



26 April 2013

Ms Lisa Nardi
Senior Advisor
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Ms Nardi

NATIONAL ELECTRICITY AMENDMENT (ACCESS TO NMI STANDING DATA) RULE 2013

Origin Energy (Origin) welcomes this opportunity to respond to the Commission's consultation paper on the rule change request lodged by Energy Australia. Origin supports the proposed rule changes and comments made in the Energy Retail Association of Australia's submission.

Origin agrees with the assessment made by Energy Australia that current NER provisions might be considered ambiguous given the content of the Australian Energy Regulator's (AER's) Compliance Bulletin (no. 8) in 2012 regarding confidentiality requirements with respect to NMI standing data. We further agree with the view that third parties acting on behalf of retailers are subject to significantly more stringent requirements with respect to privacy and data security than any third party acting independently.

Arrangements to contract with third parties in order to access NMI standing data are an efficient response for a number of retailers to undertake particular functions in the market. Given third parties are acting on behalf of retailers as market participants, the proposed rule change provides continued support for these arrangements.

With respect to question 2 on page 13 of the consultation paper, Origin believes that following the AER's Compliance Bulletin, the current NER provisions were rendered somewhat ambiguous. Origin believes the proposed rule change addresses this ambiguity and supports retailer interpretation of rule 7.7(a).

Origin does not consider that additional consumer protections and obligations should be placed on retailers or their services providers where these service providers are undertaking consumer acquisition activities on behalf of retailers. As market participants, retailers are subject to the "suite of consumer protections" already and their agents are required to support these obligations when acting on behalf of retailers.

Should you have any questions or comments in relation to this response, please contact me in the first instance.

Regards

David Calder
Regulatory Strategy Manager
Retail
(03) 8665 7712 - David.Calder@Originenergy.com.au