

14 October 2021



Energy Ministers
Via email: ElectricityConsultation@industry.gov.au

Jemena Electricity
Networks (Vic) Ltd
ABN 82 064 651 083

Level 16, 567 Collins Street
Melbourne, VIC 3000
PO Box 16182
Melbourne, VIC 3000
T +61 3 9173 7000
F +61 3 9173 7516
www.jemena.com.au

Dear Energy Ministers,

Re: Consumer Data Right for Energy – NEL/NER amendments (consultation)

Jemena Electricity Networks (**JEN**) would like to thank the Energy Ministers for the opportunity to provide feedback on the Consumer Data Right (**CDR**) for Energy – NEL/NER amendments (**Amendments**). JEN owns and operates an electricity distribution network in the Northwest region of greater Melbourne and is impacted by the proposed Amendments. JEN is a strong advocate of supporting customers in meeting their energy needs, including supporting customer access to their data to help them make informed decisions.

The proposed Amendments that remove outdated protections and clear several impediments that currently stand in the way of customers accessing their data are an essential first step to achieving the CDR objectives. We support these necessary Amendments. However, several changes in the proposed Amendments deviate from the original intention of the CDR for Energy, in particular an expanded role for Distribution Network Service Providers (**DNSPs**) in the process for providing customer data. On this point, we believe there is a more efficient process, which we elaborate on below.

In the original CDR for Energy work, the obligation to provide customer data under the CDR for Energy came from the Australian Energy Market Operator (**AEMO**) or the customers' electricity retailer.¹ In the operation of the National Electricity Market

¹ Australian Government, *Consumer Data Right, Energy Rules Framework, Consultation Paper*, 2020.

(NEM), these two participant bodies are the natural source of information because in the case of the:

- Electricity retailers have a direct relationship with the consumers, interacting with them through several established channels.
- AEMO already stores a record of up to date standing data in real-time across the NEM. This includes collating and storing data from all fourteen DNSPs that operate in the NEM.

The most recent Amendments propose to allow consumers or their representatives the option to approach their DNSP to obtain CDR data.

In the current operation of the NEM, there is a well-established process for collating relevant standing data (as foreseen in the CDR for Energy) linearly, from source through to a central repository. We consider this an efficient and effective means of getting data to consumers or their representatives and can work with minimal change to meet the CDR for Energy obligations. The alternative, of having DNSP provide CDR data, will introduce multiple channels for data provision, which can raise additional issues, including:

- Reduced data integrity due to timing differences – a customer may seek data from multiple channels, and due to extraction and delivery timing differences, the consumer may be provided with two different sets of data. Neither collection of data is necessarily erroneous; however, the difference could create confusion and actually reduce consumer agency.

This issue is compounded with consumers and their representatives potentially asking for data at the same time. In the interests of process efficiency, a singular channel of data is preferable.

- Incremental cost – As an industry, adding a channel for data delivery creates incremental costs borne by DNSPs. Under the operation of the National Electricity Rules, these costs will be passed on to customers for each of the fourteen DNSPs through their price reset processes.

This is in addition to the cost borne by retailers and AEMO to establish their CDR for Energy channels. We consider that in the interests of efficiency, energy

customers should only bear this cost once, not multiple times, as with duplicative channel arrangements.

The CDR for energy intends to improve the customer experience. However, the above-noted challenges will have the opposite effect by creating confusion and cause consumers to disengage, and potentially inhibit the intended benefits from being realised.

Whilst there are some situations where duplicate channels may be warranted, for example, where current processes are deficient. Having identified the well-established process that already exists, the need for duplication is not necessary. Further, introducing duplication will increase cost and risk. For these reasons, we consider retaining the obligation for providing data under the CDR for Energy should remain on AEMO and electricity retailers and not fall to DNSPs.

If you have any questions regarding this submission, then please get in touch with me at matthew.serpell@jemen.com.au

Kind regards,

[signed]

Matthew Serpell
Manager Electricity Regulation