

Consumer Data Right

Data Standards Body Energy Advisory Committee

Minutes of the Meeting

Date: Wednesday 27 May 2020

Location: Held remotely via WebEx

Time: 10:00 to 12:00

Meeting: Committee Meeting No: 6

Attendees

Committee Members

Andrew Stevens, DSB Chair
Peter Giles, CHOICE
Melinda Green, Energy Australia
Joanna Gurry, NBN Co
David Havyatt, ECA
Ben Johnson, ERM Power
Van Le, Xinja
Joe Locandro, AEMO

Jan Prichard, Origin
Frank Restuccia, Finder
Lisa Schutz, Verifier
Aakash Sembey, Simply Energy
Ed Shaw, Ausgrid
Lauren Solomon, CPRC
Dayle Stevens, AGL

Observers

Barry Thomas, Data61
James Bligh, Data61
Eunice Ching, Data61
Rob Hanson, Data61
Terri McLachlan, Data61
Mark Staples, Data61
Andrew Breeze, ACCC

Bruce Cooper, ACCC
Michelle Looi, ACCC
Fiona Walker, ACCC
Athena Jayaratnam, OAIC
Leanne Breen, Treasury
Daniel McAuliffe, Treasury

Apologies

N/A

Chair Introduction

The Chair of the Data Standards Body (DSB) opened the meeting and thanked all committee members and observers for attending meeting no 6.

The Chair noted that there has been a lot of progress since the last meeting including the release of Version 1.3.0 of the Standards on 17 April 2020 and a further release on 25 May 2020. This Version, 1.3.1, included some minor clarifications arising from the Maintenance Iteration. There was also an Energy Workshop held on the 29 April which was well received and attended.

Minutes

Minutes

The Chair thanked the Committee Members for their comments and feedback on the Minutes from the 8 April 2020 Advisory Committee meeting. The Minutes were taken as read and formally accepted.

Action Items

The Chair noted that the Action Items were either completed or would be discussed later at this meeting.

Working Group Update

A summary of the progress since the last committee meeting on the Working Groups was provided in the Committee Papers and was taken as read.

A further update was provided on the Technical Working Group by James Bligh as follows:

The DSB noted they have their first detailed consultation open on [Decision Proposal 109 - NMI Standing Data Payloads](#) which is open for consultation until 12 June 2020. Participants and stakeholders were encouraged to comment early and often.

The DSB are very appreciative of the engagement to date in the workshops which has been very helpful and noted that some of the feedback led to the workshop which was held on the 26 May on an “Introduction into the Consumer Data Standards”.

The DSB noted that the “Introduction into the Consumer Data Standards Workshop” was well represented peaking at 210 attendees from 240 registrations and sustained at around 190 participants, which showed that people are generally interested and engaged.

The DSB noted there was a number of good questions raised at the workshop coming from new participants who are trying to get across the regime, and questions from existing stakeholders and participants. The questions were engaging which will help the DSB steer some of the documentation and consultation they are doing.

The DSB also noted that people coming into the regime are not necessarily sectoral based but also from second tier banks because their compliance obligations are in the near future and coming in parallel with the emerging work in the energy sector.

The DSB noted that the next step for the Technical Working Group on Standards is additional account holders which will be coming out in the next week or so and the intent is to have a steady cadence of two consultations available at any one time.

The Chair noted that Michael Palmyre is an apology for this meeting so no further updates will be provided today.

Treasury Update

Daniel McAuliffe from Treasury provided an update as follows:

Treasury noted that the consultation period for the Designation Instrument (DI) closes on the 30 May 2020. They noted that there have been a lot of stakeholders who have engaged in the consultation process with various drafting issues raised for e.g. how they refer to energy data sets in the NEM and, how retailers are mentioned as being designated as Data Holders for metering data. It was noted that this will be fixed as AEMO will be the Data Holder for metering data. It was noted that they are still on track to have the DI made before the 30 June 2020.

Treasury noted that the Privacy Impact Assessment (PIA) for the DI is in its final stages of being settled. It was noted that there were a number of recommendations which the agencies will be developing a response to over the next couple of weeks. It was noted that they don't intend to consult again but they will, subject to the Minister making the DI, publish the DI, the PIA and the agencies response to the recommendations in the PIA in the first couple of days of July 2020. It is hoped that this will give everyone a high degree of certainty about what is in scope.

ACCC Update

Bruce Cooper from the ACCC provided a general update as follows:

The ACCC noted that following the publication of the draft DI, they have been able to continue the work they are doing on preparing the draft Framework for extending the Consumer Data Right (CDR) to energy and they intend to publish by the end of June. They noted that this will set out what the approach will be to a number of issues like authentication.

Andrew Breeze from the ACCC provided an update on consumer authentication. This was in the form of a PowerPoint presentation (included as an attachment to these minutes).

ACCC introduced two models for consumer authentication. Each of these would use a redirect-model with OTP, similar to that used in the banking CDR. The first model placed more responsibility for the solution on a consumer's retailer, while the second placed more responsibility on AEMO.

Members discussed the models. Discussion covered matters including:

- technical questions around how customers would be routed from their ADR to the authentication functionality and how they would be authenticated. The ACCC confirmed that the models were capable of accommodating customers who were not digitally enabled;
- whether it may be more appropriate to introduce an alternative, less stringent consumer authentication model for some energy datasets, not based on a redirect model with OTP. Alternatively, whether authentication should be aligned across the CDR, as opposed to having separate models for each sector;

- how to manage consumer authentication in respect of particular consumer issues such as where consumers switch retailer or leave premises, where consumers are supplied at multiple premises, and where consumers are businesses as opposed to individuals;

One member noted that early standardisation of consumer could lower the cost. The DSB noted that to date, they have standardised on the points where standardisation was important for interoperability. However, where banks had different go-to-market strategies and consumer-facing presentation, the data standards preserved this variation as part of their business strategy. They have ensured, through the rules and technical standards, the way banks interact with the ADRs are consistent.

The Chair noted that those collectively involved in implementing the CDR have looked to keep clear where the regulated space is and out of where the competitive space is. So, the competitive space is outside the regulated point and that is why in the case of consumer experience, there are some items that are standards and some are guidelines. The guidelines are to encourage a similar consumer experience but they are not mandatory in the guidelines space.

Members also discussed the related issue of who would be an 'eligible consumer', including:

- the ACCC's intention to consult on this issue using the banking CDR rules as a baseline;
- the potential for the definition of eligible consumer to be widened over time, in future iterations of the rules;
- whether co-residents at a premises, including a tenant where their landlord has the energy account, should be able to initiate CDR data-sharing.

The Chair noted that there is a 6-8-week consultation period for the rules framework and encouraged fulsome and formal input from all parties. It was noted again, that we are not implementing "open energy" or "open banking" as standalone regimes, CDR is an economy-wide initiative that will bring cross sector use cases which have been undeveloped in the past because it has not been possible and the interoperability element is a very important characteristic to be taken into account.

One member asked how the offer data from the Energy Made Easy and Victorian Energy Compare fits into the proposed model. ACCC noted this is CDR data for which there are no consumers, and it would work in a similar way to product reference data (PRD) in the banking side. Effectively that data will be provided via API's directly by ADR's and the Victorian Government.

The DSB noted there is a desire by Energy Made Easy, Victorian Energy Compare, ACCC and the DSB not to create the complexity of having to go to both parties, merge the data and have every ADR do that. It was noted that both of those bodies hold generic tariff information but with different jurisdictional boundaries so to get a picture of the nation you really need to get data from both. It was noted that there is ongoing conversation as to whether either one of those bodies will be the proxy for the API's for the other. DSB noted that electricity as a sector is unusual as there is a body with all this tariff data which most sectors don't have. It was noted that most of the context in getting PRD information for individual data holders and we will want to maintain that consistency across the sectors even if it comes from one proxy.

DSB noted that in regards to actual usage information it will not go via Energy Made Easy or Victorian Energy Compare as they are recipients of that data from AEMO. AEMO as the data holder of usage will continue and custom tariffs are not held by Energy Made Easy, Victorian Energy Compare or AEMO, they held by the retailers themselves.

On next steps, ACCC noted that they intend to finalise the rules framework consultation by the end of June. In the meantime they would liaise with Treasury in relation to submissions in response to the consultation on the draft designation instrument.

Further discussion

One member noted that for the next steps which include consumer experience, PIA and potential use cases aiming for broader adoption and really good coverage. Over the last couple of months, the levels of trust in Government when it comes to digital applications, and what we have seen is a quite remarkable uptake in the COVIDSafe app, is testing some of the traditional assumptions that may have been relevant potentially a year ago. They suggested we should be adding in some additional tests of what our previous assumptions around engagement with regulatory and government bodies are when it comes to authentication and uptake of applications over the last couple of months.

One member noted that for a simple use case energy plan, as an ADR you may not need half hourly data, you may be happy if the data holder gave some derived data from the data set. This creates a significantly different set of privacy questions, because they are no longer providing the data but the derived data. If we wanted to include derived data in that format is that something we would deal with in the designation or the rules framework?

The Chair noted that on an economy wide basis derived data, while it might have some value, it generally will be off limits.

Treasury noted that if you look at the DI, they have the same restrictions on what it does or does not cover in relation to materially value added data except that the restriction does not apply to AEMO data sets. The DI at the moment means that AEMO could generate derived data sets from metering data and the rules could provide for that to be accessible. It was noted that to reassure retailers, there is the “no materially valued added data” exception for the data they hold.

The DSB noted that there was an opportunity missed in the banking sector of making a distinction between simplistically aggregated data and model driven materially value-added data. They were both bundled under the concept of derived data because it wasn't raw data. There was a real opportunity for the comparison use cases to lower the hurdle for customers to share if not sharing the raw data but the aggregated data that is aggregated at source and can in certain use cases reduce the risk to customers.

One member noted that they are interested in the definition of metering data as the metering data that AEMO holds vs retailers are not the same data sets. The term ‘metering data’ can be quite wide and what is sitting where can add to complexity of what they are doing and those definitions as they consult on the rules framework and the DI.

Treasury noted that if there are any metering data types that are held by retailers that they should be looking at, retailers should reach out to them with details.

Meeting Schedule

The Chair advised that the next meeting will be held remotely on Wednesday 8 July 2020 from 10am to 12:00pm.

Other Business

The Chair noted that he is refreshing the Advisory Committee in the Banking sector before the July meeting and given where the CDR roll-out in that sector is, substantial changes should be expected.

One member asked if there is any update from Treasury on Scott Farrell's inquiry into the Future Directions of the CDR. The Chair noted that the report is not due to be submitted until September 2020 and that he will extend an invite to Scott Farrell for the next meeting.

ACTION: Chair to extend an invitation to Scott Farrell to the next Energy Advisory Committee meeting in July 2020

The Chair thanked Andrew Breeze from ACCC for his presentation today on consumer authentication models.

Closing and Next Steps

The Chair thanked the Committee Members and Observers for attending the meeting.

Meeting closed at 11:45



Australian Government



Consumer
Data Right

Energy CDR - consumer authentication

Presentation to EDSAC

27 May 2020

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Authentication in Open Banking

CDR Rules for open banking:

- deal with authentication at a high level
- require the Data Standards Chair to make binding data standards for consumer authentication that meet ‘best practice security requirements’

Data Standards ‘security profile’ requires ADR to redirect the consumer to the data holder, with authentication via a One Time Password

Open banking’s authentication model was selected because it was considered extensible to other sectors, including energy. It is intended to leverage existing authentication processes, not create novel solutions.

However, some features of CDR energy may necessitate modifications to CDR rules/data standards etc:

- AEMO gateway as ‘middle man’ in energy
- ADR may need data from multiple data holders simultaneously for some use cases (AEMO + retailer(s))
- No existing relationship (digital or offline) between customers and AEMO

CDR energy - proposed designation instrument

Treasury published an exposure draft of the energy sector designation instrument on 6 May 2020

This instrument sets out the classes of data subject to energy CDR

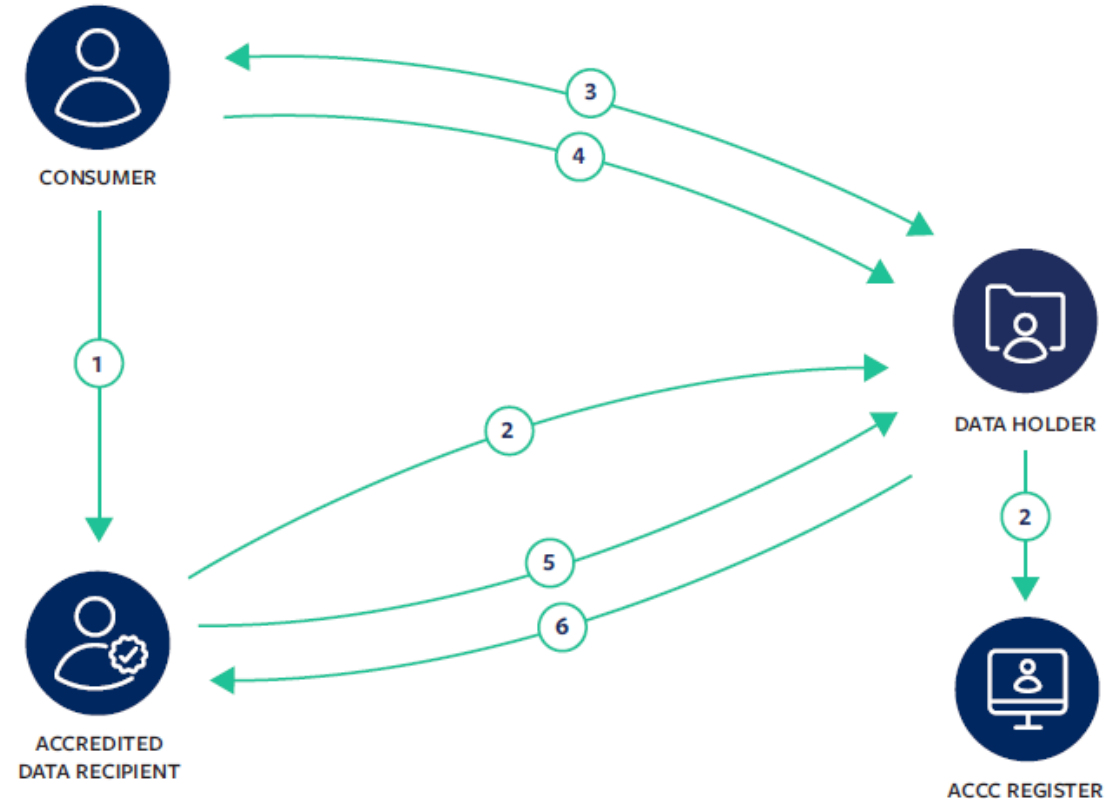
It also designates data holders for each class of data, and the AEMO data gateway

Class of data	Designated data holder	Gateway
NMI standing data fields	AEMO	-
Metering data	AEMO/retailers	-/AEMO
Customer-provided data	Retailers	AEMO
Billing data	Retailers	AEMO
Generic product data	AER/Victorian Government*	AEMO
Tailored product data	Retailers	AEMO
Distributed Energy Resource (DER) data	AEMO	-

* In their capacities as administrators of Energy Made Easy and Victorian Energy Compare

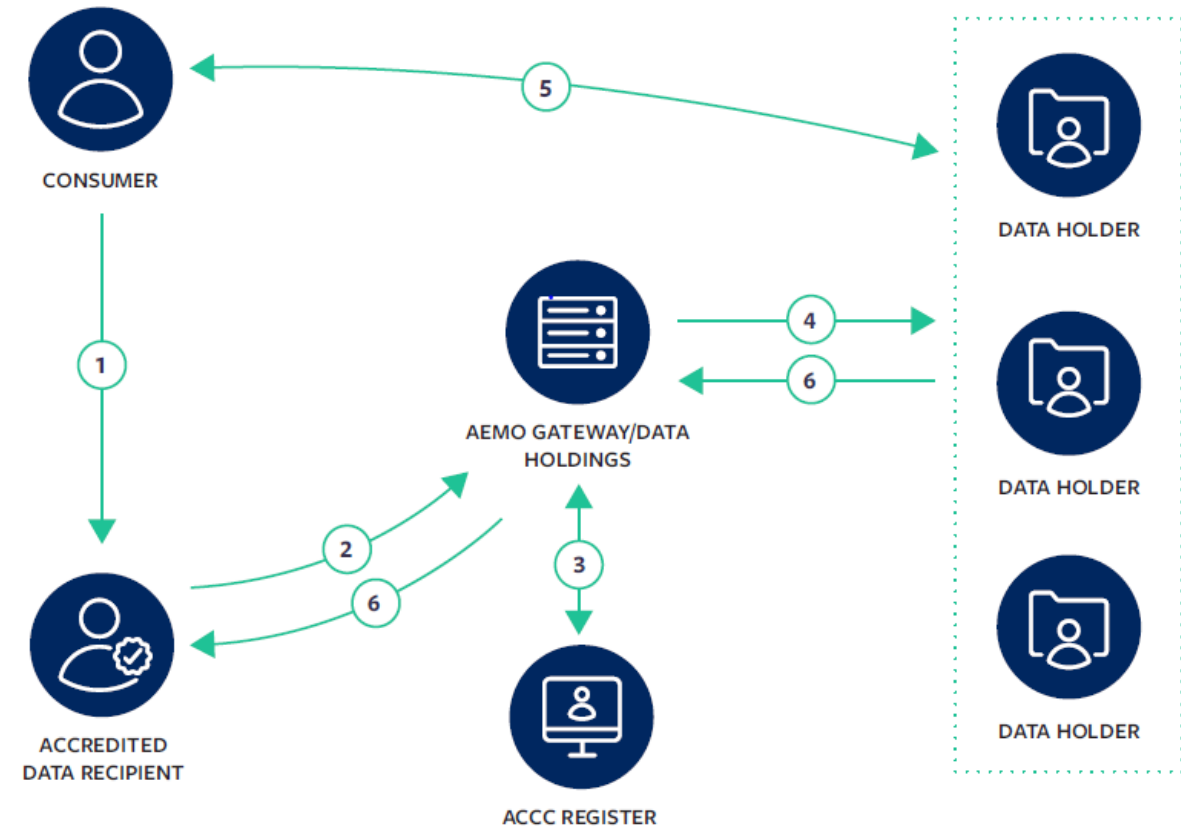
Information flows - CDR Open Banking

1. The consumer consents to an accredited data recipient obtaining their data
2. The accredited data recipient seeks to access the consumer's data, and their identity and accreditation status is authenticated by the data holder (which keeps a cached record of accredited data recipients, as maintained on the ACCC Register of Accredited Persons, also known as the ACCC Register)
3. The data holder authenticates the identity of the consumer via a One Time Password
4. The consumer authorises the data holder to disclose their data to the accredited data recipient
5. The accredited data recipient requests a specific set of data that is covered by the authorised consent
6. The consumer's data is shared between the data holder and the accredited data recipient



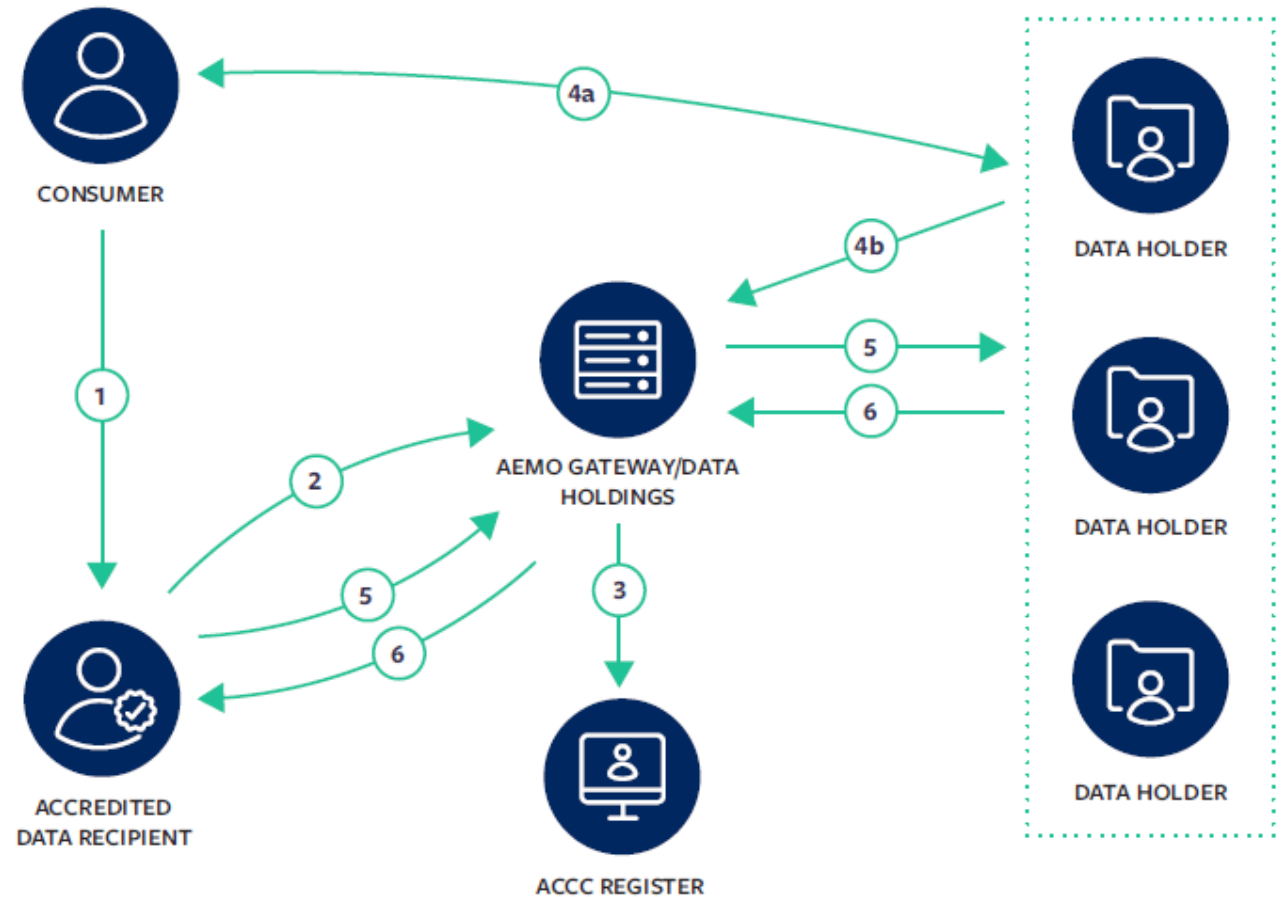
Proposed information flows - CDR energy

1. The consumer consents to an accredited data recipient obtaining their data
2. The accredited data recipient contacts the gateway, seeking to access the consumer's data
3. The gateway authenticates the accredited data recipient using data obtained from the ACCC's register.
4. The gateway identifies which data holder(s) hold the consumer's data and provides transaction details to them
5. The process of authentication and authorisation occurs in accordance with any requirement in the Consumer Data Right energy rules. The gateway's role in this process is to be determined.
6. The consumer's data is shared with the accredited data recipient via the gateway.



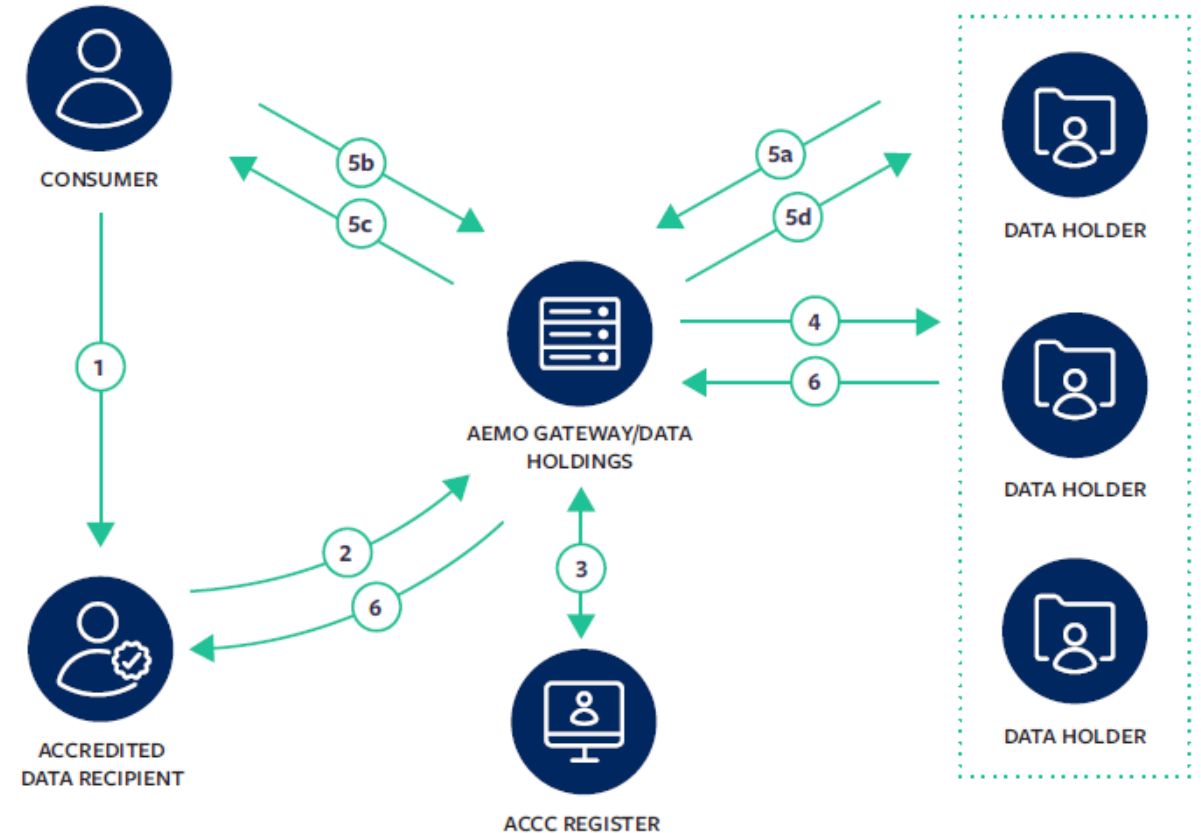
Authentication model 1

1. The consumer consents to an accredited data recipient obtaining their data
2. The accredited data recipient contacts the gateway, seeking to access the consumer's data from a specific data holder
3. The gateway authenticates the accredited data recipient using data obtained from the ACCC's register.
- 4a. **Current retailer data holder sends One Time Password (OTP) to consumer. Consumer enters OTP on retailer authentication/authorisation screen**
- 4b. **Current retailer data holder confirms successful authentication/authorisation to AEMO**
5. The accredited data recipient requests a specific set of data that is covered by the authorised consent
6. The consumer's data is shared with the accredited data recipient via the gateway.

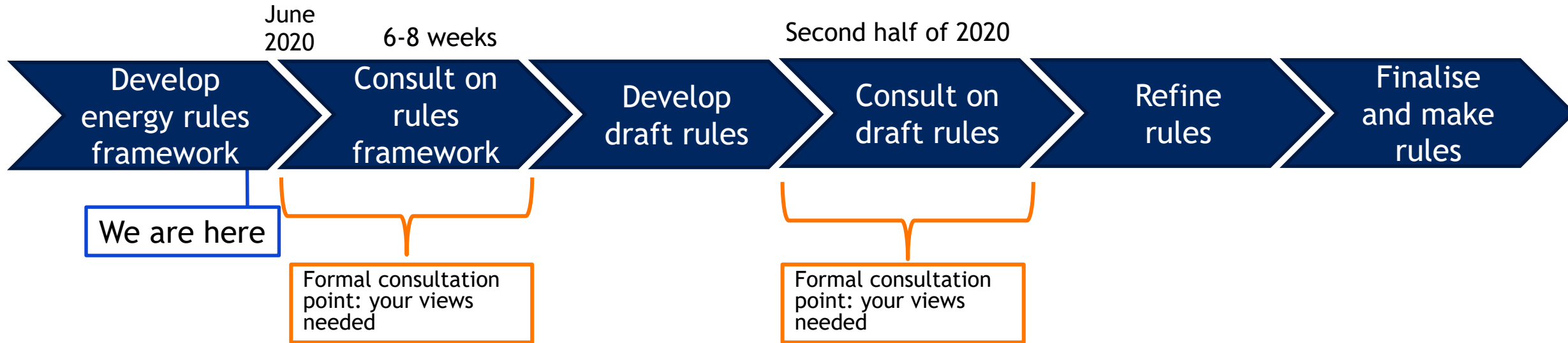


Authentication model 2

1. The consumer consents to an accredited data recipient obtaining their data
2. The accredited data recipient contacts the gateway, seeking to access the consumer's data from a specific data holder
3. The gateway authenticates the accredited data recipient using data obtained from the ACCC's register.
4. The gateway identifies the current retailer for authentication and requests consumer contact details for sending OTP
- 5a. Current retailer data holder provides contact details to gateway
- 5b. Gateway sends OTP to consumer on behalf of the current retailer
- 5c. Consumer enters OTP on gateway authentication/ authorisation screen
- 5d. Gateway confirms account holder's authenticated request and provides authorised request to data holder(s)
6. The data holder shares the data with the accredited data recipient via the gateway. The ADR provides the consumer with the service and/or their data.



Next steps



- ACCC CDR Committee input
- Ongoing standards development (DSB)
- Consumer experience work (DSB)

- Stakeholder views **throughout process**
- Privacy impact assessment
- Regulatory impact analysis

Any questions/comments?