



23 April 2020

Secretariat  
Inquiry into Future Directions for the Consumer Data Right  
The Treasury  
Langton Crescent  
PARKES ACT 2600

By email to: [data@treasury.gov.au](mailto:data@treasury.gov.au)

Dear Secretariat

### **Inquiry into Future Directions for the Consumer Data Right – Issues Paper**

Energy Queensland Limited (Energy Queensland) appreciates the opportunity to provide a submission to Treasury in response to the Issues Paper on the *Inquiry into Future Directions for the Consumer Data Right* (Issues Paper).

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited;
- Ergon Energy Queensland Limited; and
- Affiliated contestable business, Yurika Pty Ltd including its subsidiary, Metering Dynamics Pty Ltd.

While Energy Queensland supports the Consumer Data Right (CDR) and related reviews undertaken so far, there is a concern that this Inquiry is premature given the CDR is yet to be applied in energy and tested to ensure that it is effectively embedded within businesses. As such, Energy Queensland does not support the proposed expansion in scope of the CDR.

Energy Queensland acknowledges that customers and/or their accredited third party will have “read” access to certain data. However, expanding this access to allow for “write” access creates potential issues with respect to data quality, formatting and storage capacity. Providing write access is not straight-forward. The more entry points which are provided to customer data, the greater the cyber security risks to that data. Firewalls will need to be enhanced, new practices and procedures created, the cost of which will be passed to customers.

In addition, Energy Queensland is concerned that with write-access, there is the potential to over-write existing data or inadvertently remove the controls that energy companies have in place for managing data.

The Issues Paper does not provide clarity on who holds liability if a customer has “write” access, and in adding data, a breach later occurs. For example, if a customer is recorded as a life-support customer, and that life support notification is inadvertently over-written via write-access, who is liable for a future breach of a planned interruption notification given the data was over-written by a third party on behalf of the customer? In addition, there are occasions when vulnerable customers (for example, customers with a Domestic Violence Order against a spouse) need to be protected via a higher level of data security. The more parties who have access to data or the right to write data, the greater the chance of data security breaches via the additional entry points.

Please do not hesitate to contact me on (07) 3851 6787 or Alena Christmas on (07) 3861 6784 if you have any questions.

Yours sincerely



Trudy Fraser  
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