



20 March 2019

Bruce Cooper
General Manager
Consumer Data Right Branch
Australian Competition & Consumer Commission
Level 2, 23 Marcus Clarke Street
Canberra ACT 2601
Via email: ACCC-CDR@acc.gov.au

Dear Mr. Cooper

RE: ACCC consultation paper on data access models for energy data

The National Farmers' Federation (NFF) welcomes the opportunity to respond to the Australian Competition and Consumer Commissioner's (ACCC) *Consultation Paper on data access models for energy data* as part of the Consumer Data Right (CDR) in energy.

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. The NFF's vision for Australian agriculture is to become a \$100 billion industry by 2030. Agriculture is a source of strength in the Australian economy, providing stable employment and income to rural communities. To achieve our vision, the sector needs regulatory and public policy settings that foster growth and productivity; innovation and ambition.

The NFF understands that the CDR originated from the banking sector and is now looking to incorporate energy data in the CDR, and supports its intent to provide consumers greater access and control of their data to improve their ability to compare and switch between products and services and encourage competition between service providers.

The NFF also notes that the CDR for utilities assumes smart meters will be in use and, at the moment, it is not uniformly applied across the NEM, that is, there is a mandatory requirement in Victoria, and installation is at best piecemeal in other NEM jurisdictions.

While the NFF supports measures that increase competition across all aspects of the energy sector, consistent with its energy policy, arrangements surrounding the privacy of information are a key concern, particularly in the current landscape where privacy, rights of individuals and its implications are already confusing.

The NFF is of the view that one of the outcomes of the CDR should require customers to have a clear understanding of their rights associated with data rights, particularly if they are to authorise data access to third parties. Customers should have a clear understanding of:

- Who holds the data;
- How the data is managed and who has access to the data;
- How secure the data is;
- How the data will be used.

To that extent, the information should be communicated in a manner that is simple and which allows customers to easily access and understand, and not add to the existing labyrinth of the energy market. Administrative costs involved in this process should not be passed onto the customer. In determining the optimal data access model for energy data, the NFF is of the view that, of the criteria noted in the consultation paper, user functionality and reliability, security and privacy should be key in the decision making process.

For further information, please contact Warwick Ragg, General Manager NRM on 02 6269 5666.

Yours sincerely



TONY MAHAR
Chief Executive Officer