

Secretariat
Energy Senior Officials

Submitted via email: ElectricityConsultation@industry.gov.au

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Consumer Data Right for Energy – NEL/NER Amendments Consultation

The Australian Energy Council ('AEC') welcomes the opportunity to make a submission to the Consumer Data Right for Energy – NEL/NER Amendments Consultation ('CDR NEL Amendments').

The Energy Council is the industry body representing 20 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia, sell gas and electricity to over ten million homes and businesses, and are major investors in renewable energy generation.

The AEC has been an active stakeholder in the development of the energy CDR regulatory regime to date and will continue to be as the sector prepares for commencement. Our members, who will assume the role of data holders, collectively serve the majority of customers and want to see the CDR develop in a safe, secure and efficient manner. For the most part, the proposed CDR NEL Amendments align with this objective. Providing AEMO with flexibility with respect to how it manages its data holder obligations is a forward-thinking reform that should enable the CDR to operate smoothly as the regulatory regime evolves and data sets are expanded, and minimise the need for persistent minor regulatory amendments.

The AEC agrees with adding the CDR to the list of AEMO's statutory functions, though the scope of these CDR functions should be clearly outlined and there needs to be transparency over how AEMO determines the costs to be recovered for administering these CDR functions.

Notwithstanding the above, the AEC does not support the inclusion of non-CDR related reforms in this CDR-titled reform package, namely the inclusion of NMI standing data in the Metering Data Provision Procedures (MDPP) and enabling data sharing between AEMO and the CSIRO. Through the AEMC, the energy sector has a transparent and legislated rule making process and no clear policy reason has been given for why these reforms should progress outside it. To maintain proper process, the AEC encourages Energy Senior Officials to pursue these reforms via the AEMC.

Any questions about this submission should be addressed to Rhys Thomas, by email to Rhys.Thomas@energycouncil.com.au or by telephone on (03) 9205 3111.

Yours sincerely,



Ben Barnes
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