

4 November 2025

Fiona Hooymans  
General Manager, Market Surveillance Branch  
Australian Energy Regulator  
Submitted via email: [ContractMarketMonitoring@aer.gov.au](mailto:ContractMarketMonitoring@aer.gov.au)

Dear Ms Hooymans

**Re: Wholesale Market Monitoring and Reporting – MMIO-ELEC-2025-02**

Thank you for the opportunity to provide a submission on the draft market monitoring information order.

Flow Power is an electricity retailer that works with energy customers throughout the National Electricity Market (NEM). Together with our customers, Flow Power is committed to a vision of creating Australia's renewable future.

We appreciate the AER's attempts to make the MMIO obligations as streamlined and simple as possible and hence we broadly support the draft MMIO. The proposed approach strikes an appropriate balance between providing valuable insights and minimising the burden imposed on reporting entities.

We support the revised approach to the upfront and ongoing collection of PPA data. The revised draft will enable the AER to collect valuable data points about historical and ongoing PPA trades without imposing significant administrative burden on participants for an unclear benefit.

Similarly, the proposed approach to capturing ongoing exchange traded and OTC contract data appears sensible, and we support the template approach. We also support the AER's exploration of ways to obtain information on exchange trades direct from the ASX/FEX and/or other clearing parties to reduce the quantity and scope of information requests.

We are broadly supportive of the proposed timing for the submission of quarterly and annual reports. Annual reporting being due in February-March would be the best time for our business.

We would encourage the AER take a similar approach to the approach taken by the ACCC when it collected similar data for its Electricity Market Monitoring reporting. The ACCC gave participants the opportunity to review how submitted data was going to be represented in its published report, providing an opportunity to flag any concerns regarding commercial sensitive information that could be attributed to that participant. Given the highly sensitive nature of the information being shared, having these checks and balances provide assurance to market participants that important information isn't inadvertently conveyed.

Lastly, to the extent possible, we encourage the AER to coordinate with other market bodies and the ACCC to ensure consistency in the timing and content of retailer information requests. We also encourage a commitment to keeping the data captured consistent for future reporting periods where possible. Doing so will help reduce administrative burden on retailers and ensure that information collected is reported in a consistent way.





If you have any queries about this submission, please contact me on (02) 9161 9068 or at [Declan.Kelly@flowpower.com.au](mailto:Declan.Kelly@flowpower.com.au).

Yours sincerely,

Declan Kelly  
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Flow Power