



Energy Retailers Association
of Australia Limited

15 June 2012

Mr Phil Waren
Victorian Essential Services Commission
Level 2, 35 Spring Street
Melbourne Victoria 3000

By email: phil.waren@esc.vic.gov.au

Dear Mr Waren

RE: Smart Meter Privacy Impact Assessment Draft Report

The Energy Retailers Association of Australia (ERAA) welcomes the opportunity to provide comment on the Smart Meter Privacy Impact Assessment Draft Report (the Report).

The ERAA is the peak body representing the core of Australia's energy retail organisations. Membership is comprised of businesses operating predominantly in the electricity and gas markets in every State and Territory throughout Australia. These businesses collectively provide electricity to over 98% of customers in the National Electricity Market (NEM) and are the first point of contact for end use customers of both electricity and gas.

All ERAA Member companies currently handle customer data and adhere to the National Privacy Principles (NPP). The ERAA considers that the NPPs provide sufficient protection for consumers, and therefore does not support the introduction of any additional privacy measures related specifically to smart meters. The increased use of smart meters will not necessitate measures additional to the NPPs, as increased data volumes do not change the rationale or effectiveness of these existing measures.

The Report raises concerns relating to the increased participation by third parties in the smart meter data market. The ERAA believes that the NPPs should cover these third parties as it does retailers and distributors. For this reason we oppose recommendation 7 which states that third parties should be merely encouraged to abide by the NPPs in their business. As outlined in Box 18 of our submission to the National Smart Meter Consumer Protections and Pricing Draft Policy Paper Two (<http://www.scer.gov.au/files/2012/06/ERAA-Submission.pdf>), the ERAA believes that there are inadequate consumer protection measures for third parties.

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Should you wish to discuss the details of this submission further, please contact me on (02) 9241 6556 and I will be happy to facilitate such discussions with my member companies.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cameron O'Reilly'. The signature is fluid and cursive, with a large loop at the end of the last name.

Cameron O'Reilly
Chief Executive Officer
Energy Retailers Association of Australia