

15 September 2022

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

Dear Ms Collyer,

Re: Delaying implementation of the AER Billing guideline (RRC0046) – Consultation paper

Simply Energy welcomes the opportunity to provide feedback on the consultation paper for the Australian Energy Market Commission's (Commission) review into whether to delay the commencement date of the Australian Energy Regulator's (AER) Better Bills Guideline from 31 March 2023 to 30 September 2023.

Simply Energy is a leading energy retailer with approximately 700,000 customer accounts across Victoria, New South Wales, South Australia, Queensland and Western Australia. Simply Energy is owned by the ENGIE Group, one of the largest independent power producers in the world and a global leader in the transition to a zero-carbon economy. As a leading retailer focused on continual growth and development, Simply Energy supports the development of effective regulation to facilitate competition and positive consumer outcomes in the market.

Simply Energy supports the Australian Energy Council's rule change request, which proposes a reasonable delay in implementation that reflects the complexity introduced through the AER's Better Bills Guideline. We consider that a delay would likely lead to better consumer outcomes, as retailers would have sufficient time to update and properly test the extension of their Victorian best offer systems to the jurisdictions covered under the Guideline. Rushing implementation of this reform may lead to risks of errors, such that consumers receive inaccurate information on whether their retailer has a better offer available. We also note that the AER permits retailers to comply with the Guideline prior to its commencement date via a notification.

Simply Energy welcomes further discussion in relation to this submission. To arrange a discussion or if you have any questions please contact Matthew Giampiccolo, Senior Regulatory Adviser, at matthew.giampiccolo@simplyenergy.com.au.

Yours sincerely



James Barton
General Manager, Regulation
Simply Energy