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24 January 2019

Manager – Consumer Data Right Team  
Structural Reform Group  
The Treasury  
Langton Crescent  
Parkes ACT 2600

Submitted via email to: [data@treasury.gov.au](mailto:data@treasury.gov.au)

Dear Sir/Madam,

### Re: Draft Privacy Impact Assessment – Consumer Data Right

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to participate in the consultation process being run by Treasury on the Consumer Data Right privacy assessment. Specifically on the Draft Privacy Impact Assessment (the draft assessment) released on 21 December 2018 for stakeholder feedback. We note that the Government has committed to implement the Consumer Data Right into several key industries including banking, energy and telecommunications. Ensuring the right privacy safeguards are in place will be one measure of success in the implementation of the Consumer Data Right.

Red and Lumo are proud of our ongoing commitment to find the best outcome for the customer. We pride ourselves on our award-winning customer service and offering products that suit our customers' needs as well as our commitment to ensuring the customer is at the centre of our business operations. We agree with the recommendation that consumer preferences should be at the core of the implementation of the Consumer Data Right. However, we note that consumer preferences on energy data are likely to be different to their preference on banking or telecommunications data. As such, a continuous approach to consumer preferences is important to ensure that confidence in the implementation remain consistent across all sectors.

It is important to reassess the privacy impacts on a sector by sector basis, prior to the development of the Consumer Data Right rules and standards as it applies to energy. The current regulatory objectives that govern decision making in the gas, electricity and retail energy laws promote the long term interests of consumers and also promote efficiency in the operation and investment in energy services. The Consumer Data Right must take into account the application of privacy and data sharing standards in energy within this lens and make its assessment alongside the Australian Privacy Principles and the Competition and Consumer Act. We welcome the opportunity to work with Treasury, as it begins the privacy assessment, as it applies to energy.

### About Red and Lumo

Red and Lumo are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in Victoria, South Australia, New South Wales and Queensland to over 1 million customers. Should Treasury have any enquiries regarding this submission, please call Geoff Hargreaves, Regulatory Manager on 0438 671 750.

Yours sincerely

**Ramy Soussou**  
General Manager Regulatory Affairs & Stakeholder Relations  
**Red Energy Pty Ltd**  
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