



26 Reddacliff Street, Newstead QLD 4006
GPO Box 1461, Brisbane QLD 4001

ergon.com.au

Part of Energy Queensland

15 September 2022

Ms Anna Collyer
Chair
Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2000

Dear Ms Collyer

Consultation Paper: National Energy Retail Amendment (Delaying Implementation of the AER Billing Guideline) Rule 2022 (RRC0046)

Ergon Energy Queensland Pty Ltd (Ergon Retail) welcomes the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) in response to the *National Energy Retail Amendment (Delaying Implementation of the AER Billing Guideline) Rule 2022 (RRC0046)* Consultation Paper.

We acknowledge the aim of the current rule change process is to reduce the considerable compliance costs currently being incurred by retailers by delaying the commencement date of the AER Better Bills Guideline (the Guideline) from 31 March 2023 to 30 September 2023.

Ergon Retail has invested significant costs and diverted resources to ensure it is able to comply with the 31 March 2023 commencement date, and makes clear that a delay to our commencement date will add to our project costs. However, we acknowledge that a delay in the commencement timeframe could provide our business with additional time to resolve issues identified during user acceptance testing in a more cost-effective manner, thereby potentially offsetting some of the delay costs.

Given this, and provided that retailers may continue to opt into Part 3 of the Guideline earlier than the required commencement date, then Ergon Retail supports a voluntary and flexible deferral of the implementation date for the Guideline to 30 September 2023.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me or Andrea Wold on 0428 384 448.

Yours sincerely,



Alena Christmas

Acting Manager Regulation

Telephone: 0429 394 855

Email: alena.christmas@energyq.com.au