

11 October 2017

Project Reference Code: RRC0010
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235
By email: aemc@aemc.gov.au

To Whom It May Concern:

Consultation: National Energy Retail Amendment (Notification of the end of a fixed benefit period) Rule 2017

On 22 August 2017 the Honourable Josh Frydenberg MP, Minister for the Environment and Energy on behalf of the Australian Government, submitted a rule change request to the Australian Energy Market Commission (AEMC) under the National Energy Retail Law, seeking to increase customer awareness of changes in retail market contracts by requiring retailers to give customers notice of the end of their benefit periods under those contracts.

ActewAGL Retail - response

ActewAGL appreciates the opportunity to provide feedback regarding the AEMC's proposal to implement an expedited rule change regarding customer notifications at the end of a fixed benefit period.

ActewAGL's primary concern in relation to the change is the proposed implementation date, along with the requirement to provide information on how much benefit the customer received while on a market contract. Given the industry is currently focused on achieving compliance with the Power of Choice reforms, ActewAGL would request that any rule change be deferred to at least 1 July 2018. Both the proposed rule change and Power of Choice necessitate updates to business processes and systems, which in part rely on the ability of third parties to deliver. ActewAGL has no certainty as yet that its suppliers (including technology/system vendors) will be able to effect the required changes by 1 January 2018 as proposed.

ActewAGL would also like to offer the following additional points relevant to the Consultation Paper for consideration by the AEMC:

- Page 4: regarding the provision of customer "information on where to view generally available retail energy offers for their area"; ActewAGL's view is that Energy Made Easy is the obvious (and existing) reference point.

- Page 5: with regard to retailers being required to send out a “standard notice with basic information from that date” – ActewAGL Retail would request increased visibility regarding what the AEMC considers is ‘basic’ information in order to understand what is being proposed.
- Page 7: of the presented recommendation options 1, 2 and 3 from the retail energy competition review, ActewAGL considers Recommendation 2 to be the most straightforward option, being that “the AER is resourced to run an effective awareness campaign of their Energy Made Easy website and are resourced to maintain and develop the site”.
- Page 9: ActewAGL’s view is that writing to customers coming off contract assists the customer in question, however will not necessarily encourage customers who are not currently on a contract to seek competitive offers (i.e. it would not necessarily have an impact on broader imperatives relevant to increasing competition). Again, ActewAGL considers Energy Made Easy to be the most useful reference point for customers wishing to compare offers across the competitive market.
- Page 10: regarding Q7, ActewAGL does not consider that the proposed change would materially increase the likelihood of consumers seeking and obtaining better deals in retail energy markets. Customers have existing channels, such as the Energy Made Easy website, to review and compare current offers available in the market.

If you require any further information regarding this submission, please contact Rachael Turner, Manager Business Projects by telephone: (02) 6248 3655 or email: rachael.turner@actewagl.com.au.

Yours sincerely



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