

1 June 2020

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Dear Energy Consumer Data Right team,

### **Consumer Data Right – energy sector designation instrument**

AusNet Services appreciates the opportunity to respond to the Consumer Data Right (CDR) – energy sector designation instrument. We have eight years of experience in operating portals that provide customers with their interval data.

The energy sector designation instrument sets out the classes of information, the persons who hold this information and will be required or authorised to transfer the information under the regime, the gateway for customer metering data, and the earliest date that the information being held is subject to the consumer data right.

AusNet Services supports, in principle, the establishment of a CDR in energy in establishing efficient and robust rules for exchanging data that allow customers to benefit from customer services in energy facilitated by fast access to relevant data. It also is important these arrangements protect the privacy rights of customers.

The CDR energy sector designation exposure draft correctly establishes retailers and AEMO as data holders for metering data and other customer energy data. However, the exposure draft does not specify the role of energy distributors in providing, receiving, and using energy data and customer data.

As an electricity distribution business in Victoria, we are required to provide metering data to AEMO, relevant retailers, and the customer for over 700,000 customers. The obligation to provide this metering data to customer's is set out in Victorian electricity law<sup>1</sup> and in the National Electricity Rules.<sup>2</sup> Additionally, we send notifications to customers related to planned works and associated supply interruptions using customer contact details, largely provided by the retailers.<sup>3</sup>

To identify and mitigate adverse customer implications on other businesses that hold energy data, AusNet Service recommends a Treasury undertake a review of the proposed legal changes to all instruments, including the energy sector designation instrument, to ensure the above processes are not unintentionally impeded.

If barriers are identified, we suggest possibly a better alternative would be electricity distribution business having the option to become a data holder under the energy sector designation. The reason for making this option available to electricity distribution businesses is to allow the continuity of service, where the implementation cost is justified by customer benefits.

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<sup>1</sup> Advanced Metering Infrastructure (AMI Tariffs) Order in Council under section 46D of the Electricity Industry Act 2000 (No. S 216, 19 June 2013)

<sup>2</sup> National Electricity Rules, clause 7.15.5

<sup>3</sup> In accordance with jurisdictional obligations and the privacy act with metering data treated as personal information

If you have any queries about any of the positions outlined in this submission, please do not hesitate to contact Justin Betlehem on 03 9695 6288.

Yours sincerely,

A handwritten signature in black ink that reads "C. Eddy". The signature is written in a cursive style with a long horizontal stroke extending to the right under the name.

Charlotte Eddy  
**Manager Economic Regulation**