Ms Anna Collyer
Chair
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

30 July 2026

To Ms Collyer,

Streamlining payment difficulty protections – Draft determination

ENGIE Australia & New Zealand (ENGIE) appreciates the opportunity to respond to the Australian Energy Market Commission's (the Commission) draft determination on the rule change requests from the Australian Energy Regulator (AER) in relation to streamlining payment difficulty protections.

The ENGIE Group is a global energy operator in the businesses of electricity, natural gas and energy services. In Australia, ENGIE operates an asset fleet which includes renewables, gas-powered generation, and battery energy storage systems. ENGIE also provides electricity and gas to retail customers across Victoria, South Australia, New South Wales, Queensland, and Western Australia.

ENGIE agrees with the Commission that most retailers' current practices largely aligns with the proposed new protections for payment difficulty and disconnection protections.[1] For that reason, ENGIE considers the draft rule is non-controversial and supports its implementation. While ENGIE typically does not support the introduction of additional regulation where there is no clear evidence of market failure, in this instance ENGIE agrees there are some benefits from clarifying protections to address ambiguity and inconsistencies in the current rule drafting.

ENGIE is supportive of the Commission adjusting the drafting of the AER's proposed rule change request in the new rule 111(3A) to clarify that a second contact method is not required to be used if the customer has acknowledged receipt of the first contact attempt. However, ENGIE's view is that the proposed rule 111(3A)(b) has not made it clear enough that a successful contact with the customer would meet the obligations of rule 111(1)(e) and rule 111(3)(c) even if only one communication method had been used. ENGIE recommends that the Commission revisit the drafting of the new rule 111(3A)(b) to ensure the final rule is not ambiguous or unclear.

[1] Australian Energy Market Commission 2026, Draft rule determination – National Energy Retail Amendment (Streamlining payment difficulty protections) Rule, June, p. 7

ENGIE considers that a six-month implementation period would be required to enable retailers to update their websites and customer communications to reflect the new information requirements, as well as reviewing and updating payment difficulty related processes and agent training. In that context, ENGIE is comfortable with the Commission's proposed implementation date of 30 March 2027.

Should you have any queries in relation to this submission please do not hesitate to contact me on, telephone, 0436 929 403.

Yours sincerely,

Matthew Giampiccolo

Matthew Giampiccolo
Manager, Regulation and Policy