



22 March 2019

Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

By email: ACCC-CDR@acc.gov.au

Dear Sir/Madam

Consumer Data Right in Energy – Consultation paper: data access models for energy data

The Australian Banking Association (**ABA**) welcomes the opportunity to comment on the Australian Competition and Consumer Commission (**ACCC**) consultation paper on data access models for energy data.

The ABA supports the Consumer Data Right (**CDR**) and giving Australian consumers more control over data related to them. Banking will be the first sector to apply the CDR and the ABA supports the participation of more sectors over time to achieve an economy-wide open data regime, as recommended by the Productivity Commission¹. In this regard, interoperability between sectors is of critical importance to ensure that consumers can choose to share data efficiently across sectors, and also to provide for a safe, secure and streamlined consumer experience.

The data access models outlined in the consultation paper necessarily draw on factors specific to the products and structure of the energy sector and the ABA does not seek to comment on the merits of each proposed model. The ABA is pleased that the consultation paper puts forward interoperability as a criterion for assessing the data access models. We note that interoperability will be substantially shaped by the ACCC rules and standards that will apply to the energy sector. While it will be necessary for the rules and standards to be sector-specific, where possible, consideration should be given to their alignment across sectors to support interoperability.

The ABA notes the importance of consistent consent frameworks across all sectors to support a simpler consumer experience in accessing and sharing data across the suite of products and services they use. The application of a multitude of consent frameworks is likely to result in a confusing experience for consumers accessing the CDR in many sectors.

The ABA understands that the data standards and rules for the energy sector would be the subject of consultation at a later stage, and the ABA would be pleased to participate at that time.

Yours sincerely

Signed by

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¹ Productivity Commission (8 May 2017), *Data Availability and Use*, Final Report.