

7/08/2018

Mr Andrew Truswell  
Director  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Mr Truswell,

Simply Energy welcomes the opportunity to provide feedback on the Australian Energy Market Commission (AEMC) Register of distributed energy resources draft rule determination. Simply Energy is a leading second-tier energy retailer with over 660,000 customer accounts across Victoria, New South Wales, South Australia and Queensland. As a growing retailer, Simply Energy supports competition and facilitation of customer engagement in the market.

Simply Energy supports the concept of a register for Distributed Energy Resources (DER), and notes that the consultation paper considers the privacy implications of such a register. Simply Energy would support the register being opt-in for customers, and also supports standardisation of the registration process to ensure that the opt-in consent for customers is consistent.

Simply Energy considers that there is considerable value in facilitating access by parties other than distribution network businesses to the detailed information in the register, through a mechanism based on consumer consent such as the consumer data right under consideration in other contexts.

Making customer-level information available to all parties interested in advancing distributed energy resources would promote innovation. Specifically, facilitating access to the registry to parties in addition to distribution network businesses would lead to better consumer engagement and provide for future customer trading platforms to enable distributed energy resources customers to interface indirectly through an aggregator in the wholesale market.

Aggregators and other potential providers of services to consumers need to be able to access all relevant information about a customer premise for the purposes of offering the customer the most appropriate product or service. The DER register would contain information these parties would need to rely on to set customers up with the best offer tailored to them.

Further, the draft rule assumes that distribution network businesses will be the main recipients of information contained in the DER register. Simply Energy notes, however, that consultation about how information in the DER register will be managed, and believes it would be prudent to ensure flexibility in access to the DER register to accommodate any future model adopted and support the facilitation of competitive distributed energy solutions in the market.

If you have any questions or wish to speak to a representative of Simply Energy regarding this submission please contact Courtney Markham on 03 8807 1179 or by email at [Courtney.Markham@simplyenergy.com.au](mailto:Courtney.Markham@simplyenergy.com.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "James Barton". The signature is written in a cursive style with a long horizontal stroke at the end.

James Barton  
General Manager, Regulation  
Simply Energy