



23 June 2014

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

Re: Draft Rule Determination Governance of Retail Market Procedures (ERC0162)

Lumo Energy welcomes the opportunity to provide further commentary to the Australian Energy Market Commission (the Commission) in relation to the Draft rule determination (Draft Determination) on the National Electricity Amendment (Governance of retail market procedures) Rule 2014 as proposed by the Australian Energy Market Operator.

Lumo Energy continues to argue that the existing governance arrangements are not ideal and any future amendments to the IEC provisions must focus on improved representation, opportunities for second tier retailers to have a voice, and the opportunity for open consultation with clear information on the positions of the **all** the various participants within the retail market.

The Commission in the Draft Determination notes the interdependency of the Information Exchange Committee (IEC) governance with other rule changes, such as 'Expanding Competition in Metering and Related Services' and 'Customer access to information about their energy consumption'. Lumo Energy would appreciate that the Commission clarify in the final rule determination whether a recommendation will be made by the Commission to the COAG Energy Council to submit a rule change regarding IEC governance structure required as a result of the other rule changes, or whether it will be up to the IEC to re-submit another rule change request to enable the IEC to be more representative.

Please do not hesitate to contact Stefanie Macri, Regulatory Manager on 03 9976 5604 to discuss this submission further.

Yours sincerely

A handwritten signature in black ink, appearing to be "Aneta", with a long horizontal line extending to the right.

Aneta Graham
General Manager, Regulatory Affairs & Corporate Relations
Lumo Energy Australia Pty Ltd