

13 August 2025

RRC0063 - Improving the application of concessions to bills
Australian Energy Market Commission (AEMC)
Submission made online at www.aemc.gov.au

Dear Sir/Madam

Subject: RRC0063 Draft Rule Determination – *National Energy Retail Amendment (Improving the application of concessions to bills)* Rule 2025 – Submission by SA Power Networks.

SA Power Networks (SAPN) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) Draft Determination for the *Improving the Application of Concessions to Bills* rule change.

As South Australia's regulated energy distributor, serving 1.7 million South Australians, we play a critical role in the well-being of our community. SAPN believes that all customers deserve affordable and equitable access to energy supply and is committed to advocating for and supporting improvements that provide safeguards for all customers, particularly those experiencing vulnerability.

SAPN acknowledges the challenging cost-of-living environment for customers and supports the AEMC's proposed rule change to help eligible customers access energy concessions, providing some relief from cost-of-living pressures.

This submission specifically addresses the proposed changes outlined in the Draft Determination:

1. Retailers must ask consumers about their eligibility for concessions at sign-up.
2. Retailers must provide jurisdiction-specific information on rebates and concessions at sign-up.

SAPN believes these proposed changes represent a positive step towards increasing customer awareness of available concessions. We are supportive of the changes outlined, as they will improve awareness and encourage customers to provide their eligibility information during the sign-up process. This will hopefully lead to an increase in the application of concessions and deliver better outcomes for customers.

We acknowledge that this rule change provides short- to medium-term solutions for customers and commend the AEMC for recognising that automating the provision of concessions remains the most effective long-term solution. Removing the onus from customers to provide eligibility information will simplify the process and ensure greater accessibility.

While recognising an automated solution is a priority and longer-term goal, SAPN also calls for the development of a nationally consistent approach to how energy concessions and rebates are applied for and managed. A streamlined, harmonised process would ensure easier transferability of concessions across jurisdictions and reduce complexity for customers.

SAPN supports the AEMC's recommendations for further actions, specifically:

1. The Department of Climate Change, Energy, the Environment and Water (DCCEEW) should facilitate next steps across governments to automate concessions.

2. Jurisdictions should work to harmonise concession schemes to improve consistency and accessibility.
3. The Australian Energy Regulator (AER) should develop guidance, amend the Better Bills Guideline, and consider updating the Exempt Selling Guideline.
4. Services Australia should provide more detailed information on rebates and concessions.
5. Jurisdictions should increase the provision of accessible information to customers.
6. Retailers should make it easier for customers to add concession details to their accounts.

SAPN values the opportunity to provide feedback on the AEMC's Draft Rule Determination – *National Energy Retail Amendment (Improving the Application of Concessions to Bills) Rule 2025* and supports initiatives aimed at improving outcomes for customers and the broader community.

Should you wish to discuss this submission, please contact SAPN's Policy and Advocacy Lead, Rebecca Carter at rebecca.carter@sapowernetworks.com.au or on 0417 480 984.

Yours sincerely



Cecilia Schutz
External Affairs Manager