Data61

Consumer Data Right

Submitted online

18 January 2019

Data61 – Consumer Data Standard in Banking consultation round 2

AGL Energy (**AGL**) welcomes the opportunity to make a submission in response to Data61s Working Draft for the Consumer Data Standards (Working Draft) for the application into the banking sector.

We support the high-level principles outlined in the Working Draft, however it remains difficult to provide robust analysis while little is known about how the Consumer Data Right (CDR) will be applied in energy.

The recent exposure draft for CDR by Treasury in December 2018 has included a new CDR participant of 'designated gateway', with the example of the Australian Energy Market Operator (AEMO) being used. Depending on how the designation and Rules are drafted, the technical standards may be different for the energy sector.

We continue to encourage robust consultation throughout all elements of the CDR regime, which each proposed designated sector to ensure that all matters are fully considered and resolved before implementation. As we have previously raised, baseline standards can help improve efficiency for regulators and accredited parties but can also be costly and not-quite-right fits for data holders or designated gateways.

Consultation run at the time of each separate designation can also ensure that the relevant stakeholders are fully engaged at the appropriate time, with more information being available for their industry application of CDR.

We have provided some technical comments in the attachment below. Should you have any questions in relation to this submission, please contact Kathryn Burela on 0498 001 328, kburela@agl.com.au.

 Yours sincerely

[Signed]

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API Standards v0.2.0

AGL requests additional detail on Decision 12, Payload Conventions which states "mandatory fields MUST be present *and* have a non-null value" (emphasis added). This convention also states that "an empty string ("") is not considered to be equivalent to null.".

This implies that the API standards allows a Mandatory field to be an empty string"". A mandatory field must be present and have a value that is not null or empty however the draft standards allows them to be set to an empty string.

Further, we have other questions about the use of mandatory fields such as:

- middleNames - previous feedback from participants has raised concerns about the mandatory nature of middleNames. The current description continues to state that "field is mandatory, but array may be empty".
- Decision 26 PersonDetail: array of emailAddresses is required but may be empty.

While this may be consistent with the Payload conventions, it is unclear why mandatory fields will be left empty.

Information Security Profile v0.1.1

- Client authentication: does not mandate the use of mutual Transport Layer Security (TLS) between clients. It is unclear from decision 33 collateral why this position has been made. We would encourage mandating mutual TLS to ensure authentication of both the client and the data holder prior to transmitting information.

- Decision 33 states "MTLS will be used to encrypt back-channel communication between the data consumer and data provider", however both 5 Client Authentication and 11.2 Mutual TLS "All back-channel communication between Data Recipient and Data Holder systems must incorporate, <u>unless stated otherwise</u>, MTLS as part of the TLS handshake". It is AGL's view that as backchannel communication is used for systems of a higher trust level, use of MTLS should be mandated between the data consumer and the data provider without exception.