9 April 2020

**Origin Energy’s Response to CX CDR Logo – Consultation Draft 6**

**Use of the CDR Logo by Accredited Data Recipients**

The use of the CDR logo throughout the data application and retrieval process will provide comfort to customers that they are dealing with an ACCC accredited business and thus the business is trustworthy.

We note the following is a proposed ADR requirement:

*The exact locations of CDR Logos in the Consent Model are at the discretion of the ADR but any use* ***MUST*** *be in direct relation to CDR and* ***MUST NOT*** *be used in relation to non-CDR data sharing.*

Does the above mean that a business that offers an array of services (and one of them is CDR) across many industries can include the CDR logo on the front page of their website?

A challenge for the ACCC in developing this standard is ensuring that an impression is not developed that the presence of the CDR logo means that the ACCC has endorsed all the services provided by the accredited third party. That is, the presence of the CDR logo at the top of their website

may give the impression that, they as a whole business, have been accredited - when this is not the case. Rather, they have only been accredited for CDR purposes.

**Data holder obligations**

It is difficult for Origin to comment on the proposal for Data Holders as it is not clear how this process will be managed. While different entities will be designated at data holders, the data holder may not have a direct relationship with a customer. Therefore, the “must” requirement may not be relevant to energy data holders.

This is given that it is in intended that a “gateway” model be utilised in energy. It is envisaged that there is an interface to the gateway (ie AEMO), the gateway then seeks the data through connected systems with the information is collated and provided back to the customer. The customer may not have any contact with the data holder as the centralised system provides the requested data. Therefore, the need for “must” requirement for data holders in energy may not be relevant.