

28 August 2020  
Rod Sims  
Chairman  
Australian Competition and Consumer Commission  
Consultation Hub

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Dear Mr Sims,

**Consultation paper: Consumer Data Right - energy rules framework consultation**

AusNet Services appreciates the opportunity to respond to the ACCC's consultation paper on the development of rules for applying the Consumer Data Right (**CDR**) in energy.

We have eight years of experience in operating portals that provide customers with their energy consumption interval data, and we also provide Distributed Energy Resource (**DER**) register information to AEMO as required by recent changes to the National Electricity Rules (**NER**).

The consultation paper seeks stakeholder views on the ACCC's preliminary positions on the proposed framework to inform the development of additional rules for CDR in energy. The CDR rules would allow customers to benefit from energy services facilitated by fast access to relevant data. It is important that in establishing these CDR rules the privacy rights of customers are protected, especially for customers with particularly sensitive needs.

AusNet Services supports the establishment of efficient and robust rules for exchanging data. Specifically, we support and agree with the following proposals outlined in the consultation paper, including:

- The approach to data sets in the energy rules;
- The proposal to remove potentially sensitive information of little commercial value from the data set, such as installer names in the DER register information; and
- the proposed Model 1 arrangement.

Importantly, we fully agree with the proposal for voluntary consumer data where a potential provider of data is not a data holder. This would make CDR in energy arrangements available to customers where the data holder is not otherwise required to provide the requested data, e.g. data held by a small retailer or a Distribution Network Service Provider (**DNSP**). As a DNSP, we may utilize this voluntary arrangement to provide non-standard data to customers in a secure and transparent manner.

We are broadly supportive of the proposed framework and would appreciate the opportunity to engage with the CDR in energy team at the ACCC or Treasury if future changes to the positions or rules are contemplated.

If you have any queries about any of the positions outlined in this submission, please do not hesitate to contact Justin Betlehem on [REDACTED].

Yours sincerely,



Charlotte Eddy  
**Manager Economic Regulation**