

Our Ref: 54546-D14/62720
Contact Officer: Sarah McDowell
Contact Phone: 03 9290 1488

30 May 2014

John Pierce
Chairman
Australia Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Dear Mr Pierce

Customer access to information about their energy information

The Australian Energy Regulator (**AER**) welcomes the opportunity to respond to the Australian Energy Market Commission's (**AEMC**) consultation paper on 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* (**Customer access to consumption information rule change request**). This submission focuses on the proposed metering data common terminology guidelines.

The Customer access to consumption information rule change request, which has been initiated by the COAG Energy Council, proposes a number of amendments to the National Electricity Rules (**Electricity Rules**) and National Energy Retail Rules (**Energy Retail Rules**) which seek to facilitate greater demand side participation in the National Electricity Market (**NEM**). The amendments arise out of the Australian Energy Market Commission's (**AEMC**) Power of choice review, the COAG Energy Council's work on privacy and smart meters; and the Australian government's energy information hub.

In general, the AER is supportive of measures which will boost demand side participation in the NEM. We endorse the proposed amendments to the Electricity Rules and Energy Retail Rules which will enable customers to have greater access to their own consumption information, including the form and timeframe within which it is provided. In particular, we note the proposed amendment to Electricity Rule 7.7(a) will enable distributors to provide consumption data directly to consumers. This will address compliance issues identified in the AER's *Compliance Bulletin No.8 - Confidentiality requirements for energy, metering and NMI standing data June 2012*.

The proposed rule change also requires distributors and retailers to inform customers, using a common terminology, which parties have access to data obtained from their meter. The common terminology is to be prescribed by the AER in the proposed metering data common terminology guidelines.

The AER 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. We recognise that for some consumers, information regarding who has access to their consumption data may bolster their confidence in the operation of the market. In turn, this may facilitate greater demand side participation.

The AER is uncertain, however, whether this information needs to be prescribed in a regulatory instrument, such as the proposed metering data common terminology guidelines. In our view, the proposed amendment to the Energy Retail Rules which requires retailers and distributors to provide information relating to the use of metering data sufficiently achieves the policy intent of this rule change request without the need for further prescription in guidelines.

If the AEMC determines that the metering data common terminology guidelines should be developed, the Australian Energy Market Operator (**AEMO**) is probably better placed to develop them (subject to consideration of the guideline's purpose and audience). The AEMO is responsible for the day-to-day management of metering arrangements in the NEM. This includes registering and accrediting metering providers and publishing metering procedures such as the NEM metrology procedures. Since the proposed guidelines seek to explain which parties have access to consumption data, such as metering providers, we consider AEMO would be better suited to this proposed role.

If you have any queries relating to this submission, please contact Sarah McDowell, Assistant Director, on 03 9290 1488.

Yours sincerely

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

Andrew Reeves
Chair
Australian Energy Regulator