



22 March 2019

Mr Rod Sims  
Chair  
Australian Competition and Consumer Commission  
23 Marcus Clarke Street  
Canberra ACT 2601

Dear Rod

**Re: CONSUMER DATA RIGHT IN ENERGY CONSULTATION PAPER: ACCESS MODELS FOR ENERGY DATA – RELEASE NO. 21/19**

CitiPower, Powercor and United Energy welcome the opportunity to respond to Australian Competition and Consumer Commission's (ACCC) consultation paper on data access models for energy data. Our response proposes the following:

- model 3 should be adopted as the data access model for energy data and
- regardless of the model adopted, the open standard used for the Consumer Data Right (CDR) should integrate with our existing data platforms.

**1.1 Model 3—the economy-wide CDR model—provides customer benefits at least cost**

Model 3 would require multiple parties to be responsible for providing data directly to accredited data recipients if a consumer consents. Each party would need to develop and maintain a means of data accessibility. With reference to the assessment criteria outlined by the ACCC in its consultation paper, Model 3 provides customers with a platform for information sharing that promotes competition in the sector at least cost.

**Our customers already have easy access to their usage data**

We already offer information to our customers in a similar model compared to Model 3. CitiPower and Powercor's myEnergy portal and United Energy's Energy Easy portal are accessible platforms that provide 30-minute interval usage data to registered customers (soon to be upgraded to 5-minute interval data). The platforms have received positive feedback and a large customer uptake. We are also planning to introduce a user-friendly 'one-stop-shop' data portal in 2021, allowing our customers to easily access their usage and account information in one consolidated portal to better inform their choices.

Adding further portals through the Australian Energy Market Operator (AEMO) would represent unnecessary duplication of services and could be confusing to customers. Additionally, unnecessary double handling of data and information by AEMO can increase the likelihood of errors and data inconsistencies.

**Model 3 is the least-cost option**

The least cost model is where we can continue to provide data to our customers through the existing portals. The expected costs to meet Model 3 requirements under these conditions include small alterations to our systems to increase the type of information provided on our myEnergy and Energy Easy portals.

Alternatively, if we are required to change our portals under Model 3, or if we are required to continuously provide information to AEMO in a pre-determined format under Models 1 or 2 using API interfaces, estimated costs would include either new systems or system upgrades to align data information and reporting to new standards.

## **1.2 The open standard used for the CDR should integrate with our existing platforms**

We do not consider it necessary to develop new API interfaces for any of proposed open standards for CDR. We consider that the cost of doing so would outweigh any customer benefit from having access to this information. Rather, we propose the selected open standard model make use of the existing platforms such as our myEnergy and Energy Easy portals. This will ensure customers are continuing to benefit from significant investment we have made in our portals to date and will continue to make in the future.

### **Our myEnergy and Energy Easy portals are integrated with the Victorian Government's Victorian Energy Compare (VEC) platform**

Our existing myEnergy platform integrates with the Victorian Government's VEC platform, allowing customers to use our data to compare energy retail deals on the VEC site. Therefore, even if either Model 1 or 2 are the selected model, AEMO should integrate their systems with our platforms and those offered by the Victorian Government and other data providers.

### **By integrating with VEC we promote competition between energy retailers**

myEnergy's integration with the VEC platform promotes competition between energy retailers, by improving the accuracy of the VEC platform. The purpose of the VEC platform is to help customers compare offers from all energy retailers based on information provided by the customer about their household or small business. Where we are able to provide more accurate data, through myEnergy's existing integration with VEC, customers are able to more accurately and effectively compare retail energy offers. By integrating our myEnergy platform with VEC, we have enabled customers to find the best energy deal, and have therefore promoted competition in the energy sector.

Should you have any queries about this letter please do not hesitate to contact Amber Wilkie on (03) 9683 4124 or [awilkie@powercor.com.au](mailto:awilkie@powercor.com.au).

Yours sincerely,



Brent Cleeve  
**Head of Regulation, CitiPower, Powercor and United Energy**