

Consumer Data Rights (CDR): Energy

14 June 2022



We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture.

We pay respect to their Elders past, present and emerging.

AEMO Competition Law Meeting Protocol

- AEMO is committed to complying with all applicable laws, including the Competition and Consumer Act 2010 (CCA). In any dealings with AEMO regarding proposed reforms or other initiatives, all participants agree to adhere to the CCA at all times and to comply with this Protocol. Participants must arrange for their representatives to be briefed on competition law risks and obligations.
- Participants in AEMO discussions must:
 - Ensure that discussions are limited to the matters contemplated by the agenda for the discussion
 - Make independent and unilateral decisions about their commercial positions and approach in relation to the matters under discussion with AEMO
 - Immediately and clearly raise an objection with AEMO or the Chair of the meeting if a matter is discussed that the participant is concerned may give rise to competition law risks or a breach of this Protocol
- Participants in AEMO meetings must not discuss or agree on the following topics:
 - Which customers they will supply or market to
 - The price or other terms at which Participants will supply
 - Bids or tenders, including the nature of a bid that a Participant intends to make or whether the Participant will participate in the bid
 - Which suppliers Participants will acquire from (or the price or other terms on which they acquire goods or services)
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Agenda

1. Introduction
2. Overview of CDR in Energy
 - a. Regulatory framework
 - i. CCA
 - ii. NEL/NER
 - b. How it works and the intent around historical meter data - from Rules to Standards
3. Matter for consultation
 - a. Summary
 - i. What was proposed
 - ii. Feedback
 - b. Use case walkthrough
4. Conclusion – next steps

Introduction



Consumer Data Right (CDR)

The Consumer Data Right (CDR) is a Commonwealth economy-wide reform designed to:

- Offer Australians greater control over their data, and
- Empower Australia's consumers to choose from a range of tailored and innovative products and services.

Who is involved

- The [Treasury](#) leads CDR policy, including development of rules and advice to government on which sectors CDR should apply to in the future. Within Treasury, the [Data Standards Body \(DSB\)](#) develops the standards that prescribe how data is shared under CDR.
- Treasury works closely with the two regulators, the [Australian Competition and Consumer Commission \(ACCC\)](#) and the [Office of the Australian Information Commission \(OAIC\)](#) to implement and regulate the CDR.
- The ACCC is responsible for the accreditation process, including managing the Consumer Data Right Register. The ACCC ensures providers are complying with the Rules and takes enforcement action where necessary.
- The OAIC is responsible for regulating privacy and confidentiality under the CDR. The OAIC also handles complaints and notifications of eligible data breaches relating to CDR data.

Principles

The Consumer Data Right will be implemented according to four key principles:

- The Consumer Data Right should be **consumer focussed**. It should be for the consumer, be about the consumer, and be seen from the consumer's perspective.
- The Consumer Data Right should **encourage competition**. It should seek to increase competition for products and services available to consumers so that consumers can make better choices.
- The Consumer Data Right should **create opportunities**. It should provide a framework from which new ideas and business can emerge and grow, establishing a vibrant and creative data sector that supports better services enhanced by personalised data.
- The Consumer Data Right should be **efficient and fair**. It should be implemented with security and privacy in mind, so that it is sustainable and fair, without being more complex or costly than needed.

Notes

- Meghan Bibby (AEMO) spoke to the introductory slides and gave an overview of the Consumer Data Right reform
- Jeff Roberts asked where jurisdictional bodies, like EWON etc, sit in this?
- **Action: AEMO to take the question on notice**
 - From Competition and Consumer (Consumer Data Right) Rules 2020 <https://www.legislation.gov.au/Details/F2022C00187>
Schedule 4—Provisions relevant to the energy sector
5.2 External dispute resolution requirements—energy sector
Note: The Australian Financial Complaints Authority and the energy and water ombudsman of each State and Territory are recognised as external dispute resolution schemes for section 56DA of the Act.

Overview of CDR in Energy



Competition and Consumer Act (CCA)

The Consumer Data Right is established primarily through amendments to the Competition and Consumer Act 2010 and the Privacy Act 1988. This enabling legislation:

- Sets out the role, functions and powers of each of the ACCC, OAIC and Data Standards Body;
- Outlines the overarching objectives and principles for the Consumer Data Right;
- Creates a power for the Treasurer to apply the Consumer Data Right to new sectors; and
- Enshrines a guaranteed minimum set of privacy protections, which are built upon in the ACCC rules.

CDR in the energy sector

The regulatory framework for the implementation of CDR in the energy sector was completed by Treasury in 2021 including:

- The designation of the energy sector and data holders
- The development of energy specific consumer data right rules
- The establishment of data standards by the DSB.

The CDR designation for the Energy sector puts obligations on Retailers and AEMO to fulfil CDR data requests as primary and secondary data holders respectively.

CDR Rules are available [here](#).

National Electricity Law (NEL) and National Electricity Rules (NER)

The Commonwealth Department of Industry, Science, Energy and Resources consulted on amendments to the NEL/NER to support the introduction of CDR to Energy. The key elements were

- Amendments to ensure consistency between the CDR for Energy and the NER, remove existing barriers to the functioning of the CDR for Energy and ensure that providing data in accordance with the CDR Rules is authorised under the NEL.
- A catch all provision to ensure that nothing prevents AEMO or a registered participant disclosing CDR data in accordance with the CDR Rules. In doing so, this amendment will provide certainty that complying with the CDR will not put retailers or AEMO at risk of breaching the NER.
- Addition of CDR as a statutory function of AEMO
- Extension of the existing Metering Data Provision Procedures to include standing data. The effective date of changing this change is proposed to be set by AEMO.

Energy Ministers have agreed to the NEL and NER amendments and the amendments will be introduced into the South Australian Parliament in the second half of 2022.

Notes

- Luke Barlow (AEMO) spoke to slides 11 to 13.
- Mark Riley (AGL) stated that retailers will need to know how handle consumer complaints, especially AEMO provided data, probably need some direction to the Ombudsman that there's no point sending it to us.
 - Competition and Consumer (Consumer Data Right) Amendment Rules (No. 2) 2021
 - Section 1.26 Dispute resolution—primary data holders and secondary data holders
 - Where a primary data holder requests relevant information from a secondary data holder in relation to a consumer complaint or dispute with the primary data holder that relates to an SR data request, the secondary data holder must provide the information to the extent that it is reasonable to do so.
- Robert Lo Giudice (Alinta) questioned why a solution is being proposed as CDR has yet to be ratified by the SA Government?
 - Luke Barlow (AEMO) noted that the Commonwealth CCI Act and the CDR rules have defined what is happening. Luke noted, that the obligations under the CCA stand irrespective of the NEL/NER amendments in place before the SA government.
- Robert Lo Giudice (Alinta) questioned why Industry wasn't engaged earlier to identify a preferred solution.
 - Robert noted that once in writing, it's always much harder to reverse a proposal or remove these policies. The preference would have been for solutions to be workshopped and then proposals put forward as opposed to the other way around.
 - James Bligh (DSB) noted that there was consultation done, just not by AEMO. Engagement occurred through Treasury's CDR process, questions were being asked around how to resolve specific issues with data sharing e.g. CDRs that spans multiple retailers. The consultation was done during the period of time when AEMO was going to be at Gateway. To a degree this consultation has inherited those other consultations, just via a different channel.
 - August 2019 Consumer Data Right in Energy Position paper: data access model for energy data - [ACCC position paper: data access model for energy data](#)
 - Data designation link [Consumer Data Right – energy sector designation instrument](#)
 - Priority Energy Datasets - [Consumer Data Right – Priority Energy Datasets](#)
 - CDR Energy Standards for Usage Data [Decision Proposal 195 - Candidate Usage End Points](#)

Notes

- Wayne Turner questioned what sort of NMI standing data would be required to be provided under the MDPP.
 - Luke Barlow (AEMO) noted the extension to the MDPP procedures will be consulted on following the passage of the NEL/NER changes through the SA Government.
- Christophe Bechia asked if AEMO would have additional obligations and therefore consequences in terms of managing customer's privacy.
 - Luke Barlow (AEMO) noted that CDR is not expected to change AEMO's privacy obligations, including the proposed new MSATS field. Legal assessment is being done by AEMO.
 - [Consumer Data Right: Privacy Impact Assessment \(June 2020\) | Treasury.gov.au](#)
- Mark Riley (AGL) noted that any consultation that was undertaken two years ago, about providing data or discussions of data to customers, was only about the metering data.
 - There wouldn't have been any discussion about a field in MSATS and the management and maintenance of said field.
 - Mark also noted concern regarding the legislative changes which may not pass, liabilities and obligations and the scheduled May implementation date putting obligations on tier 3 retailers.
 - Luke Barlow (AEMO) noted currently there is no way to back populate the last consumer change date, hence, early implementation supports consumer's having access to more data sooner. If left until the last tranche, consumers would not be able to benefit from CDR until 2025 at the earliest. Noting the last consumer change date only applies to metering data.

How CDR works and the intent around historical meter data



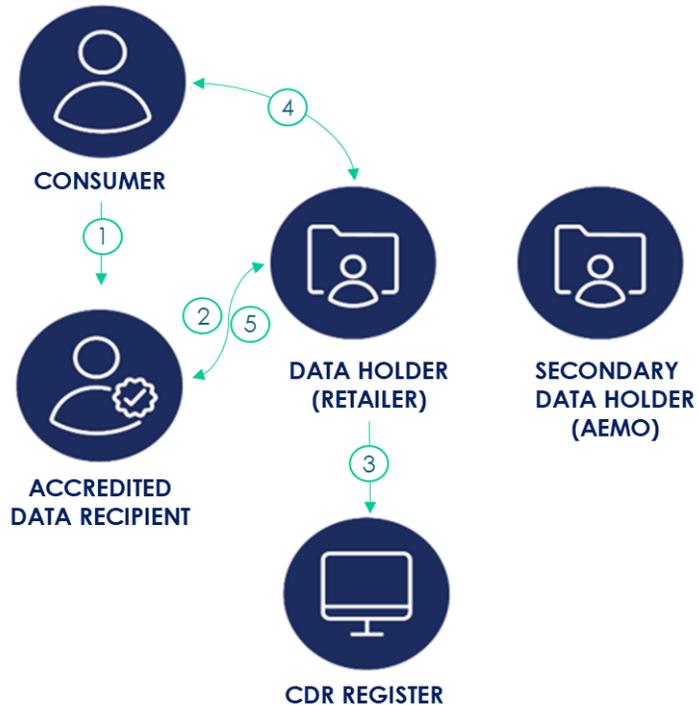
From Rules to Standards



How CDR works – CDR data sharing model in Energy

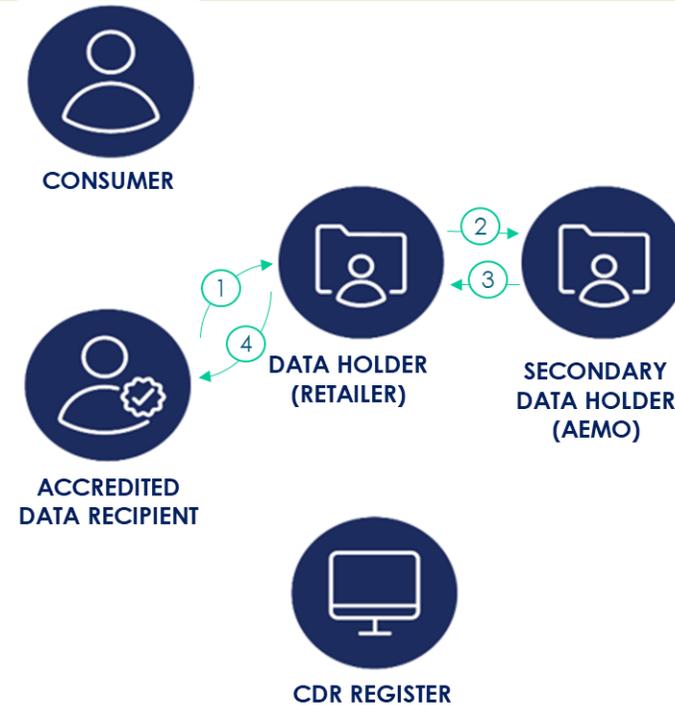
Authentication and Authorisation

The Consumer requests a service from the ADR (1), who passes the Consumer to their Retailer for Authentication (2). The Retailer checks the ADR's credentials (3), authenticates the Consumer who Authorises sharing of their data (4) and confirms with the ADR (5).



Data Provision

Once Authorised, the ADR requests the data they need to deliver their service, from the Retailer (1). When the Retailer needs AEMO supplied data (standing, usage or DER data) the request is forwarded (2). AEMO retrieves and supplies the data to the Retailer (3) who together with data they supply, forward it to the ADR (4) who uses it to deliver the service to the Consumer.



Intent around historical meter data

For CDR the “Usage” dataset is the only designated dataset (Retailer or AEMO) for which historical data is to be provided beyond the current retailer relationship.

From a user perspective

“I used CDR last month and had access to 2 years of my usage data. I switched retailers and now only have access to 1 month of usage data!!”

Notes

- John Adshead (AEMO) spoke to the slides, including authentication, authorisation and data provisioning workflows
- Jeff Roberts asked who holds the CDR register
 - John Adshead noted it was the ACCC and any accredited data recipient is required to get accredited through the required process (ADR onboarding)
- Helen Vassos (PLUS ES) asked what is the obligation on the accredited data recipient that they need to ascertain that the customer was the customer, before they go to the retailer or does that responsibility fall on the current retailer and how much of the obligation falls on the current retailer.
 - James Bligh (DSB) noted the key relationship for data sharing under the CDR is not a NMI, it's the consumer, data holder and ADR. For data sharing to occur, a consumer needs to go to an ADR and identify themselves. The ADR will do whatever process they have for identity provision, which may be a varying quality. There is then a process that's been documented in regulations, in rules, as well as legislation, down to detailed technical standards, including consumer experience standards.
 - James Bligh (DSB) noted the technical process is based on open ID CONNECT, which is an international standard, where the control is shifted from the ADR to the Retailer. The Retailer is the Retailer nominated by the consumer. The Retailer then presents 'authorisation screens' to support the consumer authorising the sharing of information with the ADR. These may be the same channels Retailers are currently using for digital channels or call centres. The data holder in all cases is the Retailer, AEMO is considered a secondary data holder (a provider of data to the primary data holder).
 - Question, why can't the ADR authenticate the consumer upfront, may include identification (e.g. 100 point check) and recent energy invoices? ADRs could, but consumers would also need something to show how long they had been at the premise... The model is already chosen based on Banking. The banks, as data holders, know the customer and can validate them from that knowledge (in their systems) without need for additional (100 point) supporting material.
 - James Bligh (DSB) noted the technical standards have been designed so that AEMO never knows the consumer, only the ADR and the retailer have consumer information.
 - James Bligh (DSB) noted that the core issue occurs where a consumer has been with multiple Retailers during the CDR period. AEMO has no visibility to these arrangements. If the Retailer cannot authenticate the consumer/premise relationship then data sharing cannot occur (low risk approach).

Notes

- Shaun Cupitt asked if the previous Retailer had an obligation to authenticate a consumer, where the CDR covered multiple Retailers.
 - James Bligh (DSB) stated that this has been looked at extensively, especially with the 3 initial Retailers. CDR decided that AEMO would instead be able to play a role in resolving this issue.
- Mark Riley noted that the proposed solution would impact all Retailers, not just the initial 3 Retailers, much earlier than anticipated, for very low benefit.
 - James Bligh (DSB) noted that alternative solutions were seen to be much more expensive, on a relative basis e.g. Retailers having to maintain previous consumer details (consumer history).
- James Bligh (DSB) confirmed that usage data (metering data) is the only designated dataset which historical data is to be provided beyond the current retailer relationship.
 - Usage data, up to 2yrs, is seen as key information required for Pricing and Product purposes.

Matter for consultation



AEMO Proposal

- To support AEMO's ability to efficiently respond to a Retailer's consumer data request, AEMO is proposing an aseXML change to add a "Last Consumer Change Date" field to the CATS_NMI_DATA table with the following requirements:
 - Extend the CR5054 and CR5055 Change NMI Details transactions to allow the current FRMP to explicitly maintain this data.
 - N.B. As both "Last Consumer Change Date" and 'Customer Classification Code' will be mandatory fields, Participants will be required to complete both fields whenever this CR is raised.
 - The actual change date would be the effective date of the completed Change Request.
- Procedure effective/implementation date of 30 May 2023, to align with SAPS
- The addition of the "Last Consumer Change Date" field will enable the current retailer to request data for periods prior to them becoming the FRMP, eliminating the need for an ADR to otherwise contact multiple Retailers/FRMPs to obtain the information required.

AEMO Proposal (2)

- The point of Consumer onboarding by a Retailer is the most secure point to capture the information as the process:
 - Includes a Consumer authentication step – “Know your customer”
 - Seeks information on whether a consumer is moving into the premise

Consultation Submission Summary

- 15 submissions were received, 9 of which did not support AEMO's proposal
- Material issues raised:
 - Lack of legislation
 - Potential privacy and liability risks
 - 'Customer Information' being maintained in MSATS
 - Impacts to non-Retailer Participants e.g. costs and schema
 - Edge case applications, including error corrections and cooling off periods
 - Implementation timings
- Alternative options suggested:
 - Consumers to inform their appointed ADR about their electricity retailers, ADR to raise multiple CDRs where required
 - AEMO to use customer switching information held in MSATS where 'Change Retailer Insitu' CRs (e.g. CR1000) provides information that customer has remained the same but switched retailers, whereas 'Change Retailer Move-in' (e.g. CR1020/1030) provides change in customer as well as retailer.
 - B2B solution providing more real time information to AEMO. AEMO already has access to the B2B platform and can interrogate the information of interest as is seen fit.

Notes

- Meghan Bibby (AEMO) spoke to the slides consultation slides
- Meghan Bibby noted the proposed field was being suggested to support the key outcomes of CDR e.g. provision of data where multiple Retailers are involved.
- Robert Lo Giudice asked about how AEMO would respond to data requests between Nov 2022 and the proposed implementation date of the MSATS field (30 May 2023)
 - Meghan Bibby stated that between Nov 2022 and May 2023, data would only be provided by AEMO for a maximum of 2yrs where the Retailer is the current FRMP in MSATS
- Mark Riley asked if the proposed last consumer change date would be visible through NMI Discovery
 - Meghan Bibby stated that it wouldn't be visible via NMI Discovery
 - Mark Riley raised concerns about how the current FRMP would be able to verify the change date for a CDR, especially associated to a consumer complaint (e.g. consumer was provided 6mths but has been living at the premise for 3yrs). To be discussed in next workshop.
 - James Bligh (DSB) acknowledged that the Retailer would not be able to resolve this complaint under the proposed solution during the initial stages of CDR
 - James Bligh (DSB) suggested that potentially the last consumer change date could be 'back loaded', but this would add additional costs. To be discussed in next workshop.
- Meghan Bibby (AEMO) spoke to the issues and potential alternative solutions raised as part of the initial consultation submissions
 - Meghan Bibby (AEMO) mentioned that the proposed:
 - B2B solution was not viable as:
 - B2B information was not currently accessed by AEMO, AEMO is just a mailbox. AEMO has no authority to access this information.
 - The information contained within the files may not accurately reflect the correct consumer to premise relationship from a CDR perspective.
 - The ADR solution would not be ideal as the ADR is not in a strong position to understand the customer privileges and may breach privacy laws.

Notes

- Robert Lo Giudice (Alinta) suggested that ADRs should be able to manage privacy issues
 - James Bligh (DSB) mentioned that the ADR is seen to be the least capable of ascertaining how long the consumer has been at a premise.
- Robert Lo Giudice (Alinta) questioned how a Retailer was meant to verify how long the consumer has been at a premise
 - James Bligh (DSB) agreed that the Retailer may not be able to verify that information as well, however, Retailers have additional mechanisms in place when a consumer commences a contract for the supply of energy. On a comparative basis, the Retailer was seen as being best placed to manage this issue.
- Regarding the issue of costs and impacts to non-Retailers, associated to the proposed solution, Meghan Bibby (AEMO) noted that AEMO are currently considering a change in how the proposed field would be maintained in MSATS i.e. creating a new CR for this field which would allow Participants the choice to stay on the n-1 schema.
 - Any proposed changes will be socialised with the ERCF prior to the Draft report.
- Meghan Bibby (AEMO) noted that as the proposed field would not be accessible via NMI Discovery, AEMO believed this managed the risk of this 'consumer information' being used or accessed inappropriately.

Use Case Walkthrough

- Key CDR elements:
 - CDR only allows the current account holder to access the data for the NMI (if there has been a change in account holder, any previous account holders cannot authenticate so do not have access)
 - Current CDR standards still apply – if the retailer knows when there is a move in (ie. they have been the FRMP throughout), they can only request/modify the ADRs request, for the period of the current consumer
- For setting the LastConsumerChangeDate flag - from a retailer perspective:
 - A person approaches wanting to become a customer – Retailer asks is this a move in or are you just changing retailer? A move in resets the LastConsumerChangeDate flag a change of retailer does not
 - An existing customer approaches wanting to change the name on the account – Retailer uses existing approach (unknown to us) to establish if this needs a new clean account or to change the account holder to the new name. A new account resets the LastConsumerChangeDate flag, a change to a new name does not
- Other use cases?

1 - Base Scenario – Single Consumer, Single Retailer

Consumer

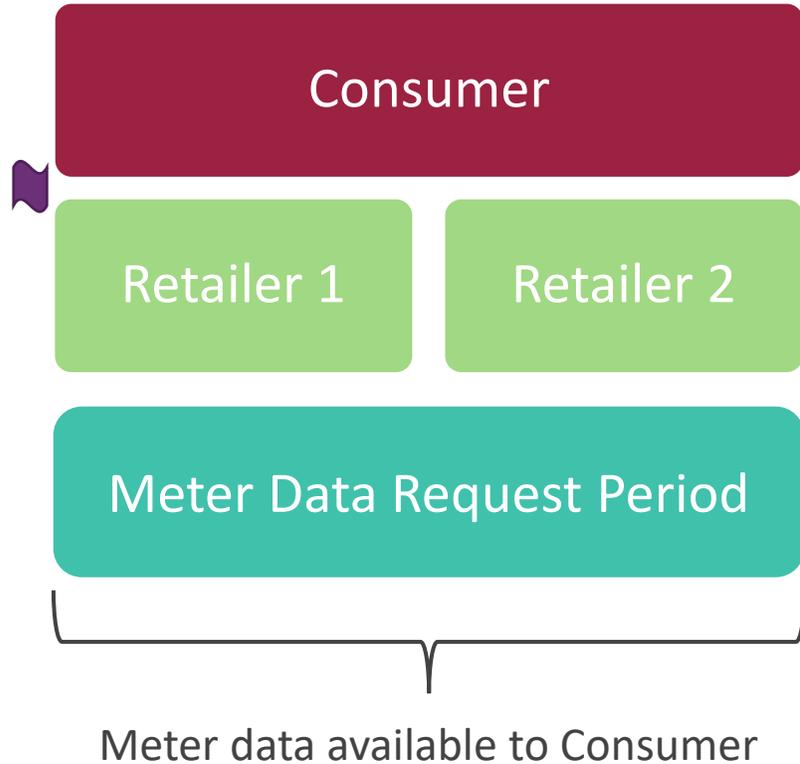
Retailer (FRMP)

Meter Data Request Period

Meter data available to Consumer

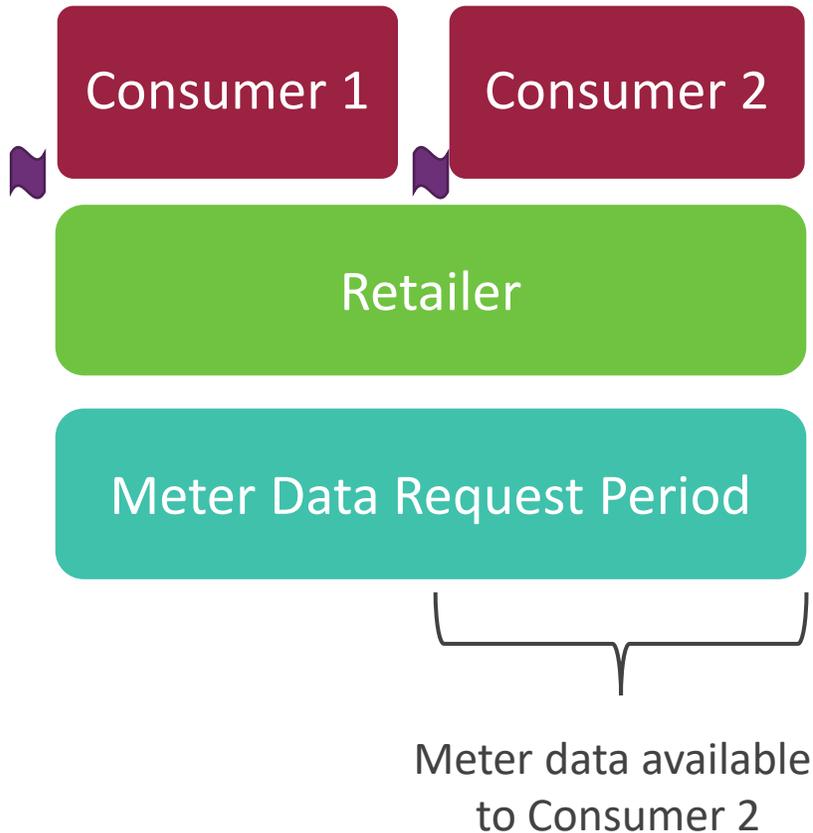
- Meter data is requested for a period within 24 months
- The consumer is a customer of a single retailer for the full date range of the request
- All available data within the requested date range can be provided to the requesting party
- **Current model supports this scenario**
 - Under CDR the Consumer as account holder has access to all of the data requested
 - The Retailer already knows the Consumer has been at that service point for more than the request period
- **The new MSATS flag also supports this scenario.** All of the data for the request period will be made available back until the LastConsumerChangeDate Flag
 - The Flag would be set by the Retailer when the Consumer moves in

2 - Single Consumer – Change of Retailer



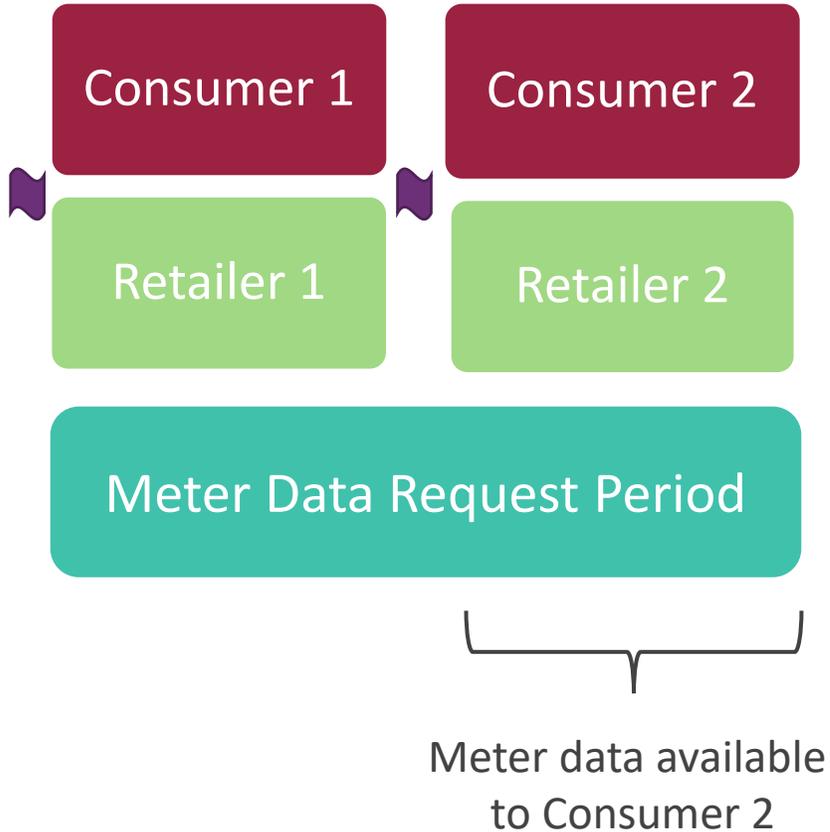
- Meter data is requested for a period within 24 months.
- The consumer has been a customer of multiple retailers during the meter data request period.
- The current retailer (Retailer 2) can only authenticate the consumer for the period during which they have been the retailer.
- **Current model does not support this scenario.**
 - Currently under CDR, the consumer can only access meter data for the period they were with Retailer 2
- **The new MSATS flag does support this scenario.** All of the data for the request period will be made available back until the LastConsumerChangeDate Flag
 - The Flag would be set by Retailer 1 when the Consumer moves in and **not reset** by Retailer 2 in the event of a change of retailer only

3 - Multiple Consumers – Single Retailer / Move In



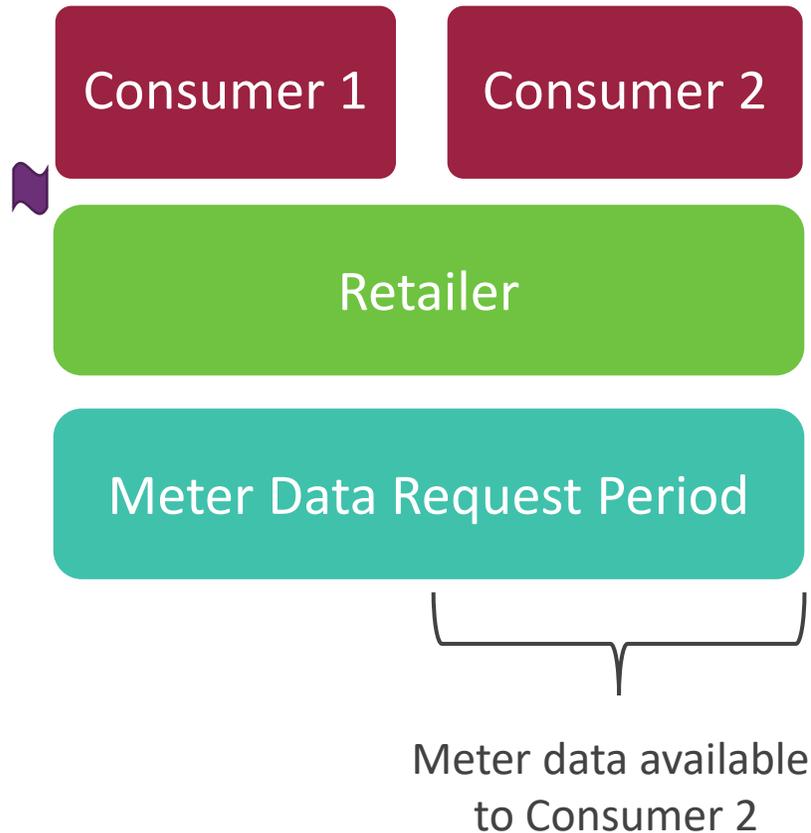
- Meter data is requested for a period within 24 months for the **current** consumer.
- The request covers a date range that includes a period before the consumer moved into the premise.
- The retailer is the FRMP for the full request date range and can identify the current consumer's start date.
- Meter data is only to be provided for the period Consumer 2 is responsible.
- **Current model supports this scenario**
 - Only data for the period Consumer 2 is the account holder is available
- **The new MSATS flag also supports this scenario.** All of the data for the request period will be made available back until the LastConsumerChangeDate Flag
 - The Flag initially set by the Retailer when Consumer 1 moves in is reset when Consumer 2 moves in

4 - Multiple Consumers – Change of Retailer with Move In



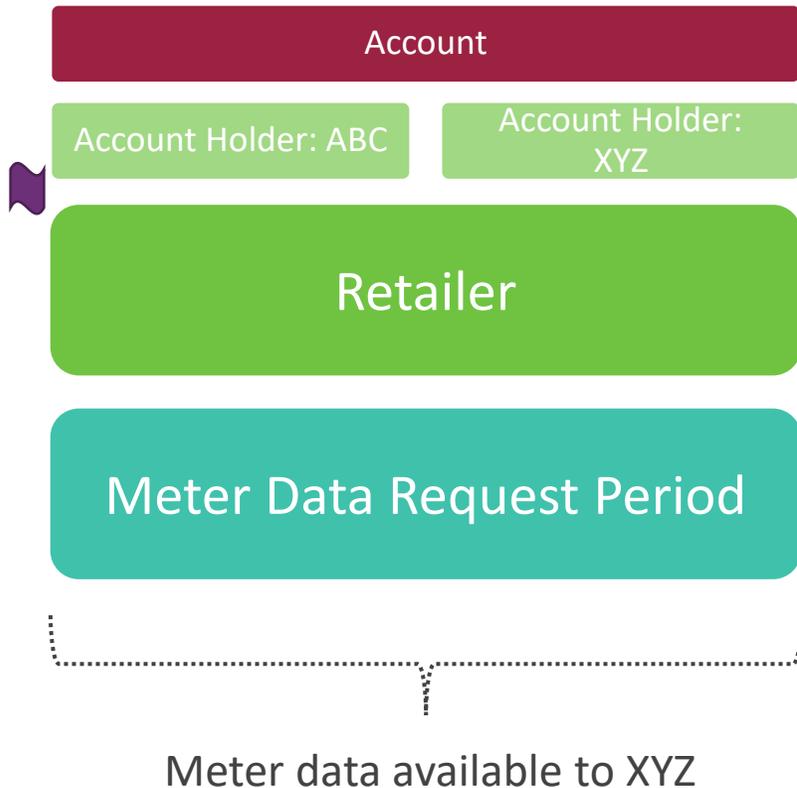
- Meter data is requested for a period within 24 months for the **current consumer**.
- The request overlaps with a change in consumer where the new consumer has moved into the premise and selected a different retailer.
- Meter data must only be provided for the period that the current consumer is responsible for.
- **Current model supports this scenario**
 - Only data for the period Consumer 2 is the account holder is available
- **The new MSATS flag also supports this scenario.** All of the data for the request period will be made available back until the LastConsumerChangeDate Flag
 - The Flag initially set by the Retailer 1 when Consumer 1 moves in is reset by Retailer 2 when Consumer 2 moves in

5 - Change of Account Holder – No Move In



- Meter data is requested for a period within 24 months for the **current** consumer (Consumer 2).
- Responsibility was transferred from one consumer to another (without a move in) during the request period. For example: a share house situation where the responsible tenant moves out and a remaining tenant assumes responsibility for the account.
- **Current model does not support this scenario.**
 - Only data for the period Consumer 2 is the account holder is available
- **The new MSATS flag does support this scenario.** All of the data for the request period will be made available back until the LastConsumerChangeDate Flag
 - When transferring between Consumers 1 and 2, the retailer uses their existing protocols to determine whether to transfer the account to Consumer 2 (assumed in this case) or to create a new account in their name (a new account would reset the LastConsumerChangeDate flag)

6 - Change of Account Holder – Authorised Party



- Meter data is requested for a period within 24 months for the **current** account holder.
- Responsibility was transferred from one primary account holder to another during the request period. For example: a business account where the primary account holder leaves the business and is replaced by another.
- Data can be returned for the full request period where the consenting party is XYZ. Requests where the consenting party is ABC can no longer be authenticated.
- **Current model supports this scenario**
 - Under CDR the account holder XYZ has access to all the data requested
- **The new MSATS flag also supports this scenario.** All of the data for the request period will be made available back until the LastConsumerChangeDate Flag
 - When transferring between Account Holders ABC and XYZ, the retailer uses their existing protocols to allow the transfer (assumed in this case)

Notes

- John Adshead (AEMO) spoke to the use case slides
- John Adshead (AEMO) noted that the initial population of the last consumer change date will likely form part of the CDR consultation's draft report. This will be discussed at the next workshop.
 - A point was made in the chat re the potential use of the Blind Update Tool (BUT) to support the mass population of the field
 - Note: This would require AEMO and Retailer BUT development
 - Mark Riley stated that Retailers are not planning on determining the last consumer change date for every existing consumer, the proposed field would be updated progressively over time as part of the Retailer's onboarding processes
 - If the current Retailer does not set the flag for existing customers, when the customer switches to another Retailer a CDR would only be able to be provided back to the change in FRMP date (issue to be considered as part of the draft report)
- Mark Riley asked about the treatment of various scenarios like power of attorney, etc.
 - James Bligh (DSB) acknowledged that these types of scenarios are problematic, as different Retailers may have different processes. This will be discussed at the next workshop.
- A comment was made as to if the proposed solution was actually restricting a consumer's access to data under CDR where a consumer moves back into a previous premise e.g. a landlord scenario - landlord moves out, renter moves in, renter moves out, landlord moves back in
 - For a CDR request the CDR period must be contiguous under the CDR Rule/Standards. In this case the Landlord will only receive the latest period.
- Origin and AGL both supportive of CDR but are concerned with the 'pitfalls' of the proposed solution
 - James Bligh (DSB) asked if anyone had a better alternative solution, noting that he did not believe an ADR led solution would be acceptable from a CDR legislation/privacy perspective
 - Aakash Sembey (Origin) acknowledged the complexity of various scenarios and suggested that additional workshopping was required
- James Bligh (DSB) asked if the current FRMP was given the ability to override or correct the existing last consumer change date (back 2yrs), which have been originally set by a previous retailer, would that alleviate some of the concerns with the proposed solution?
 - This will be discussed at the next workshop.
- Robert Lo Giudice (Alinta) reiterated that another workshop should be called to consider all potential solutions, not just isolated to refining AEMO's proposed solution.
 - Agreed, workshop scheduled for 12 July.

Next steps



Next steps:

- AEMO will consider feedback provided in submissions and in today's workshop to form its Draft Report position
- Consultation:
 - Draft Report due to be published 30 June 2022
 - Submissions on Draft Report due 15 July 2022
 - Final Report published 26 August 2022



For more information visit

aemo.com.au