

Essential Services Commission

GPO Box 2605
Adelaide, SA 5001

30 June 2021

Dear Essential Services Commission,

Please see the following Written responses from ZEN Energy Retail Pty Ltd for the Retailer Energy productivity Scheme: Reporting Requirements;

Consultation Question 1: Do you support the streamlined process to determine REPS obligations, whereby energy retailers will no longer be required to report energy sales and customer numbers to the Commission? If not, why not?

ZEN'S RESPONSE: Yes, streamlining reporting is preferred. Having a bulk acquisition view as opposed to individual sales and customer numbers avoid the lengthy process of data reconciliations, which in turn may result in a faster target being issued but not necessarily a more accurate one. ZEN is concerned this year at the size of our target not being reflective of the market share, this comes down to the data accuracy that AEMO and AGN have on sales acquisitions of ZEN Energy. ZEN would like to consider interrogating the data that ESCOSA use to create the target so we can help tidy up any anomalies.

Consultation Question 2: Should the information requested from obliged retailers to inform reporting on the costs of each type of activity being delivered under REPS be changed? If so, how?

ZEN'S RESPONSE: We do not support the requirements that retailers must submit our costings to ESCOSA and encourage the Department to reconsider the purpose of this type of reporting. The penalties for the shortfall built into the scheme are significant and represent such a momentous brand risk that they are the key considerations when selecting approved providers. We consider this to be quite an onerous reporting task and it is not known how this data will be used or disclosed given these factors.

Consultation Question 3: Is there any additional evidence that would inform reporting on competition in activity delivery and any identified barriers to competition and the delivery of eligible activities? Please include the following details:

- How many providers were considered for providing energy productivity?
- How many providers were engaged to provide energy productivity activities?
- What was the process for selecting providers (e.g. open tenders)?
- What were the key criteria (top three) for selecting providers (eg Price)?

ZEN ENERGY RETAIL PTY LTD

ABN 54 615 751 052
Level 2, 134 Fullarton Road, Rose Park 5067, South Australia
Phone: 1300 936 466
Fax: 08 8277 2586
Email: enquiries@zenenergy.com.au

@ZENEnergyAU 

ZEN Energy 

@ZENenergyau 

www.zenenergy.com.au 

ZEN'S RESPONSE: As this is the first year ZEN Energy has been obligated for such a scheme (were not obligated under REES), no previous experience in this area in SA and given the tight timing to get underway, we chose for CY2021 to contract directly (without a tender process) with an Activity Provider based on existing, trusted relationships that were already in place, and a provider who is already serving one of the major electricity retailers in SA.

Kind regards,

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Regulatory Compliance and Office Manager, ZEN Energy