



14 October 2021

Energy Senior Officials

Via email: ElectricityConsultation@industry.gov.au

Re: Consumer Data Right for Energy – NEL/NER amendments – Consultation

CitiPower, Powercor and United Energy welcome the opportunity to respond to the consultation on the Consumer Data Right for Energy – National Electricity Law (NEL) and National Electricity Rules (NER) amendments.

The Consumer Data Right is intended to provide individuals and businesses with a right to efficiently and conveniently access specified data that relates to them held by energy businesses, and to authorise secure access to this data by accredited third parties.

As highlighted in the Explanatory Note, the intent of the Consumer Data Right for Energy is to introduce new obligations on the **Australian Energy Market Operator (AEMO)** and **authorised energy retailers**, as data holders, to provide certain data sets (CDR data). The certain data sets are expected to be subsets of the National Metering Identifier (NMI) Standing Data, which are expected to be set by AEMO through their Metering Data Provision Procedures (MDPP).

We support the intent of the Consumer Data Right for Energy where AEMO is the central data hub, and data is transferred from retailers to AEMO for this purpose. This is the most efficient and orderly approach and provides third parties, acting on the behalf of customers, a single source of information.

We understand that until such time as AEMO is able to make its centralised data hub operational, there is an intent to provide customers, or their authorised representatives, earlier access to this data. This is to be through retailers or distributors. We support customers, or their authorised representatives, having access to NMI standing data however, we consider the proposed approach will increase the costs and complexity for all parties, without any additional benefit.

Below we propose an alternative approach.

Customers should get NMI Standing Data only from retailers

The draft NER amendments to clause 7.15.5(d) require distributors to provide a subset of NMI Standing Data directly to customers, or their authorised representatives. This is despite retailers being able to readily access and provide this same data to consumers.

We don't consider it appropriate distributors provide this data, in addition to retailers, as:

- distributors don't have access to the full set of NMI standing data or other data that would be relevant to a customer or their authorised representatives, to allow them to access better retail deals. Most notably, distributors do not have the customer's retail tariff, billing cycle, payment plan or similar. To be able to match the NMI Standing Data with the relevant data from retailers, either the customer, or their authorised representative would:
 - either get all that information from the retailer in one go, or
 - if they approach the distributor first, still need to approach the retailer for the retail tariff—effectively deeming the distributor's involvement redundant and unnecessary
- NMI Standing Data is a materially larger data set compared to 'metering data' which distributors provide to consumers today (through online portals in Victoria). Should distributors be required to share NMI Standing Data directly with customers, this would require an upgrade to the portals that would take more than

12 months and estimated to cost at least \$2.6 million. These costs are unforeseen as it was never the intent of Consumer Data Right for Energy that distributors would be increasing capabilities to share NMI Standing Data with any parties involved

- the intent of Consumer Data Right for Energy has always been for retailers to be the interface with AEMO. It is anticipated retailers will have systems in place to enable this data sharing to meet their new obligations. Requiring distributors to expend resources to share the same data to the same customers is duplicative and will impose unnecessary costs on our customers
- with 'big data', such as daily NMI Standing Data, periodically data will require 'cleansing and correcting'. If customers, or their authorised representatives, access the same data from different sources, they may encounter different data issues that would require correcting by multiple parties. Alternatively, limiting the source of data to a 'single source of truth' would remove the need to conduct data accuracy test across multiple stakeholders.

Therefore, we consider the most practical, efficient and appropriate approach that meets the intent of the Consumer Data Right for Energy is for retailers to be the main source of data, both directly to consumers/authorised representatives and to AEMO's central data hub.

Should you have any queries about this letter please do not hesitate to contact Sonja Lekovic on 0418 166 169 or slekovic@powercor.com.au.

Yours sincerely,



Brent Cleeve
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CitiPower, Powercor and United Energy