

## **Appendix A: Stakeholder Comments Received on Draft Proposal – Publication of Retail Market Statistics**

Comments were received from the following stakeholders:

- Direct
- Enmax

Stakeholders were requested to provide feedback on the draft proposal as well as add any other suggestions that they may have.

### **Direct**

Direct were pleased that the MSA is not moving forward with the naming of retail firms and their associated market shares by segment or region. They look forward to the implementation of the proposed changes.

*MSA Response:* None required.

### **Enmax**

Enmax commented that the method of reporting does not indirectly disclose the information that the MSA has proposed not to provide. Presentation of graphics and references should not identify the retail participants in defined market sectors by inference, by consistent use of colour or other identifying characteristic.

*MSA Response:* The MSA has affirmed its intention not to include participant names in its publication of retail market statistics. However, it is difficult to fully meet the stipulations implied by this stakeholder comment without completely ceasing the publication of retail statistics. For example, in the residential sector there are three active retailers in the competitive segment of that market. Any information on market shares can be interpreted by the knowledgeable market participant with some degree of correctness. For the firms active in that sector, having to discern only the shares of the other two would be quite easy. Where more retailers are competing for market shares the degree of disguise is higher. In these cases, consistency of colour is valuable in distinguishing trends relevant to the evolution of overall competition. In the MSA's view, considerable protection is afforded by ensuring that the geographic areas used are relatively large. Specific percentages will not be easily discerned to a high level of precision and the data behind such graphs will not be released. The same feature that makes it difficult to disguise participants – a small number of large players – is at the root of the MSA's view that the market will be well served by greater transparency.

Enmax commented that the sizes of market segments should be provided as well as continuing the existing publications of Residential, Small Commercial & Industrial, and Large customers.

*MSA Response:* This is part of the new package of retail market statistics.