



St Vincent de Paul Society
VICTORIA

good works

The St Vincent de Paul Society (SVDP) welcomes the opportunity to comment on the Consumer Data Right – Energy Rules consultation.

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To whom to may concern,

The St Vincent de Paul Society (SVDP) has for a number of years been actively involved in monitoring, evaluating and assisting energy consumers to navigate the residential gas, electricity and solar market, (reports can be found at www.vinnies.org.au/energy)

During this time, we have gained a comprehensive understanding of the energy market and how consumers engage with it.

Of particular interest to the Consumer Data Right (CDR) consultation is *how* many households make basic energy decision in regards to standard energy offers, i.e. generally available gas and electricity offers.

SVDP are aware that often the energy account holder *is not the persons* responsible for the energy management activities and the product selection decision of the household. This is often left to other parties, which can include either a resident in the household OR a third party that a household calls on to assist them in household management and budgeting, for example, members of extended family, friends, or members of the SVDP Society or other community welfare organizations.

It is critical for policy makers to understand this, in the energy context, to ensure that the development of the CDR for energy is fit for purpose for the market it is operating in.

With this in mind the CDR consultation paper asks:

“Finally, we are also seeking feedback on whether it would be appropriate from a policy perspective to adopt an alternative or additional method of authentication in relation to these specific data sets. Instead of ‘strong

authentication', which relies on the consumer's identity, it may be possible to permit authentication based on some other factor(s), allowing AEMO to share data it holds without the need for retailer input.

We welcome views on whether it would be appropriate to permit these specific data sets to be shared, for example, where a person is able to provide the NMI, postcode and the name of the current retailer for a premises. This approach may have the benefit of providing access to a limited version of CDR data sharing for a wider range of consumers. However, we are also mindful of the potential risks in respect of privacy and information security, and the costs of creating an authentication model that does not align with other CDR sectors such as banking. We would welcome additional feedback to assist us in considering the advantages and disadvantages of alternative approaches to authentication.”¹

SVDP VIEW – we support the development of a Resident model for basic energy services

The St Vincent de Paul Society believes a two-tiered approach to authentication and accreditation will maximize consumer access to specific, high value use cases while also allowing for the evolution of other innovative products and services which require more sensitive, customer provided, data.

The majority of value in the short to medium term for third parties is in the metering data, NMI standing data and generic tariff data. There are a number of specific use cases that can be easily defined and that can leverage these data sets including quoting tools, energy efficiency and monitoring products and services, and customer acquisition. These data sets can be provided following a basic authentication process, such as the one used for Victorian Energy Compare where only the customer's NMI, retailer and postcode is required as input.

In the CDR context, privacy can be managed by implementing a suite of data management principles using accreditation requirements. The ADR's could be required to only displaying analysis outcomes for the premises and not disclose granularity or behavioural information of individuals, and be required to delete data after a one-time use.

From a consumer's perspective, they can quickly and simply access a service, without having to consent to providing access to additional personal data. It also provides access to data for a wider set of consumers, including residents in a premises who are not the account holder with the retailer. Providing this access will foster engagement in the retail competitive market which has been a challenge in the energy sector.

This approach extends the banking framework which contemplates levels of accreditation and under which the ACCC also requests information from ADRs on their intended uses of data.

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