



14 September 2022

Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2000

Lodged electronically: aemc@aemc.gov.au

Dear Sir/Madam

Delaying Implementation of the AER Billing Guideline – Proposed Rule Change

Origin Energy appreciates the opportunity to comment on the Australian Energy Market Commission's proposed rule change for the delay of the commencement of the Australian Energy Regulators (AER) Billing Guidelines (Billing Guidelines).

Origin supports a delay to the commencement of the Billing Guidelines until 30 September 2023. This will allow retailers time to appropriately scope, design and test new bill design formats based on various scenarios and jurisdictional requirements. It will also allow retailers to better address resource constraints at a time when other key market reforms and system migration projects are occurring.

The consultation paper notes a key reason for the proposed delay in the commencement of the Billing Guidelines is to reduce the implementation costs to be passed through to consumers. Origin does not anticipate that a delay will result in a material reduction in costs to our business. Importantly, the additional time will allow the costs of the project to be spread out over a longer period of time.

We do not believe that there will be any significant market or customer impacts that will arise from the delayed implementation. Consumers will continue to receive Rule compliant bills until the implementation of the Bill Guideline in September 2023.

In our case, except for the best offer requirement, Origin's bills already contain the information requirements set out in the Guidelines. Although this information may not be in the style or format prescribed by the Guidelines, we have previously undertaken extensive customer engagement and have developed a format and style of a bill preferred by our customers.

We also consider that the AEMC's assessment framework is appropriate. Customer impacts and business impacts, in terms of resources and costs, should be a clear consideration in the AEMC's decision making to delay the Bill Guidelines to September 2023.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on (07) 3867 0863 or caroline.brumby@originenergy.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Sean Greenup".

Sean Greenup
Group Manager Regulatory Policy