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Dear Mr Pierce

Customer access to information about their energy consumption

The Australian Energy Market Operator (AEMO) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation paper in respect of the 'National Electricity Amendment (Customer access to information about their energy consumption) Rule 2014 and the National Energy Retail Amendment (Customer access to information about their energy consumption) Rule 2014'.

This rule change has been submitted to the AEMC to implement one of the recommendations from the Power of Choice Review. AEMO is working alongside AEMC and industry stakeholders to deliver aspects of the Power of Choice review and continues to support the wider objectives of improving pricing and incentives, informing choice and enabling customer response. AEMO agrees with the COAG Energy Council that customers should have access to information regarding who may access their consumption data or how it is used.

Consistent with this, AEMO is supportive of the objective of this rule change, particularly in order to clarify that customers (or parties authorised by customers) should be entitled to have access to their electricity consumption data.

However, there are aspects of the detail of this proposal that we consider require further development. The proposal in its current form provides for customers to be able to request their electricity consumption data from either their retailer or distribution network service provider (DNSP). While we agree that customers should be able to access the data, it is less clear who the appropriate party should be to have the responsibility to respond to such customer information requests. This is further complicated by the fact that neither the retailer, the DNSP, nor AEMO holds the full data set in respect of individual customers. To establish a change where multiple processes may actually be necessary to support access to the underlying customer data may not be the most effective outcome, particularly where these costs will ultimately be charged through to customers.

AEMO is of the view that in advance of a decision being taken in respect of this aspect of the proposed rule change, it would be beneficial for a wider and more detailed consideration of which parties should hold what particular responsibilities in respect of customer information provision. We note also that these issues are likely to be considered as part of the scoping study in respect of the potential need for an energy information hub currently being taken forward by government (discussed in section 2.2.2 of the AEMC consultation paper), and it may be of value for these discussions to be considered in parallel.

AEMO would welcome the opportunity to work together with the AEMC, and other industry and government stakeholders, to consider these issues more holistically. As part of this, we consider there would be value in considering the sequencing of the various work streams currently underway in this space to ensure the most logical and efficient outcomes can be delivered.

I trust these comments are helpful. If you would like to discuss any aspect of this submission further, please feel free to contact Violette Mouchaileh at Violette.Mouchaileh@aemo.com.au or myself.

Yours sincerely

David Swift
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