

12 August 2025

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Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Submitted: via online portal

RE: RRC0063 – Draft rule determination: National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025

About Shell Energy and Powershop in Australia

Shell Energy is an energy solutions business and renewables and battery energy storage system developer in Australia. As the one of the largest electricity providers to commercial and industrial businesses in Australia¹, Shell Energy offers integrated solutions and market-leading² customer satisfaction, innovation across a portfolio of electricity, gas, environmental products and energy productivity. Our residential energy retailing business Powershop, acquired in 2022, serves households and small business customers in Australia.

Our generation assets include 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and the 120-megawatt Gangarri solar energy development in Queensland. Shell Energy also operates the 60MW Riverina Storage System 1 in NSW, as well as the 200MW Rangebank Storage System and 370MW Koorangie Storage System both located in Victoria.

Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy, while Powershop Australia Pty Ltd trades as Powershop. Further information about Shell Energy and our operations can be found on our website [here](#).

General comments

We welcome the opportunity to provide feedback on the draft rule change as part of the 'Improving the application of concessions to bills consultation' process. Shell Energy supports the objectives of the proposed concession reform, and agree that where customers are eligible for concessions, they should have easy access to them. Likewise, we support the AEMC's key recommendation that the most effective solution would be for a government-led project to automate the application of concessions along with a concerted effort to harmonise concession application, notification and verification processes across jurisdictions.

It is the shared interest of retailers and consumers to improve access to concessions as they play a critical role in assisting consumers to stay on top of their bills. In the intervening period prior to the automation of concession access, we maintain that interim regulatory intervention must focus on the customer experience. Optimising customer experiences requires retailers to balance the amount of information requested from customers with the need to avoid overwhelming them with excessive information, information enquiries and confirmations.

In this context, greater clarity is needed around the operational scope of proactive information gathering under the proposed changes to Rule 19. For instance, does this requirement apply only to new customer sign-ups, or does it also extend to customers changing plans? The current drafting is broad, inviting uncertainty and making it difficult for retailers to have clear, constructive conversations with customers about eligibility. A more precise definition of eligibility requirements would support compliance and improve the overall customer experience.

¹ By load, based on Shell Energy analysis of publicly available data.

² Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021

Providing Jurisdiction-Specific Rebate Information (Rule 64)

Under the current drafting of Rule 64, it is unclear whether retailers must outline all available rebates to customers who have already indicated they are ineligible for concessions under Rule 19. If interpreted broadly, this could lead to unnecessarily long and complex interactions, especially over the phone or during digital sign-ups - despite the customer having already confirmed their ineligibility. To streamline the process, we propose amending the rule to allow flexibility in how jurisdiction-specific rebate information is provided. This could include directing customer to a dedicated webpage listing with the available concessions by jurisdiction.

Accommodating for delivering this information via a dedicated webpage would reduce call times and improve the digital onboarding experience, while still ensuring customers have access to relevant information.

Additionally, clear regulatory guidance on messaging is strongly preferred to ensure accuracy and minimise compliance risks for retailers.

Better Bill Guideline – advice improvements

There is scope for improvement in the Better Bills Guideline recommendation, which suggested the requirement for notifying customers that their concession status does not carry over to their new retailer on their first and last bill notices. This approach introduces unnecessary complexity and increases the risk of system logic failures. We recommend that changes to the guideline to require this concession notice on every bill. This change would simplify implementation and enhance customer awareness of concession-related rules especially as a customer's circumstances and eligibility can change at any point, not just when they switch.

Harmonisation of State-Based Barriers

There is a clear need to harmonise state-based concession schemes to improve efficiency in eligibility verification, allocation, and delivery. On average since 2016, 89,762 people move interstate, every quarter³, simplifying the concession experience could reduce a significant amount of complexity for energy consumers (and other industries with concession schemes). The current system is fragmented, with significant duplication and variation across jurisdictions. Centralising and standardising concessions and targeted measures (such as Energy Bill Relief) would reduce administrative costs, simplify compliance for retailers, and enhance the customer experience through a more consistent and transparent framework.

A major barrier to greater concession uptake is the lack of national consistency. Retailers operating in the National Electricity Market must adapt their systems to accommodate five different state schemes, increasing complexity and driving up development and maintenance costs – and ultimately raising the cost to serve. A coordinated, whole-of-government approach is needed to ensure concession card holders receive their full entitlements and understand how to access them. This should address inconsistencies in eligibility, access, and support across states, and be jointly designed by governments and industry to ensure broad uptake and awareness across sectors and jurisdictions.

Powershop thanks the AEMC for the opportunity to provide comment on this matter. If you would like to discuss any part of this submission, please contact Brett Crossley at brett.crossley@shellenergy.com.au.

Yours sincerely

Libby Hawker

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³ [Net interstate migration review](#), ABS 2025