

12 June 2014

John Pierce  
Chair  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235  
Via: AEMC's website



Your Ref: ERC0171

Dear Mr Pierce

### **Customer access to information about their energy consumption**

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit, law and policy organisation that works for a just and democratic society by taking strategic action on public interest issues. PIAC has, as a key area of work, energy and water policy. The Energy + Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in New South Wales.

We (PIAC, the Alternative Technology Association, Uniting Care Australia and CHOICE<sup>1</sup>) welcome this rule change proposal from the Council of Australian Governments and the COAG Energy Council, and thank the AEMC for the opportunity to provide this late submission.

We are strongly supportive of the rule change including:

- clarifying customer access to energy use data
- AEMO developing 'data provision procedures'
- the development of a requirement for information sheets
- AER developing Metering Data Common Terminology Guidelines.

#### **Question 3 Access to data**

In our view, it is appropriate that the NER be amended to allow a customer to access its consumption data by requesting that data from its DNSP and that Metering Data Providers (MDPs) should be able to provide electricity consumption data directly to customers or their agents.

#### **Question 4 Minimum format requirements**

In our view, AEMC's proposed summary format looks sensible and could be market-tested a broad range of consumer representatives including consumer welfare organisations (CWOs) and the Alternative Technology Association..

Ideally, metering data would be provided in a form such that consumers can interpret it easily and make optimal choices about how to manage their own consumption. The rule change should also ensure data is provided in a machine-readable format that enables CWOs, consumer organisations and other authorised agents to create services to assist consumers to interpret and understand their data.

In order to maximise the utility of the data, it would seem sensible for customers to be able to specify the time period of their data request, rather than this being determined

---

<sup>1</sup> Uniting Care and CHOICE were not able to review this submission prior to lodgment so will write to the AEMC if they have any variations in position set out here.

by the National Electricity Rules.

**Question 5 Timeframe to respond to a request**

PIAC would like the AEMC to explore how the rule change can facilitate the quickest viable access to data for consumers, especially given that data for consumers with smart meters should be able to be provided promptly, ideally in real time.

**Question 6 Fees payable by a customer**

We consider that fees payable by customers is unlikely to be a major issue, but to prevent poor conduct, a cap could be placed on the number of times a month customers could request their energy consumption free of charge (in line with retailer moves to monthly billing).

**Question 7 Timeframe for making and revising data provision guidelines**

We consider that the data provision guidelines should be published as soon as possible and reviewed annually (or at least every two years) given the speed at which the electricity market is changing.

**Question 8 Request from large customers**

Given the potential of electricity consumption data to assist all users to better manage their energy use, including at peak times, we believe this data should be available free-of-charge to all users, large and small.

**Question 9 Access by authorised agents or service providers**

The rule change should help ensure explicit informed consent is obtained from customers to enable authorised agents access to their data for particular purposes.

**Question 10 Informing consumers about the uses of their electricity consumption data**

We support the proposals to publish standard information on the websites of retailers and DNSPs and 'metering data common terminology guidelines' to provide transparency for consumers and further reduce information barriers to consumers participating in demand side management.

If you require any further information from PIAC in relation to this matter, please do not hesitate to contact me or Dr Gabrielle Kuiper, EWCAP Senior Policy Officer, on 02 8898 6520 or [gkuiper@piac.asn.au](mailto:gkuiper@piac.asn.au).

Yours sincerely



**Deirdre Moor**  
**Manager Policy and Programs**  
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6507  
E-mail: [dmoor@piac.asn.au](mailto:dmoor@piac.asn.au)