



26 April 2013

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

Dear Mr Graham,

RE: Access to NMI Standing Data Consultation Paper

Lumo Energy welcomes the opportunity to comment and provide feedback on the AEMC's consultation paper for its access to NMI Standing Data Consultation Paper.

Lumo Energy is one of the largest second tier energy retailers in the National Electricity Market. As such, it has a keen interest in ensuring processes and systems facilitate an efficient and cost effective outcome for consumers.

In summary, Lumo Energy supports:

- A mechanism which allows agents of a retailer to access the NEM standing data whereby appropriate contractual arrangements exist to ensure compliance.

The AEMC consultation paper discusses a number of issues and our responses are set out below:

1. What is considered the minimum information required for retailers to undertake their market functions, for example, sale and supply of electricity as opposed to consumer acquisition activities?

The key purpose of standing data is to confirm active metering configurations and network tariffs; this ensures customers pricing offers directly correlate to their metering configuration and corresponding network tariff. By completing this task prior to entering a customer into a retailer's customer relationship management system significantly reduces the rate of incorrect NMI transfer errors and ongoing billing errors which lead to customer complaints.



Standing data requests also enable a retailer to process meter reads onto new meters, the creation of new metering headers for electricity sites, to check for next scheduled read dates, and determine the energised status of a site.

Essentially the standing data ensures data validation and allows for a robust quality assurance mechanism.

2. Are the existing provisions in the NER ambiguous regarding retailers ability to access and use NMI standing data for the purposes of providing accurate quotes to consumers?

Given the widespread usage of the NMI standing data by retailers and their agents and the Australian Energy Regulators contradictory compliance advice then it would appear yes. The majority of retailers' general business practice is to utilise the NMI standing data to adequately perform the functions of a retailer.

3. Are the existing regulatory arrangements and retail contractual arrangements with their suppliers sufficiently clear and robust to allow retailer agents access to NMI standing data (and hence MSATS)?

Lumo Energy supports the rule change as proposed by Energy Australia which will remove the existing ambiguity around the usage of standing data by a retailer and their agent. The existing regulatory regime is clear in that an agent of a retailer is deemed to be a representative of the retailer and the retailer by extension is unable to limit their liability.

4. Should the NER be amended to provide for retailer authorised agents access to NMI standing data or should other mechanisms be considered? If the NER should be amended, what provisions should be put in place?

Refer point three.

5. Noting that there are a suite of consumer protection and obligations on retailers, should additional requirements be placed on their service providers who are performing consumer acquisition activities on the retailer's behalf?

Refer point three.



6. If additional obligations are required for authorised retailer agents, what arrangements should be put in place?

Lumo Energy is of the view that the amendment to the rule change as proposed by Energy Australia is sufficient to ensure all parties are acting in a responsible and compliant manner.

Effective regulation develops after careful analysis of available evidence and there is no evidence to suggest that the existing process is detrimental to customers other than the ambiguity of the rules.

Additional obligations are likely to lead to increased costs ultimately being borne by consumers.

Lumo Energy thanks the AEMC for the opportunity to provide feedback on the proposed rule change. If you require any further information, please contact myself on (03) 8680 6439.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized capital 'A' followed by a long, horizontal, slightly wavy line extending to the right.

Aneta Graham
General Manager Regulatory Affairs and Corporate Relations