



6 August 2020

Consumer Data Right
Australian Competition and Consumer Commission (ACCC)

COTA Tasmania

Submission in response to Consumer Data Right – Energy rules framework consultation

COTA Tasmania is the peak body advocating for the rights and understanding the needs of Tasmanians as they age, particular those aged over 50 years. The ACCC's *Consumer Data Right – Energy rules framework consultation* recognises that existing Consumer Data Right (CDR) rules may not adequately meet issues in the energy sector. While comprehensive, one newly developing issue not included in the consultation paper is that of customers accessing their own data from their data holder. COTA Australia supports COTA Tasmania is raising this issue.

In modern day Australia, customers and their advocates expect to access their own data from data holders in a format that they can easily interpret to make empowered decisions, without cost. This expectation extends to the energy sector.

Tasmania's leading electricity retailer, Aurora Energy, has developed an unregulated product called aurora+ - an app used with advanced meters that provides customers with the ability to see their energy usage over the day, pay bills at any time, estimate future bills, and review past bills. The product provides straightforward energy information that empowers customers to understand and act on energy information. However, customers have to pay an ongoing product service fee of 11 cents per day (\$40.15 per annum) to use aurora+. This product service fee is in addition to Aurora's Cost to Serve payment (37.9 cents per day) and retailer margin (5.7%) that covers costs of billing, marketing, customer service, corporate overheads, regulatory compliance, and metering.

Energy companies on mainland Australia, including Powershop, AGL Energy, Origin Energy, and Energy Australia, offer apps with similar features and usability to aurora+, free of charge. Aurora appears to be the only Australian energy retailer that charges customers to access such information, even though customers have already paid for these services within

their standing offer energy charges. While not a broad issue in the energy sector currently, the product service fee sets a dangerous precedent that other energy retailers may seek to adopt.

Aurora claim that the product service fee is required to cover the costs of sending SMS notifications, ongoing product development, and maintaining app security. It is surprising that these costs are not absorbed by the increased efficiency offered by the app. If this is the case, COTA Tasmania argues that the app was a poor business decision and Aurora should have followed the lead of mainland retailers that offer the app for free, apparently without needing to recoup costs and disadvantage customers.

Charging customers to access their own data is unreasonable in Australia's current business environment. No Australian should be required to pay extra to access their own data using a system that should be more efficient and less expensive for their energy retailer. Aurora's product service fee sets a dangerous precedent by charging those customers who seek to make empowered energy decisions.

COTA Tasmania, supported by COTA Australia, urges the ACCC to consider including a CDR rule that protects customers against the imposition of additional fees to access their own energy data in a way that they can easily interpret and use to make informed decisions about their energy usage.

Kind regards,

A handwritten signature in black ink, appearing to read 'Sue Leitch', written in a cursive style.

Sue Leitch

CEO COTA Tasmania