

30 August 2022

FAO: Lauren Taborda Project Leader Australian Energy Market Commission

By online submission service

## Submission to AEMC Better Bills Delayed Implementation Proposal (RRC0046)

Aurora Energy welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (**AEMC**) expedited rule change process to delay implementation of the Australian Energy Regulator's (**AER**) Better Bills Guideline (**the Guideline**).

As outlined in Aurora Energy's previous submissions on the development of the revised billing rules, the implementation of the Guideline will result in new requirements for Aurora Energy, particularly in the form of the 'better offer' obligation, that will drive material adjustments to existing systems and processes. These requirements come at a point in time where other market reforms are set to impact retailer costs and resources, such as the Consumer Data Right and the application of Stand Alone Power Systems.

Accordingly, Aurora Energy is supportive of the proposal to delay the date for retailers to achieve full compliance with the Guideline by six months with a new start date of 30 September 2023.

Aurora Energy notes the proposal has the support of the majority of National Electricity Market retailers through the Australian Energy Council as well as a letter of support from the AER.

Aurora Energy also considers there will be no detrimental effects to customers through the delayed implementation. Conversely, a rushed implementation could have a negative effect if reforms are delivered incomplete, with sub-optimal outcomes and/or higher than necessary implementation costs.

Given this broad support, it is considered the proposal meets the requirements for a noncontroversial rule change process.

Yours sincerely

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Oliver Cousland Company Secretary / General Counsel