

Mr James Clinch
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne Victoria 3000

5 December 2017

Lodged via email: energy.submissions@esc.vic.gov.au

Dear James

Re: Proposed Rule Change, Energy Retail Code (Fixed benefit periods - notification obligations for energy retailers)

The Australian Energy Council (AEC) welcomes the opportunity to make a submission to the Essential Services Commission (ESC) on the proposed changes to the code outlined in the *Fixed benefit periods – notification obligations for energy retailers* draft decision.

The AEC is an industry body representing 21 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively sell gas and electricity to over 10 million homes and businesses.

The AEC supports measures to improve customer engagement with the retail energy market. We consider that the proposed amendments will support the long-term interests of Victorian consumers by ensuring that customers on market contracts will be made aware of when a benefit ceases to apply under that contract. Further, the proposed rule change will benefit consumers by promoting engagement with the retail energy market.

Our support for the proposed amendments is conditional upon the changes to the Retail Code being made in their current form, as set out in the draft decision. The proposed changes are consistent with the rule as made by the Australian Energy Market Commission in recent changes to the National Energy Retail Rules. We are concerned at the potential impact that any variation (even minor) to the proposed rule could have on retailers. In our view, there is a material risk that any variation to the amendments as proposed will considerably increase the compliance burden on retailers to ensure that different notification requirements are met in different jurisdictions.

If the ESC entertains any changes to the proposed rule as set out in the draft determination, we would urge the ESC to provide a draft to industry for comment so that the costs of any changes could be considered by retailers and reflected to the ESC for consideration.

Should you have any questions in relation to this submission please contact Tess Fitzgerald, telephone (03) 9205 3115 or tess.fitzgerald@energycouncil.com.au.

Yours sincerely,



Tess Fitzgerald
Retail Policy Manager