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By email: submissions@aemc.gov.au

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Commissioners

Submission to AEMC Issues Paper—Power of Choice—giving consumers options in the way they use electricity

The Consumer Action Law Centre (**Consumer Action**) welcomes the opportunity to comment on the Australian Energy Market Commission's (the **Commission**) Issues Paper *Power of Choice—giving consumers options in the way they use electricity* (the **Issues Paper**).

Consumer Action welcomes the review of the demand side in this latest Issues Paper, as part of the Demand Side Participation (DSP) 3 review. As an opening observation, however, we believe it necessary to highlight that the energy market is a market unlike many others in a consumer based society.

While it is commonly understood within the consumer sector, we regularly find that policy makers need to be reminded that energy is essential (in the economic and broader sense of that word) in that it;

- supports fundamental human needs including safe food (storage, preparation) and safe shelter (hygiene, lighting, temperature control);
- powers equipment that is critical to wellbeing and independence (health, communication); and
- supports community engagement and family life (social interactions, employment, education).

For many uses there is no substitute for electricity. Gas is a substitute for a minority of users but doesn't have the same penetration as electricity and as such only meets the needs of a few. For most users, it cannot be stored for later use. Except in rare and exceptional circumstances, a regular connection to electricity supply is not discretionary or optional. A reliable, safe, affordable supply of electricity is a right, not a privilege, and access must be guaranteed as far as reasonably possible.

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Further, the increasing number of products, options and incentives available relating to energy are serving to make the market increasingly complex. Given that energy is a core component of everyday living, these complexities cause problems for an increasingly large number of consumers.

On this basis, the Commission's focus should be firmly on the consumer interest—that is, what consumers want and need, in fact, not in theory.

About Consumer Action

Consumer Action is an independent, not-for-profit, campaign-focused casework and policy organisation. Consumer Action provides free legal advice and representation to vulnerable and disadvantaged consumers across Victoria, and is the largest specialist consumer legal practice in Australia.

Consumer Action is also a nationally-recognised and influential policy and research body, pursuing a law reform agenda across a range of important consumer issues at a governmental level, in the media, and in the community directly. Consumer Action has been actively involved in energy advocacy work in Victoria and nationally since the 1990s. Over this time we have provided key consumer input into important energy regulatory processes for consumers, including the current Victorian smart meter rollout and initiatives relating to improved energy price and product information disclosure following the deregulation of Victorian retail energy prices.

Since September 2009 we have also operated a new service, *MoneyHelp*, a not-for-profit financial counselling service funded by the Victorian Government to provide free, confidential and independent financial advice to Victorians with changed financial circumstances due to job loss or reduction in working hours, or experiencing mortgage or rental stress as a result of the current economic climate.

General comments

We have an overarching concern with the way that the Issues Paper is framed. In the context of the broader market we believe that the Commission may have conflated the terms demand side participation (DSP), a broadly acceptable economic term which applies to consumer participation in the market as a whole, necessary for effective competition, with demand side management (DSM), which, once consumers are able to participate in the market, enables access to, and engagement in, energy reduction activities.

It is essential to clarify this before making the assumption that consumers can fully consider their energy consumption behaviour.

All outcomes and decisions in relation to DSP should emerge from the experience of consumers in the market place and, particularly, including an examination of the features of energy services and the market rules that prevent consumers from performing their part in the competition equation.

We are particularly concerned that interventions which assume that consumers always behave “rationally” will continue to risk being ineffective and may result in a misdirection of

policy effort and resources. Drawing on the experience of consumers in markets and the evidence from behavioural economics will better equip the Commission to select the right policy responses to ensure optimum outcomes in the national energy market. Consideration of the actual experiences of consumers will also help identify situations where the experiences of consumers in general and the experience of disadvantaged and vulnerable consumers diverge (or converge). This is particularly important where, as is the case for energy and as outlined above, the market is one for an essential service.

The Issues Paper's analysis of the demand side does not adequately differentiate between residential and non-residential (particularly industrial, large scale consumers), despite highlighting that only 28%¹ energy usage comes from residential users. By not doing so, we are concerned the paper implies that the balance of responsibility in relation to DSM sits with residential consumers (only 28% of the market). This is an unbalanced approach to what is essentially a market wide issue.

Further, we believe that the supply side of the market (generators, network operators, retailers and other parties) have a key role to play in "activating" the demand side - or at least to removing barriers to consumer participation - and taking a lead role in reducing the level of emissions and the amount of network augmentation where the supply side can take a much more enabling role.

Recommendation 1:

The Commission reframe the review to focus on the *actual* experience of consumers in the marketplace and the lessons from behavioural economics, not only that of the "rational" consumer. The Commission should also ensure that sufficient weight is placed on the supply side as well as industrial, large scale consumers in addition to residential consumers.

Methodology and assessment

In our view, the paper is framed with a flawed assumption - that consumers "will always make the best decision from their viewpoint, based on the prices they face, the technology and equipment they have access to, the information they have and their individual transaction costs." There is an ever growing weight of evidence that this assumption is not only flawed, but that consumers depart from it in a systematic and predictable way. We note by way of example the following principles set out by the New Economics Foundation in the UK:

- **Other people's behaviour matters:** people do many things by observing others and copying; people are encouraged to continue to do things when they feel other people approve of their behaviour.
- **Habits are important:** people do many things without consciously thinking about them. These habits are hard to change – even though people might want to change their behaviour, it is not easy for them.
- **People are motivated to 'do the right thing':** there are cases where money is demotivating as it undermines people's intrinsic motivation, for example, you would quickly stop inviting friends to dinner if they insisted on paying you.

¹ AEMC, Power of Choice - giving consumers options in the way they use electricity, 2011, pg 8

- **People’s self-expectations influence how they behave:** they want their actions to be in line with their values and their commitments.
- **People are loss-averse** and hang on to what they consider ‘theirs’.
- **People are bad at computation** when making decisions: they put undue weight on recent events and too little on far-off ones; they cannot calculate probabilities well and worry too much about unlikely events; and they are strongly influenced by how the problem/information is presented to them.
- **People need to feel involved and effective to make a change:** just giving people the incentives and information is not necessarily enough.²

We also note that the Australian Government has drawn upon these theories more broadly in its publication, *Consumer Policy in Australia, A companion to the OECD consumer policy toolkit*³, basing its approach on behavioural economics.

Importantly, we consider that the objectives of the review do not fully reflect the significant issues within the current energy market for consumers before making the assumption that they can fully consider their energy consumption behaviour, in the context of the broader market and we believe consumers need to be able to participate fully and drive competition, before they can access and engage in energy reduction activities. This needs to be reflected in the objectives, for example, in the first objective, a "view to identifying opportunities for consumers to make informed choices about the way they use electricity", needs first to rely on consumers understanding the market and actively participating in it.

The second objective, to "provide incentives for network operators, retailers and other parties to invest efficiently so there is increased confidence that demand and supply side options are given equal weight in satisfying the communities demand for electricity services", is also of concern, for we believe that this objective should first rely on the supply side reducing barriers to consumers actively engaging in the market.. We believe there is significantly more benefit in focusing on the role of the supply side to support consumers' participation in the market first, as well as including through reducing the level of emissions and the amount of network augmentation.

Recommendation 2:

The Commission develop a sophisticated understanding of the demand side to provide a strong evidence base for future policy discussions.

National Electricity Objective

We acknowledge that the AEMC is guided by the National Electricity Objective (NEO)⁴, however we believe the AEMC has taken a narrow interpretation of the NEO by not

² New Economics Foundation Briefing *Behavioural economics - 7 principles for policy maker*, London July 2005

³ *Consumer Policy in Australia, A companion to the OECD consumer policy toolkit*, March 2011

⁴ We continue to be concerned that the National Electricity Objective NERL does not address the needs of consumers in the increasingly complex, and expensive, energy market.

providing any analysis of what is in the long term interests of consumers, thus undermining the value of this review.

It is our view that the long term interests of consumers are advanced by ensuring continuous access to the affordable, reliable and safe supply of energy, in recognition that energy is an essential service to the community, and this Issues Paper which relies heavily on continuing consumer engagement in the market - fails to adequately consider equity or distributional issues, or consumer protection requirements in the current market.

We continue to advocate for broadening the objective, in the meantime and in this review process, the AEMC needs to proactively shift its framework to effectively adopt an approach that considers fair and sustainable outcomes for consumers.

Recommendation 3:

The Commission define its interpretation of the NEO and shift the focus of its framework to actively consider fair and sustainable outcomes for consumers.

Assessment criteria

The AEMC appears to progress its work through the eyes of pure economics. Increasingly, however, there is evidence that particularly in consumer markets, this is no longer sufficient. Instead, we must consider a broader range of factors, and apply lessons from behavioural economics to these processes.

Consumers are not purely rational beings, and even when presented with all the options such as price, technology, equipment, information and transaction costs, they do not always make the best decision—assuming that consumers necessarily make rational decisions risks poor policy outcomes and, in particular, inefficient outcomes that are not in the long term interests of consumers.

It is now well established that behavioural characteristics can lead to consumers making poor decisions, including:

- **the endowment effect**—consumers may persist with options they have chosen, even when better value alternatives are available;
- **choice overload**—consumers may avoid making decisions where there are too many choices on offer, or whether those options appear too complicated to evaluate;
- **simple rules of thumb**—consumers may inappropriately apply these decision-making techniques to complex situations; and
- **framing effects**—the way in which a product is presented can influence choice.⁵

In the complex energy market, all these behaviours are problematic and manifest themselves in a range of ways, including:

⁵ Australian Productivity Commission, *Review of Australia's Consumer Policy Framework, Productivity Commission Inquiry Report*, Volume 2 - Chapters and Appendixes, No. 45, 30 April 2008, Pg 33

- staying with a standing offer as the potential to enter a market contract is too confusing and consumer information asymmetries make search and switching costs overwhelming;
- the potential for market complexity (including the number of retailers, the changing tariffs they offer, and the type of non-price offerings included) to overwhelm consumers' rational decision making capability, causing them to fall back on heuristics or rules of thumb (which may or may not provide the 'rational' answer);
- high pressure, door to door sales mean that many consumers are making decisions on the spot, with little access to information, and which may ultimately end in them making the wrong decision; and
- In many instances, the information relating to an energy retail offer is provided as a single offer at the door, or over the phone with the retailer, or a limited number of offers are provided via switching sites, neither of these provide consumers with an ability to truly consider an offer by comparing it with a number of other offers to determine if it is better for them.

We do not see that any of these barriers for consumers are currently being tackled, in fact, we continue to see through this Issues Paper and more generally, no acknowledgement that there is a market failure for consumers. Information asymmetry is so acute that it makes fair participation next to impossible.

To provide sufficient information and evidence to the Commission's review, much more focus needs to be on the difficulties consumers currently face in the National Energy Market (NEM) as well as those they will face in relation to accessing any or all DSM options. Relying on consumers to make the ultimate decision on consumption needs actually relies on the market facilitating them making such decisions. While a sector of the community can change their overall consumption behaviour, for the majority of consumers this ability actually relies on understanding and engaging in a market which is complex and expensive—an exceedingly difficult thing to do.

We strongly urge the Commission to undertake a sophisticated level of market or industry analysis to understand and identify problems with consumers' engagement in the market. This will in turn assist the Commission with the development of market-wide initiatives and rules to address these issues including how to structure an appropriate response to DSP. Without this, as the market continues to evolve and become more complex, the obstacles to consumers effectively participating in DSP will be insurmountable.

Consumer Action would be pleased to assist the Commission in the development of such an approach.

Recommendation 4:

The Commission undertakes to truly understand the way consumers interact with the market, including the barriers they face in for fair participation.

Consumer participation and DSM opportunities

The factors listed in the Issues Paper as reasons for low consumer participation in the electricity market are largely based on issues with the market design itself.

The Issues Paper fails to sufficiently explore the 'lifestyle and behavioural' factors facing a significant number of consumers, who for the most part, cannot navigate the market let alone participate in DMS, based on:

- the current level of complexity;
- energy inefficient homes;
- the upfront capital costs of energy efficient appliances; and
- lifecycle/situational factors such as having to be at home much of the day, particularly in peak times; for example those that are disabled, the elderly, unemployed and young families.

We note that the Commission suggests that "As prices continue to rise, and become a more significant portion of costs and incomes, consumers may consider more innovative ways to either reduce or manage electricity consumption more efficiently"⁶. We contest that consumers are already feeling the pain of the rising cost of energy and their ability to afford their energy bills. Consumers are already adjusting their consumption to mitigate this.

Price regulation vs deregulation

We suggest that consumers do not engage in the market knowing whether prices are regulated or deregulated. While prices are de-regulated in Victoria, a large number of consumers in Victoria are still unclear as to whether these are determined by energy retailers or the government. A study conducted for the ESC by Wallis Consulting in 2009 found that in response to questions about how energy prices are set in Victoria;

"The most common response continues to be that prices are set by the retail companies but are approved by a government agency (40%). This is no longer correct and prices are now set by retailers."⁷

While we have not seen data that reflects more current consumer understanding, we encourage the Commission to seriously consider these findings in its suggestion that price regulation limits consumer participation in the market.

On the basis of the above, we find the suggestion that consumers will respond to DSM more effectively if prices were de-regulated questionable. We highlight that price regulation exists in absence of effective competition. The markets need to be fully equipped to assist consumers to benefit from competition with an effective consumer protection framework addressing issues around information asymmetry, as discussed above before prices can be deregulated. Not simply to promote DSM.

⁶ Australian Energy Market Commission, Issues Paper, Power of choice - giving consumers options in the way they use electricity July 2011, Pg ii

⁷ Wallis Consulting, Essential Services Commission, Communications Effectiveness Final Report, June 2009, Pg 16

Recommendation 5:

The Commission separate the discussion of price deregulation from DSM. The Commission must only link price deregulation to the presence of effective competition (DSP).

The value of energy

"Consumers have the choice to take up DSP opportunity if they see value in doing so,"⁸ according to the Issues Paper.

This statement puts a lot of emphasis on the concept of value in relation to DSM, and it appears the Commission has overlooked the range of barriers facing a large number of consumers to effectively assessing value in the market. Consumers face multiple barriers in relation to peak shifting (for example, if they need to be at home at peak periods of the day), electricity conservation (for example, if they only have access to energy inefficient appliances and already use these in a limited way), fuel switching (for example, those consumers who live in areas not serviced by reticulated gas), utilisation of distributed generation (for example, those who can not face the upfront capital costs necessary to make the investment in solar PV) and energy efficiency (for example, tenants who can not augment the house or its fixed appliances beyond energy efficient light bulbs). Further, drivers of demand and supply are not singularly determined by their own personal value for (heat, light, refrigeration). Energy is an essential service. Consumers must have an absolute right to heat their home, keep their food fresh in a refrigerator and light their homes at dark. This is a societal value and cannot be confused or compared with other goods and services that consumers buy and sell.

Recommendation 6:

The Commission actively recognise that energy is an essential service and that the societal value placed on energy means that in many cases its use is not discretionary, as energy is like no other consumer product.

Intermediaries - third parties

In light of our concerns regarding complexity and information asymmetry, we welcome the concept of demand aggregators and other third parties entering the market. However we note also the potential for such intermediaries to add to rather than remove consumer problems if not carefully managed. In particular, we are concerned about the absence of a facilitating regulatory framework or adequate consumer protections to support consumers dealing with these new players. For example, the ombudsman schemes and the state government of Victoria receive a large number of complaints about solar installations and misleading representation of benefits of solar. This suggests that there should have been a better licensing framework in place from the beginning to prevent consumer detriment occurring.

⁸ Australian Energy Market Commission, Issues Paper, Power of choice - giving consumers options in the way they use electricity July 2011, Pg 23

We see the potential for demand aggregators, for example those intermediaries who seek to sign consumers onto contracts to reduce their demand, creating similar problems for consumers. For, at this time, third parties will not be licensed market participants (or authorised businesses under the NERL) and yet will be accessing a range of consumer information about consumption and tariffs, they will be approaching consumers, gaining consumer consent, liaising with retail and distribution businesses on behalf of consumers and potentially seeking to access and control consumer demand.

Not only does the potential role of third parties introduce a significant layer of complexity to the market that for many is already unnavigable, but it also exposes consumers to a new layer of risk, and potentially increased cost.

It is essential the Commission and key policy makers consider the risks of introducing these third parties in the market and addressing these risks by potentially requiring them to be licensed in the NEM, and introducing considerable consumer protections. Without a clear understanding of the issues facing consumers in the current energy market, we fear this will not be possible, and subsequently there will be considerable consumer detriment.

Recommendation 7:

The Commission establish a review of the way third parties will interact with consumers in the market, to further initiate necessary licensing and consumer protection arrangements, as a matter of priority.

Market conditions required for efficient DSM outcomes

Pricing

As above, we strongly refute the implication that prices should rise or be unregulated to facilitate consumer participation in the market. There are several other approaches the Commission could consider in relation to pricing to support DSP and DSM, such as how prices can be regulated, for example, in terms of tariff shapes. Aligning tariff shapes between distribution businesses and retailers, as well as developing an understanding of how consumers interact with the market to enable them to respond to price more effectively, including what barriers they may face, is essential.

Further, in terms of tariff shapes, we note that the Victorian Government is currently conducting a review into the impacts of time of use pricing on different customer classes. We believe that any further work in relation to time reflective pricing structures would be premature as we wait for the findings of the Victorian Government's report. In particular, however, we believe that many low income and vulnerable consumers will be extremely limited in their ability to benefit from time of use pricing because of difficulties in shifting demand and already limited usage. There is also a risk that many of these consumers will experience increased financial difficulty as a result of new tariff arrangements.

We are also concerned that consideration of pricing regulation in the context of the current review may be occurring without consideration of the wider environment and current market

reforms. Changes to price regulation shouldn't be made solely to facilitate demand side participation where the current review considers it to be efficient to do so. It should consider the range of issues detailed below.

Consumer Action was involved in the cost benefit analysis of Victorian smart meter rollout conducted by NERA in 2008,⁹ which found that there would be limited benefits arising from consumption behaviour change as result from TOU tariffs. NERA found that it would be difficult for some consumers to benefit from smart meters. In particular, the study demonstrated that should TOU tariffs be introduced, consumers' limited ability to shift behaviour due to life and time constraints will severely impact the proposition that TOU tariffs will be effective in changing energy consumption behaviour.

For example, in relation to demand management, NERA states that “there is considerable uncertainty about how much demand would actually be affected by time of use and/or critical peak pricing”.¹⁰ Low take-up rates would result in increased bills or no positive change (reduction) for many consumers due to their flat or low elasticity profiles which limit their ability to shift their load. This is particularly the case for consumers who are necessarily home during peak times and must use heating and cooling appliances at those times - older consumers, disabled consumers and other vulnerable groups may receive increased bills under TOU pricing.

We are particularly concerned by NERA's observation that in jurisdictions with retail competition for small residential customers, changes in network tariffs may or may not be passed through to customers.¹¹ This is of increasing concern as this will potentially dilute the tariff signals to consumers. It is important that, should TOU pricing be introduced, there is a policy framework to provide consumer protections, particularly to ensure electricity remains accessible and affordable to low income and vulnerable consumers. As supported by NERA,¹² consumers should have the voluntary option for TOU pricing and should not be required to use it should it not benefit them.

We strongly support the introduction of pricing principles which ensure that the first level of energy use, considered as ‘essential’, is retained on a low, fixed and affordable tariff while tariffs aimed at changing behaviour are targeted at ‘discretionary’ usage.¹³ This will provide additional environmental and social benefits as peaky usage and subsequent demand can be targeted.

Our concerns about TOU pricing are further exacerbated by Victoria's price deregulated market and particularly the failure of retailers to publish all their market offers. The lack of transparency of market offers provides barriers to effective consumer understanding and

⁹ NERA Consulting Cost Benefit Analysis of Smart Metering and Direct Load Control Work Stream 4: Consumer Impacts, Phase 2 Report for the Ministerial Council on Energy Smart Meter Working Group p. 113.

¹⁰ NERA Consulting Cost Benefit Analysis of Smart Metering and Direct Load Control Work Stream 4: Consumer Impacts, Phase 2 Report for the Ministerial Council on Energy Smart Meter Working Group p. 113, pg 113

¹¹ *ibid* pg 114/115

¹² *ibid* pg 115

¹³ For further information about such an approach, see Gavin Dufty, *Electricity Pricing – Delivering Social Justice and Environmental Equity*, in CUAC Expert Forum on Energy Pricing. 2007

market participation. We refer to the report by St Vincent De Paul¹⁴ in relation to available standing offer and market offer tariffs in Victoria and also the report by the Consumer Utilities Advocacy Centre in relation to energy switching sites.¹⁵ These reports highlight the complexity of the Victorian market, specifically in identifying the best deal. TOU pricing will only make this harder.

Recommendation 8:

That the Commission honour its obligations of ensuring competition is effective in a jurisdiction prior to recommending the removal of retail price regulation.

Recommendation 9:

Consumers should be able to opt into time of use pricing arrangements and should not be required to use it should it not benefit them.

Recommendation 10:

The Government develop pricing principles which ensure that the first level of energy use, considered as 'essential', is retained on a low, fixed tariff while tariffs aimed at changing behaviour are targeted at 'discretionary' usage.

Information

The Issues Paper notes that when consumers are unable to access necessary information, or information is too complex or costly to decipher, there is a risk that consumer are not sufficiently well-informed. We agree with the Commission that this is the current status of the market, and consumers are not sufficiently, or in many cases even remotely, well informed. It is generally very difficult to access the necessary information because the market and the information available is too complex and it is a very timely to fully access and comprehend necessary information.

As a result, it is quite clear that the market continues to fail consumers. Effective competition can not exist while these asymmetries exist and we cannot support further complexity being introduced into the market at the risk of further consumer detriment.

Information provided by energy retailers needs to be transparent, comparable and easy to access. Retailers rely on consumers not being able to access information and keeping consumers in the dark. In barely any other industry, other than the telecommunications industry, can businesses get away with such obfuscated price and product information.

Recommendation 11:

The Commission address the information asymmetries the currently exist in the NEM.

Technology and system capability

¹⁴ St Vincent de Paul, Victorian Energy Prices, [An update-report on the Victorian Tariff-Tracking Project](#), July 2010 – January 2011

¹⁵ Consumer Utilities Advocacy Centre, [Report on Energy Switching Websites](#), May 2011

In a sector that has the primary function of delivering energy as an essential service to consumers, it is paramount that policy drives technology, rather than the other way around. Should technology be the driver of many consumer outcomes, it will likely result in higher costs for consumers when they are paying for technology that they do not need, or do not want. Further, unregulated development of various technology will result in additional confusion and complexity in the market. Importantly, all consumers must be able to access a supply to meet their full household needs. Technology should not allow for essential services to be rationed, or penalise households experiencing financial difficulties.

We believe that technology and system capability needs to be framed in how technology benefits consumers, for example:

- enabling effective interaction between competitive and regulated services, **for consumers;**
- regulating access to infrastructure, data and customers, **in the interests of consumers;**
- encouraging efficient investment in new technology and services, **for consumers.**

Recommendation 12:

The Commission ensures that all consumers must be able to access a supply to meet their full household needs. Technology should not allow for essential services to be rationed or penalise households experiencing financial difficulties.

Market and regulatory arrangements

We are concerned that much of the discussion regarding incentives and regulations on the supply side are relegated to Chapter 7 rather than forming the foundation of the paper. As discussed earlier, much of a consumer's engagement in the market and ability to enact demand side participation is 'end of pipe', essentially after the energy they purchase has passed through several phases of production and distribution, at the hands of businesses that have a crucial role in energy efficiency and demand management.

We consider the following to be crucial to the ability of consumers to contribute to DSM and an essential component of this review:

- the potential for market institutions to support and promote efficient use of, and investment in DSM, through NEM infrastructure and systems;
- that market participants and institutions are better positioned to facilitate energy efficiency decisions than external third parties or users;
- the enforcement and compliance procedures that may be required if regulatory requirements and obligations are imposed on market participants; and
- the need for changes to the NEO to facilitate more central consideration of energy efficiency under the NEL.

External factors outside of the energy market will influence these factors, further regulation on minimum energy performance standards (MEPs) will provide consumers much more control over energy they use, more stringent housing designs for individual homes and

developer estates will clearly influence the overall energy needs of consumers. The MEPs program in particular should assist with developing the standards, and then a recognised, government run labelling program of energy efficient power appliances and power-intensive domestic appliances need to be clearly labelled, the program will need to be implemented and maintained to raise and maintain consumer confidence in the independence and consistency of information provided.

Recommendation 13:

The Commission ensures that energy efficiency policies are central to the energy legislation and the rules, to ensure they do have an impact on efficient DSM and overall electricity market outcomes.

Consumer Advocacy Panel grant recipient - disclaimer

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The views expressed in this document do not necessarily reflect the views of the Consumer Advocacy Panel or the Australian Energy Market Commission.

Should you have any questions about this submission, please Janine Rayner on 03 9670 5088.

Yours sincerely

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