

25 April 2013

Australian Energy Market Commission  
PO Box A2449  
Sydney South, NSW 1235

**CONSULTATION ON NATIONAL ELECTRICITY AMENDMENT  
ACCESS TO NMI STANDING DATA RULE 2013**

**Lodged online**

Reference: Submission ERC0153 Access to NMI Standing Data

Thank you for the opportunity to provide a submission to the AEMC consultation paper "*National Electricity Amendment (Access to NMI standing data) Rule 2013*" and the proposed rule change as put forward by Energy Australia.

Please let me introduce our organisation. Serviceworks is a wholly owned subsidiary of Computershare Limited (CPU). Computershare was founded in Australia in 1978, and since floating in 1994 has grown substantially. Computershare is a global leader in the Share Registry industry and the Printing, Mailhouse & Stakeholder communications industry.

Established in 1999, Serviceworks Management Pty Ltd (Serviceworks) has organically grown into one of Australia's leading utility specialist services organisations. Providing services to utilities across Australia, Serviceworks currently delivers specialist customer management, information technology, communications and consulting services.

Serviceworks provides complete end-to-end customer management services supporting more than 600,000 end-use customers across water, electricity and gas utilities in Australia; encompassing multiple market segments including residential, small and medium business, and commercial and industrial markets. We specialise in customer on-boarding, customer service, billing, payments, meter data management, credit & collections, customer management systems, telephony infrastructure, specialist applications development and project management.

Our key retail clients who participate in the retail energy market include:-

- Australian Power & Gas
- Alinta Energy
- Neighbourhood Energy
- CS Energy
- QEnergy
- Energy Australia

Each of these retailers have outsourced some or all of their retail functions to Serviceworks and we have formal service contracts in place with each organisation. In addition, Serviceworks host and manage the customer billing systems for each of our clients and as such, access to market data via MSATS is core to our ability to efficiently and effectively deliver the contracted services.

Whilst not directly responding to the questions posed in the consultation paper, Serviceworks would like to make the following comments:

### **Rule Change Request**

Serviceworks supports the need to address any ambiguity that exists within the National Electricity Rules around access to National Meter Identifier (NMI) standing data. In seeking to address this issue Serviceworks supports the rule change request and solution proposed by Energy Australia.

This proposed rule change seeks to ensure the continuation of benefits and efficiencies are maintained through the current practices under which retailers have been operating for some time, whilst also ensuring ongoing compliance with confidentiality obligations are maintained.

### **Retailer Authorised Agents Access to NMI Standing Data**

As stated above, Serviceworks has contractual arrangements with a number of retailers to provide a range of retail services, which require real-time and adhoc access to MSATS.

We have been accessing MSATS for a number of years on the basis that we are an authorised agent of the respective retailers we service.

The activities that we currently access MSATS for, include (but not limited to):

- customer acquisition- validation of standing data at the point of sale;
- customer transfers - raising market transfer requests;
- managing B2B transactions, including raising and completing service orders;
- undertaking market & network reconciliations, and
- reporting.

The practice of providing MSATS access to third party agents has been widely undertaken within the industry and was deemed consistent with the intent of the rules and has occurred without demonstrable customer or market detriment.

Consequently, the proposed rule change seeks to clarify and make explicit the fact that retailers, and agents acting on their behalf, are permitted to access standing data for the legitimate purpose of conducting relevant retailing activities.

In order for the market to continue to operate in an efficient manner, where these efficiencies provide consumer benefit, Serviceworks strongly supports the proposed rule change. Any restrictions to MSATS would have significant detrimental impact to our retailers, to their end customers, on the retail market generally and most importantly on our business.

### **Data Access and Privacy**

Serviceworks has had access to MSATS for a number of years and we have both direct interface and manual interaction with the system. We understand the importance of data protection, security and confidentiality and whilst we are not directly licensed under the regulatory frameworks, we conduct ourselves as if we

were. In addition, we have contractual obligations with our Retailers that require us to comply with all relevant Acts, Regulations and Rules.

We have tight IT governance and security over all our systems and data, including our links to MSATS and its data. We do not believe additional accreditation or compliance requirements are needed or would be in the long term interests of consumers or the market. As to date there has been no demonstrable consumer or market detriment resulting from current practices. To date, we believe that we have been accessing MSATS responsibly in accordance with the rules and without any breach of privacy or confidentiality.

#### **Power of Choice Review**

Serviceworks notes the references to the Power of Choice review in the consultation paper. Recommendations contained in the power of choice review underpinned by market developments, such as the roll out of Advanced Interval Metering, and the introduction of flexible pricing, where there will be a heavy reliance of third party providers, are further evidence of the need for clarity around third party access to NMI standing data. The success of a number of customer choice energy efficiency programs hinge on the ability of third party agents ability to access consumer data, including NMI standing data.

#### **Supporting the rule change**

We understand that Energy Australia has requested a rule change to clarify the rules around retailer's third party providers having access to NMI standing data. We support the proposed change on the understanding that the change will allow us to continue to have access to enable us to continue to fulfil our contractual obligations with our retail clients. And for our retail clients to in turn continue to fulfil their contractual obligations with their end customers.

Should you have any questions or wish to discuss our submission further, I may be contacted on 03 9862 8000 or via email: [tszakacs@serviceworks.com.au](mailto:tszakacs@serviceworks.com.au)

Yours sincerely



Tim Szakacs

**Executive General Manager**