



13 September 2021

Michelle Looi
Assistant Director
Consumer Data Right Department, Markets Group,
The Treasury

By email: data@treasury.gov.au

Dear Michelle,

ReAmped Energy welcomes the opportunity to comment on the draft CDR rules for the energy sector. We broadly support any measures that promote competition and enable consumers to get access to cheaper prices. We believe the use cases for CDR are consistent with these aims, especially those that enable customers to better assess competing market offers and maximise their savings.

However, our view of the CDR rules proposed for the energy sector is that they are significantly onerous and risk driving costs that far outweigh the benefits. As a rapidly growing independent retailer with just over 42,000 residential customers, we are primarily concerned about the overall impact on customers' bills from new regulations. In this case it is highly possible, if not probable, that the cost of implementing the CDR P2P model will outweigh the benefits, a net cost that will ultimately be borne by our customers.

The proposed design will incur significant costs to implement and maintain

The crux of the issue is that each retailer in the NEM will be managing multiple new B2B relationships and systems integrations with Authorised Data Recipients (ADRs). Administratively and technically this will likely have unforeseen complications that need to be resolved multiple times over, for each B2B relationship, significantly eroding any net benefits for customers.

Additionally, the multiple relationships required for an ADR to get access to a scalable amount of data may create a significant barrier to entry for many, reducing the success of the CDR to promote better competition.

Alternative avenues to achieve the benefits targeted from CDR

While technology in the P2P space is rapidly evolving and does present new and exciting opportunities to create value for customers, our view is there are several solutions available today which are far simpler. These solutions build on existing systems and integrations in the energy industry and would therefore deliver much greater efficiencies in implementing CDR.

We recommend the Treasury explores in more detail the following ideas before settling on building a new P2P model for CDR

1. It would make sense to leverage the existing regulatory data sources and standardised interfaces in the design of CDR. The energy industry set-up is already more prepared to deliver CDR than the banking sector and this should be considered in this design. As a first step, it would make sense to



provide ADRs access to existing centralised data stores and should there be demand for more data fields, then these can be collected once the business case has been made.

2. Further consideration of who is the primary data holder should be made. As most of the 'use cases' for CDR in energy revolve around access to metering data it is worth questioning whether the retailer needs to be the primary data holder. Currently a consumer can get access to their consumption data from AEMO, their Distributor and their Retailer. In fact, a retailer only has access to consumption data for the period they were a customer. The benefits of reassigning AEMO as the primary data holder for consumption data would remove restrictions in accessing the data faced by the retailer and an ADR would only need to build one interface with the AEMO system removing a large chunk of administrative overhead.
3. Whilst there are many potential ADRs in the future, who deliver value services for customers, the current use cases revolve around enhancements to comparisons so that customers can make more informed decisions about their energy use and retailer. Potentially there is a much quicker route to delivering this value by increasing the required information provided to Energy Made Easy and Victorian Energy Compare, the government's own price comparison websites.

Ongoing monitoring of ADRs required to protect customers

The final point we'd like to raise is to highlight that the rules put a heavy onus on retailers to vet ADR credentials, ensure customers authorise the sharing of data and monitor this authorisation on an ongoing basis. It is our view that the ADR also needs to have greater accountabilities to ensure protections are in place to prevent misuse.

To protect customers ADR practices will need to be monitored in the same way as retailers to ensure that customer's data is being used solely for the authorised purpose and appropriate controls are in place to manage and store the data securely.

We look forward to further engagement with the Treasury on this matter and encourage lower cost options to be explored to ensure that CDR delivers the expected value to Australian consumers.

Kind Regards,

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