

28 August 2020

Australian Competition and Consumer Commission

Submitted online to www.accc.gov.au

Submission on Consumer Data Right Energy Rules Framework Consultation Paper

CleanCo welcomes the opportunity to comment on the Australian Competition and Consumer Commission's (ACCC's) Consultation Paper on the Consumer Data Right (CDR) Energy Rules Framework.

CleanCo is Queensland's newest electricity generator. Our purpose is to deliver reliable clean energy solutions at a competitive price for Queenslanders. Our activities will help to improve electricity affordability, contribute to the achievement of Queensland's 50 per cent renewable energy target by 2030, support secure and reliable electricity generation, and create new investment and jobs in regional Queensland. We have a target to support 1,000 MW of new renewable generation by 2025 and we will achieve this by building, owning and operating our own assets and by investing in new renewable projects driven by others. CleanCo supports rule and policy changes that support an affordable, reliable supply of clean energy to customers into the future.

CleanCo supports providing customers with data to empower them to make the most informed decisions. To this end, we are broadly supportive of the proposal to extend CDR to the electricity sector in line with the phased-in approach suggested. We believe the changes, while not free to implement, will help inform customer decisions and improve competition in the mass market retail sector.

In relation to eligibility, CleanCo supports excluding significantly large energy users on the basis that this information is already readily available to these customers. As noted in your report, these customers typically have sophisticated energy management and data access arrangements. Contracts with C&I customers are bespoke, with specific terms and conditions to meet the customer's expectations on a wide range of issues, including data sharing. As such, any application of the CDR to these cohorts is likely to duplicate existing arrangements, potentially require data to be provided in a way that is not customised for, and less useful to, the customer and increase the cost to serve.

It is not immediately clear what makes a customer significantly large, but the 100MWh per annum threshold between small and large customers is likely too low – customers towards the lower end of the large customer bracket are unlikely to have the resources to invest into fully understanding their energy usage and needs, so some form of standardisation/automation may be of value.

An alternative might be to align with the threshold for distribution connection asset customers (typically around 4 GWh per annum). These customers are large enough to have negotiated complex connection agreements that required assets to be specifically dedicated to them, so it is likely they have a strong understanding of their energy use. As enabled in the NECF, retailers should also be allowed to join multiple sites held by the same customer to help meet this threshold – a company with multiple sites adding to more than 4 GWh per annum most likely has a strong understanding of its energy usage and the broader market.

We thank the ACCC for the opportunity to submit on this process. If you have any questions about our submission, please contact me on [REDACTED] or [REDACTED].

Yours sincerely,



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