



14 October 2022

Consumer Data Right Division
Treasury
Langton Crescent
PARKES ACT 2600

Lodged electronically: data@treasury.gov.au

Dear Sir/Madam,

Consumer Data Right Rules – Operational Enhancements

Origin Energy (Origin) appreciates the opportunity to provide comment on the operational enhancements to the Consumer Data Right (CDR) Rules, published on 15 September 2022.

Ensuring the successful delivery of complex initiatives such as the CDR requires certainty around the operational requirements and timeframes. Introducing new obligations at short notice increases the risks to participants of not being able to discharge their obligations in a timely and or cost-efficient manner. This also has a flow on effect that consumers may not be delivered with a fully functional end product.

While some of the proposed operational enhancement appear to be clarifications and assume no implementation changes, we believe several enhancements will require energy businesses to make system and process changes. Origin's preliminary High Level Impact Assessment (HLIA) is provided in below table:

Proposed amendments	Origin's HLIA
Notifications of expired consents and authorisations	System and/or process changes to notify to accredited persons when a consumer withdraws an authorisation to disclose particular data, or when it an authorisation expires.
Displaying authorisation amendments on dashboard	System changes to include details about amendments to authorisations on a consumer's dashboard.
Additional consumer dashboard functionality	System changes to include the ability for consumers to request disclosure of corrected CDR data, on the consumer dashboards.

Refusal to disclose required consumer data	System changes to enable refusal to ask for an authorisation to disclose relevant CDR data (or an amendment to such an authorisation) or to disclose requested data if another provision of the CDR Rules would not permit disclosure of the relevant CDR data.
Record keeping and reporting	<p>System changes to keep CDR complaints, in addition to CDR complaint data.</p> <p>Process changes to enable CDR consumers to request copies of CDR complaints they have made, as well as statistical or other data relating to CDR complaints.</p>

These changes are being proposed at a time when energy businesses are heavily focussed on delivering the CDR for go-live on 15 November 2022. Origin has resourced and planned according to this date and the agreed technical and operational specifications. Given we have already committed resources to meeting the agreed date, adding additional obligations at this late stage places an unnecessary burden on energy companies and introduces unnecessary delivery risks.

While Origin supports the proposed additional operational enhancements, these should be delayed to coincide with the next phase of the CDR rollout – the introduction of CDR for business customers in May 2023. This will allow for appropriate integration and testing and the better management of limited resources.

Ensuring the successful rollout of CDR for consumers is paramount. As rule makers and industry we ought to be minimise any actions that will knowingly jeopardise this. For this reason we request that Treasury delay the integration of these proposed enhancements until the next stage in the rollout process being May 2023.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on (07) 3867 0863 or caroline.brumby@originenergy.com.au.

Yours sincerely



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