



6 October 2023

Louise Staker
Market Conduct and Digital Division
The Treasury
Langton Crescent
Parkes ACT 2600

Consumer Data Right rules – Expansion to the non-bank lending sector

Alinta Energy welcomes the opportunity to respond to the Treasury's consultation the exposure draft rules and amending instrument on expanding the Consumer Data Right rules to the non-bank lending sector.

Alinta Energy is an active investor in energy markets across Australia with an owned and contracted generation portfolio of over 3,300MW and more than one million electricity and gas customers. As a tier two retailer, we have invested significant resources in preparing to be a data holder under the rules by the compliance date of November 2023.

We are concerned with the proposed amendments to schedule 4 of the CDR rules impacting product data requests. We understand that the purpose of this amendment is to improve access to information about energy offers made by retailers, obliging them to facilitate product data requests in conformance with the data standards. This is a significant expansion of the scope of retailer obligations and the cost of implementing the changes required is expected to be material.

The amendments to schedule 4 require retailers to provide a product data request service under certain conditions. If these conditions are met, rule 4.2(3) effectively makes rule 4.2(1) redundant (energy data holders are not required to provide a product data request service).

While the effective date of changes to the energy sector will be delayed, the timing of these changes comes after Tier 1 retailers have already implemented their CDR programs and when Tier 2 retailers are focusing on delivering as data holders by November 2023. The scope of the changes relating to product data mean that new projects will need to be established shortly after energy retailers have expended significant resources (often diverted from other projects and priorities) to meet the initial set of obligations under the CDR rules.

Alinta Energy would urge Treasury to consult further on the changes relating to product data requests. The need for the proposed changes and the ramifications for retailers as data holders requires further consideration. The need for this amendment to the rules at this time and its benefits are unclear – we would welcome further consultation with Treasury on the amendments relating to product data requests and retailer's hosting product data request services ahead of locking the changes into the rules.

If the changes to the rules are to proceed, an extended period of implementation will be required and for some retailers, a new project team and associated resources will be required, adding costs to all energy consumers.

We welcome further discussion of this response with Treasury, please contact David Calder (David.Calder@alintaenergy.com.au) in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Shaun Ruddy', written in a cursive style.

Shaun Ruddy
Manager, National Retail Regulation

