specific enough;
  - the authorisation process requires any consent to be sent to the mobile or email of the account holder to authorise through 2 factor authorisation requirements;
  - this authorisation process is founded on an enrolment process before you can initiate CDR participation and we can only do the enrolment process for the account holder. This is important to ensure security of account and account information especially in regard to

[18] Draft Energy Rules, Schedule 4, Part 2, rule 2.2(2)

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accounts with family domestic violence flags, and those with any code word noted on the account to protect account holder details;

- If the Draft Energy Rules contemplate secondary users being able to initiate and consent to participating in CDR regime on behalf of a CDR consumer, this significantly complicates:
  - the consent and authorisation process on accounts as a new set of data will need to be pulled in for contact persons and authorised contacts on the account, who are sometimes only stored within an account's contact notes; and
  - the build for consumer dashboards as we will have to build one for the account holder (who can review their own consents, and any provided by the secondary user) and a dashboard for the secondary user. This increases the scope of the consent dashboard build considerably and raises serious questions around security of customer information and authorisation processes due to the secondary user concept not reflecting business practice.

Metering data and complaints

We recommend where a customer has complained to the retailer about metering data provided by AEMO that in this instance the Draft Energy Rules allow retailers to "open the envelope" to review the data and potentially be able to resolve the customer's complaint. There are numerous instances (e.g., customer own meter reads, or retailer substituted metering data may be used for billing purposes) where metering data provided by AEMO does not match retailer provided billing data and this may cause confusion for customers and result in complaints

Other minor drafting issues

We recommend consideration of the following minor drafting points:

- We query why AEMO has the discretion to "choose[19]" to disclose the SR data requested and this obligation is not "must provide"?
- We question what does "reasonable" mean in the context of AEMO providing information "to the extent it is reasonable to do so[20]" when a complaint arises due to the SR data which AEMO have provided?

Visibility of CDR and public understanding

In closing, as previously raised in our past submissions and discussions with Treasury, we urge there be serious consideration on what needs to be done to increase the visibility of the CDR as a framework for consumers and to promote a greater understanding of its purpose to significantly increase the uptake of consumers seeking this information, which at current levels in the banking sector is low. This is pivotal in achieving success across designated industries. Without proper engagement with the CDR framework by consumers across all consumer segments and clear information on the use cases and benefits, CDR has the potential to being only a costly compliance exercise for industry sectors.

[19] General Energy Rules, Part 1, Division 1.5, rule 1.23(5)
[20] General Energy Rules, Part 1, Division 1.5, rule 1.25