



15 September 2022

Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Email: aemc@aemc.gov.au
Ref: RRC0046

Delaying implementation of the AER Billing guideline Consultation paper

Powershop Australia Pty Ltd (“**Powershop**”) thanks the Australian Energy Market Commission (“**AEMC**”) for the opportunity to provide comments in response to the Delaying implementation of the AER Billing guideline Consultation paper (the “**Paper**”).

Background on Powershop

Powershop is an innovative retailer committed to providing lower prices for customers and recognises the benefits to customers in transitioning to a more distributed and renewable-based energy system. Powershop has introduced numerous new, innovative, and customer-centric initiatives into the market.

Statement

Powershop supports this Paper rule change. Powershop are also encouraged by the support that the Australian Energy Regulator has provided this rule change request¹. Powershop recognises that the implementation of the better bills carries with it a significant impact on resource, time and cost to comply with the original deadline of 31 March 2023. Finally, Powershop also support the AEMC’s position of an expedited rule process due to its non-controversial nature.

Powershop supports the rule change start date of 30 September 2023. Powershop has always maintained the position that retailers would require at least 12 months to implement such broad changes to consumer bills, post the final decision being made by the AEMC². One important reason behind this timeframe is to ensure that retailers would have more time for testing (both at a system and customer experience level) to deliver better outcomes for customers.

This 12-month period was also based on the premise that the industry would not have any significant interruptions. Since the final decision was made in 2021, the 2022 unprecedented market conditions have resulted in unforeseen challenges for retail businesses. With further impacts on costs and resource, Powershop supports the proposal to delay the implementation of the AER Billing Guideline. Powershop consider that the delay will ease the burden on retail businesses and by association result in more considered and favourable outcomes for customers.

¹ AEMC Consultation Paper, National Energy Retail Amendment (Delaying Implementation of the AER Billing Guideline Rule 2022, 18 August 2022, Page 1

² Powershop Submission, AEMC Bill contents and billing requirements Draft Decision Paper, 4 February 2021

If you have any questions in relation to this submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "James EII". The signature is fluid and cursive, with the first name "James" being more legible than the last name "EII".

James EII
Manager Regulatory and Compliance, Consumer
Powershop Australia