



Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

25 September 2014

Email: submissions@aemc.gov.au

Dear Mr Pierce

ERC0171: CUSTOMER ACCESS TO INFORMATION ABOUT THEIR ENERGY CONSUMPTION DRAFT DETERMINATION

CitiPower Pty and Powercor Australia Limited (**the Businesses**) welcome the opportunity to respond to the draft determination by the Australian Energy Market Commission (**AEMC**) in relation to customer access to information about their energy consumption.

The Businesses support the intention of the draft determination to allow a customer access to their consumption data from their distributor, in addition to their retailer. However, the implementation of an IT solution to provide the data to a customer will take time, and there are many practical issues that need to be resolved.

Timeframe for implementation of rule

The Businesses do not currently have a portal or IT systems in place to enable the provision of automated responses to data queries from customers pursuant to the proposed new rule.

A Customer Relationship Management system would need to be purchased and integrated into the existing IT systems, together with a portal, to provide the necessary data. The Businesses estimate that such a system would cost around \$15 million to implement and maintain over a 5 year period. Given the significant expense, the Businesses will request funding for a CRM system in its Regulatory Proposal to the Australian Energy Regulator (**AER**) for the 2016-2020 period. The earliest that the Businesses could therefore implement such a system is late 2016.

Practical issues to be resolved

Verification of customer identity

The Businesses do not currently keep records about the identity of their end-user customers. If a customer requests access to their data, then to ensure compliance with the Privacy Act 1998 and other regulations, the Businesses will need to verify the customer's identity prior to providing any data.

REGISTERED OFFICE

40 Market Street, Melbourne VIC Australia Telephone: (03) 9683 4444 Facsimile: (03) 9683 4499
Address all Correspondence to: Locked Bag 14090, Melbourne VIC 8001 Australia
CitiPower Pty ABN 76 064 651 056 General Enquiries: 1300 301 101 www.citipower.com.au
Powercor Australia Ltd ABN 89 064 651 109 General Enquiries: 13 22 06 www.powercor.com.au

The AEMC considers that distributors can verify the identity and details through the B2B transactions providing customer details from the retailer.¹ The customer name is a required, but not mandatory, field in the Customer Detail Notification (**CDN**) received by a distributor from a retailer. This process would need to be amended to allow customer identification verification, such as by mandating that a retailer provides the name, postal address, phone number and email address for each customer.

The verification process would also need to consider the scenarios of:

- how to verify the customer identity if the customer no longer resides at the property that the data is sought for;
- how to verify the customer identity if the retailer no longer operates; and
- failure of the CDN process to provide adequate information to authenticate a customer.

Timeframes to provide the data

Draft clause 7.16(d)(4) and (5) of the National Electricity Rules (**NER**) sets out that a distributor, using reasonable endeavours, must provide the required information to customers in no more than 10 business days.

The timeframes for a retailer to respond to a Customer Detail Request from a distributor are established through the Australian Energy Market Operator (**AEMO**) B2B procedures. However, the 10 day timeframe may not be possible if delay is incurred as a result of:

- failure by a customer authorised representative to demonstrate that it has the authority to act on a customer's behalf; and
- failure by a third party to provide data, for example where a Meter Data Provider fails to provide data relating to meter types 1 to 4 to the distributor in the required timeframe.

Limitation on period and frequency of data

Draft Rule 86 of the National Energy Retail Rules (**NERR**) does not propose to limit the time period over which the request for electricity consumption data is to cover. The Businesses currently have 13 months of data available online, with historical data located in an archive. Therefore, the Businesses consider that a time limitation of the preceding 13 months should be placed on electricity consumption data requests where the data is provided free of charge.

The Businesses note that practical issues could arise if the data provided contains substituted data and this is subsequently updated to actuals, but the customer is using the data to validate bills every three months. The provision of data may therefore frustrate, rather than assist, the customer. That said, the Businesses will endeavour to make the latest version of data available.

Ability to charge customers

The AEMC also proposes in draft Rule 86 of the NERR that a distributor can charge for the provision of customer data where it has been requested more than once in any three month period, or exceeds the minimum requirements in the metering rules.

¹ AEMC, *Customer access to information about their energy consumption data*, draft rule determination, Sydney, 14 August 2014, page 12.

As the distributor does not generally have a billing relationship with a customer, the manner in which such a charge could be levied needs to be resolved.

The Businesses consider that this draft Rule should be clear that charges may apply if the metering data is requested more than once in any three month period by the customer, customer's retailer or customer authorised representative, to eliminate duplication of requests and associated costs.

In addition, the Businesses consider that charges should also be able to be levied where:

- the customer requests data relating to a period prior to 13 months before the date of the request, which results in the Businesses incurring costs to extract data from archived systems; and
- the request relates to multiple customers or customer sites.

Other matters

The Businesses note the following points:

- draft clause 7.7(a) of the NER refers to "information relating to that retail customer's metering installation". The term "information" inappropriately broadens the scope of the obligation and it should be amended to "metering data" to reflect the intent of the clause;
- draft clause 7.16(d)(5) of the NER considers that the data provision procedures must ensure the manner of data provision allows for web portal, electronic and hard copy delivery. A long time series of metering data may result in a long document that is costly to post. The Businesses consider that given the rapid changes in technology, minimum standards for data delivery should not be mandated.

The Businesses would be pleased to discuss any aspect of this letter with the AEMC. Please contact Elizabeth Carlile on 03 9683 4886 or ecarlile@powercor.com.au.

Regards



Renate Tirpcou
Manager, Regulation