

**ACCC Consumer Data Right Energy Rules Framework Consultation Paper**  
**Make It Cheaper submission in response – 28 August 2020**

**Introduction**

Make It Cheaper (“MiC”) welcomes the opportunity to make a submission in response to the ACCC’s Consumer Data Right (“CDR”) energy rules framework consultation paper.

MiC is Australia’s leading business energy comparison and brokering service, serving both small business and large commercial and industrial customers, as well as looking after their residential energy needs. We’ve been in the business over 10 years, working with a panel of 11 energy retailers to find customer energy savings, primarily in the business segment, where we currently have more than 30,000 customers in live placed contracts. We also work with a network of over 50 state business organisations, franchise networks, industry associations and other comparison platforms to effectively service the needs of business energy customers. We’re proud of our Product Review score of 4.6/5 from 759 reviews to date.

Our purpose is to make it easy for Aussie businesses to save time and money, again and again. As such we welcome the energy CDR and believe it has the potential to be the catalyst for much greater customer engagement and improved outcomes in the energy market. Energy is unnecessarily complex for customers; the energy CDR could facilitate energy data transparency and simplicity at scale, enabling customers to work with third party intermediaries (“TPI”) like ourselves to make well informed choices about energy usage, pricing, contracting, monitoring and efficiency management.

**Executive Summary**

On the following pages we have provided feedback on each of the specific sections. In summary

- We believe the focus should be on a fast and effective early stage energy CDR, in order to realise scale engagement with improved customer outcomes and energy savings
- As such we support the introduction of a lower tier of accreditation, recognising the much less sensitive nature of energy data
- Furthermore, the speed to market of an early stage energy CDR should not be delayed for reasons of interoperability with, or slavish reference to, the broad CDR rules drafted with banking in mind
- In support of this we point to the established premise level model for high level energy data access through the Energy Made Easy and Victoria Energy Compare web-sites, and the prevalence of machine readable customer bills from energy retailers; these two components could be combined with customer data validation for a fast and effective roll out of the core energy CDR use case of energy comparison and switching
- Critically we believe that product data must be extended to include both existing customer retention plans and offers, and large customer plan information. For small business customers, retention plan information is required to provide accurate comparison and best advice to customers. For large customers, there is a great deal of complexity at the smaller consumption end, that the early stage energy CDR can help significantly mitigate. MiC has a great deal of experience in this segment and gives further detail in the relevant section later.

- Given the need to combine premise level with customer level data and specific energy plan information, we support the need for strong consumer authentication on a redirect basis, with the AEMO gateway performing a key role under the Model 2 authentication model. Furthermore, we think there is a range of current technology ways to support customers who do not have online accounts with their energy retailer. In addition, we believe the AEMO gateway should play the key role when providing for consumer dashboards to data holders and ADRs.
- There needs to be much more detailed consideration of how this works under specific use cases
- Also critically, given that the standard small business energy contract is for a 24 month period, we strongly feel that consumer consent duration should be extended from the current rule 12 month period to support this. This is unique to business energy. There are a range of ways that the energy CDR can protect customer recency and privacy to assure a longer consent validity period.
- Finally, with regards to phasing, we believe that to achieve energy customer engagement at scale through an early stage energy CDR, the phasing proposals need to change to include all retailers above suggested customer account number thresholds, for the provision of customer account and billing data. This can mostly be provided for through machine readable PDF billing formats. To support this overall objective the tranche 1 sequencing of data sets should also include NMI standing data and basic non sensitive customer data (including ABN), in addition to PDF billing data.

For any questions regarding our submission please feel free to contact us directly.

## Detailed Response by Section/Question

### 3.3 Approach to data sets in energy Rules

Q1. Do you agree with our proposed approach to data sets in the energy rules? Why or why not?

#### 3.3.2 Customer Data

MiC agrees with the minimum requirements bulleted at the start of this section – all details are required to effectively authenticate and administrate comparison, switching and monitoring of energy accounts.

In addition, in the following order of priority, MiC supports the option of including data on

1. Life Support data
  - Is essential information required by retailers to validate prior to processing a switch; MiC considers this a mandatory requirement
2. Concession data
  - Is also required by retailers; if it's not included the customer risks losing out on that concession benefit; MiC considers this an optional requirement as primarily for Residential
3. Hardship programme data
  - MiC supports its inclusion on the basis that, without it, a switch could be processed and then objected to, creating poor customer experience; MiC considers this an optional requirement as primarily for Residential

#### 2.3.3 NMI standing data (MSATS)

MiC agrees with all requirements as per the MSATS energy markets role today.

MiC believes the minimum standards for ADL would need to be significantly improved from the current once per year 20% usage difference threshold, to once per quarter mandatory in line with standard billing cycles.

In addition, MiC suggests that fields for metering co-ordinators and metering data providers are made available to enable metering agreements to be better covered under early stage energy CDR.

#### 3.3.4 Metering data

MiC agrees with all requirements and definitions in line with NER and 2 years of retrospective usage data.

Furthermore, MiC believes that there must be ongoing provision of prospective data each quarter in line with billing cycles to support account/bill monitoring and usage alert services. This could be achieved by metering data provision but could be more simply provided for by retailer data holders providing every bill as an e-mail PDF.

The only data MiC considers to be potentially sensitive is real time interval data, or past interval data when there is an obvious repeated pattern on premise occupancy. This is particularly for residential customers and some very small businesses. Therefore, protections against this should be considered.

The solution for this should be as simple as possible, and balanced versus speed to early stage CDR launch, given that

- It seems unlikely that there will be many real time interval data use cases early on
- Availability of interval data through smart digital meters is limited in most of the NEM

For a fast early stage energy CDR implementation, mass market real time interval data could be excluded from a phase one energy CDR launch, and/or limited to the past 12 months small businesses usage only.

However, usage data should be made available in aggregate across tariff TOU periods to facilitate accurate bill comparison.

Finally, MiC doesn't believe this exclusion should apply to large market customers; we discuss this in more detail in our response to section 4.2.3.5 later.

### **3.3.6 Billing data**

Agreed with minimum requirements bulleted at start of section – all points are required to effectively authenticate and administrate comparison, switch and account/bill monitoring.

This is best provided for an entire annual usage period, to enable comparison and switching services in line with regulation requiring estimated annual price, savings and reference price benchmark.

In addition, MiC considers any recent retailer price change notification as a mandatory inclusion i.e. if price is set to change for the next billing cycle.

Billing data and price change notification could easily be provided and incorporated into a simple early stage energy CDR implementation through the provision of retailer bills in their native PDF format. These are already available from energy retailers, and able to be scanned into systems by existing technology.

This represent the fastest way to an early stage energy and should be prioritized over other customer and metering data sources to achieve an early implementation.

### **3.3.7 Energy plan information**

MiC agrees with the general requirement to enable all product data be made available by AER/DELWP.

In addition, MiC strongly believes this product data must be extended to include retention plans and offers only available to existing customers of the retailer.

All of this data is required in order to provide accurate comparison and best advice to the customer i.e. they may better off staying on their existing retailer plan.

Furthermore, MiC believes that large customer plan information should also be included in the CDR, albeit not at the expense of a fast implementation of mass market. There is certainly a large market customer use case that in many ways may be easier to implement. We discuss this in more detail in our response to section 4.2.3.5 later.

*Q2 - Considering the above discussion about potentially sensitive information, what data, if any, should be subject to specific arrangements (for example, during the consent process)? Should any particular sensitive data be explicitly excluded from the proposed data sets?*

MiC's views on data exclusions have already been discussed in our answers to Q1 above, and more generally MiC believes that all data should be subject to strong consumer consent and authentication.

#### **4. Issues requiring energy-specific rules**

*Q3. Do you consider the proposed approach to the gateway rules, standards and privacy safeguards appropriate for CDR in energy?*

*Q4. If not, which aspects of the approach should be reconsidered or amended, and why?*

MiC agrees with all general summary points bulleted at the start of this section.

*Q5. Should the information security obligations contained in Schedule 2, Part 2 of the Rules be applied to the gateway, or should we adopt an alternative standard such as the AESCSF?*

*Q6. Should the gateway be subject to obligations relating to the privacy safeguards, beyond what is set out in Part 7 of the current Rules?*

MiC's view is that it should be whichever the easiest and most efficient for the energy CDR eco system to adopt, assuming that both standards are of required efficacy. It's important that the lowest cost and fastest route to the required data standards is adopted.

*Q7. How should any disclosure of voluntary consumer data work under the gateway data access model (see section 3.3.1 for discussion of voluntary data)?*

In line with the provision of required customer data i.e. subject to consent, authentication, data security and transparent to consumers via dashboard update.

#### **4.2 Eligible consumer**

*Q8. Do you agree with our approach to determining an eligible CDR consumer? Why or why not? What additional factors should we consider?*

MiC agrees with all general summary points bulleted at the start of this section except for excluding large market C&I customers.

*In providing a response you may wish to address the following:*

- *What are the risks and benefits of including minors as eligible CDR consumers? If minors are included, what additional safeguards are required (if any)?*
- *What use cases exist for retailer-held consumer data sets for inactive accounts? What changes to data holder obligations would be appropriate to facilitate this?*

MiC cannot envisage use cases for the inclusion of minor, or inactive accounts beyond the provisions the paper already makes to enable access to historic information for that customer's account when it was active.

- *How might we facilitate the inclusion of customers who do not have an online account with their retailer as eligible CDR consumers? What particular issues will need to be resolved?*

MiC agrees that the energy CDR should be available to consumers who don't use online accounts with their retailer and doesn't see any issues that couldn't be fairly easily resolved. For example, authentication could be offered over mobile phone, SMS or even landline keypad entering to a data holder IVR. These are all established technologies. MiC also agrees with the point made in section 4.3.3.2 that just because consumers don't use energy sector online accounts, the vast majority will be familiar with using mobile Apps and web portals in their everyday lives.

- *Should any particular customers, such as large customers, be excluded from the initial scope of CDR in energy? How should our approach account for the spectrum of large customers (for example, significantly large customers versus mass market large customers)? What thresholds or definitions might we use in determining these customers?*

#### 4.2.3.5 Large customers

As already noted, MiC believes that large market customers should be included in the energy CDR, albeit not at the expense of a swift implementation of early stage energy CDR, if there is a trade off.

There are a number of reasons why we believe large market customers should be included

1. There is a high volume of large customers that are small businesses i.e. customers < 500MWh load whom are likely to approach the market in a mass market way, and therefore benefit from the CDR
2. The definitions of small and large are different across the NEM and create ambiguity and blurred use cases for customers and retailers alike. For example, Victoria can classify a large customer as anything > 40MWh, in NSW and Queensland its possible to be classified as large at > 100MWh, and in South Australia its > 160MWh. For the NECF states its possible for a > 10 multi-site mass market meter customer to be classified as large if their total aggregated loads exceed these thresholds.
3. Customer loads can change up or down across these thresholds, with the result that they may end up with a large meter and tariff classification at smaller mass market loads, or vice versa.
4. Clearly this creates confusion and uncertainty for those customers, who therefore look to third party intermediaries to provide them with best advice, which can be enabled by the energy CDR
5. The energy market for large customers is already set up in a way consistent with, or complementary to, the emerging design of the CDR
  - a) Customers give consent to third parties by LOA to third parties
  - b) Retailers share data and bid for customers via the same third parties
  - c) Metering is all interval data for accurate usage profiling
  - d) Contracts are fixed with definitive end dates and energy rates for contract duration
6. However, the current large market customer procurement process is generally decentralized and low technology (paper contracts). This means it can be inefficient and time consuming for all parties, particularly at the smaller and/or more ambiguously classified end of the large market as highlighted.

For all the reasons above, MiC believe that large market customers should be included in the CDR

- *Are existing protections in the Rules that place restrictions on accredited persons seeking consent and where disclosure of data would create a risk of harm (for example, Rules 4.12(3)(b) and 4.7) appropriate for CDR in energy or do they require some adaption?*

As drafted in their high-level form, MiC's interpretation of these rules is that they're designed to protect against cyber, domestic or other malicious intent. Therefore, they appear to be appropriate for CDR in energy without adaption. Detailed consideration will need to be given to how these rules may be validated and applied in practice; MiC would welcome the opportunity to be consulted on this further to ensure the practice is true to the intent of the rules.

*Q9. Is our characterisation of energy joint accounts and energy nominated persons accurate?*

Yes

*Q10. Is our proposed approach to facilitating data sharing for joint accounts appropriate for the energy sector?*

Yes. Furthermore, the joint (vs multiple) account is considered to be the main use case here and does not require the complex solution of Joint Account Management Process developed for open banking. The simple joint account solution should be adopted for early stage energy CDR implementation, and not held up for considering the apparent edge case for multiple (>2) account holders.

*Q11. Should nominated persons or certain nominated persons be eligible CDR consumers?*

Yes – this is very important in the case of SME businesses where an employee may be a nominated person for the account. MiC agrees with the definition and proposals laid out in this section.

*Q12. What particular arrangements exist for nominated persons who are able to transact on business accounts?*

MiC understands that most retailers have the capability to add other nominated or authorized persons to mass market accounts, and therefore should be able to recognize them for the purposes of CDR consent and authentication.

In addition, it is standard practice within large usage energy markets, for customers to enable nominated persons to sign letters of authority that enable third parties to offer comparison, switch and bill metering and monitoring services, amongst others.

#### **4.3 Authentication**

*Q13. Do you agree that strong consumer authentication based on a redirect model is the correct authentication model for CDR in energy? If not, please set out your preferred alternative model, and the risks and benefits of that approach.*

MiC broadly agrees that this is the correct authentication model for CDR in energy. Much more detailed consideration needs to be given to how this will work clearly and transparently in practice, in tandem with consent, for specific consumer use cases. MiC provides examples under commercial in confidence.

Consumer Consent / Authentication Duration

MiC further notes that the current CDR rules provide for a maximum 12-month consent period. Given that the standard small business energy contract is 24 months, MiC strongly proposes that this consent period is extended accordingly for business energy customers. Customer recency and privacy is still protected by the fact that any account changes that effect the validity of that consent (e.g. account holder or ABN change) could be detected on an ongoing basis, and therefore trigger a requirement to re-collect consent. If there are no changes then the consent should stay valid for the 24-month period to enable a renewal energy comparison and switch service.

*Q14. Do you agree that data holders should be able to rely on a single authentication carried out by another data holder?*

Yes.

*Q15. What are the risks and benefits of allowing customers to engage with a redirect-based authentication model offline (for example, by telephone)?*

As per our response to section 4.3 above, we believe there are existing technologies that can make a redirect-based authentication model accessible by “offline” consumers. For example

- Real time authentication over phone and e-mail
- SMS response for OTPs authentication
- Landline keypad to data holder for ADR IVR

*Q16. What are the costs and benefits for stakeholders associated with Model 1 and Model 2?*

*Q17. Do you agree with our preference to implement Model 1 as the authentication model for CDR in energy?*

*Q18. Should the ACCC and DSB also facilitate Model 2, for example as an alternative for retailers who are unable to build the authentication capability required by Model 1?*

MiC believes that Model 2 is the preferred option for the following reasons

- For the early stage energy CDR to work powerfully and quickly, as many retailers as possible should be part of the CDR eco-system from inception. As noted in the paper and in question 18 above, Model 2 is the quickest, most reliable and secure way to achieve this outcome.
- The potential additional risks in data sharing noted for Model 2 are easily mitigated for the reasons presented
  - Limited personal data sharing i.e. only name, e-mail, telephone number, postcode, ABN, NMI and current retailer are required, all of which are non-sensitive
  - The process only needs to supplement the personal data provided to the gateway for the purposes of authentication

More detailed consideration needs to be given for the likely scenario that the current retailer does not have an up to date mobile telephone number or e-mail address to facilitate authentication. For example, this could be provided by the provision of NMI combined with energy account number in these circumstances, in order to facilitate authentication by an unknown to retailer e-mail or mobile telephone number, or even landline key touch pad to IVR. This process could be analogous to the well-established concept of providing 100 points of identification.

#### **4.4 Dashboards**

*Q20. Of the three options for data holder dashboards, which do you prefer and why?*

*Q21. What are the advantages and disadvantages of each of the options?*

*Q22. What other options should we consider?*

*Q24. What consumer experience factors should we take into account with respect to how dashboards should be presented to CDR consumers?*

Generally, MiC agrees that consumer dashboards are an important aspect of the energy CDR eco-system. The principal purpose of the dashboards are to make it very easy for consumers to see and manage their specific CDR data sets and permissions/consents.

However, MiC believes that these dashboards will not be regularly reviewed by consumers, given the low engagement nature of energy. This is demonstrated by the fact that for the most obvious CDR use case, switching energy suppliers or plan, only 29% of small businesses switch in any one year

(referencing AEMC 2019 Retail Competition Review Small Business research conducted by Colmar Brunton). Therefore, care should be taken not to over complicate this requirement, and in doing so delay the roll out of an early stage energy CDR.

Furthermore, MiC notes that the paper's drafted position on dashboards is primarily concerned with data holder (as opposed to ADR) dashboards. Given that the paper also states in section 2 that its not intended "...to allow direct to consumer sharing in the early stages of CDR" then MiC believes the primary use case of consumer dashboards for early stage CDR is that between ADR and consumer.

Taking account of the above, MiC believes that Option 2 is the only option that meets this primary use case. In addition, MiC believes there should be a further option 4 where AEMO can provide an API to the relevant ADRs so that they can provide comprehensive dashboard services directly to consumers. This could be provided for on a "white label" basis as noted in the last paragraph of section 4.4.

Finally, with reference to section 4.4.3.4, and the role of AEMO in a customer facing capacity for the CDR, MiC sees this as an option worth exploring to promote impartiality, objectivity, trust and engagement in the energy market for ADRs, retailers and other data holders alike. MiC would welcome the opportunity for participation in any energy CDR CX research.

*Q23. Noting our intention to include customers without an online account with their retailer as eligible CDR consumers (see section 4.2.3.4) how might dashboards be provided for these consumers?*

These are most easily provided by e-mail on an annual, or on demand basis. In addition, they could also be provided through secure digital portal by the ADR or even AEMO direct, or on a white label basis.

#### **4.5 Dispute resolution**

*Q25. Do you agree with our proposed approach to energy sector IDR?*

Yes.

*Q26. How important do you consider consistency of IDR approaches across sectors at this stage of the CDR regime?*

It's not important at this very early stage of the CDR in both banking and energy. The focus should be on achieving a swift roll out of an early stage energy CDR.

*Q27. Do you think the Rules should provide for IDR processes for complaints by CDR entities to and about these same parties? Why or why not?*

No, as its likely to require a greater level of administration and bureaucracy that may impact the time to market of the early stage energy CDR. Existing energy IDR processes, regulation oversight and escalation, plus contractual and commercial relationships between these entities is more than sufficient.

#### 4.6 Phased implementation

*Q28. What do you consider is an appropriate measure of retailer scale to justify being brought within scope of CDR in energy?*

Customer (account) numbers.

*Q29. Should we apply a different measure of retailer scale for retailers serving large customers?*

No, MiC believes that customer account numbers are appropriate.

*Q30. If you favour a particular measure of retailer scale (for example, customer numbers) what threshold should we set between the different tranches?*

MiC is primarily concerned with small and large business customers, where obviously the addressable market is significantly smaller than residential, by a factor of ~10x. It therefore follows that the thresholds should be much smaller. MiC therefore proposes

- For small business customers a threshold of 500 customers
- For large business customers the threshold should be 100 customers

*Q31. Which of the options for the phasing of data holders do you prefer? Why? Do any of the above options present any significant issues that we should be aware of?*

MiC does not believe the options for sequencing of data holders (Table 2) nor proposed approach for sequencing data sets (Table 3) provide line of sight to a comprehensive enough data set for a compelling early stage energy CDR.

A more comprehensive data set can be accommodated simply by requiring all retailers over the threshold to provide up to date billing data through a recent PDF bill (which would also cover NMI, tariff and basic customer data), alongside any recent/relevant price change notification.

In effect this is proposing one tranche for all retailers in early stage energy CDR participation, with an exclusion for retailers below the customer account numbers threshold.

MiC can see there may be potential for a more sophisticated data sharing model, beyond simple PDF billing data, for later stage energy CDR. In which case MiC would favour a version of Option 3 in Table 2, incorporating the top 20 contestable SME retailers and at least the top 15 contestable retailers for large customers. This is broadly consistent with the customer account number thresholds advised above, and ensures participation of all the major Tier 2 retailers in energy CDR.

Finally, with reference to the proposed approach for sequencing data sets (Table 3), MiC believes the early stage energy CDR (Tranche 1) should also include NMI and basic non sensitive customer data (including ABN) in addition to billing data. As noted above much of the basic customer data can be made available with a PDF bill.

*Q32. What are the costs and benefits of phasing in retailers for the purposes of facilitating authentication only, in particular if this occurs at an earlier date than the date at which they must be able to fully participate by serving data into CDR?*

The benefits are as set out in the paper – sufficient participation by retailers to create scale consumer engagement and benefits from early stage energy CDR. Therefore, MiC agrees with the option to require the majority of energy retailers to be involved in the authentication process. The burden of this to the retailer, if there is one, can be mitigated by

- Only requiring retailers above MiC’s proposed customer numbers threshold to participate
- Implementing AEMO Model 2 for authentication as discussed in the response to section 4.3

*Q33. Do you agree with our proposals to permit data holders to come into the regime early on a voluntary basis, and to phase data holders into the regime earlier than scheduled if they become accredited?*

Yes. This is also consistent with the principle of reciprocity in CDR established by the ACCC.

#### **4.7 Issues relating to accreditation**

##### Energy data

*Q34. Do you agree that energy data sets are less sensitive than banking data sets?*

Yes absolutely. As there is no financial data shared, energy customer data is non sensitive and energy usage data is by and large non sensitive, with the one exception of real time interval data.

*Q35. Should any energy data sets, or subsets of those data sets, be treated with a higher degree of security (due to potential sensitivities), similar to banking data?*

As above, only real time interval data.

*Q36. If you agree that some or all energy data sets are generally less sensitive than banking data sets, do you support the introduction of a lower tier of accreditation for ADRs seeking to access those energy data sets?*

Yes. MiC believes this is a key requirement for a successful early stage energy CDR.

*Q37. If so, how should the obligations for ADRs at the lower tier differ from those applicable to ADRs at the existing ‘unrestricted’ tier? In particular, should the obligation to provide an assurance report be modified as outlined above?*

MiC has not been able to consider a full response to this question in time for the submission deadline. It logically follows that a lower tier of accreditation for less sensitive energy data (versus financial data) should require a lower level of assurance reporting. MiC will consider this more fully in time for the next consultation that we hope will be later this year.

##### CDR-wide tiering

*Q38. Alternatively, do you consider that we should consider introducing a lower tier of accreditation on a cross-sectoral basis for both banking and energy?*

No. MiC doesn't believe this needs to be considered at this very early stage of the CDR in both banking and energy. The focus should be on achieving a swift roll out of an early stage energy CDR.

Streamlined accreditation

*Q40. Do you agree that data holders in energy, if they wish to become ADRs, should have access to a streamlined accreditation process analogous to that applicable in banking?*

MiC's expertise is in small and large business energy comparison and brokering services, and so can only answer this question through that lens, as opposed to any knowledge of financial services or open banking regulation.

Third Party Intermediaries' (TPIs) role as a future ADR in the energy CDR seems clear. How an energy retailer could become a fair, transparent and objective ADR, without the potential for market commercial advantage is not clear to MiC. We would think for this to be possible there would have to be significant reassurance and regulatory oversight of any ADR capability and objectives within an energy retailer data holder. For example, formal "information insulation" walls and systems that prevent data and even physical IP sharing.

Furthermore, MiC also believes the same principles apply to any government agencies that wish to become ADRs, to prevent any kind of unintended competitive market distortion.

Conditions for accredited person to be data holder

*Q45. Do you agree with our view that conditions like those set out in Schedule 3, clause 7.2 of the Rules should be adopted in CDR in energy, with appropriate modifications? If so, what modifications are required?*

Consistent with our responses above, the role of TPIs as ADRs seems clear. In that model, ADRs would use the consumer CDR data to find new energy offers and process switching or renewals on behalf of consumers, and perform ongoing monitoring services; this is a core role of an ADR. The use cases for enabling transfer of data from one energy retailer data holder to another is not clear to MiC, so we do not think this is relevant to early stage energy CDR implementation.

The only exception is that already noted for AEMO and its dual role as both data holder, for MSATS data, and that of the energy CDR gateway.

## 5 Estimating the regulatory costs of CDR in energy

*Q46. Can you provide a rough breakdown of the implementation and ongoing regulatory costs that an energy data holder might incur? An estimated range would be appropriate.*

*Q47. Can you estimate what costs might be involved for a retailer to comply with authentication Model 1 and Model 2 identified in section 4.3.4?*

*Q48. Can you provide a rough breakdown of the implementation and ongoing regulatory costs that an ADR seeking energy data might incur? An estimated range would be appropriate.*

MiC has only been able to consider these questions at a high level for the purpose of this initial consultation. We would like to take the opportunity to comment that consumer data holding, privacy, security, authentication and regulatory oversight are part of the current processes and therefore costs of operating in the energy market. In a modern digital API environment, MiC does not think that these costs should be overly burdensome for an early stage energy CDR as described in this response. With the above caveat and point of view, the ADR costs in the paper look of the right order of magnitude, as do the lower end of the data holder costs.