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Data61

Consumer Data Right

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Data61 – Consumer Data Standard in Banking consultation

AGL Energy (AGL) welcomes the opportunity to make a submission in response to Data61's Working Draft for the Consumer Data Standards (Working Draft).

AGL supports the high-level principles outlined in the Working Draft, however it is difficult to comment on the suitability of the underlying standards until more is known about how the Consumer Data Right (CDR) will be applied in energy. Depending on the designation in the energy sector, the Australian Energy Market Operator role may impact the application of standards and how energy retailers interact with the CDR framework.

While AGL accepts that a baseline standard will help improve the efficiency for regulators and accredited parties that operate across designated sectors, there is also concern that one set of standards, not appropriately tailored, may have significant operational efficiency and implementation costs for each sector. As a worst case scenario, it may result in the costs of the CDR framework outweighing the potential benefits of the framework.

To date, the energy and telecommunications sectors have remained on the periphery of the CDR frameworks development due to the time restrictions on implementing a workable solution in the banking sector for the July 2019 deadline. This has resulted in condensed consultation timeframes which are particularly difficult for industries such as energy and telecommunications that have not had the same involvement as banking to-date.

AGL welcomes the proposed Working Draft as a potential template for the energy sector, however we encourage Data61 – or the body designated to develop standards at the time – to conduct thorough consultation with each designated sector as designation occurs to ensure any Standards set not only meet the high-level principles but also lead to the most efficient outcome for consumers.

A summary of concerns against the proposed Standards in the Working Draft with more detailed information is provided in the attachment below. Should you have any questions in relation to this submission, please contact Kathryn Burela on 0498001328, kburela@agl.com.au.

Yours sincerely

Con Hristodoulidis

[Signed]

Senior Manager Regulatory Strategy

Common APIs

AGL support the use of Common APIs that are consistent with existing industry standards. The Australian Energy industry has standardised information exchange for **Address**, **PersonName** and **Telephone** through the AEMO.¹ The definitions for these common data entities were based on AS-4590 and have remained largely unchanged for over a decade providing strong evidence of fit for purpose that should be considered for adoption in the Common APIs². Based on the existing AEMO b2b industry guidance, AGL considers that the working draft should ensure:

- **Person**
 - Person.MiddleNames should not be mandatory
 - Person.Prefix should be enumerated as per *Title* in AS-4590
 - Person.NameType is missing and provides additional, optional information about the name e.g. legal, maiden, preferred
- **Organisation**
 - Agent should be defined as an instance of Person instead of just the first and last name. This is suggested in the description of AgentRole
- **Address**
 - The energy industry defines the address structure as being comprised of either an Australian address or a generic International address. The Australian address can be either structured (as per AS-4590) or unstructured (as per SimpleAddress). The structured address provides a more granular definition of the components of an address and includes a delivery point identifier of the address as defined in the Australian Postal Address File.
 - The common API should provide businesses with the choice of providing structured or unstructured addresses. As many companies are uplifting their address data quality by using Australia Post certified verification tools the ability to use structured addresses with DPIDs will enable more accurate address data to be shared.

Security

As the security section is a work in progress, AGL offers only high-level comments on this element of the standard. AGL is comfortable with the references for the security specification within the standard. We note that the references are currently bank centric – which is understandable as banking will be the first designated sector.

We also note that the security reference Financial API is an appropriate reference because:

¹ Refer to sections 3.4-3.6 of https://www.aemo.com.au/-/media/Files/Electricity/NEM/Retail_and_Metering/B2B/B2B-Procedure-Technical-Delivery-Specification-v31.pdf.

² For reference, the corresponding technical implementations are defined the A Standard for Energy transactions in XML (aseXML) Schema (https://www.aemo.com.au/Electricity/IT-Systems/aseXML_standards/aseXML-Schemas).



- the FAPI specifies industry standard and financial grade identity and authorisation schemes;
- is structured on different risk profiles (R & RW); and
- is designed using a threat/control model.

The FAPI is not an industry standard and this is currently referenced as a draft, which will need to be reviewed.

We seek clarity from Data61 on how data holders bind user ID's to other party's user ID's through this process. For example, it is unclear how an energy retailer could match their customer (i.e. John Smith) to a financial institution customer (John Smith).

AGL is a member on the Data61s Security Working Group and we will continue to participate in the Group to gain greater insights on this and other matter and provide input to ensure the Standards set a robust security framework for CDR to protect consumers but also acknowledge and account for the energy sector idiosyncrasies.