

24 September 2014

Australian Energy Market Commission PO Box A2449 Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

Re: ERC0171 Customer access to information about their energy consumption

Lumo Energy welcomes the opportunity to make a submission to the Australian Energy Market Commission (the Commission) in response to the Draft Rule Determination on the National Electricity and Energy Retail Amendments (Customer access to information about their energy consumption) Rule 2014.

Lumo Energy strongly supports the provision of information to its customer's customers about their energy consumption.

Lumo Energy supports the establishment of the Data Provision Procedures to be established, maintained and published by AEMO.

However, Lumo Energy does not support that the contents of these Procedures are over prescribed under the Rules, as outlined in the current draft Rules. For example, service providers, both Retailers and the Distribution Network Service Provider, when receiving a data request from a consumer, will provide the information in a manner that is agreeable to the consumer.

Innovation and competitive forces in the provision of energy consumption data to retail customers will be limited through the inclusion of the particulars of what the Procedures must cover in the Rules. The provision of a minimum standard of settlement ready data and metering data should be specified in the Data Provision Procedures but further obligations, should not be prescribed.

Further, Lumo Energy proposes that the minimum period between the date when the Data Provisions Procedures are published and the date they commence be extended from a minimum of 3 months to a minimum of 6 months to ensure that all affected parties have sufficient time to configure and develop any system changes as required.



Lumo Energy is a member of the ERAA and generally supports the positions made in their submission to the Commission.

Should you wish to discuss this submission further, please do not hesitate to contact Stefanie Macri on 03 9976 5604.

Yours sincerely

Aneta Graham

General Manager, Regulatory Affairs & Corporate Relations

Lumo Energy (SA) Pty Ltd