



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

25 September 2019

Manager
Consumer Data Right
Structural Reform Division
Treasury

via email: data@treasury.gov.au

Dear Sir/Madam

Priority Energy Datasets Consultation Consumer Data Right 29 August 2019

We support the introduction of the Consumer Data Right (CDR) into the energy sector. For over 2,000,000¹ small and family business operators in Australia, energy costs are a significant expense to their business. Whilst operating on slim margins, unexpected cost increases in this critical resource has significant impacts on the ongoing operations of a small business. We therefore request that specific consideration be given to the datasets needed by small and family businesses for the roll out version of the CDR.

To be effective, proposed priority datasets must contain at a minimum the data stated in the consultation paper and include datasets that provide energy account usage period dates and the total energy used during the period. The datasets must be explained in plain language and follow common terminology. The datasets must be consistent, and mandatory, in both billing and product offerings to allow products to be compared with each other and with a consumers' current usage.

We support the use of the innovative CDR functions to include datasets such as itemising energy use by each piece of equipment to inform the consumer where efficiencies could be made. Data holders should be accredited to minimise privacy risks associated with these datasets. The CDR energy sector rules must include a right for a consumer to request the deletion of this information once a retail plan has been selected.

The provision and presentation of meaningful data will enable time poor small business operators to compare offers from retailers to and access the best fit, and competitive, energy plan for their business.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Bryan Smith on 02 6121 6414 or at bryan.smith@asbfeo.gov.au.

Yours sincerely

Kate Carnell AO
Australian Small Business and Family Enterprise Ombudsman

¹ ASBFEO Small Business Counts Small Business in the Australian Economy July 2019