

19 August 2021



Sectoral Assessments  
Consumer Data Right Division  
The Treasury  
Langton Crescent  
Parkes ACT 2600

Submitted via email 19 August 2021: [data@treasury.gov.au](mailto:data@treasury.gov.au)

Dear Sectoral Assessments

**Energy Queensland submission to Treasury - Consumer Data Right Sectoral Assessment - Telecommunications**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Treasury in response to the Consultation Paper on Consumer Data Right (CDR) Sectoral Assessment – Telecommunications (Consultation Paper).

This submission is provided by Energy Queensland, on behalf of its affiliated entity Yurika Pty Ltd including its subsidiary Yurika Telecoms. Yurika Telecoms is an approved retail service provider for NBN services including FTTx and hybrid fibre coaxial services, enterprise ethernet, fixed wireless and satellite services.

Energy Queensland suggests that most of our customers would be interested in the available network speed of their services and data usage charges, while business customers are most likely to benefit from having access to their capacity usage. All of this data is currently available from Yurika Telecoms through its website.

We consider that internet services, Eline services and IP VPN services should be included in the CDR for business customers. The datasets that would provide the greatest benefit would be the available network speed of their services, actual network speed utilised and data usage. This could be useful for a Council or business who is wanting to understand if their data backup runs will be completed overnight in a required timeframe using the available data speed they have purchased.

However, Energy Queensland has significant concerns surrounding data security of sensitive customer data and commercial-in-confidence business data. We note the Consultation Paper suggests the collection, use and disclosure of usage data by ADRs would be subject to the enhanced privacy framework under the CDR, along with additional protections under other existing legislation. Notwithstanding, there remains concerns for vulnerable customers (as noted in the Consultation Paper). In particular, it is unclear how this data will be protected when databases held by multinational

corporations could be stored offshore or transferred to countries that do not afford the same level of protections provided by the privacy laws that apply in Australia.

Should Treasury require additional information or wish to discuss any aspect of this response, please contact me on 0467 782 350 or Barbara Neil on 0429 782 860.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Trudy Fraser'.

Trudy Fraser  
**Manager Regulation**

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