



EnergyAustralia

LIGHT THE WAY

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Submitted electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Delaying implementation of the AER Billing Guideline

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory, of which around 22k customers are supported under our hardship program (EnergyAssist). EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise 4,500MW of generation capacity.

EnergyAustralia appreciates the opportunity to participate in the AEMC's consultation, delaying the implementation of the AER Billing Guideline. We support the extension of the implementation date, as we do not believe there are any negative customer or market impacts from delaying the implementation until 30 September 2023. We expect a positive outcome is more likely, as the delay will allow the industry to produce the billing design at a reduced overall cost.

EnergyAustralia commenced our project discovery and initiated our delivery project in January 2022, prior to the final decision being released, as we sought to be proactive in producing the required output to ensure compliance by the initial implementation date. We have been steadfast in our desire to achieve a final product by the implementation date; however, the vendor for our tech solution, has not adhered to the timeframes it provided, and this has resulted in a situation in which our completion is looking likely to be outside the initial implementation date.

While we started early, the magnitude of the change is considerable. While the guidelines have simplified and provided guidance as to where information can be, there are still many scenarios for which we need to complete the redesign to ensure we can deliver a bill that would meet our customer's needs. Considerations for a wide range of scenarios, including estimated bills, solar bills, final bills, discount changes, rate changes, and business and residential customer needs, have been thoroughly thought out and designed to ensure they meet the BBG requirements. We also took the time to complete customer research to make sure we got this right. It will impact our customers and business if we don't take the time to get it right.

We expect to start testing on the new bill in December, but this leaves a very short timeframe to complete the significant amount of testing to cover specific bill scenarios. If we expedite this process, we risk not getting it right, which impacts our customers. Or worse, we put a freeze on customer billing until we can ensure compliance. This would result in delayed bills sent to customers, which is both annoying and undesirable for customers, and costly for us retailers.

While we are still working towards finalisation by the initial implementation date, we would greatly appreciate the extension as this will ensure we can achieve appropriate implementation within the timeframe.

If you would like to discuss this submission, please contact me on 03 9060 1361 or Travis.Worsteling@energyaustralia.com.au.

Regards

Travis Worsteling

Regulatory Affairs Lead