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Mr Michael Drake

Australian Competition and Consumer Commission
ElectricityMonitoring@acc.gov.au

Dear Mr Drake

ACCC monitoring of electricity supply in the National Electricity Market – Discussion Paper

Ergon Energy Queensland (EEQ) welcomes the opportunity to provide comment to the Australian Competition and Consumer Commission (ACCC), on its consultation on *ACCC monitoring of electricity supply in the National Electricity Market – Discussion Paper* (Discussion Paper).

Frameworks for monitoring and data collection

EEQ agrees that each of the aspects of an analytical framework considered in the discussion paper are appropriate to the electricity market and each have their relevance to the ACCC's monitoring activities. Notwithstanding, we note that the legal framework is currently monitored and enforced by the applicable regulatory bodies, such as the Australian Energy Regulator (AER) and jurisdictional regulators.

EEQ also supports the application of a framework that can be evolved and amended over time to accommodate rapid changes in the industry.

Process and timing for the collection of information

EEQ currently reports to several regulatory bodies, including the AER, the Queensland Department of Natural Resources, Mines and Energy (DNRME), New South Wales Department of Planning and Environment (DPE), the Australian Securities and Investment Commission (ASIC), the Australian Energy Market Operator (AEMO), and the Clean Energy Regulator (CER).

Current reporting requirements are extensive and continuous throughout the year. EEQ notes that additional reporting obligations increases the regulatory burden borne by retailers and increases the cost of compliance. As such, we suggest that alignment with existing reporting requirements in terms of timing and data, as well as greater consistency across agencies would reduce the cost of compliance.

Similarly EEQ believe that it is prudent for the ACCC to avoid duplication of the functions of other bodies currently tasked with market monitoring at a federal and jurisdictional level. As noted in the discussion paper there are over a dozen reports produced by Federal, State and

private bodies covering electricity prices and competition across and within the NEM. EEQ encourages the ACCC to consider all of the reporting currently produced with a view to incorporating them into their reports.

Monitoring the impact of policy developments

EEQ notes that a number of recent policy developments have had a significant impact on the functioning of the electricity market bringing additional obligations and costs to bear on retailers and in turn customers. These issues were identified in the ACCC's Retail Electricity Pricing Inquiry and EEQ believe it is prudent to continue to report on the efficacy of implemented policies designed to create a more efficient market and put downward pressure on electricity prices.

Should you require additional information or wish to discuss any aspect of this submission, please contact me on [REDACTED].

Yours sincerely

[REDACTED]

[REDACTED]

Manager – Policy and Regulatory Reform

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