



15 September 2022

Project Team
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Submitted Online

RRC0046 – Delaying Implementation of AER Billing Guideline

Alinta Energy Retail Sales (**Alinta**) welcomes the opportunity to provide comments on the Australian Energy Market Commission consultation paper "*Delaying Implementation of the AER Billing Guideline*"

As an active investor in energy markets across Australia with an owned and contracted generation portfolio of over 3,300MW and more than one million electricity and gas customers Alinta are well placed to provide comments on the above-mentioned consultation paper.

The rule change to delay the implementation of the AER Billing Guideline, is one that we support. The necessity for the delay has become even more apparent following recent market volatility, which has included multiple *Retailer of Last Resort* events. Such volatility has resulted in cost uncertainty for retailers, including the flow on cost recovery from consumers as a result of market intervention.

This coupled with the wide range of reforms retailers are expected to manage over the coming 24 months, particularly those associated with Customer Data Rights, further lend support to providing flexibility to retailers through the delaying of the implementation of the AER Billing Guideline. Allowing retailers to better optimize their overall reform implementation schedule reducing implementation cost and the flow on impacts to consumers at a time where managing cost of living pressures is paramount.

The extension of time for the implementation of the Guideline should not have any detrimental impacts on consumer protections, given that existing arrangements will remain in place until the implementation of the Guideline.

Should you have any questions regarding our submission I may be contacted on (02) 9372 2653 or via email: shaun.ruddy@alintaenergy.com.au

Yours sincerely

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