



5 June 2014

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

Project number: ERC0171

Dear Mr Pierce,

RE: NATIONAL ELECTRICITY AMENDMENT (CUSTOMER ACCESS TO INFORMATION ABOUT THEIR ENERGY CONSUMPTION) RULE 2014

CitiPower and Powercor Australia (**the Businesses**) welcome the opportunity to respond to the Australian Energy Market Commission's (**the Commission**) consultation paper into customer access to information about their energy consumption.

The National Electricity Rules (**NER**) currently allow customers to access their electricity consumption data by requesting that data from retailers only. It is unclear, however, how the proposal to extend customers' entitlements to include accessing electricity consumption data from distribution network service providers (**DNSPs**) will contribute to the achievement of the National Electricity Objective. For example:

- The Businesses support the proposed solution for improving access to electricity consumption data—requiring the provision of both raw format and summary format data. This solution can be implemented, however, without extending customers' entitlements to include accessing electricity consumption data from their DNSPs.
- Requiring both retailers and DNSPs to maintain systems and processes for providing electricity consumption data to customers represents an unnecessary replication of costs and administrative burden. These costs may increase charges to customers, for no clear benefit.
- The Commission stated the ability for customers to access their electricity consumption data from DNSPs would be particularly useful for large customers, as they may already have interactions with their DNSP. These customers, however, will also have direct interactions with their retailer.

Given the above, the Businesses consider the NER should not be amended to extend customers' entitlements to include accessing electricity consumption data from their DNSP.

If you have any queries regarding this submission please do not hesitate to contact Jeff Anderson on (03) 9683 4809 or janderson@powercor.com.au.

Yours sincerely,

Renate Tirpcou
Manager Regulation, CitiPower and Powercor Australia

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