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Data Standards Body

Submitted online: <https://github.com/ConsumerDataStandardsAustralia/standards/issues/99>

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AGL submission – Concurrent consent target state

AGL Energy (**AGL**) would like to take this opportunity to respond to the Data Standards Body (**DSB**) consultation on Consumer Data Right (**CDR**) concurrent consent target state (99).

We have recently learned that all data standards that have been consulted on over the last 12 months are intended to apply to all future designated CDR sectors (e.g. that the standards are considered industry agnostic). While we support the principle of interoperability and recognise that this will rely to some on a consistent set of rules and standards to apply across industry, we are disappointed that this message has not been clear and consistent across decision-makers from the start.

There have been several occasions over the last 18 months, since CDR consultation began on the enabling legislation, in which AGL and the energy sector more broadly has called for greater engagement. This has been met with a message from decision-makers that energy consultation will commence when government provides clearer direction on the expectations for energy designation.

We have therefore not been participating in the DSB consultations in the way in which we would have if the full circumstances were known to us from the outset. We are still unaware of what our interaction or role will be in the CDR eco-system with the Australian Energy Market Operator (**AEMO**) acting as the gateway.

It may be that AEMO develop and impose separate obligations on retailers to facilitate data-sharing through their gateway, or that the CDR data standards will apply to us equally. Given these limitations on the energy sector, it may be appropriate to reassess these matters once greater clarity is provided to the energy sector on the role of AEMO on a more granular level.

Until more information is provided on this point, we provide only the following high-level comments on the consultation:

- **Support of Rich Authorisation Request (RAR)** - allowing fine-grained consent and re-authorisation should adopt a RAR so that level of consent is not fixed and can be stepped-up depending on the data the data recipient is requesting and this would be brokered by AEMO as the proposed gateway model to share market data with 3rd parties.



Profile: OAuth 2.0 Rich Authorization Requests (RAR)

- **Management and auditing of many-many-many consent model** – we do not currently have clear information on the application of the CDR in the energy sector to be able to respond to this concept in detail but note that the many-many-many consent model is complex in the energy sector. It is unclear how joint accounts will translate into the energy sector (e.g. with shared authority, authorised representatives, delegates etc). These matters will depend heavily on the decision and structures put in place by the ACCC and AEMO.

For instance, consumer (tenant/landlord) -> data holder(s) -> data recipient(s). Where there will be multiple account holders for each account, account holder for multiple accounts. Third parties having consent from multiple consumers (account holders) including social workers, accountants, lawyers or a child of an elderly customer. The current Inquiry into the Future Directions of the Consumer Data Right is also looking at allowing write access for accredited data recipients which will again influence this matter.

- **Revocation requests from Consumer or Data Holder** – we support this principle and recognise the important use case for data holders to be able to manage special circumstances (such as domestic violence cases that may have authorised representatives).
- **Security profiles** - we support the adoption of Open Banking security profiles: Financial-Grade API (FAPI) or Client Initiated Backchannel Authentication (CIBA) profiles.
- **Third party utilisation** – as with many other large businesses, we are reliant third parties in our supply chain to deliver our business needs. We therefore encourage supportability and adoption of standards by our vendors / suppliers and encourage DSB to ensure that all relevant members of the economy likely to be impacted by the CDR obligations are informed of the relevant consultations.

If you have any questions in relation to this submission, please contact Kat Burela on 0498001328 or at kburela@agl.com.au.

Yours sincerely

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