



13 October 2022

Anna Collyer
Chair
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted online: www.aemc.gov.au

Dear Ms Collyer

Review into extending the regulatory frameworks to hydrogen and renewable gases – Draft Rules

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Australian Energy Market Commission's (AEMC) Review into Extending the regulatory frameworks to hydrogen and renewable gases Draft Rules.

Origin agrees customers should be informed if there is a substantive change in the type of gas that is delivered to them. We retain our view that a high-level government / distributor led information campaign would likely be more effective than a retailer-based notification framework in achieving this. To the extent this is not the AEMC's preferred position, it will be important to ensure any retailer notification requirements are appropriately designed and not unnecessarily prescriptive.

If the gas type delivered to a customer changes, there should be no impact on the functionality of that gas given overarching gas quality standards / specifications. In other words, the customer's appliances should continue to operate as they did prior to the change in gas type. This is an important message, but whether notification occurs five days before the change as proposed by the AEMC, or at some point after, will make no difference to a customer's amenity. Advanced notice from a retailer may in fact create an unnecessary level of concern and urgency for customers.

Further, where supply of alternate gas types does result in a change in network charges and therefore retail prices, how customers are notified of these changes is already well established in the National Energy Retail Rules (see rule 46).

We therefore do not see the need for new, prescriptive customer notification requirements for retailers. This will increase retailer costs as they will need to initiate customer communications and ensure their contact centres are resourced to cope with the expected increase in call volumes – costs ultimately borne by the customer. Consistent with this, we recommend that where draft rule 147F is to be retained, it should be revised to specify that:

- retailers are only required to notify relevant customers of a change of gas type if they receive a notice from a distributor under rule 147D, and the change has implications for those customers' pricing and consumption of gas;
- retailers should be permitted to notify customers as soon as practicable, but no later than the next bill;

- any notifications should be in a form and manner that is consistent with a customers preferred method of communication.

If you wish to discuss any aspect of this submission further, please contact Shaun Cole at shaun.cole@originenergy.com.au or on 03 8665 7366.

Yours Sincerely,

A handwritten signature in black ink that reads "S Cole". The "S" is large and stylized, and "Cole" is written in a cursive script.

Shaun Cole
Group Manager, Regulatory Policy