

Treasury consultation on CDR energy designation instrument

Submission from Finder

Thank you for giving us the opportunity to provide input into the Consumer Data Right (CDR) energy sector designation instrument. Finder continues to be very supportive of the CDR, which we believe will empower Australians to take control of their personal data and make better financial decisions.

[Finder.com.au](https://finder.com.au) (“Finder”) is Australia’s most visited comparison website, with more than 2.6 million Australians using our site per month¹. We compare products across more than 100 categories, including credit cards, home loans, transaction accounts, savings accounts, insurance products, superannuation, telecommunications and energy. Our purpose is to help the world make better decisions, and our guides, calculators and comparison tables enable better decision making across a range of complex products and services. Finder is proud to be an Australian fintech business that has succeeded in growing internationally.

Materially enhanced information:

As we advocated for with the [banking designation instrument](#), Finder would welcome clearer definitions of what is and isn’t considered “materially enhanced information” for the CDR in the energy sector. One way to achieve this would be the creation of a single definitive list of the information that is included in the CDR parameters for energy, including any derived data that is not considered to be materially enhanced.

As an example, it is not currently clear whether half-hourly interval data for energy usage that has been aggregated into daily or weekly usage figures would be considered to be materially enhanced. Data that has been aggregated in this way would be easier for the average consumer to understand and it would also ease some of the privacy concerns related to highly time-specific energy use data that is included in the framework. However, without more clarity on definitions, this useful data set could be excluded from the CDR on the grounds of being materially enhanced.

Definition of customer:

We would also welcome more clarity on the definition of what constitutes a “customer” in the designation instrument. In many instances for energy products, there are effectively multiple customers in a given energy contract with just one of them named in the contractual arrangement. We believe that access to the CDR should be extended to all the people living in a household and not just the person named on the account. Limiting the definition of “customer” to the person named in the contract significantly reduces the potential benefit of the CDR to the market for energy.

¹ 2.6 million average unique monthly audience (Oct-Dec 2019), Nielsen Digital Panel