



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

27 September 2019

Energy Security Board
COAG Energy Council
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

via email: info@esb.org.au

Dear Sir/Madam

Energy Security Board Post 2025 Market Design

Energy costs for small business have increased in real terms by over 50% in the past 10 years. Any outcomes of this consultation must address small and family business concerns of increasing electricity costs and the reliability of electricity supply. The Energy Security Board should deliver a long term, fit-for-purpose market framework that will provide a more affordable and reliable energy supply.

This market design needs to ensure that other projects and initiatives being pursued by bodies such as the Australian Energy Market Commission (AEMC), Australian Energy Market Operator (AEMO) and the Australian Energy Regulator (AER) are acknowledged and that parties work together to provide certainty, reliability, and affordability in the market for consumers as well as the retailers and wholesalers.

Driving innovation to benefit small business and consumers generally is a key feature of the future energy market. It is therefore paramount that any market design producing new service offerings allows energy purchasers to engage with the system in a way that meets their needs and circumstances. For small business operators, future innovation in energy generation and supply should result in the lowering of energy costs. This innovation will result in change to regulatory arrangements, the traditional retail model and the network where businesses access their energy supply. This also provides an opportunity to leverage the Consumer Data Right to enable the customer to access and transfer data to accredited third parties to help make informed decisions about the emergence of innovative new market service offerings.

Any future designs must recognise energy supply is an essential service and that the transition from old energy generation to new must be seamless to limit any impact upon small business operation. Therefore, stakeholder consultation must be timely, transparent and relevant. Adequate time must be allocated for future feedback to enable consumers to understand the recommended changes and the potential impact on their business.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Bryan Smith on 02 6121 6414 or at bryan.smith@asbfeo.gov.au.

Yours sincerely

Kate Carnell AO

Australian Small Business and Family Enterprise Ombudsman

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