Consumer Data Right

Data Standards Advisory Committee

Minutes of the Meeting

Date: *Wednesday 8 September 2021*

Location: *Held remotely via WebEx*

Time: *10:00 to 12:00*

Meeting: *Committee Meeting # 35*

Attendees

Committee Members

Andrew Stevens, Data Standards Chair	Melinda Green, Energy Australia
Luke Barlow, AEMO	Gareth Gumbley, Frollo
Jill Berry, Adatree	Joanna Gurry, NBN Co
Brenton Charnley, TrueLayer	Rob Hale, Regional Australia Bank
Damir Cuca, Basiq	Lisa Schutz, Verifier
Nigel Dobson, ANZ	Aakash Sembey, Simply Energy
Chris Ellis, Finder	Lauren Solomon, CPRC
Lawrence Gibbs, Origin Energy	Stuart Stoyan, MoneyPlace
Peter Giles, CHOICE	Glenn Waterson, AGL

Observers

Barry Thomas, DSB	Hemang Rathod, DSB
James Bligh, DBS	Tomas Schier, DSB
Ruth Boughen, DSB	Mark Verstege, DSB
Eunice Ching, DSB	Paul Franklin, ACCC
Rob Hanson, DSB	Richard Hough, ANZ
Jarryd Judd, DSB	Mark Staples, Data61
Vadym Korotkov, DSB	Athena Jayaratnam, OAIC
Brian Kirkpatrick, DSB	Kate O'Rourke, Treasury
Terri McLachlan, DSB	Jessica Robinson,
Neale Morison, DSB	Jodi Ross, Treasury
Minh Nguyen, DSB	Phil Schofield, Treasury
Michael Palmyre, DSB	Senator the Hon Jane Hume
Monica Pen, DSB	Caity McLoughlin, Digital Adviser

Apologies

Andrew Cresp, Bendigo and Adelaide Bank	John Harries, Westpac

Chair Introduction

The Data Standards Chair (**Chair**) opened the meeting and thanked all committee members and observers for attending meeting # 35.

The Chair noted that it's a pleasure to have the Minister attend the meeting and we look forward to hearing from her. He noted that not only do we have our Advisory Committee Members joining us, but he has also asked the Data Standards Body (DSB) team to attend to have the opportunity to hear the Ministers remarks and see how their work is represented at the Advisory Committee.

The Chair noted that good progress has been made on the energy standards over the last month and he can now confirm that he will have "Candidate" level standards by the beginning of November. This means that once the rules are finalised, he will be in a position to go through the final consultation work.

The Chair noted that the DSB have released an update on the Consumer Experience (CX) Guidelines including updated CX artefacts relating to Decision Proposal 160 and the CX Checklist which contains all existing CX Standards plus key requirements for all current artefacts.

The Chair noted that the DSB ran a workshop on the 31 August on the "CDR Introduction – Energy Sector 2021" which was well attended including new people to the regime.

The Chair noted that we have reached a significant milestone of having over 1000 tickets being raised on Zendesk.

The Chair noted that in line with the increasing rollout focus, he is in the process of doing some market testing to identify some new talent for the CX and Technical Teams at the DSB. He looks forward to completing that process and welcoming new team members in the coming month.

The Chair noted that Andrew Cresp (Bendigo Adelaide Bank) and John Harries (Westpac) are apologies for this meeting.

Minutes

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The Chair thanked the Committee Members for their comments and feedback on the Minutes from the 11 August 2021 Advisory Committee meeting. The Minutes were formally accepted.

Action Items

The Chair provided the following update in regard to the Action Items:

The DSB have provided Treasury's (TSY) CDR Measuring Success slide deck to members and the ACCC are due to present on how the CDR system is working at a future meeting.

The Chair asked the DSB to provide an update on the invite that has been sent to the committee inviting them to join the Design Subcommittee.

The DSB noted that this follows multiple discussions about the challenges of getting particularly smaller participants to have a voice in the standards, whether it's from smaller data holders (DHs), data recipients (DRs) or consumer groups. They are focussed on getting feedback from all of the

community to help shape the standards. They acknowledge that they don't know everything and the feedback they get from the community tends to be a bit skewed as it's mainly from the major players.

The DSB noted that there is a potential benefit of forming a consultative group, comprised of committee members, in order to give advice to the Chair on ways we could expand our engagement with smaller groups, and he invites members who would like to volunteer to respond directly to the DSB. Once he has volunteers, he will then arrange an initial meeting to discuss the Terms of Reference and the goals for the group.

Update from Senator the Hon Jane Hume

The Chair noted that he is delighted that Senator the Hon Jane Hume is here to meet the volunteers who are part of the Data Standards Advisory Committee (DSAC) as well as the members of the DSB team. He would be very pleased to hear from members and hear their guidance in relation to our activity.

The Minister thanked the Chair and the DSB for inviting her to the meeting and noted that it is an honour to meet everyone. The Minister was very grateful, on behalf of the government and nation that DSAC has provided crucial advice on both the design and the implementation of CDR Data Standards and helped Australia facilitate engagement across the ecosystem.

The Minister wanted to acknowledge some of the long-term members of the committee - Lisa Schultz, the Managing Director at Verifier; Lauren Solomon, CEO at Consumer Policy Research Centre; and Stuart Stoyan, CEO at Moneyplace.

The Minister said she entered Parliament to implement policy that works to improve the lives of Australians and the CDR does exactly that. As an economy-wide reform, the Minister said, it will become increasingly powerful for everyday consumers, and she is particularly pleased to see the CDR rollout continuing to gain momentum, with non-majors joining the ecosystem from 1 July this year and energy consumers set to benefit next.

The Minister noted that they are already starting to see the accredited data recipients (ADRs) provide compelling use cases that harness customers' data, gathered with their consent, to tailor product and service offerings.

The Minister noted that the Government is committed to accelerating the CDR's roll-out with a new sector to be assessed and designated every year, commencing with telecommunications in 2021. She said as more sectors activate under the CDR and the range of innovative services offered by ADRs increases, the opportunities for innovation are unlimited.

The Minister noted that Open Banking offers automated financial advice and insights, faster credit checks, streamlined application processes and AI-enabled personal finance assistants; and that in the energy sector, the CDR will help consumers find better deals, encourage new retail products for households and businesses to better manage their energy use and ultimately drive down the cost of energy.

The Minister noted that when telecommunications data can be combined with a consumer's banking and energy data, it will provide opportunities for a range of different applications, e.g., budgeting, cashflow and financial management apps.

The Minister said they are excited about the opportunities and the potential impact because it will be truly game changing, and whilst they can see it, others can't as yet. She said that to help people optimise the way they live based on those insights and achieve their goals more effectively is really what it's all about.

The Minister said she is excited to see consumers leveraging their data as the CDR expands to other sectors. She noted that cross-sectoral data-sharing will allow ADRs to help with identifying vulnerable customers and helping them avoid financial hardship and save time on administrative and things Australians do every day.

The Minister thanked everyone who contributed to the recent strategic assessment consultation. She said this process was to identify those priority data sets that will help ensure that the roadmap for the economy-wide roll-out of the CDR maximises the benefit for the consumers.

The Minister noted that, as with any ambitious new system, there are challenges in implementing the CDR, and that one of these is getting all DHs over the line and able to share consumer data as part of the CDR.

The Minister said she understands that the ACCC is providing advice, guidance and onboarding support to banks that are still working to go live and has also published a rectification schedule that outlines when banks will commence sharing consumer data.

The Minister said she knows that there has also been a lot of focus on reducing barriers to participation in the CDR and allowing consumers to better leverage their data in open banking. She said that's why the proposed v3 of the CDR rules may include new pathways to participate in the CDR by allowing businesses to work together to deliver CDR-based products and services without compromising consumer protection, trust, and confidence. She also noted, provisions to give consumers more choice about who they can share their data with, such as their financial adviser, mortgage broker, accountant, or tax agent and a revised 'single consent data-sharing model' for joint accounts to make data-sharing easier for consumers to navigate. She said this would allow a single account holder to consent to data-sharing without requiring any action from the other account holders and make the CDR much more accessible to consumers who hold joint accounts.

The Minister noted that the exposure draft rules and regulations for energy CDR are currently undergoing consultation and will close next Monday.

The Minister noted that the CDR is nothing less than a crucial underpinning feature of our digital economy. She said it will directly benefit households and businesses, it will boost competition, it will foster innovation and it will promote confidence in the digital ecosystem and our thriving digital economy.

The Minister noted that there are challenges that need to be addressed and there is still a fair way to go but collaboration with industry is absolutely critical to ensure that CDR maintains a robust framework for the secure use and sharing of data and ultimately for direct consumer benefit. She said it is a once in a generation opportunity for the country, and she is really excited to work together to get it right.

The Minister said she wants to be able to provide certainty so that businesses can participate in the CDR but also wants a degree of flexibility without compromising on security so that they can amend the system with a sufficient evidence based to do so to achieve those highly beneficial outcomes.

The Minister said she is committed to the CDR and she knows that the Prime Minister is absolutely committed to the CDR and she wants to thank everyone for their commitment and contribution to this really exciting project which is going to change the way our nation operates.

The Chair thanked the Minister noting that it was not only informative, but very inspiring and every one of us sees ourselves moving towards the opportunity and the challenges that come with doing that.

The Chair also noted that we have configured the DSAC in a cross-sector way, and we have representatives from DHs in banking and energy, DRs, potential DRs and consumer reps and we are trying to live and operate in that digitally enabled cross sector world that you spoke so powerfully about.

The Chair, on behalf of everyone, thanked the Minister once again for her leadership in this area and appreciates everything you do to lead this amazing initiative.

The Chair also thanked the Minister for re-appointing him for another 18 months to lead the Data Standards Body as Chair until February 2023. He said he is delighted to be in the service.

Working Group Update

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

Technical Working Group Update

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

The DSB noted that the energy standards and consultations are progressing well. They have had good engagement on the consultations and they're fairly confident of having a candidate standard by the 1st of November. The DSB said the amount of change on the standards is pretty minimal given that they have been working on them for about 18 months.

The DSB noted that the new peer-to-peer (P2P) model consultation is pretty much done and dusted. The DSB said this was the only new thing that they needed to deal with, everything else was reiterating what they've already consulted on.

The DSB asked if anyone had any major concerns on the energy standards, they would like to hear about it as soon as possible so they can deal with any issues that may exist.

The DSB noted that they have a consultation open on Non-Functional Requirements (NFRs) which closes at the end of the week. They've had some feedback, but knows that performance, metrics and NFRs is a hot topic, and the consultation is really important. They also wanted to thank Frollo for publishing the metrics. The DSB said it has been very helpful to get another data point and be able to see the performance of the ecosystem and be able to contribute as to whether the NFRs are in the right position or not.

The DSB noted that in regard to the banking sector, the 8th Maintenance Iteration has now closed, and they are due to commence the 9th Maintenance Iteration today. The DSB said they received strong support from the banking sector and energy stakeholders about uplifting the Information Security profile, so it remains aligned with the international standards. They said this will be done in

line with the energy timeframes and towards the potential action initiation timeframes in the future. The DSB said this is a significant change which allows them to build strong foundations as they move into a richer consent model that gives consumers a much better ability to initiate and instruct actions within the ecosystem.

The DSB noted that they have joined the Open ID Foundation as a Working Group Member which continues their international engagement.

The DSB noted that on action initiation, they are supporting the policy team at Treasury (TSY) and continuing to work on elaborating that as well as engaging with both the payments sector and other stakeholders around action initiation.

One member asked about the applicability of the energy standards for very large customers i.e., Commercial and Industrial (C&I) energy customers. The member said they have raised some issues at some of the Working Groups as they don't think the standards are quite ready for the large customers.

The DSB noted that their next two consultations will be around invoicing, billing, and account data, and they are trying to ensure that they are fit for purpose and taking corporate and institutional customers into account with those structures.

The DSB noted that another area that has been raised is with generic tariff data. The DSB said they are limited because Energy Made Easy (EME) and Victorian Energy Compare (VEC) are the DHs and they don't hold C&I plans. When they go to the account data and they're looking at tailored tariffs, retailers will be presenting those plans. The DSB said they are cognizant of that issue and any early insight or feedback that can help them shape those consultations would be most welcome.

Consumer Experience (CX) Working Group Update

A further update was provided on the CX Working Group by Michael Palmyre as follows:

The DSB noted that it has been a busy month with releases, consultations and artefact development. The most notable one in terms of artefacts was in relation to Decision Proposal 160 which is on secondary users and partnerships. The DSB said they also released some artefacts in relation to the energy sector.

The DSB noted that there was a lot of consultation done on Decision Proposal 207 based on their analysis of the draft V3 rules. This is based on a community request for the DSB to provide a heads up on what they anticipate could result in standards impact based on their analysis, which closes on 30 September.

The DSB noted that they are planning on growing the team based on their anticipation of the upcoming work. The DSB said they are looking for additional CX Researchers and Designers as there is a high level of demand for guidelines, artefacts, and research. The DSB said that growing the team will allow the DSB to continue to meet those requests from the community and scale their work to meet the demands of the CDR ecosystem.

One member asked when the DSB plan on releasing CX Guidelines relating to consenting to de-identification of data.

The DSB noted that they will be coming out in the next month and that they are balancing that with the V3 rules analysis.

Stakeholder Engagement

A summary of stakeholder engagement including upcoming workshops, weekly meetings and the maintenance iteration cycle was provided in the Committee Papers and was taken as read.

Issues Raised by Members

The Chair thanked Committee Members for tabling issues for discussion at the DSAC meeting and said that today the DSAC will hear from Rob Hale (Regional Australia Bank) with the results from the "Measuring Success of the CDR" Survey, Richard Hough and Nigel Dobson (ANZ) on the CDR Regime performance from their perspective and Melinda Green (Energy Australia) on the implications for data payloads relating to large customers potentially arising from the Draft Energy CDR rules.

Measuring CDR Success Survey Results

Rob Hale from RAB presented the results from the survey on Measuring CDR Success as follows:

Hale noted that this survey was not done on behalf of Regional Australia Bank (RAB), but by him as a participant in the ecosystem.

Hale noted that it was an anonymous survey that ran for 3 weeks survey with 12 questions. It was sent to about 100 people within industry, published on LinkedIn and promoted on the DSB's weekly Implementation Call. He received 48 responses with most people answering all of the questions.

The respondents included DHs, DRs, prospective DHs and DRs, people in consulting roles and industry bodies and thinks this should be considered as broadly indicative of actual sentiment across our stakeholder base.

Hale stated that in terms of how the respondents rated themselves from novice to experts in CDR; 100% responded to the survey with an average score of 7.8 out of 10.

Hale stated that in terms of possible measures of success, 100% responded and the measures of success were viewed as being helpful. These range from "the number and % of all DH brands active on the register", "the number and % of all DH brands publishing complaint data" and "the number of consumer consent attempts made (success/fail) etc.

Hale said that in terms of what other possible measures might be useful in determining CDRs success. He said there was a 54.2% response rate to this question with some really interesting viewpoints around themes like the general ecosystem, consumer experience, consumers, technical and performance.

Hale said that in terms of customer participation and whether CDR should be accessible to all Australians, and how can we make sure we hit that target - 68.8% responded. This touched-on things like eligibility and digital inclusion and providing these services to people who may not have internet connected devices etc.

Hale said that in terms of the DR participant question, there was a 100% response rate. Hale noted that there were statements on whether it's important to recognise the number of DRs, and track the growth of the number, and if you don't have a published software product, but you're accredited, is it important to differentiate between the two and whether ADRs should be responsible for identifying and report DH conformance issues.

Hale stated that in terms of DH participation question, there was a 100% response rate. Hale said there were statements on whether full DH participation should be a major focus and they agree that technical standards compliance and data quality is important. Hale said whether having DH endpoints that were accurate but slow provides value, there is appetite, and should we accept that DH endpoint issues will always exist and set our expectations accordingly.

Hale said in terms of the Conformance Test Suite (CTS) and whether the quality of the CTS may impact the overall success of the CDR. Hale said there was a resounding yes, and that we need to make sure the CTS is good because it's going to have an impact on the overall success of the CDR.

Hale said in terms of the CTS and onboarding metrics question, there was a response rate of 97.9%, and there were statements on how do we feel about the current CTS as an effective onboarding tool for DHs, should it be more rigorous and comprehensive for DHs), once DH pass the CTS should we have a high degree of confidence in their conformance and would a pre-production environment with staged access to production help conformance.

Hale said, in terms of the publication of DH performance metrics, there is an appetite for sharing overall figures but less of an appetite to share individual DH to publish those.

Hale said in terms of the publication of other performance metrics, there is a similar pattern overall but looking at DRs there is less appetite to share those more publicly and register uptake rates and overall register endpoint success/failure rates would be useful.

Hale said there were some interesting comments made on CTS security profile compliance, Open ID Foundation and support for the smaller institutions to help them meet their obligations.

Hale advised that they would be happy to share the slides with the committee.

ACTION: DSB to circulate a copy of the slides to the Committee.

One member asked what is Hale's take out on the mood and attitude from the survey.

Hale said he thought that it's bullish, buoyant and they want to make it happen but there are things that keep getting talked about which needs to be addressed.

One member noted that there are incredible insights and actions, big problems, and opinions from this survey and they asked what are the actions from this?

Another member noted that there are some things that are actionable and others that are food for thought, and asked, or is that too simplistic?

The Chair noted that the DSAC will first hear from ANZ in relation to their perspective, and in the context of the work the DSB have been doing on the NFRs, ANZ will present some of the analysis on the "Get Metrics" data. We can then identify the top 3 or 5 priorities and decide what action from there.

CDR Regime Performance

The Chair welcomed Nigel Dobson and Richard Hough from ANZ who will be presenting on their perspective as a DH. He also noted that Westpac have agreed to do a presentation from their perspective at the next meeting.

ANZ noted that they don't think they've ever seen such a diverse mix of fast moving, single purpose organisations, interacting with large multipurpose organisations to try and make a regime sing, which is our combined purpose.

ANZ said as they are only one year in there will inevitably be learnings and opportunities for improvement. ANZ said they are a large multipurpose organisation with many priorities and different focuses, and they are learning about the responsiveness that's required to participate in this regime. ANZ said they also need others to understand that they're working in a complex environment with millions of customers, all of which have to be considered whenever a change has to be made.

ANZ noted that it has been a fascinating journey going through this process of CDR from the initial legislation to build to a live service. ANZ said there has been a sense of strong collaboration right up until this point from all participants, which has been fantastic in a smaller group. ANZ said as more participants join, we need to look at how we balance those communication channels, which were often in the early testing phases 1:1, versus a broad range of participants.

ANZ noted having the CTS in place is definitely a big step forward from early testing which was very manual, but obviously the discussion focuses on the coverage of the CTS and its risk-based approach versus fully understanding of participants readiness to enter the ecosystem.

ANZ said the consolidation of the data standards and the registry standards is very positive, and they are mindful as a big organisation they have more resources to respond and absorb constant change. ANZ said both the data standards and registry standards had seven updates in 2020 and for smaller organisations seeking to join, we need to look at how we tighten the ease of participation and the cycle of updates.

ANZ said they are positive that they have clear dates for future dated obligations and it's fantastic to see more DRs joining the ecosystem. ANZ said the consultation process led by the DSB is open and transparent which is positive.

ANZ said that in terms of ecosystem entry for new participants, and in their experience with testing, there is a direct relationship between the completeness and coverage of a test suite and what issues you will find later on once you've passed the stage gate. They said they often invest heavily in test suites to give them the confidence when bringing their own digital channels into production. ANZ said even when you build a set of assets that are fit for purpose, you still find further issues and that is why they have integration testing and have production test environments as much as possible.

ANZ said as the CTS coverage is risk-based, they are seeing as new participants join, defects raised as they test together with DHs, DRs and the ACCC registry. ANZ said in some cases, there are defects and other cases it comes down to standard clarification where no technical change is required, and it is more about providing their view on how to interpret and apply the standard. ANZ said they feel that there's a direct relationship between how they can extend the CTS and pre-production environment in the future.

ANZ said they noted in terms of the discussion with ACCC and participants about the timing of defect rectification. ANZ said they have a responsibility when identity stack supports millions of customers in mobile and internet banking to make changes responsibility. ANZ said the change process is, in terms of internal testing, internal change approval, making sure there's no other residual impacts from making a change on a release cycle in the interest and safety and security for services for all

Australians essentially. ANZ said there is a balance in driving towards immediacy in rectifying service outages versus the safe and secure method of making changes.

ANZ said in terms of operational management and coordination, and that the defect resolution processes are very P2P and that's been very useful and collaborative. ANZ said, as more organisations join, do they have the bandwidth to discuss defects with every DH? They don't have a solution for this but the level of rigor around their change control and release-based approach will help minimize those issues. They are looking forward to the point where they embark on action initiation, payment initiation and other actions as the central management and traceability and operational oversight of those things if an action breaks is what's being considered at the moment. They need to look to have the right central infrastructure for traceability for breakages to ensure that can be followed up and managed effectively as we continue to scale.

ANZ said, in terms of conformance questions and the entry gate and the level of rigor and completeness in terms of knowing an organization is fully aligned to the standards before they join. ANZ said, this will have a direct correlation to how many issues they will find that are different or interpreted differently in production when people go live. ANZ said, the pre-production environment would certainly be a strong asset to support that.

ANZ said, in terms of product API, there has been a category of issues in terms of data quality but some of those issues relate to product variation versus standardisation.

ANZ said, their hypothesis on the ideal model, being mindful of small participants, would be to have a predefined timetable. ANZ said, for example, a quarterly view where you look to align with industry where you have an entry point, a set of combined standards for data and registry would be released and shortly after supported by an appropriate CTS update and then a window for implementation that is common and known in advance. ANZ said, this would allow all organisations to move in synchronicity as we put change in the ecosystem.

ANZ said, in terms of the NFRs consultation, that they provided an example of the UK API calls which shows indicatively where we are in Australia versus the UK, because we have seen a very similar initial trajectory in volume through the system. ANZ said, they are in the build phase, and they have further builds to go. ANZ said, in terms of the feedback that's being sought on whether the NFRs are at the right level, their view is that the CDR needs to see a greater volume of API calls than currently within the ecosystem before they can respond to that. ANZ said, a lack of feedback on the NFRs setting does not mean full agreement, it means there's not enough information to be able to provide that feedback at this point in time.

The Chair noted that in regard to the release schedule and when the rules are made, the CDR would require an additional period before the compliance date so he could do the consultation work to establish the standards. He also noted that on the CTS being released at the same time or shortly after of the standards, and he asked the question, does the ANZ see the CTS evolving to more of a preproduction environment or a tool to help people to be more conformant.

ANZ noted that they have seen more updates to the standards than the rules. ANZ said, for example, for the registry standards there has been a change where it was released with 6 weeks' notice which is challenging in terms of data obligations and an example of the data standards release where there was no future obligations, so it was an immediate non-compliance. ANZ said, when there's new rules it would be a precursor to this, and the timetable could be predefined. ANZ said, in parallel, where there's not new rules, but there's a need for maintenance and iteration, this is something that could be considered just from the perspective of the standards.

ANZ also noted that the CTS is a valuable tool but not comprehensive. ANZ said when they raised defects, because there's been an interpretation difference that could have been picked up if that was a test aspect in the CTS, then they're pushing more of the risk into the production space, then the entry gate to that production. ANZ said there is a balance of investment, trade off and coverage and we are looking to cement the best practice and operations in all aspects.

One member noted that ANZ had the opportunity to do the manual testing (with over 200 tests) to ensure conformance for July 2020 go live. The member asked what is their preferred approach to testing - manual (200 tests) or current CTS (~20 tests) as there are pros and cons to each?

ANZ noted that the level of time required to do the process manually and in a paired way for a growing number of participants would be a challenge. ANZ said the question now is how do they move to an ecosystem that has the right tools in place, given that there is no longer that central facilitated process for pre-production conformance testing. ANZ said they have a situation now where each participant does their own testing and has a checkpoint with the CTS which is risk-based. ANZ said their view is a stronger entry stage gate has a relationship with how many issues will be found in production.

The member also asked about SLAs and resolving defects versus ensuring safe release practices? They then asked, does ANZ have their own SLAs for severity of incidents, responses, and resolution?

ANZ said that for system availability when it's a live system they certainly do. ANZ said they are calling out the difference between the initial connectivity phase, if they haven't had the benefit of that P2P testing to prove connectivity works, if they find an issue that needs a code change that needs to be tested and released safely is different to once we're live with data sharing, they're doing transactional updates multiple times a day, and they have a system outage that then is immediately responded to it.

ACCC noted that in terms of testing, in the onboarding guides that the ACCC issued there is an expectation stated there that all participants including DHs will have tested their own solutions before they commenced CTS. The ACCC said they've seen from their experience of onboarding, the level of DHs testing that's been done by participants' own solution isn't adequate. The ACCC said the CTS was never built to test everything; it was intended to be a minimum set of tests with a focus on security and reliability. The ACCC said they are currently reviewing their approach to testing, including developing a strategy for testing for the energy sector. The ACCC said they are also considering an environment for multilateral testing.

Another member noted that on the consumer impact side, the volumes are incredibly low at the moment, and they asked, but how is the ANZ finding the implementation through the contact centre, the customer support channels and people's experience of DH engagement from consumers? The member said they are still getting lots of issues that they're managing around significant questions with consumers where they're just hitting a wall with DHs.

ANZ noted that they have well established processes for supporting consumers but said it's quite early days to of provide that comparison.

The Chair noted that the major threads, in priority order, that are coming through from both of these presentations are the:

i). Pre-production environment and the degree to which it overlaps, supplements, and extends the CTS;

ii). Operational governance – defect resolution processes and accountabilities and responsible timings;

iii). Performance data and reporting of the that data; and

iv). Release scheduling.

Draft Energy CDR Rules

Melinda Green from Energy Australia (EA) presented on applying energy data standards to large energy customers as follows:

EA prefaced this conversation to say that for the energy sector the question of whether commercial & industry energy customers (C&I) is in or out has been a bit up in the air, and that the draft rules that have just came out clearly say that all C&I customers are in.

EA noted that they don't have all the answers, but they do see some major gaps and if the CDR uses the standards as they are currently set up, EA would not be providing complete or sensible data for these types of data. EA said generic tariff is only set up for mass market customers so it's not useful at all. There is nothing at the moment that's published for those very large customers, because they all get bespoke pricing in some way.

EA noted that they want to discuss the issues concerning billing data, tailored tariff data and meter data. EA said they noted that for very large customers, account and NMI standing data will often be too complex to fit into the data standards as they are currently set up.

EA said they understand that the underpinning of the CDR is to make things as standard as possible, but it cannot summarise this data and make it sensible and fit it into the standards. EA said they do have similar standards in the energy industry "to share meter data", which cover the whole range from mass market to commercial industrial customers and they believe that the CDR standards could be extended to be applicable to this data.

In terms of "billing data" EA provided a slide of mocked up data which showed C&I customer bills often have an 'unbundled' structure. There were a number of values shown that would not be passed to the ADR unless the data standards were updated. The ADR would receive the bill total and enough information to calculate about half of the bill amount. EA said for use cases relating to providing future bill estimates or savings, the ADR would have nowhere near enough information to do this adequately.

EA said, in terms of "tailored tariff data: currently the retail components i). peak, off peak & shoulder usage rates; ii). Retail supply charge; and iii). annual meter charge, these could be provided using the current standards. EA said these make up only about half the bill. EA said the other charges are more complex and don't fit into the current data standards. EA said the C&I customers have bespoke retail pricing based on wholesale market prices at the time they contract and their usage patterns. EA said generic tariff data doesn't apply.

EA said in terms of "meter data", C&I customer meter data often contains demand reads in various units of measure not supported by the current data standards. EA said some values can be calculated but some values are independent readings that are essential to understanding the customers usage patterns and bills.

The DSB noted that they will reach out to EA to have a follow up session on this as this relates to the consultation they are currently working on. The DSB noted that some of the fields are already accommodated and they do have space for ancillary charges or charges that are not directly related to usage etc. They would also like to discuss the meter usage and kVA which came up in previous consultations. The DSB said the feedback they're received from AEMO is that AEMO doesn't present the data that way. The DSB said that the data is also coming from AEMO so the DSB is using the data sets the DSB has access to and they have tried to match the data standards to that data set. AEMO noted that they hold demand reading data as well as meter data, although only meter data is currently required by the CDR data standards. AEMO noted that retailers' bills do sometimes use the demand reading data.

One member noted that drawing a comparison to where the CDR was with the banking standards a couple of years ago on what's included and what's excluded, the principle that some of us came back to was essentially, if the data is provided to the customer, then that data should be made available via the regime. The member said, you start from that as the first principle and then work back from there around complexity and challenges around difference in data sets with different types of customers. The member said, the more inclusive it is the more usable it is.

ACTION: DSB to reach out to Energy Australia to discuss the C&I

Origin noted that they would also like to be involved in those discussions.

NFR requirements

Mark Verstege from the DSB provided an update of the NFR requirements as follows:

DSB noted they've been looking at the metrics recently to understand that in context of their current consultation. The DSB said, at times the discussion around NFRs gets distilled into the response rate performance of APIs, whereas the NFR section in the data standards comprises quite a number of different dimensions around NFRs; for example, data quality, data latency and the comparison or the commensurate performance with existing banking channels, exemptions to protect services as well. The DSB said they are wanting to see the feedback on the consultation to be as detailed as possible with the issues or the considerations that you have because the NFRs are a broad set of concerns and they want to be able to understand the specific issues that participants have.

The DSB said that in lots of situations the NFRs are there to provide relief to DHs; for example, for "availability", at the moment without a binding standard, there is an expectation that there is 100% availability and if the standards were to become binding, it would be set to 99.5% availability. The DSB said it is important to acknowledge that a lot of the NFRs are there to protect DHs and allow them to perform or reject above certain thresholds.

The DSB noted that the NFRs were built looking at the UK and the performance around that and also with consultation from the banks at the time. The DSB said they have not received any change requests around the individual NFRs, and it has been left unchallenged for 18-24 months.

The DSB noted that in regard to the metrics data, there are a number of DHs that are currently responding in a non-compliant manner. The DSB said, for the ones that are responding correctly, the overall takeaway is that most of the DHs are close to or exceeding the NFR targets.

Treasury Update

Kate O'Rourke, First Assistant Secretary, and CDR Division Head, from TSY provided an update as follows:

TSY noted that they have been doing an enormous amount of consultation work in relation to the extension of CDR to energy, the consideration of a sectoral assessment in telecommunications, the Strategic Assessment for going beyond those sectors and the Farrell Report Part II Action Initiation piece.

TSY noted that they have recently launched the consultation on energy rules which closes on 13 September. TSY said key issues being consulted on include proposed coverage of the regime (that it is all retail consumers, including the C&I customers); the role of AEMO in the regime; the staged application of CDR to different retailers by size and commencement dates.

TSY noted that there is a related consultation on regulations which clarify the application of the privacy safeguards in relation to energy.

TSY noted that the discussion on benefits realization at last month's meeting was very helpful and they thanked Rob Hale for the additional information presented at today's meeting on the results from the Measuring CDR Success Survey. TSY said they will reach out to Rob to get some further information as they are continuing to work through this and have benefited from the observations.

One member asked if there was any update on the accreditation rules and the timing around that?

TSY noted that there was a high level of interest in this package and that they are working through the 50+ submission and will provide advice to the Minister as quickly as they can.

Another member about what was the timing for the strategic assessment consultation and next steps.

TSY noted that they were provided a short period of time to complete the strategic assessment and it is up to the Minister to decide what to do in regard to the advice and next steps. TSY said they are incredibly grateful for everyone's participation in the round tables and bilateral discussions.

ACCC Update

Paul Franklin from ACCC provided an update as follows:

ACCC noted that on the commencement of the rules, they have been working with TSY on the implementation of those rules for tiered accreditation and it's their intention to be ready to do that as soon as possible once the date of the rules is known.

The ACCC said they activated the 49th and 50th bank brands as DHs this morning; and collectively those 50 active brands consist of 32 entities and another 18 brands and represent about 87.4% of household deposits. The ACCC said there's continuing progress to bring on the DHs and support them through testing and onboarding.

The ACCC noted that the latest CDR newsletter contains some guidance about their compliance and enforcement activities, which includes a reminder to DHs that phase two data sharing obligations commence on the 1st November. The ACCC said they regard CDR as a fundamental compliance obligation for anyone who's offering in scope banking products and they expect that any DHs who

have already commenced consumer data sharing, that those DHs will continue to ensure the availability of their solutions and the reliability and quality of the data shared. The ACCC said they also noted that technology, incidents, and defects that impact on data sharing activities should be rectified urgently. The ACCC said this also includes a reminder of the potential compliance and enforcement actions for non-compliance with any of the rules and standards.

ACCC noted that as they've moved from the pre-live for DHs, there's an increasing focus on compliance and enforcement activities to make sure that the quality of the ecosystem is there, and we get full coverage. The ACCC said they are also very focussed on implementing all of the system changes to support future version so the rules.

One member noted that in regard to the "activities should be rectified urgently" could you quantify what "urgent" is?

ACCC responded that quantifying that is really hard as you need to look at every case by case but the clear message to all DHs is that if there's something stopping you from sharing data, you need to fix it promptly.

Meeting Schedule

The Chair advised that the next meeting will be held remotely on Wednesday 13 October 2021 from 10am to 12pm.

Other Business

No other business raised.

Closing and Next Steps

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

Meeting closed at 12:00 pm