

29 August 2023

Anna Collyer  
Chair  
Australian Energy Market Commission  
GPO Box 2603  
Sydney NSW 2001

Dear Anna Collyer,

**Re: Bill transparency – consultation paper**

Simply Energy welcomes the opportunity to provide feedback on the Bill Transparency consultation paper that was initiated by the Energy Security Board.

Simply Energy is a leading energy retailer across Victoria, New South Wales, South Australia, Queensland and Western Australia. Simply Energy is owned by the ENGIE Group, one of the largest independent power producers in the world and a global leader in the transition to a zero-carbon economy. As a leading retailer focused on continual growth and development, Simply Energy supports the development of effective regulation to facilitate competition and positive consumer outcomes in the market.

As this review has recently been transferred to the Australian Energy Market Commission (the Commission), we consider it is a good opportunity to reconsider the scope of the review. We consider the scope of the review should be expanded beyond granular billing data to enable a more fulsome assessment of the most cost-effective method for policy makers to obtain the energy market insights sought through data collection activities.

**We would support this review being refocused on the outcomes from data collection**

As the Commission picks up this review, we recommend that it does not presuppose that continuing with, or expanding, the collection of granular billing data is the only option for policy makers to obtain insights into customer outcomes. Specifically, we recommend that instead of focusing on the datasets, the review should focus on the outcomes and insights that policy makers require and then consider the most cost-effective ways of obtaining data that can provide those outcomes.

The review could also assess the insights and overall value of the Australian Competition and Consumer Commission's (ACCC) electricity market monitoring inquiry. This would help understand whether the ACCC is the appropriate body to continue monitoring the market beyond 31 August 2025 (either under its current scope or an amended scope).

In relation to the billing data that the ACCC currently collects and publishes, it is not clear to us that the insights are particularly beneficial, when weighed up against the cost and effort involved in collecting and analysing the data. In our view, the insights set out in Box 1 of the consultation paper could be identified through other data sources and do not require a burdensome bill data gathering exercise.

### The data limitations faced by policy makers could be addressed in other ways

Simply Energy does not agree that policy makers would significantly benefit from having the ACCC share granular billing data with them. It is much more efficient for one body to analyse the raw data and share aggregated insights with all stakeholders, rather than each government Department duplicating that task at additional cost. If policy makers are not currently receiving useful insights from the ACCC's reports, it would be more appropriate to require the ACCC (or an alternative body) to publish specific findings that would aid assessment of market outcomes and policy development.

### It is unlikely that jurisdictional governments would remove their existing data collection processes

Simply Energy considers that any new data collection process would likely be in addition to existing data collection processes and would impose additional regulatory burden on retailers, with costs ultimately passed through to consumers.

We agree with the Energy Security Board that current data collection activities are uncoordinated, burdensome, and fragmented. However, we consider it very unlikely that agencies and government Departments would remove existing data collection to rely on centralised data collection activities. The sensitivity of energy within Australia is such that governments would find it challenging to commit to reducing their own direct oversight of the energy market and the outcomes for their constituents.

### Regardless of the approach taken, a cost-benefit assessment is critical

We consider it is critical that the Commission assesses the costs and benefits of continuing with, or expanding, the collection of billing data (and other datasets that form part of the ACCC's inquiry). The cost-benefit analysis should also consider related policies, such as the Consumer Data Right, which will provide customers with better access to their data than ever before.

While the analysis may find there is sufficient benefit in continuing to obtain the kinds of insights set out in Box 1, there may be more cost effective and operationally efficient methods to collecting these data points than the current data request.

### Concluding remarks

Simply Energy welcomes further discussion in relation to this submission. To arrange a discussion or if you have any questions please contact Matthew Giampiccolo, Senior Regulatory Adviser, at [matthew.giampiccolo@simplyenergy.com.au](mailto:matthew.giampiccolo@simplyenergy.com.au).

Yours sincerely



**James Barton**  
General Manager, Regulation  
Simply Energy