

19 July 2023

Anna Collyer
Chair
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

Dear Anna Collyer,

Re: Electricity Consumption Benchmarks – consultation paper

Simply Energy welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (the Commission) consultation paper into the Australian Energy Regulator's (AER) rule change request to remove its obligation to develop electricity consumption benchmarks.

Simply Energy is a leading energy retailer across Victoria, New South Wales, South Australia, Queensland and Western Australia. Simply Energy is owned by the ENGIE Group, one of the largest independent power producers in the world and a global leader in the transition to a zero-carbon economy. As a leading retailer focused on continual growth and development, Simply Energy supports the development of effective regulation to facilitate competition and positive consumer outcomes in the market.

Simply Energy agrees with the Commission that this rule change request is non-controversial. We consider it is sensible to remove the requirement on the AER to develop electricity consumption benchmarks now that there is no corresponding requirement on energy retailers to display these benchmarks on electricity bills.

While regular updates to the electricity consumption benchmarks may still be useful for the preparation of Victorian electricity bills, we do not consider that this is a sufficient justification for the AER to continue to incur the cost of developing updated benchmarks. If the Victorian Government values the continued inclusion of consumption benchmarks (and the currency of the data relied on) it should develop its own process for updating electricity consumption benchmarks going forward.

Simply Energy welcomes further discussion in relation to this submission. To arrange a discussion or if you have any questions please contact Matthew Giampiccolo, Senior Regulatory Adviser, at matthew.giampiccolo@simplyenergy.com.au.

Yours sincerely



James Barton
General Manager, Regulation
Simply Energy