



7 March 2019

CDR Team, Australian Competition and Consumer Commission

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

Dear CDR Team

Consumer Data Right in Energy

Thank you for the opportunity to comment on the *Consultation paper: data access models for energy data*.

These comments reflect the feedback of each of the signatories, the industry-based external dispute resolution schemes for the energy and water industries in our respective States.

Our schemes support the overall intention of the Customer Data Right (CDR) as we believe that empowering consumers is one of the vital steps which will assist in restoring confidence in energy markets.

We are not able to comment in detail on the efficacy of the three data access models proposed. However, we have greater regard to Model 2 (AEMO gateway) and Model 3 (economy wide) over Model 1 (AEMO centralised). Both Models 2 and 3 place greater responsibility on the entities currently holding CDR data. Further, Model 1 would require AEMO to hold, manage and distribute data which it does not currently hold under national energy legislation and there may be greater risks with this approach.

We look forward to future consultation on the dispute resolution aspects of the CDR.

Please do not hesitate to contact us if you would like further information.

Yours sincerely

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