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Data61

Consumer Data Right

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Consumer Data Standards – energy engagement

AGL Energy (AGL) welcomes the opportunity to provide comment on the Consumer Data Standards being developed by Data61 in their capacity as the Data Standards Body under the Consumer Data Right (CDR) regime.

AGL has actively engaged in consultation processes run by Federal Treasury, the Australian Competition and Consumer Commission (ACCC), the Senate Committee and Data61 to help shape a regime that is appropriate for all industry sectors.

Throughout our engagement, we have stated the consumer and industry risks associated with the speed of preparing the CDR legislation and either bypassing or conducting minimal consultations, cost benefit analysis and impact assessments. We have also outlined the need for the ACCC and Data61 to undertake early and effective engagement with the energy sector for parts of the CDR framework they are responsible in developing, considering previous commitments by the Federal Government that energy will go-live with CDR in early 2020.¹

Industry Engagement

While we understand the need for a focus in banking, as banking is to be the first designated sector, the difference between banking and energy start-date of CDR is growing significantly smaller. With delays in developing Rules, and the lapsing of the Bill in April 2019, banking CDR is now slated to start in February 2020. This would be only a few months before the designation of energy (based on Federal Government commitments for energy designation).

The financial sector has had extensive engagement with decision-makers across all elements of the CDR regime, including through Data61 on the consumer data standard. The Advisory Committee for Open-Banking API's commenced 12 months ago² and over this time has provided insights and access to information on the CDR regime to banking participants that energy have not been privy too.

While AGL previously held a position on the Advisory Committee for API standards in Open-Banking, as an observer for utilities, we have been unable to continue in this spot since our representative left AGL in December 2018. Data61 has indicated that a separate Advisory Committee for energy will likely be established at some point but is awaiting further direction from the Government.

¹ <https://www.energy.gov.au/news-media/news/consultations-open-energy-consumer-data-right>

² <https://algorithm.data61.csiro.au/data61s-role-in-creating-standards-for-the-consumer-data-right/>



We recognise that much of the consumer data standard elements for energy will be dependent on the energy data model chosen by the ACCC. However, we would encourage Data61 to establish an energy advisory committee as soon as possible to allow participants to give insights and context into the energy sector and to understand consumer research and expectations that may impact the CX focus.

Consumer Experience

We have some comments in respect to the energy finance use-case (prototype 2). The prototype has been developed to show how an accredited data recipient (ADR) may request financial information from a consumer to help them *manage [their] everyday life, starting with [their] finances to energy usage*.³

This prototype has been developed in a simplistic way to help the testing phase but focuses on an environment where only the financial sector is designated in the CDR regime. Future testing needs to contemplate and manage complex and cross-sector data requests, particularly where consumer financial and energy data is collected to optimise services to customers.

It is important that these types of scenarios are considered early, so that consumers engaging in the initial stages of the CDR regime are not misled or misunderstand the purpose of the data sharing, or believe that they are already receive comprehensive energy insights and assistance through the data they agreed to share from their banks.

We encourage Data61 to ensure that the CX work, and consumer consent flows considers the cross-pollination of different data sources by multiple players for multiple purposes. Because of the fast approaching expected designation of energy, we recommend this be done as soon as possible to ensure consumers have a positive and transparent experience and should start with establishing an energy Advisory Committee to help build a positive consumer experience which encourages high consumer participation.

Central Dashboard

We have previously recommended the need for a centralised dashboard for consumer consents.⁴ Consumers may have several accounts (and therefore multiple data sets) across different designated data holders, such as:

- financial accounts with more than one bank,
- electricity and gas with different retailers,
- the consumer may switch energy and/or gas in a year,
- the consumer may move homes, keep the same retailer but have a different distribution zone.

All these data sets can then be requested and collected by different accredited data recipients, including data holders, for different use cases. Placing the onus on the consumer to remember who and where to manage and revoke consents from is not practical.

Having multiple dashboards complicates the CDR regime for the consumer and may lead to unintended consequences (such as confusion as to the type, timing or spread of consents). The Consumer Policy

³ Data61 Prototype May 2019 - <https://projects.invisionapp.com/share/5BRXCAPFRAK#/screens>

⁴ See for example [AGL submission to ACCC Rules Framework](#)



Research Centre (CPRC) supports the need for a central dashboard, noting *it is impractical to think that consumers will be likely to go into each data holder and/or accredited data recipient to manage these activities.*⁵

Please contact Kat Burela, kburela@agl.com.au or 0498001328 if you have any questions.

Regards

[Signed]

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⁵ https://www.accc.gov.au/system/files/Consumer%20Policy%20Research%20Centre_0.pdf