



Data61

Consumer Data Right

Consumer Experience workstream

Submitted online

15 March 2019

AGL Energy (**AGL**) welcomes the opportunity to make a submission in response to Data61's Consumer Experience (CX) Report for the Consumer Data Right (CDR).

The CX Report released by CSIRO Data61 represents a positive step in ensuring that consumers and not only access the CDR but understand the impacts and scope of this regime. It is a great start in to ensuring that the CDR regime is fit-for-purpose, useable and accessible for different consumers across Australia.

Our experience as an energy retailer allows us to recognise many of the benefits the CX Report recommends for implementing consents and authorisation elements under the CDR regime. For example, our customers engage with us across all different channels (digital and non-digital). Customer access, literacy, understanding and convenience all interact with the service propositions we offer our customers, including not just our digital tools (such as our website, or phone app) but also our call centre, mailing and other contact methods.

How consumers are provided information on their consents and the CDR regime will have significant impacts on their experience and interaction with the regime. Stronger consumer understanding will mean there is less chance of consumers not fully providing informed consent or misunderstanding their rights. These elements are fundamental to an operational and effective regime that consumers and businesses can trust and engage in.

The CX Report assesses these different customer needs and preferences and recognises the diverse needs of different customer sets. We agree with many of the recommendations in the CX Report including:

- Consumers should control their CDR data to be able to build and foster trust in the CDR regime. The ability to cancel, manage and revoke consents should be emphasised as they are all points of intervention that give control to the consumer.¹
- The use of consumer-friendly language is essential for engagement (such as Consent, Login, Confirm instead of Consent, Authenticate, Authorise)² and the phrase 'once-off'.
- There should be non-digital means of consent revocation for consumers.
- Data recipients clearly communicate that the CDR prohibits the use of CDR data for unrelated marketing purposes.³ We agree that this type of disclosure helps to educate consumers about their rights under the CDR regime, but this must be balanced with the ability to provide clear, concise

¹ CX Report, p48

² p44

³ p42



information for consumers to ensure they are engaged (and read all the relevant disclosures for their CDR data).

- The use of data clusters will help those consumers who wish to know more engage with the relevant information without acting as a barrier or deterrent for those less engaged or less interested customers.
- Consumers to be provided with information about the data sharing flow upfront and how long the process will take⁴, as well as confirmation of terms of use after the fact, and information on how to revoke consent.⁵
- Familiarity of data-access and sharing should be continued to facilitate consumer trust in the system. The authentication screen for consumers should be a re-direct to their normal bank login screen to make it clear they are no longer on the accredited data recipients page.⁶

AGL are pleased that Data61 and ACCC acknowledging the research gaps and have committed to investigating these areas in the coming months.⁷ We are also pleased that Data61 intends to consider application in both energy and telecommunications to ensure that language is mapped for each industry's needs. We support the proposed testing and modelling to start early and welcome the opportunity to assist Data61 with this work.

Our only suggestion is that Data61 consider starting this process as early as possible in energy (that is, before the banking element is concluded). Our understanding of implementation expectations for energy is for an early 2020. Energy retailers would not have enough time to build, test and finalise all IT requirements in such a short period.

Should you have any questions in relation to this submission, please contact Kathryn Burela on 0498 001 328, kburela@agl.com.au.

Yours sincerely

[Signed]

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⁴ p52

⁵ p71

⁶ p66

⁷ p108