

14 October 2021

Energy Senior Officials

Electronic Submission – [ElectricityConsultation@industry.gov.au](mailto:ElectricityConsultation@industry.gov.au)

Dear Sir/Madam

## Consultation Paper – Consumer Data Right for Energy

SA Power Networks welcomes the opportunity to provide a submission to the Energy Senior Officials Consultation Paper for Consumer Data Right (CDR) for energy.

SA Power Networks is the primary electricity distributor in the state of South Australia and supplies more than 900,000 consumers.

SA Power Networks supports the expansion of the Consumer Data Right (CDR) to the energy sector to provide consumers with more control over their data, enabling them to access and share their data with accredited third parties to access better deals on everyday products and services.

The Consultation Paper states that the CDR for Energy will impose obligations on both retailers and the Australian Energy Market Operator (AEMO) to provide energy data to consumers. We consider that this is appropriate as retailers and AEMO hold all the consumer data that third parties will require to provide consumers with better deals on energy products and services.

The Consultation Paper highlights a significant expansion of AEMO's role, as a CDR data holder, in terms of data provision to third parties and will build and maintain a CDR Application Programming Interface to allow retailers to request and receive data and ensure record keeping obligations are met. Further, amendments to the National Electricity Law (NEL) are proposed to allow AEMO to recover the costs of performing these CDR functions through participant fees, as part of its normal cost recovery functions.

SA Power Networks is concerned that Energy Senior Officials are proposing to amend NER Rule 7.15.5(d) by expanding the current obligation on retailers and distributors (which is to provide consumer metering data) to also provide NMI standing data. We consider this change is unnecessary and inefficient, imposing additional costs on distributors to provide NMI standing data that will be available from retailers and AEMO. This is contrary to the National Electricity Objective (NEO) as it will ultimately impose additional costs on consumers for no additional benefit.

SA Power Networks notes that there is a proposal to introduce a new NER Rule 8.6A, to ensure that nothing prevents AEMO or a registered participant (which includes retailers and distributors) from disclosing CDR data in accordance with the CDR Rules. Also, there is a proposal to delete NER Rule 7.15.5(f) as it essentially duplicates the Commonwealth privacy legislation. Retailers and distributors will be required to comply with the CDR Rules as they are Commonwealth legislation and consequently

NER Rule 7.15.5(d) in effect duplicates that Commonwealth legislation. Therefore, there is no requirement to amend NER Rule 7.15.5(d) as it duplicates Commonwealth legislation. We propose that, like NER Rule 7.15.5(f), it could be deleted.

If you have any queries relating to this submission, please contact Mr Grant Cox on telephone 08 8404 5012 or [grant.cox@sapowernetworks.com.au](mailto:grant.cox@sapowernetworks.com.au).

Yours sincerely



Richard Sibly  
Head of Regulation  
SA Power Networks

