



13 September 2021

Secretariat
Treasury
Langton Crescent
Parkes ACT 2600

Submitted via email 13 September 2021: data@treasury.gov.au

Dear Secretariat

**Energy Queensland submission to Consumer Data Right in the energy sector -
Proposals for further consultation - Consultation Paper**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to Treasury on their Consultation Paper - *Consumer Data Right (CDR) in the energy sector – Proposals for further consultation*.

This submission is provided by Energy Queensland, on behalf of its related entities, including distribution network service providers (DNSPs), Energex Limited and Ergon Energy Corporation Limited, retailer, Ergon Energy Queensland Pty Ltd, and affiliated contestable business, Yurika Pty Ltd.

Energy Queensland supports the proposed staged approach to implement the CDR in the energy sector and anticipates this approach will afford retailers sufficient time to comply with the new obligations.

While our retailer has focused on meeting its expected compliance obligations as a data holder, preparations for implementation have been hampered by the extensive delay in publishing draft CDR rules for the energy sector, the late change in data delivery model (from the AEMO Gateway model to the Peer-to-Peer model), and concurrent implementation of significant market reforms associated with five-minute settlement and global settlement. It is anticipated that the CDR will require investment in new systems to ensure compliance and to integrate the CDR with business-as-usual activities.

Similarly, it is unclear whether requests from consumers would result in significant additional data provision requirements from DNSPs beyond existing data sets already supplied to retailers or AEMO. Accordingly, if further system changes are required by DNSPs to implement potential changes or additional data sets, our DNSPs advise this could not be accommodated prior to June 2023 to align with the existing planned system replacement go live.

As such, it is difficult to quantify additional costs or implications that the implementation of CDR across the EQL business will have at this stage. Given this, we suggest there is

a compelling need for Treasury to conduct a detailed review of the implementation and operation of the CDR in the banking sector over the initial 12 months of operation, with this report to be made public to aid the efforts of the energy sector with its implementation and reduce the cost impacts which will flow to customers.

Should Treasury require additional information or wish to discuss any aspect of this response, please contact me on 0409 239 883 or Barbara Neil on 0429 782 860.

Yours sincerely



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