



6 March 2025

Ms Anna Collyer  
Chair  
Australian Energy Market Commission

Project Reference Code: RRC0063

Dear Ms Collyer,

**National Energy Retail Amendment (Improving the application of concessions to bills) Rule Consultation Paper**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) in response to its Consultation Paper on the *National Energy Retail Amendment (Improving the application of concessions to bills) Rule* (the Consultation Paper).

This submission is provided by Energy Queensland on behalf of its related entity, the retailer Ergon Energy Queensland Pty Ltd (EEQ).

We support enhancements to the National Energy Retail Rules (NERR) that improve the application of concessions to customers' energy bills. As a socially conscious retailer, EEQ goes beyond the NERR requirements and confirms its customers' eligibility for concessions (such as Queensland's Electricity Rebate) when establishing their accounts. EEQ then reconfirms eligibility when subsequently engaging with customers, in particular when supporting those customers experiencing difficulty paying their bills.

In EEQ's experience, barriers preventing the application of concessions to bills include the limited supporting information made available to retailers to enable proactive identification of eligible customers, and discrepancies in customer-owned information such as out-of-date address details registered with concession services such as Smart Service Queensland. A retailer is unable to apply ongoing concessions to a customer's account until the customer has passed validation checks and the obligation rests with the customer to ensure their details (including name and address) remain current. We therefore consider there is a need for concessions services to enhance their engagement practices to remind concessions recipients of the need to keep their customer-owned records current.

We also recommend that concession services and healthcare card providers such as Centrelink and the Department of Veterans' Affairs support retailers' efforts via the provision of a target list (data matching) to enable retailers to actively engage eligible customers and offer the concessions. We consider that eligibility criteria, specifically the living arrangement criteria, could also be reviewed with the intent to remove this

requirement. This would enable eligible customers to access a concession payment on a bill addressed to the premises at which they reside.

Alternatively, a simpler, more cost-effective and more-efficient solution may be for eligible customers to engage directly with concession services to have concessions applied to their electricity account, without customers needing to engage with retailers. Such an approach would also avoid potential privacy risks. EEQ notes the Consultation Paper's proposal to expand the information sought, retained and transferred between retailers increases risks concerning customer privacy and data integrity. We recommend the AEMC take these risks into account as part of its rule change determination.

In conclusion, our view is that the effort to improve the application of concessions to bills should not be primarily born by retailers and more onus should be placed on concession services to assist customers in accessing this bill support.

Should the AEMC require additional information or wish to discuss any aspect of this submission, please contact either myself, or Andrew Bozin on 0436 447 814.

Yours sincerely



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