

Enabling Consumer Mobility

Submitter	
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Questions	Comments
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	Yes, absolutely. The current situation is stacked against the consumer for all the reasons given. The relevant "product data" needed to make meaningful plan comparisons is unavailable to customers or hidden by retailers behind a web of smoke, mirrors and website labyrinths. I have not found one retailer in all my years of evaluating their "deals" which has provided the data I need up front, in useable form.
Q2. Are there any other aspects of improving access to data that the Authority should be considering? Are there further benefits that we have not articulated?	I think that EA should mandate a common set of plans which all retailers must submit pricing for in all distribution regions in which they operate. Without this it is impossible for the average consumer to make useful comparisons of underlying costs, because most retailer plans contain difficult to quantifiable variables and freebees.
Q3. Do you agree that creating standards for the exchanging of product data should be aligned with a potential future electricity Consumer Data Right (CDR)? Why, or why not?	No response.
Q4. Are there additional opportunities or risks the Authority should consider in aligning improved access to electricity product data with a potential CDR designation and implementation?	No response.
Q5. Do you have any views on the interaction between the definitions of "generally available retail tariff plan" within the Code and "product data" within the CPD Act? Are these definitions easily reconciled? Do they capture the same information?	I dont think this approach goes far enough to provide competitive comparisons. I think that all retailers should be required to offer a common mandated "Generally available retail tariff plan" or plans, which can be compared like for like as a baseline of their competitiveness in regions they operate in. As a customer, this would be my selection starting point, and I would then look at the value of their alternative plans and enticements. It would become a much simpler process. After all, they are all selling exactly the same product at the same quality. With this approach, you might find out what customers have known all along: there is no effective competition in the electricity retail market.

Q6. Do you agree that the current data access arrangements (eg, clause 11.32G, non-regulated EIEP14 and bilateral agreements) are no longer fit for purpose to promote a digitalised electricity industry that enables the on-demand sharing of electricity information?	Yes, in my view as a consumer they never have been. I have found third party pricing analysis practically useless and have always undertaken my own analysis of my residential demand profile against specific retailer plans. This requires market knowledge, time, and commitment that most customers do not possess. It is disappointing that this issue has taken 30 years for the regulatory agencies (which are supposed to have the best interests of the consumer as their core value) to address.
Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?	I wouldn't know because I am not party to all the complicated industry compliance requirements. But as an example I have always thought that retailers were required to publish their plan rates on their websites, but even to this day I find it almost impossible to locate relevant rates without actually applying to become a customer! As a consumer I have always found it frustrating and time consuming to firstly, find plan pricing information on retailer web sites and secondly, to get my existing annual usage data in the form to make a useful future cost analysis.
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	On comparison websites, not all plans are available or up to date. There is lack of clarity and consistency about where and if GST is included in the retailer website prices and offerings. It is ridiculous to sometimes have to apply to switch before finding out the plan rates.
Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?	Simply to make value comparisons of different plans quicker and more accurate. At the moment there are so many assumptions made due to lack of specific data that the comparison estimates are too inaccurate to be useful.
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	It all still seems to be very complicated. Most customers simply want to know the best price for a year's worth of electricity under their existing detailed consumption patterns, and what restrictions there are, if any, to use. Surely it can't be difficult to mandate that the industry players provide this quote as a starting point to any other enticements they might like to offer?

Q12. Do you agree with our preliminary assessment of the options presented above?	In my view EIEP14-A should define one or more standardised plans which by regulation it is mandatory for all retailers to offer a price on. This is the only way a true comparison of competitiveness in any particular region can be evaluated.
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	Since these provisions appear to have been largely ignored arrangements moving forward need to be mandatory.
Q14. Are there any other barriers to using EIEP14 that we have not identified?	Since these provisions appear to have been largely ignored the arrangements moving forward need to be mandatory.
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to ensure deliverability and minimise disruption?	Since these provisions appear to have been largely ignored the arrangements moving forward need to be mandatory.
Q16. If option 3 is pursued, do you think the proposed EIEP14B (all electricity plans) should capture historic offers to capture all current and legacy plans?	Since these provisions appear to have been largely ignored the arrangements moving forward need to be mandatory.
Q17. If option 3 is pursued, are there practical limitations the Authority should consider? (For example, should plans that have no active customers, or highly specialised plans such as internal staff discounts, be included?) Q17a. If limitations are appropriate, how should these be defined to ensure the protocol remains comprehensive and useful for consumers and third-party service providers?	No response.
Q18. What practical limitations (if any) should apply to third-party requests for tariff data? Q18a. Do you think any interim measures should be considered as part of the new protocols, to facilitate the transition to the on-demand access to product data? If so, what are your suggestions? Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?	No practical limitations that I can think of. As a consumer, the data I particularly want to have direct access to at any time is an up to date (rolling 12months) summary of annual cost of supply to me, broken down into categories as defined by the plan (eg, fixed charges, day kWh and cost, night kWh and cost, etc, and including any benefits paid out, all with GST inc.
Q19. Should each electricity plan be required to have a unique identifier to help consumers and third parties distinguish between plans with the same or similar names? Q19a. If yes, how should the unique identifier system be designed and administered to ensure that is practical, consistent and does not add unnecessary compliance costs?	This might be useful as the current disorganised proliferation of market-speak plan names is highly confusing to the consumer.

Q20. Do you have any feedback on how these new protocols could be implemented?	I think it should be mandatory for the proposed EIEP14A and B data to be published on the retailers website. This would be much more efficient and timely than retailers having to respond individually to every request. Likewise, EIEP14C data should be directly and continuously available in useful form to customers via their internet based accounts.
Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?	No Respons.
Q22. What support, if any, would you find helpful during implementation (eg, technical guidance, test environments)?	No response.
Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?	There should be a reasonably fast complaints process by which individual customers or third parties can attempt to obtain redress. (Utilities Disputes?)
Q24. How would you like to be involved in co-designing the new product data protocols? Are there any specific parties that the Authority should be consulting with to help design these protocols?	I have had plenty of experience in analysing my load profiles and searching for the best residential plans for my needs. I would very much like to comment on any proposals which relate to the residential customer's ability to make more informed decisions based improved direct access to customer data and plan pricing.
Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?	No response.
Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?	Urgency is required. The retail market is currently broken as the ability to easily and accurately compare offerings has dissipated over the years. True competition has disappeared, to be replaced by frilly, worthless edge enticements.