

RECEIVED 29 APR 2013

26 April 2013

Mr Steven Graham
Chief Executive
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

By email: aemc@aemc.gov.au

Dear Mr Graham,

RE: Access to NMI Standing Data Consultation Paper

Red Energy welcomes the opportunity to provide comments on the *Access to NMI Standing Data Consultation Paper* (the Consultation Paper).

Red Energy supports the rule change proposal as it will provide clarity on this issue, and allow industry and consumers to continue to benefit from the efficiencies of current practices.

Red Energy supports the interpretation of others and of the ERAA, whereby third parties are able to access NMI standing data if they are the agent of a registered participant. We understand that the majority of ERAA members currently use agents to access NMI data. There is a sound basis for this position- an action undertaken by an agent is deemed to have been undertaken by the principal.

Access to NMI standing data allows retailers (or their agents) to provide new customers or prospective customers with accurate pricing information. In addition access to standing data enables retailers to efficiently and effectively manage customer data. Accurate information provides business efficiencies and results in related cost savings. Removing these efficiencies will result in increased costs being passed on to customers.

The Consultation Paper notes the distinction between methods of third party access to NMI standing data. Energy retailers are registered parties liable for breaches under NECF or jurisdictional consumer protection schemes, whereas third parties are not. Energy retailers are Registered Participants with commensurate obligations under the NER. When

contracting with agents to access NMI standing data (or for any purpose), retailers assume the compliance risk and any potential liabilities through commercial agreements. Retailers have commercial and legal incentives to ensure that the Rules are observed.

Red Energy does not believe that additional or alternative compliance or accreditation requirements would be in the long term interests of consumers, as they are likely to increase compliance costs without any material benefits.

Should you have any questions regarding this submission, please contact me.

Yours sincerely

A handwritten signature in black ink, appearing to be 'S Grant', written over a horizontal line.

Stephen Grant
Manager-Quality and Compliance
Red Energy Pty Ltd

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