AER (Retail Law) Performance Reporting Procedures and Guidelines

Draft instrument – explanatory statement

February 2024

AUSTRALIAN ENERGY REGULATOR

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Request for submissions

Interested parties are invited to make written submissions to the Australian Energy Regulator (AER) about this paper via email to marketperformance@aer.gov.au with subject line ‘Retail Guidelines review – draft Guidelines submission’ by close of business, **19 March 2024**.

Alternatively, submissions can be mailed to:

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Submissions should be in PDF, Microsoft Word or another text readable document format. Due to timing constraints, late submissions will not be considered.

The AER prefers that all submissions be publicly available to facilitate an informed and transparent consultative process. Submissions will be treated as public documents unless marked confidential.

Parties wishing to submit confidential information are requested to:

- clearly identify the information that is the subject of the confidentiality claim
- provide a non-confidential version of the submission in a form suitable for publication.

All non-confidential submissions will be placed on the AER’s website. For further information on the AER’s use and disclosure of information provided to it, see the ACCC/AER Information Policy, June 2014.

Enquiries about this paper, or about lodging submissions, should be directed to the AER’s Retail performance team at marketperformance@aer.gov.au with the subject line ‘Retail Guidelines review – draft Guidelines’.

Contents

Glossary

Term	Definition
AEC	Australian Energy Council
ANU	Australian National University
DMO	Default Market Offer
ECA	Energy Consumers Australia
ESB	Energy Security Board
ESCV	Essential Services Commission of Victoria
EWON	Energy & Water Ombudsman New South Wales
EWOQ	Energy & Water Ombudsman Queensland
EWOSA	Energy & Water Ombudsman South Australia
GSL	Guaranteed service level
NECF	National Energy Customer Framework
NERL	National Energy Retail Law
NERR	National Energy Retail Rules
NSW	New South Wales
PIAC	Public Interest Advocacy Centre
SACOSS	South Australian Council of Social Service

1 About this document

This explanatory statement accompanies the draft *AER (Retail Law) Performance Reporting Procedures and Guidelines* (draft Guidelines).

1.1 Role of the Guidelines

The *AER (Retail Law) Performance Reporting Procedures and Guidelines* set out the manner and form in which authorised retailers are required to submit performance data to the AER.[1]

We use the performance data (indicators) collected for annual and quarterly retail market reporting. The data collected, via a template, includes retail contract information, complaints, customers experiencing payment difficulties and hardship indicators. We clean and analyse this data to produce a dataset (schedules) containing data from all retailers across the jurisdictions that have adopted the National Energy Customer Framework (NECF) – New South Wales (NSW), Queensland, South Australia (SA), Tasmania and the ACT. We publish these data schedules quarterly on our website for stakeholders to use in their own analysis of retailer performance.

Retail performance data enables us to monitor retail market outcomes to inform policy design and help target compliance and enforcement priorities. It is also an input into our strategic objectives and initiatives, including the *Towards energy equity strategy* and Game changer reforms to develop and assess measures to improve outcomes for consumers experiencing vulnerability.

The Guidelines first came into effect in July 2011. The last review of the Guidelines was finalised in April 2018, with a commencement date of 1 January 2019.

1.2 Consultation process

We commenced our consultation on potential improvements to the Guidelines in July 2023 to better enable us to collect data we require to effectively monitor retail market outcomes.

We must follow the retail consultation procedure prescribed under Part 12, rule 173 of the National Energy Retail Rules (NERR), as a minimum. This includes providing at least 20 business days for submissions and comments on a draft instrument (the draft Guidelines). Our consultation activities to date and planned approach for the remainder of the Guidelines review is described below.

1.2.1 Issues paper

To ensure a comprehensive and inclusive approach to develop the draft Guidelines, we published an issues paper on 10 July 2023 as an additional consultation step to obtain stakeholder feedback on potential changes to the Guidelines.

We consulted on the following potential changes to the Guidelines:

[1] National Energy Retail Law, section 282.

- introduce new indicators to enhance our retail performance reporting framework
- refine current indicators, clarify definitions and improve the comparability of indicators to provide more clarity to retailers and users of retail performance data
- increase the frequency and granularity of some of the data we collect to better observe retail market dynamics
- consolidate indicators, including removing indicators that do not add value to our reporting to reduce any unnecessary reporting burden on retailers
- collect annual data from distributors on guaranteed service levels (GSL) and the small compensation claims regime
- improve clarity and readability with a revised format
- better align our Guidelines with the Essential Services Commission of Victoria's (ESCV's) equivalent guideline where practical (noting we operate under different legislative frameworks).

On 20 July 2023 we hosted a stakeholder forum to clarify our positions within the issues paper and obtain early feedback from stakeholders. We issued follow-up guidance to forum attendees via email on key topics raised during the forum on 31 July 2023.

We received 20 written submissions on our issues paper. The list of stakeholders that provided a written submission is provided in Appendix A: List of submissions. These submissions are publicly available on our website.

1.2.2 Draft Guidelines

We are now seeking stakeholder views on the draft Guidelines. As part of this stage of the consultation process, we aim to engage closely with stakeholders to have more substantive and detailed discussions on the interpretation of indicators and definitions, and to understand any challenges in implementation and reporting.

Table 1.1 outlines the proposed timeline for the remainder of the Guidelines review.

Table 1.1 Retail Guidelines review project timeline

Milestone	Proposed date
Publish draft instrument	20 February 2024
Public stakeholder forum	27 February 2024
Stakeholder workshops	March 2024
Written submissions due	19 March 2024
Final instrument published	May 2024
Implementation date	1 January 2025

1.3 Key outcomes of the issues paper consultation

We have considered the information and feedback provided through the stakeholder forum and written submissions in preparing the draft Guidelines. In reaching our positions in the draft Guidelines, we have sought to balance several factors, including the need for data as well as the burden and challenges faced by retailers.

A prevailing view in many retailer submissions was that implementing the changes proposed in the issues paper would impose additional cost and resource requirements, which would ultimately be borne by consumers.

Other submissions agreed that additional performance metrics would assist the AER to ensure retailers are meeting their consumer protections obligations and improve the transparency of new areas of regulation and policy interest.

The scope of the draft Guidelines seeks to incorporate stakeholder views while still meeting the AER's core reporting objectives and requirements. We have focused on instances where there has been a significant change identified in underlying challenges, benefits, or both when considering the refinement and enhancement of indicators. Where consistent feedback has been received from stakeholders, some of the new indicators and refinements proposed within the issues paper have been adjusted or withdrawn. In high-priority areas where we still consider there is a need and basis to collect data, we have maintained our proposals to add or refine indicators.

New indicators

Additional indicators have been proposed for inclusion in the draft Guidelines. These are priority areas of interest to the AER, including embedded networks, life support customers and customers affected by family violence. Chapter 2 of this paper contains our proposal for new indicators and our response to stakeholder feedback is summarised in Appendix B: AER response to submissions on the issues paper – New indicators.

Refinements to current indicators

Chapter 3 of this paper summarises all proposed refinements to current indicators and definitions within the draft Guidelines. Our response to stakeholder feedback on indicator refinements is summarised in Appendix C: AER response to submissions on the issues paper – Refinements to current indicators.

Indicator refinements will be a key focus of this consultation period and we are seeking stakeholder feedback on the proposed refinements to ensure indicators are clearer and more comparable.

Frequency and granularity of data

We have proposed an additional level of granularity (distribution network level) for select indicators. The indicators we propose to collect at an increased level of granularity in reporting are listed in Chapter 4. We have withdrawn the proposal to collect select indicators at additional levels of frequency (monthly).

Implementation date

The issues paper proposed a 6-month implementation time frame and implementation date of 1 July 2024. Many retailer submissions expressed concern with the proposed implementation time frame considering system and resourcing requirements.

After considering stakeholder feedback and the scope of the new and revised indicators, we now propose an implementation date of 1 January 2025. Retailers would commence collecting data under the revised Guidelines on 1 January 2025, with the first submission being for Q3 2024–25. We will work with retailers during the implementation period to ensure a smooth transition to the new reporting process.

Other changes

Outcomes of other areas consulted on in the issues paper are summarised in Chapter 5, including the:

- consolidation or removal of indicators
- withdrawal of the proposal to include indicators for distributors in the revised Guidelines
- format of the revised Guidelines
- submission template and process.

Our response to all other topics raised by stakeholders in written submissions is in Appendix D: AER response to submissions on the issues paper – Other topics.

2 New indicators

The issues paper explored the addition of new indicators covering embedded networks, life support customers and customers affected by family violence. These new indicators were chosen to increase transparency for the AER and other interested stakeholders in new areas of regulation and policy interest and to assist us to better understand how the retail energy market is performing.

High-level summaries of key issues raised by stakeholders are provided throughout this chapter, followed by our position on these new indicators in the draft Guidelines. Our response to issues and suggestions raised by stakeholders is summarised in Appendix B: AER response to submissions on the issues paper – New indicators.

2.1 Embedded networks

The issues paper sought stakeholder views on the merits of expanding the Guidelines to collect data on residential, small business and large customers within embedded networks.

There is a prevailing view among many stakeholders, especially organisations that advocate for or have a role in protecting the interests of consumers experiencing vulnerability, that insufficient retail performance data is available on customers within embedded networks.

This lack of visibility on the performance of retailers servicing customers in embedded networks limits the ability of regulators and other bodies to monitor, report and intervene, if necessary, on behalf of customers.

We have maintained our proposal to introduce specific reporting on embedded networks within the Guidelines. To reach this position we considered the need for more insightful information to monitor embedded networks to ensure consistent and adequate protections for customers in embedded networks, while being mindful of any additional reporting requirements for retailers.

Several retailer submissions raised concerns around barriers to collect embedded network data. Our intention is for retailers to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter. Retailers who are selling electricity to customers directly within embedded networks would be required to provide customer-level data.

We emphasise that reporting requirements only extend to authorised retailers and not exempt sellers. Section 282 of the NERL requires regulated entities (retailers and distributors) to submit information and data relating to their performance to the AER in the manner and form required by the Guidelines, and this does not extend to exempt sellers.

Table 2.1 describes our proposal for indicators covering embedded networks in the draft Guidelines. We recognise contractual structures and arrangements behind embedded networks can be bespoke and seek stakeholder feedback on the barriers to providing this data under the Guidelines. More specifically, during this consultation period we are seeking to clarify how retailers presently collect information on customers they directly supply within embedded networks. For example, whether a retailer can distinguish the contract type of an embedded network customer they directly supply (S6.1), and how retailers monitor payment difficulty metrics for customers within embedded networks compared to their wider customer base through support in the form of payment plans (S6.4) or hardship programs (S6.7). This feedback will be a key factor in how we refine the scope of embedded network indicators in the final Guidelines and whether retailers can meet these reporting obligations as part of their normal course of business.

Our response to issues and suggestions relating to indicators for embedded networks raised by stakeholders is summarised in Appendix B: AER response to submissions on the issues paper – New indicators.

Table 2.1 Proposed indicators for embedded networks

Issues paper position	Draft instrument position	Rationale
For customers within embedded networks, new indicator to capture: • number of customers on 'on-market' and 'off-market' contracts • number of customers on 'energy only' contracts.	New indicator: S6.1. Number of electricity customers in embedded networks (as at the end of the reporting period, broken down by on-market retail contracts, off-market contracts and energy only contracts and by residential/small business/large) *Note: For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.*	This indicator will provide greater visibility of customers within electricity embedded networks. This information is important in assessing the growth in embedded networks and would assist the AER and other bodies to address issues affecting consumers experiencing vulnerability. Data collected on contract types will allow the level of market competition within embedded networks to be monitored and reported on.
New indicators to capture the number of customers in embedded networks, broken down by subcategories such as those on a hardship program or payment plan.	7 new indicators for residential customers in embedded networks: **Energy debt** S6.2. Number of residential customers in embedded networks with electricity debt (as at the end of the reporting period) S6.3. Average electricity debt of residential customers in embedded networks (as at the end of the reporting period) **Payment plans** S6.4. Number of residential customers in embedded networks on	Data relating to customers receiving specific assistance within embedded networks will provide greater clarity on the specific issues affecting these customers.

Issues paper position	Draft instrument position	Rationale
	a payment plan (as at the end of the reporting period) **Disconnections** S6.5. Number of residential customers in embedded networks disconnected for non-payment (during the reporting period) S6.6. Average electricity debt at time of disconnection of residential customers in embedded networks (during the reporting period) **Hardship programs** S6.7. Number of residential customers in embedded networks on hardship programs (as at the end of the reporting period) S6.8. Average debt of residential customers in embedded networks on hardship programs (as at the end of the reporting period) *Note: For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.* .	

2.2 Life support customers

Our issues paper sought stakeholder views on introducing new indicators to consistently capture data on life support customers.

Retailers have obligations under the NERR when a customer advises that a person who is residing or intending to reside at their premises requires life support equipment. These customers rely on life-saving equipment and are particularly vulnerable if disconnected from their energy supply. Given the heightened possibility of these customers experiencing vulnerability, we are seeking to improve the transparency and our monitoring of this customer group through introducing indicators on life support customers.

Several retailers submitted that the AER should collect this data from distributors and consider that distributors would provide life support customer data in a more reliable and uniform way. We recognise the ability of distributors to provide this data but ultimately consider it necessary to collect this data from retailers because they are often the main point of contact for customers and have important obligations to fulfill for life support customers under the NERR.

There was support from consumer advocacy groups, ombudsmen and some retailers to collect this data to better ensure protections for customers experiencing this type of vulnerability. Other retailers raised the need to distinguish between registered life support customers with and without medical confirmation and the potential for inflated reporting.

Table 2.2 describes our proposal for indicators covering life support customers in the draft Guidelines. Our response to issues and suggestions raised by stakeholders is summarised in Appendix B: AER response to submissions on the issues paper – New indicators.

Table 2.2 Proposed indicators for life support customers

Issues paper position	Draft Guidelines position	Rationale
New indicators to capture: • the total number of registered life support customers for each retailer • the number of registered and deregistered life support customers for each retailer during the reporting period.	3 new indicators: S6.9. Number of life support customers (as at the end of the reporting period, broken down by with and without medical confirmation) S6.10. Number of life support customers registered (during the reporting period) S6.11. Number of life support customers deregistered (during the reporting period)	Collection of this data would allow the AER to better monitor this customer group and associated protections in line with our enduring priority to act on serious issues impacting consumers experiencing vulnerability, including life support customers. Indicator S6.10 requires a split between customers with and without medical confirmation. We still consider it necessary to collect data on registered customers without medical confirmation as they are still afforded the appropriate protections under the NERR. This additional layer of data can give the AER a clearer picture of instances where a retailer or customer is unable to confirm medical confirmation as part of a registration.

2.3 Customers affected by family violence

The issues paper explored introducing new indicators to capture data on customers affected by family violence, following the introduction of family violence obligations on retailers in May 2023. Our purpose is to better understand the impact of and compliance with these new customer protections and associated obligations for retailers under the NERR.

Some stakeholders commented on the sensitive nature of these proposed indicators and sought clarity on the benefit of data collection. Others agreed they will enable the AER to gain valuable insights into the impact and effectiveness of the new protections.

We recognise the sensitivity of this affected customer group but still consider data collection necessary and beneficial. This is considering the key responsibilities of retailers to offer support to this cohort and recognising the likelihood of affected customers also experiencing payment difficulties and/or hardship. Like other retail performance data, all information on customers affected by family violence would be collected as an aggregate at the retailer level and be de-identified.

This data will enhance our understanding of the cross-section of a retailer's customer base, including those experiencing vulnerability, and will support our compliance monitoring functions. It will also assist the AER and policymakers to assess the effectiveness of the new protections.

Due to consistent views raised by stakeholders, the potential new metric 'number of customers identified as no longer affected by family violence' has been withdrawn.

Table 2.3 summarises our proposal for indicators on customers affected by family violence in the draft Guidelines. Our response to issues and suggestions raised by stakeholders is summarised in Appendix B: AER response to submissions on the issues paper – New indicators.

Table 2.3 Proposed indicators for customers affected by family violence

Issues paper position	Draft Guidelines position	Rationale
New indicator to capture the total number of customers identified as being affected by family violence during the reporting period.	New indicator: S6.13. Number of affected customers added to a retailer's system (during the reporting period)	This data will support our enduring Compliance and Enforcement priority to act on serious issues impacting customers affected by family violence and our progress on the action set in our *Towards energy equity strategy* to improve protections for consumers affected by family violence.[2] The NERR requires retailers to recognise family violence as a likely cause of a residential customer being a hardship customer or a small customer experiencing payment difficulties.[3] Capturing hardship program and payment plan data on customers who are affected by family violence will provide greater context to this customer group and the support provided to them.
New indicators to capture the total number of customers who identify as affected by family violence, broken down by subcategories such as those on a hardship program or payment plan.	3 new indicators: S6.12. Number of affected customers (as at the end of the reporting period) S6.14. Number of affected customers on a payment plan (as at the end of the reporting period) S4.15. Number of affected customers on a retailer's hardship program (as at the end of the reporting period)	

[2] AER, Towards energy equity strategy, Australian Energy Regulator, October 2022, p. 16.

[3] National Energy Retail Rules, Part 3A, Rule 76E.

Issues paper position	Draft Guidelines position	Rationale
New indicator to capture the total number of customers identified as no longer affected by family violence during the reporting period.	The AER will not include this proposed indicator in the revised Guidelines.	We recognise the consistent concerns raised by stakeholders about this proposed metric, including that it is unlikely that affected customers would inform their retailer if they were no longer experiencing family violence and that the impacts of family violence are likely to continue long term.

3 Refinements to current indicators

The issues paper outlined high-level refinements that could be made to the Guidelines to make indicators clearer and more comparable. This chapter lists the specific changes we propose to make to current indicators.

As a result of these refinements, the numbers for some indicators in the current Guidelines have changed. To avoid confusion, we explicitly note throughout this chapter when referring to an indicator in either its 'current Guidelines' or 'draft Guidelines' form.

Our response to issues and suggestions on refinements to current indicators raised by stakeholders is summarised in Appendix C: AER response to submissions on the issues paper – Refinements to current indicators.

3.1 Clarifying definitions

In our issues paper, we acknowledged that several indicators in the current Guidelines are unclear and open to interpretation, which may be causing variations in reporting across retailers and could lead to inaccurate analysis. We sought stakeholder views on certain indicators that could benefit from clarification and any other issues they have with definitions in the current Guidelines.

Stakeholders were broadly supportive of clarifying definitions within the Guidelines to remove ambiguity and allow a degree of alignment with other reporting regimes, such as the ESCV's guideline. This would facilitate consistent interpretation and reporting among retailers, reduce retailer burden and limit the risk of non-compliance.

A concern was raised in one submission that definition changes would require investment by retailers and introduce further costs. One retailer suggested establishing a retailer working group to ensure consistent understanding across retailers and the AER.

We have identified definitions in the Guidelines that will be updated to remove ambiguity due to potential inconsistencies in the way retailers interpret and report on certain metrics. Additionally, where a clear definition has not been provided within the Guidelines, leading to retailers needing to arbitrarily interpret a metric, we have provided an appropriate definition to ensure clarity. Indicator refinements will be a key focus of this consultation period. We will be seeking stakeholder feedback during the consultation period on any other proposed refinements to definitions to ensure more clear and comparable indicators.

Table 3.1 describes the changes to definitions in the draft Guidelines.

Table 3.1 Proposed amendments to definitions

Indicator/definition (draft Guidelines)	Amendment
Schedule 1 – Glossary and general reporting conventions	
Government feed-in tariff	Definition expanded to also include distributor-funded feed-in tariffs.

Indicator/definition (draft Guidelines)	Amendment
Schedule 3 – Retail market activities report	
S3.17. Number of small customers with an energy bill debt	Name and description have been adjusted by removing reference to 'repaying' (see section 3.3 Debt indicators).
S3.20. Average amount of energy bill debt for small customers	Due to the adjustment in S3.17, the average count should reflect customers 'with' debt rather than 'repaying' (see section 3.3 Debt indicators).
Schedule 4 – Hardship program indicators	
S4.10. Number of customers entering the hardship program	Guidance note for 'self-identified', 'financial counsellor referral' and 'retailer referral' inserted in indicator S4.10.

3.2 Data validation

We have maintained our proposal in the issues paper to introduce data validation requirements to promote consistency across indicators and retailers.

Stakeholders were broadly supportive of implementing data validation requirements to improve the accuracy of data and consistency across retailers. Some submissions raised that data validation processes would incur significant human resource requirements and that certain circumstances in which data would be dissimilar must be accounted for.

As part of the draft Guidelines consultation process, the AER would like to clarify circumstances in which data would be dissimilar, and specific challenges and resourcing costs to ensure totals are comparable.

Indicators proposed to require comparable totals in the draft Guidelines are listed in Table 3.2. We have referred to indicators by their new name and number and referenced their number within the current Guidelines in parentheses.

Table 3.2 Proposed data validation requirements

Total indicator	Subcategory/matching indicators
Schedule 3 – Retail market activities report	
S3.28. Number of small customers on a payment plan (S3.22 in the current Guidelines)	S3.18. Nature of payment plan – fortnightly amounts (S3.16 in the current Guidelines)
S3.32. Number of residential customers who have been referred to an external credit collection agency for the purposes of	S3.33. Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery – amount of debt (S3.27 in the current Guidelines)

Total indicator	Subcategory/matching indicators
debt recovery (S3.26 in the current Guidelines)	
S3.43. Number of customers disconnected for non-payment (S3.36 in the current Guidelines)	S3.45. Total number of customers with debts at time of disconnection (S3.39 in the current Guidelines)
Schedule 4 – Hardship program indicators	
S4.1. Number of customers on a retailer's hardship program	S4.2. Type of contract for hardship program customers
	S4.12. Length of customer participation in a hardship program
S4.10. Number of customers entering the hardship program	S4.4. Levels of debt of customers entering the hardship program A guidance note has been added in S4.4. to capture instances when a customer enters a hardship program with no energy bill debt.

3.3 Debt indicators

Data collection and analysis on customers experiencing payment difficulties and energy debt is a core part of our retail performance reporting and monitoring work, with an emphasis on how retailers are supporting their customers who are accumulating energy bill debt.

In the issues paper, we consulted on several changes to the debt indicators, which we consider would provide considerable benefit in enhancing our monitoring functions and help us to better understand how retailers are supporting customers experiencing payment difficulties.

The proposed initiatives included refining the definition of debt metrics to provide greater clarity, amending existing debt indicators that are energy only by splitting them by electricity and gas, expanding debt indicators to cover periods other than 90 days or greater (for example, 60-to-90-day debt), incorporating a new indicator to capture 'alternative debt arrangements' and seeking to adjust some indicators to report average debt measurements to enhance insights drawn from the data.

Overall, stakeholder submissions generally supported the proposed amendments to debt indicators, with a number expressing challenges to report on certain metrics and concerns arising out of ambiguous definitions. A broader theme that expanding debt indicators would increase retailer reporting burden was raised as an issue by some stakeholders.

We have sought to strike a balance in the indicator changes outlined in the draft Guidelines by removing proposals flagged by stakeholders as difficult or burdensome, or where sufficient definitional ambiguity exists (for example, withdrawing 0-day debt metrics), while retaining indicators that will enhance reporting insights through more relevant and detailed data.

Table 3.3 describes the changes to indicators covering debt in the draft Guidelines.

Table 3.3 Proposed refinements to debt indicators

Current Guidelines	Draft Guidelines	Description of change
S3.15. Number of small customers repaying an energy bill debt	S3.17. Number of small customers with an energy bill debt	Indicator updated as follows (flagged in section 3.3.1 and 3.3.4 of the issues paper): • Name and description has been adjusted by removing reference to 'repaying'. • Energy debt split into electricity and gas fuel types. • Debt age ranges have been introduced to capture debt that is between 30 and 90 days old.
S3.17. Average amount of energy bill debt for small customers	S3.20. Average amount of energy bill debt for small customers	Indicator updated as follows (flagged in section 3.3.1 and 3.3.4 of the issues paper): • Energy debt split into electricity and gas fuel types. • Debt age ranges have been introduced to capture debt that is between 30 and 90 days old.
N/A	S3.21. Number of customers on a deferred debt or alternative debt arrangement S3.22. Total amount of deferred debt or alternative debt arrangements	New indicators added that requires retailers to report on (as flagged in section 3.3.3 of the issues paper): • Number of customers on a deferred debt arrangement or alternative debt arrangement. • Total debt of customers on a deferred debt arrangement or alternative debt arrangements.

Table 3.4 describes the changes to indicators covering average debt measurements in the draft Guidelines.

Table 3.4 Proposed average debt indicators

Current Guidelines	Draft Guidelines	Description of change
N/A	S3.34. Average amount of debt of customers referred to an external credit collection agency	New indicator to capture the average debt of residential customers referred to credit collection. As flagged in section 3.3.2 of the issues paper, indicator S3.27 of the current Guidelines captures customers who are referred to an external credit collection agency within defined ranges of energy debt. Inclusion of an average debt measurement would provide additional context to customers who are referred to external credit collection agencies.

Current Guidelines	Draft Guidelines	Description of change
N/A	S3.46. Average amount of debt at time of disconnection	New indicator to capture the average debt of customers at time of disconnection. As flagged in section 3.3.2 of the issues paper, indicator S3.39 of the current Guidelines (S3.45 of the draft Guidelines) captures the number of customers disconnected for non-payment with debts within defined ranges. Inclusion of an average debt measurement would provide additional context to customer disconnections.

3.4 Tariff and meter types

The issues paper sought stakeholder views on the benefits, costs and feasibility of expanding indicator S2.8 to include all meter types, not only smart meters (Type 4 or 4A).

Additionally, it flagged that the revised indicator would be expanded to collect the tariff types for all residential and small business customers and break this down by meter type covering non-cost reflective network tariffs (single-rate, block or flat) and cost-reflective network tariffs (time-of-use and demand). Understanding the extent to which retailers are incentivising and encouraging their customers to take up cost-reflective tariffs and smart meters are also important considerations and would provide insight into the retail market transition.

The issues paper highlighted that there is an increasing focus on monitoring underlying tariff cost structures that flow through to consumers. Distributors pass on their cost structure to the retailer but the retailer can choose not to pass this cost structure through to its customer and potentially offer an alternative tariff arrangement. There is value in monitoring the extent to which retailers pass the underlying network tariff structure onto their customers. There is also a benefit understanding whether a customer has been assigned a cost-reflective network tariff structure and whether that network tariff structure has been passed on through the relevant retail charges.

Several stakeholder submissions supported the need for additional information on all meter types rather than only Type 4 and 4A meters. There was broad consensus that collecting data on all meter and tariff types would give a holistic overview of meters in the system and provide additional insights into the movement of electricity customers from older meters to advanced meter types (disaggregated by retailer) as well as providing insights into the underlying tariff structures.

Objections to expanding meter and tariff type data collection were raised in several retailer submissions, arguing that there is insufficient benefit in collecting this data. A range of reasons were provided, including the lack of need for such data especially considering the retirement of older meter types, that it should be collected by distributors, similar data is provided for the annual Default Market Offer determination, and the questionable usefulness that additional data would have in informing the AER’s compliance and retail performance reporting functions.

We have evaluated stakeholder feedback and recognise concerns raised in submissions but still consider there is a need to expand data collection on tariff and meter types. Central to this decision is the goal to gain insight in an area of focus for the AER and numerous stakeholders, especially as energy consumers continue to transition to more advanced meters and cost-reflective tariff types.

We also propose to collect data on the underlying network tariff structure for customers receiving flat and block tariffs and on how underlying two-way network tariffs are passed on through retail tariffs. This additional data will provide a holistic insight into how and whether customers can respond to cost-reflective price signals. It will also provide insight on the prevalence of two-way retail tariffs, which will be offered by some retailers from 2024–25.

While initiatives such as the AEMC's smart meter rollout may make the need for expanded categories obsolete in the future, the incremental rollout to 2030 means that collecting additional meter and tariff types is highly relevant in the interim period.

Table 3.5 describes the changes to indicators S2.8 and S2.9 of the current Guidelines.

Table 3.5 Proposed refinements to tariff and meter type data collection

Current Guidelines	Draft Guidelines	Description of change
S2.8. Types of tariff structures for electricity customers with smart meters	S2.8. Types of meter and tariff structures for electricity customers	Name has been adjusted. Indicator expanded to require retailers to report on: • Customers with type 5 or 6 meters. • Underlying network tariff structures, including for customers receiving flat or block, time-of-use or flexible, demand and two-way retail tariffs.
S2.9. Types of tariff structures for solar electricity customers	S2.9. Types of feed-in tariff structures for solar electricity customers	Name has been adjusted to distinguish the indicator from two-way tariffs proposed to be collected under S2.8. No change to data collected under this indicator.

3.5 Prepayment meters

The scope of indicators and associated definitions for prepayment meters within Schedule 3 of the Guidelines has been adjusted to include card-operated meters. As these indicators return nil reports in their current form, we consider this adjustment will improve our visibility of customers with this meter type.

Table 3.6 Proposed refinements to prepayment meter indicators

Current Guidelines	Draft Guidelines	Description of change
Indicators S3.29 to 3.35	Indicators S3.36 to 3.42.	No change to the data collected under these indicators but the definitional scope has been adjusted to include card-operated meters.

3.6 Energy concessions

The issues paper proposed to adjust our energy concessions data collection to also capture how many eligible customers receive energy concessions in practice.

Many retailer submissions stated they already report on how many eligible customers receive concessions and would only know that a customer is entitled to receive energy concessions if the customer has applied and been approved.

Retailer obligations under the NERR generally extend to informing customers about the availability of concessions in certain circumstances.[4] After considering consistent feedback from retailers on the lack of visibility, as well as key obligations for retailers under relevant legislation, we consider the adjustments to concessions indicators proposed in the issues paper would not yield the desired insights for retail performance reporting.

The AER still considers it paramount that customers who are eligible to receive a concession are aware of the financial assistance available to them and do receive concessions in practice. Where retailers have specific obligations to fulfil, we will continue to monitor compliance to ensure customers are afforded appropriate assistance.

Table 3.7 Proposed refinements to energy concession indicators

Current Guidelines	Draft Guidelines	Description of change
S3.40. Number of energy concession customers	S3.47. Number of energy concession customers	No changes.

3.7 Call centre indicators

The issues paper sought stakeholder views on redesigning call centre indicators to better reflect the way customers are contacting their retailers for assistance and what experience customers are receiving through different contact channels. Online chat was identified as a key channel worth collecting additional data on to better inform insights into customer service.

Several stakeholders supported expanding call centre indicators to include online contact data to better reflect the shift in customer preferences to use online applications and chat services in place of traditional call centres when seeking assistance.

In contrast, several retailers raised concerns that online engagement methods due to their nature are difficult to capture and establishing processes to collect data would be complex and costly to implement. One stakeholder questioned the priority of updating this indicator, considering the AER's focus on other indicators covering areas such as hardship programs.

Rather than an implementing a complex redesign of customer service indicators, we propose to include an additional customer service indicator to collect data on the number of customer contacts made through a retailer's customer service website portal. This is a moderate update to the Guidelines that reflects the emergence of new technology channels that customers are using to engage their retailer for assistance.

We also propose to adjust the frequency of call centre indicator reporting to quarterly data submitted on a quarterly basis. Under the current Guidelines, these indicators are reported

[4] National Energy Retail Law, section 44; National Energy Retail Rules, Rules 19, 33 and 64.

on a quarterly basis but submitted annually. This change would bring the reporting frequency of all indicators into alignment across the Guidelines. It would also provide the AER with more timely data on how customers engage with their retailer and how effectively retailers are managing customer engagement. Timelier call centre data would sooner provide the AER and stakeholders with insights on spikes in customer-initiated engagement that may prompt more detailed analysis. An example is the heightened customer engagement because of an introduction of a new energy rebate or changes to their bill.

Table 3.8 describes the changes to indicators covering customer service in the draft Guidelines.

Table 3.8 Proposed refinements to customer service indicators

Current Guidelines	Draft Guidelines	Description of change
N/A	S3.5. Total number of customer contacts made through the retailer's customer service website portal	New indicator to capture the total number of customer contacts made through the retailer's customer service website portal, such as through retailer apps, online chat, and websites. This does not extend to customer interactions through third party social media services.
S3.1 to S3.4	S3.1 to S3.4	Call centre indicators have been adjusted to be reported and submitted on a quarterly basis.

3.8 Complaint indicators

The issues paper sought stakeholder views on refining and improving complaints categories in the revised Guidelines. This is in response to a reporting trend where current complaint indicators (S3.5 to S3.14 in the current Guidelines) classify a high proportion of complaints as 'billing' or 'other'. This broad characterisation of complaint indicators into 2 predominate groups limits the effectiveness to provide insight into the causes of customer dissatisfaction.

Stakeholders were broadly supportive of refining and improving complaint categories, with suggestions including increasing the granularity of certain complaint categories, removing or consolidating complaint types that are not informative, better alignment with the ESCV and ombudsmen scheme complaints, and disaggregating indicators into electricity and gas customers.

Several retailers sought clearer complaint definitions, especially relating to any additional subcategories of 'billing' complaints to avoid challenges in reporting. One retailer recommended that all meter types be reported, not just 4 and 4A meters to avoid complaints relating to issues with legacy meters being grouped under general billing complaints.

Given the outcome of the AEMC's smart meter review and the recommendation to accelerate the rollout of smart meters to 2030, we consider it premature to consolidate meter contestability complaint indicators as part of this Guidelines review (discussed in section 5.1).

Complaint category definitions and classifications in the current Guidelines are broadly consistent with those published by the ESCV and ombudsmen schemes. We have decided to keep electricity and gas customer complaints aggregated as a single 'energy' category because we consider there is limited tangible benefit in refining categories to that level.

We are making some practical changes to complaint indicators to gather more informed insights on the nature of customer complaints. This includes adding a separate indicator for 'Complaints – meter contestability' to capture complaints related to non-advanced meter types (not type 4 or 4A) and expanding the reporting of subcategories to be reported separately under 'billing'.

Table 3.9 describes the changes to complaint indicators in the draft Guidelines.

Table 3.9 Proposed refinements to complaint indicators

Current Guidelines	Draft Guidelines	Description of change
S3.5. Complaints – billing	S3.6. Complaints – billing	Expanded to include 'billing' subcategory classification to be reported on: • prices (including high bills) • overcharging (including incorrect meter readings) • billing errors (including estimated reads problems) • payment terms and methods • failure to receive government rebates or concession • failure to provide advance notice of changes to price and benefits • debt recovery practices • imminent and actual disconnection • other billing (not specified).
N/A	S3.15. Complaints – non-smart meters	Addition of a separate complaint indicator to capture complaints related to non-smart meter types (i.e., meters that are not type 4 or 4A). This would prevent complaints about these meter types being classified as another category, such as billing or other.

3.9 Other refinements

Since publishing the issues paper, we have identified scope to improve and refine additional areas in the Guidelines. We consider these to be straightforward changes that will improve consistency between related indicators as well as insights drawn from current indicators.

3.9.1 Payment plan indicators

Proposed changes to payment plan indicators in Schedule 3 of the draft Guidelines are summarised in Table 3.10.

Table 3.10 Proposed refinements to payment plan indicators

Current Guidelines	Draft Guidelines	Description of change
S3.22. Number of residential customers on a payment plan	S3.28. Number of small customers on a payment plan	This indicator now captures small business customers as well as residential customers on a payment plan. This will make the indicator more consistent with indicator S3.18, which requires a customer count for residential and small business customers on payment plans, broken down by fortnightly amounts paid. We expect these 2 indicators to have comparable totals. Indicator name has been adjusted to remove reference to residential customers.
N/A	S3.19. Nature of payment plan – average fortnightly amounts	New indicator to capture the average fortnightly amount customers on payment plans are paying (as flagged in section 3.3.2 of the issues paper).

3.9.2 Payment methods

The issues paper considered collecting information on customers using buy now pay later services within the context of alternative debt arrangements.

We recognise these services can mask energy payment difficulty. Therefore, we propose to incorporate this as a general payment method indicator to better survey modern payment methods used by customers. To ensure the proposed changes in Table 3.11 produce informative data, we are seeking feedback from stakeholders on retailers' visibility of customers using these services.

Table 3.11 Proposed refinements to payment methods

Current Guidelines	Draft Guidelines	Description of change
N/A	S3.26. Number of residential customers using buy now pay later services	New indicator to capture the number of residential customers using buy now pay later services to pay their energy bills.
S4.9. Payment methods of hardship program customers	S4.9. Payment methods of hardship program customers	'Buy now pay later service' added as an additional subcategory to capture the number of hardship customers making payments using these services.

3.9.3 Hardship program indicators

Section 3 of the issues paper broadly focused on refining indicators within the current Guidelines to improve clarity and comparability.

Several retailer submissions made specific suggestions to refine multiple hardship program indicators within the current Guidelines. We consider the suggestions made by various retailers would remove ambiguity and have amended these indicators accordingly.

Table 3.12 outlines the proposed amendments to hardship program indicators.

Table 3.12 Proposed refinements to hardship program indicators

Current Guidelines	Draft Guidelines	Description of change
S4.4. Levels of debt of customers entering the hardship program	S4.4. Levels of debt of customers entering the hardship program	A guidance note has been added to capture instances where a customer enters a hardship program with no energy bill debt.
S4.8. Number of hardship program customers on types of payment plans	S4.8. Number of hardship program customers on types of payment plans	Stakeholder submissions highlighted definitional ambiguity in situations where hardship program customers are meeting usage costs with no arrears. A new subcategory has been added to indicator S4.8. to reflect this arrangement.
S4.10. Number of customers entering the hardship program	S4.10. Number of customers entering the hardship program	Guidance note for 'self-identified', 'financial counsellor referral' and 'retailer referral' inserted in indicator S4.10.
S4.15. Disconnection of previous hardship program customers	S4.15. Disconnection of previous hardship program customers	Guidance note added to clarify that 'previous 12 months' is from the date of disconnection.

3.9.4 Security deposits

As explained in section 3.7, where practical, we are seeking to align reporting across indicators to collect all data on a quarterly basis for greater consistency across our reporting framework. Security deposit indicators (S3.48 and S3.49 of the draft Guidelines) will be updated to align with other indicators to be submitted on a quarterly basis (rather than annually).

4 Frequency and granularity of data

4.1 Monthly data

The issues paper explored the proposal that retailers provide monthly data (submitted quarterly) under the revised Guidelines for selected indicators, such as debts, payment plans, hardship programs, credit collections and disconnections.

Stakeholders who support increased frequency of data collection consider that more frequent data would align with other jurisdictions to allow for more meaningful comparisons and be useful for analysing trends in how customers are coping with their energy bills.

Retailers consider there are challenges associated with increased frequency of data collection because it will require further resourcing. They do not believe there are commensurate benefits.

Although there is merit in collecting specific data more frequently (monthly) to provide greater insights on seasonal factors within retail performance data and conduct more detailed analysis on the impact of significant events on retail markets, we consider the cost to retailers in system adjustments and resources outweighs the benefit of collecting data more frequently. As a result, we have withdrawn the proposal to collect certain core indicators on a monthly basis as part of this review.

4.2 Distribution network level data

The issues paper sought stakeholder views on collecting data at a more granular level (for example, by distribution network or regional versus metropolitan areas) for certain indicators.

Consumer advocacy groups and ombudsmen were broadly supportive of the proposal and consider that increased granularity of data collection would help to identify gaps in consumer protections, inform policy responses and assist with community engagement planning.

Retailers raised detailed concerns, including system changes and substantial resource requirements. Some stakeholders explained that implementing regional versus metropolitan data collection would require costly postcode-level data collection.

Retailers were broadly more opposed to regional versus metropolitan data collection compared with distribution network level. We propose to apply distribution network level reporting on certain electricity indicators as middle ground between metropolitan versus regional (which would require postcode-level data) and jurisdictional-level data.

We consider distribution network level data reporting for core electricity indicators would be valuable for the AER's pricing and affordability analysis in retail performance reporting and assessment of network tariff reform. Energy prices and therefore affordability can vary between distribution zones. Having distribution network level disaggregation would allow the AER to directly assess the impact of energy affordability in each pricing region on debt, payment plan and hardship program metrics. This data would also allow us to directly assess retailer performance in proactively addressing affordability issues within each distribution network region. For example, comparative analysis on the level of participation in hardship programs in each region.

Additionally, this level of disaggregation would allow the AER to examine the intensity and quality of competition and consumer engagement in each network region. This would greatly assist the AER in assessing whether the DMO prices in each region are the optimal balance of the DMO objectives, as the level of market concentration and prevalence of smaller retailers (retailer contract numbers), as well as consumer engagement (proportion of customers on standing and market offers) could be measured in each DMO region.

Distribution network level data can also act as a proxy for metropolitan versus regional data for NSW. The energy market across distribution regions can vary due to their geographical and population characteristics. Collecting data at this level would provide the benefit of more precise information on retailer performance and consumer payment difficulties compared to data aggregated at the jurisdictional level.

Further to core indicators covering payment difficulties and hardship programs, we also proposing to collect additional data under indicator S2.8 (Types of meter and tariff structures for electricity customers) at the distribution network level. Currently we have no dataset that provides information at the retailer level on how network tariff reform is received and supported by retailers. Any analysis performed currently is built off assumptions or ad hoc data requests from retailers. Expanding data collection under indicator S2.8 at the distribution network level would provide a more complete picture of how network tariff reform is received in practice at a crucial time in the project.[5] Table 4.1 lists out all electricity indicators proposed to be reported on at a distribution network level. We have selected relatively simple ‘count’ indicators as opposed to more complex indicators that require calculation.

Table 4.1 List of indicators proposed to be collected at the distribution network level

Indicators (Draft Guidelines)
Schedule 2
S2.1. The number of customers on standard retail contracts
S2.2. The number of customers on market retail contracts
S2.6. The number of customers placed on a deemed customer retail arrangement without a customer retail contract
S2.8. Types of meter and tariff structures for electricity customers
Schedule 3
S3.17. Number of small customers with an energy bill debt
S3.28. Number of small customers on a payment plan
S3.32. Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery
S3.43. Number of customers disconnected for non-payment

[5] See Network tariff reform for more information.

Indicators (Draft Guidelines)
Schedule 4
S4.1. Number of customers on a retailer’s hardship program

5 Other changes

5.1 Consolidation of indicators

The issues paper identified several indicators that we considered could be simplified, consolidated or removed to reduce regulatory reporting burden.

The issues paper considered reducing the number of complaint indicators related to meter contestability. Consumer advocacy groups did not support this proposal considering the AEMC's smart meter review and that the penetration of smart meters has not reached a majority. Conversely, many retailers supported consolidating these indicators.

Given the outcome of the AEMC's smart meter review and the recommendation to accelerate the rollout of smart meters to 2030[6], we agree it is premature to consolidate meter contestability complaint indicators as part of this review of the Guidelines.

5.2 Removal of indicators

The issues paper explored indicators that could be removed from the Guidelines because they do not add value to the AER's performance reporting.

Retailer submissions agreed with the AER's proposal to consolidate or remove identified indicators. Consumer advocacy groups broadly supported consolidation or removal if indicators being removed were truly deemed as duplications or unnecessary.

As identified in the issues paper, indicator S3.38 of the current Guidelines is the only indicator not used currently in performance reporting and we have proposed to remove it.

Table 5.1 Indicators proposed to be removed in the draft Guidelines

Current Guidelines	Draft Guidelines	Description of change
S3.38. Total number of residential customers reconnected in the same name at the same address	N/A	Indicator removed.

5.3 Indicators for distributors

The issues paper sought stakeholder feedback on whether information from distributors could be collected annually under the revised Guidelines rather than through voluntary reporting, which is not audited. It also explored whether the revised Guidelines should include reporting requirements for distributors if a jurisdiction were to adopt the small compensation claims regime.

We propose to withdraw incorporating indicators for distributors into the Guidelines as explored within the issues paper.

The current Guidelines do not include any indicators for distributors. The AER currently collects data from distributors through voluntary reporting around September for the

[6] See the AEMC's review of the regulatory framework for metering services for more information.

purposes of mandatory performance reporting under the NERL (the Annual retail markets report). This data is consistent with the Regulatory Information Notices (RINs) that are issued later in the year, which collect audited data from distributors.

Formalising data collection from distributors through Guidelines primarily focused on retailers would create unnecessary burden for distributors considering the earlier annual reporting timing in July and continued duplication of data collection with the RINs. The AER will investigate alternatives to unify collection of data from distributors through a single channel using RINs.

5.4 Revised format

The issues paper considered a change to the format of the revised Guidelines to improve clarity and readability.

Limited feedback was received from stakeholders on the merits of this proposed change. We propose to keep our current Guidelines format to maintain consistency in how requirements for each indicator are articulated.

5.5 Submission template

A revised version of the template will be released for testing and deployment before the commencement date of 1 January 2025 and will include all indicators required to be reported on under the revised Guidelines. We will work with retailers during the implementation period to ensure a smooth transition to the new reporting process.

We expect retailers to use the new template for submissions made after 1 January 2025.

5.6 Submission process

In section 2.4 of the current Guidelines, the process for submitting data is listed as an email submission. We have updated this clause in the draft Guidelines to reflect the current reporting process, whereby submissions are made via the AER portal. We have also provided more detail on the process for requesting an extension in section 2.5 of the draft Guidelines.

Appendix A: List of submissions

Following release of the Guidelines review issues paper on 10 July 2023, we invited stakeholder submissions. Stakeholders who provided a written submission are listed below.

Academia

1. Australian National University Centre for Aboriginal Economic Policy Research

Ombudsmen

2. Energy and Water Ombudsman NSW, Queensland and South Australia (joint submission)

Industry association

3. Australian Energy Council (AEC)

Retailers and distributors

4. AGL
5. Alinta Energy
6. Aurora Energy
7. EnergyAustralia
8. Energy Locals
9. Energy Queensland
10. Momentum Energy
11. Origin Energy
12. Pacific Blue
13. Red Energy and Lumo Energy
14. Shell Energy
15. Simply Energy
16. ZEN Energy

Consumer advocacy groups

17. Energy Consumers Australia (ECA)
18. Indigenous Consumer Assistance Network
19. Public Interest Advocacy Centre (PIAC)
20. South Australian Council of Social Service (SACOSS)

Appendix B: AER response to submissions on the issues paper – New indicators

Our consideration of issues and suggestions raised by stakeholders in submissions on the issues paper are summarised in Table B1.

Table B1 AER response to submissions on the issues paper – New indicators

Issue		Submissions	Comments	AER response
Embedded networks				
1	Embedded networks – greater visibility and accountability needed	ANU Centre for Aboriginal Economic Policy Research ECA Energy Locals Indigenous Consumer Assistance Network (ICAN) Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS	Broadly support expanding the Guidelines to collect data on customers within embedded networks. Recognise a gap in protections for customers living in an embedded network due to a lack of data that would assist to identify issues being faced by these customers and potential non-compliant behaviours by embedded network operators. New indicators will increase accountability of authorised retailers supplying embedded network customers and contribute towards better regulation and protection regimes for these customers, especially those faced with payment difficulties.	There is a prevailing view among many users of retail performance data that there is a lack of retail performance data on customers within embedded networks. The lack of visibility on the performance of retailers that supply embedded networks limits the ability of regulators and other bodies to monitor, report and intervene, if necessary, on behalf of customers. This is especially pertinent for customers in embedded networks who are experiencing vulnerability. We agree there is a need for specific embedded network data. We have considered the need for data, adequate customer protections and reporting burden for retailers in our proposal to incorporate the indicators proposed in the issues paper into the draft Guidelines. We emphasise that reporting requirements will only extend to authorised retailers, not exempt sellers.

Issue		Submissions	Comments	AER response
2	Embedded networks – additional metrics	Indigenous Consumer Assistance Network (ICAN) Ombudsmen (EWON, EWOQ and EWOSA) PIAC	Ombudsmen recommend adding subcategories to capture pricing information or if customers receive a feed-in tariff. They also suggested the inclusion of business codes (e.g., ANZSIC) to help standardise reporting and recommended that any new embedded network indicators be expanded to also include data relating to life support customers and family violence as well as hardship program and disconnection metrics. PIAC recommend adding a range of reporting requirements on embedded networks that include broadening the types of indicators to cover price outcomes, hardship and payment support, and whether a customer has access to government assistance. Also suggested to extend the collection of information to exempt sellers and exemption classes. ICAN recommend the AER collect the number of embedded network customers with a subsidy in place and broadly support the collection of subcategory indicators proposed in the issues paper.	We have considered the merits of including additional indicators beyond those outlined in the issues paper. We do not intend to expand reporting obligations beyond those proposed in the issues paper. We do not collect pricing or bill information for non-embedded network customers and consider that this type of information is currently out of scope of our reporting. We consider this to be a measured approach that provides baseline information to meet the requirements of stakeholders. Section 282 of the NERL requires regulated entities (retailers and distributors) to submit information and data relating to their performance to the AER in the manner and form required by the Guidelines. This does not extend to exempt sellers. Exempt seller related issues can be considered as part of the AER's Exemptions Framework review.
3	Embedded networks – challenges and barriers to collect data	ActewAGL (verbal) AGL Aurora Energy	Highlighted various challenges and barriers for collecting data: • Unable to obtain information when there is no contractual arrangement between the retailer (selling energy to the	The intention of these indicators is for retailers to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter. If retailers only sell energy to the parent meter (and an exempt seller has the direct

Issue		Submissions	Comments	AER response
		Energy Queensland (Ergon) Shell Energy ZEN Energy	embedded network gate meter) and the end customer (at each child meter). Often this information is held by the embedded network manager/operator who is an exempt seller. Off-market contracts may not be visible to all retailers who sell energy to the gate meter. • Metrics related to 'parent/gate meters' and 'on-market' meters are already captured under retailers' existing dataset and there is a potential risk of duplication. • It is difficult to define customer types especially when there is uncertainty around level of visibility and bespoke contracts. • In some jurisdictions, the NECF framework relating to embedded networks does not apply – for example, in Tasmania.	relationship with the customers within the embedded network), retailers would not be expected to report on these indicators due to the lack of visibility. Retailers who are selling electricity to customers directly within embedded networks would be required to provide customer-level data. Even if some embedded network data is currently being aggregated within a retailer's existing dataset, the Guidelines will require this subset of data to be reported again separately under the new embedded network indicators. The amended Guidelines have sought to provide clear definitions to help minimise ambiguity and give retailers a level of discretion to help ensure information provided is reflective of embedded network characteristics. The expectation is that the collection of embedded network data remains consistent with the NECF framework.
4	Embedded networks – retailer reporting burden	EnergyAustralia Shell Energy	These retailers were opposed to creating indicators that have a speculative, uncertain value or introduce complexities in data extraction imperatives and easily accessible data. EnergyAustralia highlighted the difficulty and burden of obtaining third-party billing agent	We are cognisant of the additional reporting burden placed on retailers and sought in the draft Guidelines to only collect embedded network data where there is a clear justification and broader benefit to do so. To this end, we have identified indicators that provide useful insights that will assist

Issue		Submissions	Comments	AER response
			data if this was necessitated in the Guidelines.	regulators, retailers, industry groups, consumer advocacy groups and other related bodies to have access to information to better understand issues impacting customers in embedded networks, especially those that may be experiencing vulnerability.
5	Embedded networks – coordination with other regulators and bodies	AEC EnergyAustralia	Collection of embedded network data should be coordinated with other regulators who are also seeking this information.	We will continue to coordinate the collection of retail performance data with other regulators and related bodies where practical. However, we consider the inclusion of embedded networks falls within the remit of the Guidelines as part of our broader regulatory function. The lack of visibility of retail performance data on customers within embedded networks has been identified by numerous stakeholders as a key area of concern that the amended Guidelines will seek to rectify. This in turn may reduce the ad hoc nature of multiple data requests from a range of regulators.
6	Embedded networks – clarifications	Origin Energy Shell Energy	Clarity required around parameters and the types of indicators to be reported on.	We have endeavoured to provide clear, unambiguous language throughout the draft Guidelines to assist retailers to interpret the new requirements. The AER will further engage retailers in the upcoming draft Guidelines consultation to provide additional clarity around requirements and expectations.

Issue		Submissions	Comments	AER response
7	Embedded networks – dedicated filter in the submission template	ActewAGL (verbal)	Suggested having a customised 'tick box' format within the data submission template (similar to pre-payment meters) where a retailer may nominate whether they manage customers within an embedded network.	We will incorporate this feedback into the implementation phase that will occur after the release of the final Guidelines. We intend to engage retailers during this period to work through the practical steps around the submission of indicators covering embedded networks.
8	Embedded networks – expand to include other embedded network types	PIAC	Recommends the AER collect data on customers in hot and chilled water embedded networks.	We consider that hot and chilled water embedded networks are out of the scope of this review. The focus of the proposed new embedded network indicators is to provide greater visibility of electricity customers in embedded networks.
Life support customers				
9	Life support – support for data collection	ANU Centre for Aboriginal Economic Policy Research Aurora Energy ECA Energy Queensland Energy Locals Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS Shell Energy	Supports the inclusion of life support indicators. Considers these indicators will enable the AER to better monitor retailer compliance with the NERR and ensure protections are in place for customers. Shell Energy are not opposed to reporting on life support customers.	We agree and have maintained our proposal to include new indicators for life support customers in the draft Guidelines.

Issue		Submissions	Comments	AER response
10	Life support – collection of data from distributors	AEC Alinta Energy EnergyAustralia Momentum Energy Red Energy and Lumo Energy Simply Energy SACOSS	Life support data should be collected from distributors as opposed to retailers for various reasons. The retailers consider that distributors: • have the ultimate control and responsibility to ensure the ongoing power supply and life support status of these sites • can offer more reliable data as life support registration and deregistration numbers at the retailer level are more dynamic • collect life support data in a uniform way. Sourcing life support data from distributors would create implementation efficiencies and provide the added benefit of a locational breakdown. SACOSS supports the proposed new indicators for life support customers. They also suggested the AER also require distributors to report on life support customers.	Retailers are often the first point of contact for customers and have an obligation to collect this information and reconcile data with distributors on a quarterly basis. We acknowledge SACOSS's suggestion and while we recognise life support customer obligations also apply to distributors, our preference is to minimise duplication of cyclical reporting. We currently collect life support data from distributors voluntarily/on request.
11	Life support – medical confirmation	Origin Energy Red Energy and Lumo Energy	Origin Energy suggest that life support indicators should distinguish between those with medical confirmation and those who have not been medically confirmed. Red Energy and Lumo Energy consider that reporting on all registered customers who	With respect to inflated reporting, the AER's focus is on registered customers irrespective of medical confirmation, given that all registered customers are afforded protections under the NERR.

Issue		Submissions	Comments	AER response
			have not provided medical confirmation would likely lead to inflated reporting.	The proposed new indicator S6.10 distinguishes between customers with and without medical confirmation. This additional layer of data would give us a clearer picture of the details pertaining to life support customers and the experience of retailers where a customer or the retailer is unable to confirm medical conditions for a life support registration.
12	Life support – additional metrics	ANU Centre for Aboriginal Economic Policy Research Energy Queensland PIAC	Support the inclusion of life support indicators and recommends additional indicators and context beyond customer numbers, including: • life support metrics for card-operated meter customers • whether a retailer or distributor is the registration process owner • reasons for deregistration • number of incomplete registrations • concessions data.	We appreciate that more detailed data collection on life support customers would be useful information for the AER and other data users, but we are mindful of the additional requirements placed on retailers. The proposed life support metrics will provide the AER with sufficient quarterly data points for performance reporting and comparative analysis. We consider more detailed data collection on life support customers is better suited to targeted investigative work. We recognise the specific challenges faced by card-operated meter customers as well as the extra layer of vulnerability and risk presented when a card-operated or prepayment meter customer registers as requiring life support. Given low customer numbers, our view is that this specific subset of life support customers will not be included in our quarterly retail performance reporting. This type of information will be requested as needed for

Issue		Submissions	Comments	AER response
				our compliance and enforcement functions to monitor and examine in more depth.
13	Life support – retailer performance and data analysis	Energy Queensland Pacific Blue Simply Energy	Clarity required on the AER's intent to collect data to perform comparative analysis of regulated entities. Life support customer metrics will not provide a means to assess a retailer's performance overall and level of compliance with the NERR.	We consider that these life support indicators will enable the AER to assess compliance of retailers relative to other regulated entities and industry. With this data we can conduct improved data analysis including comparative and relative analyses to examine trends and variances from industry averages. For example, assessing the size of an entity's life support customer base versus their degree of compliance with applicable obligations to determine the efficacy of their processes. Collection of this data will also improve our visibility of the cross-section of customers served by retailers who may be experiencing vulnerability and require additional protections.
Customers affected by family violence				
14	Customers affected by family violence – support for data collection	AGL ANU Centre for Aboriginal Economic Policy Research Aurora Energy ECA Energy Locals Ombudsmen (EWON, EWOQ and EWOSA)	Supportive of the proposed metrics to gain insights into the impact and effectiveness of protections. AGL support simplified versions of the indicators (without breaking down payment plan and hardship program customers).	We agree and have maintained our proposal to include new indicators on customers affected by family violence in the draft Guidelines.

Issue		Submissions	Comments	AER response
		PIAC SACOSS		
15	Customers affected by family violence – benefits of data collection, sensitivity	AEC EnergyAustralia Momentum Energy Shell Energy Simply Energy Origin Energy Pacific Blue	Clarity needed on the benefit to affected customers and how the AER would use this information to assess a retailer's compliance with the new protections and performance overall. Concerned with the sensitivity of this data.	These new metrics will provide the AER with a more detailed cross-section of a retailer's customer base from the perspective of customers who are at increased risk of experiencing vulnerability, payment difficulties and/or hardship. Observation of the number of identified affected customers relative to a retailer's customer base can assist in our monitoring of compliance with these provisions and assessment of retailers' internal practices. This data would also assist the AER and policy makers in assessing the effectiveness of the new protections and refine our guidance to deliver improved protections for affected customers. We recognise the sensitivity of this data. Like other retail performance data, all information on customers affected by family violence would be collected as an aggregate at the retailer level and be de-identified.
16	Customers affected by family violence – subcategories (payment plan and hardship program data)	AGL Shell Energy Origin Energy Momentum Energy	Clarity needed on the purpose of subcategories, such as affected customers on a hardship program or payment plan. The purpose of family violence provisions is to provide bespoke support and not all affected customers require payment plans.	We recognise that not all affected customers are experiencing payment difficulties and support provided by retailers can take various forms. We have prioritised and proposed collection of payment plan and hardship program data within the Guidelines to obtain more context around this customer group.

Issue		Submissions	Comments	AER response
			The AER must ensure there is clear definition provided where metrics overlap.	Instructions have been provided in the draft Guidelines where metrics on affected customers overlap. For example, indicator S6.14 carves out the total number of affected customers on a payment plan. To maintain consistency within payment plan indicators in the current Guidelines, affected customers on payment plans are still to be counted within the total number of customers on payment plans in indicator S3.28.
17	Customers affected by family violence – additional metrics	PIAC Energy Queensland ANU Centre for Aboriginal Economic Policy Research	Support the inclusion of indicators on customers affected by family violence and recommend additional indicators and context beyond customer numbers, including: • what type of support is being offered and provided by retailers • what feedback has been received from victim-survivors and how the retailer has responded • specific reporting on card-operated meter customers.	We recognise the merit of collecting more detailed data on customers affected by family violence but have prioritised customer counts and payment difficulties within our quarterly performance reporting, considering the additional reporting requirement on retailers. Should the AER detect a situation that requires more detailed investigation, we would collect the required data separately through targeted information requests to the relevant retailers.
18	Customers affected by family violence – customers identified as no longer affected by family violence	PIAC Momentum Shell Energy EnergyAustralia Simply Energy	Do not support this proposed indicator. Reasons provided included: • no customer benefit • potential harm for customers • customers may not notify their retailer if they are no longer affected	After considering the consistent views raised by stakeholders, we have decided to withdraw this potential new indicator.

Issue		Submissions	Comments	AER response
		Ombudsmen (EWON, EWOQ and EWOSA) Energy Locals Energy Queensland Origin Energy AEC	• retailers do not actively seek confirmation of a change in status • it sets the wrong priority • it could incentivise retailers to remove family violence flags • the impact of family violence is likely to continue long term. Clarity needed on the interpretation of this proposed indicator. The AER should provide guidance to retailers on how to identify a customer as no longer affected by family violence.	
19	Customers affected by family violence – ESCV alignment	SACOSS	Supports the proposed new metrics and would support the AER looking into the monitoring and compliance regime established by the ESCV to align reporting obligations across jurisdictions.	We note that retailers need to report to the ESCV breaches of obligations in relation to customers affected by family violence in the Compliance reporting schedule of its *Compliance and Performance Reporting Guideline.* We will consider this potential alignment as part of our review of the AER's *Compliance Procedures and Guidelines*.
Other new indicators				
20	New indicators	ECA PIAC SACOSS	Recommend the AER introduce new indicators to comprehensively assess retail performance, covering areas such as: • offers actually available and accessed by consumers	We recognise the value in collecting additional metrics but do not intend to expand data collection beyond what has been proposed in the issues paper and in the draft Guidelines. We consider this to be a measured approach to collect baseline information appropriate for

Issue		Submissions	Comments	AER response
			• qualitative data • energy system transformation • additional consumer experience indicators • consumer engagement/retailer transfers • remote disconnection for non-payment • data on grid energy consumption (from distributors).).	our quarterly performance reporting and to increase transparency in priority areas of interest for the AER. The AER may use other functions to collect information for deeper analysis on these important issues on an as needs basis rather than in our quarterly reporting.

Appendix C: AER response to submissions on the issues paper – Refinements to current indicators

Our consideration of issues and suggestions raised by stakeholders in submissions on the issues paper are summarised in Table C1.

Table C1 AER response to submissions on the issues paper – Refinements to current indicators

Issue		Submissions	Comments	AER response
Clarifying definitions				
1	Clarifying definitions	AEC AGL Alinta Energy EnergyAustralia Energy Locals Energy Queensland Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS Shell Energy	Support clarifying definitions to remove ambiguity and allow alignment with other reporting regimes such as the ESCV's guideline. This would also encourage consistent interpretation and reporting among retailers, reducing retailer burden by limiting the risk of non-compliance. Stakeholders supported clarifying the following definitions and areas: • energy bill debt • energy concession customers • government feed-in tariff • payment plan • credit default • customer service • disconnections	We thank stakeholders for suggestions on definitions that could be amended and have considered these when adjusting definitions as summarised in Section 3.1. A key focus of this consultation period will be indicator refinements. We are seeking stakeholder feedback on the proposed refinements and any additional refinements to ensure more clear and comparable indicators. We intend to host workshops as part of this consultation period to enable more detailed discussion on the draft Guidelines and ensure consistency in interpretation across retailers.

Issue		Submissions	Comments	AER response
			• whether to include/exclude deemed and carryover customer arrangements • approach to counting a customer falling under multiple categories. AEC submitted that some proposed definition changes would require investment by retailers and introduce costs. AEC recommended the AER carry out a cost-benefit assessment for these proposals. Alinta Energy suggested establishing a retailer working group to ensure consistent understanding across retailers and the AER.	
Data validation				
2	Data validation – improved consistency	Alinta Energy Energy Australia Energy Locals PIAC SACOSS Shell Energy Simply Energy	Support implementing data validation requirements to improve accuracy of data and consistency across retailers.	The AER agrees data validation requirements would promote consistency across indicators and retailers. Data validation requirements have been proposed to be added to the indicators listed in section 3.2 of this paper.
3	Data validation – burden and challenges	AEC Pacific Blue	Data validation before sign-off would add significant human resource requirements. Certain circumstances will require data to be dissimilar and this must be accounted for.	As part of the draft Guidelines consultation process, the AER would like to clarify circumstances where data would be dissimilar, and specific challenges and resourcing costs to ensure totals are comparable. As a solution,

Issue		Submissions	Comments	AER response
				we will consider the addition of an 'other' category in the template when an indicator is a subcategory of another indicator and is required to have a comparable total.
Debt indicators				
4	Debt – Non hardship debt	Alinta Energy Ombudsmen (EWON, EWOQ and EWOSA) Origin Energy PIAC SACOSS	General support (or no opposition) among stakeholder submissions that splitting electricity and gas for non-hardship debt indicators will enable better comparisons between hardship and non-hardship customers.	The draft Guidelines will split non-hardship debt indicators into electricity and gas for future reporting.
5	Debt – retailer reporting burden	Alinta Energy	Debt indicators impose significant reporting burden on retailers. More consultation with retailers is needed to ensure proposed changes do not add considerable implementation costs and new indicators are fit for purpose.	We have endeavoured to balance collecting more detailed debt data to inform an area of high importance and the commensurate burden on retailers. The additional debt metrics being sought have been calibrated to provide greater visibility on customers experiencing payment difficulties in the earlier stages. Similar information has been provided voluntarily by retailers previously. As a result of stakeholder feedback, we have refined the debt metrics outlined in the issues paper with some changes captured in section 3.3 of this paper.
6	Debt – expanding debt metrics	Aurora Energy ECA	Support the collection of additional debt metrics. The data will enable earlier identification of issues and trends relating to	We uphold the need for more detailed debt data and consider this to be a core area of interest for the AER's retail performance

Issue		Submissions	Comments	AER response
		Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS	debt and monitoring the effect of future events, especially in the context of rising energy costs. This change would formalise the type of data collected voluntarily during the pandemic. Aurora Energy supports the reporting of debt levels other than 90+ days but recommends the AER focus on a 30, 60 and 90+ day split to ensure comparable data.	reporting and many stakeholders focused on customer protection and vulnerability. The draft Guidelines will mostly refine debt metrics as outlined in the issues paper, with some changes captured in section 3.3 of this paper. The withdrawal of the 0-day debt metric from the draft Guidelines is discussed below.
7	30, 60 & 90-day debt – clarifications	AGL Ombudsmen (EWON, EWOQ and EWOSA) Shell Energy	Seek clarity on whether debt age ranges are independent or mutually exclusive. Ombudsmen recommend the AER provide clear definitions of the age of debt and how to report to ensure data reflects customers that fall into multiple categories.	The debt ranges will be mutually exclusive, which was the same reporting approach implemented for the COVID-19 voluntary reporting framework. We have carefully articulated these debt reporting ranges in the draft Guidelines to avoid confusion.
8	30, 60 & 90-day debt – 0-day debt challenges	AEC ActewAGL (verbal) Alinta Energy Aurora Energy EnergyAustralia Energy Queensland Momentum Energy Origin Energy Simply Energy	There is a consensus among many retailers that there are challenges collecting 0-day debt data. Feedback included: • issues with 0-day debt reporting due to retailers having the ability to choose any due date (after the 13-day billing period) • data is too variable to provide valuable insights – that is, there are scenarios where customers forget to pay, which is not an indication of experiencing payment difficulty	Based on the consistent feedback received from stakeholders, we have decided to withdraw the 0-day debt metric from the draft Guidelines. We will proceed with expanding the debt metrics to include 30-day and 60-day data as well as continue to collect 90-day debt data to ensure continuity. We consider this to be the more prudent approach that balances the need for greater insights for this core indicator against the possible additional costs it could place on retailers with limited potential future value when considered against other debt indicators.

Issue		Submissions	Comments	AER response
		Red Energy and Lumo Energy	• extensive costs and potential system upgrades required with little to no demonstration of value • lack of clarity around the application of 0-day debt and whether it would account for BPAY, which typically takes 2–3 days for settlement and whether the starting point would be aligned with reporting to the ESCVs • practical limitations and challenges of reconfiguring retailer systems to collect 0-day debt – greater clarification sought by some on how the 0- day debt date parameter would be determined.	
9	Alternative debt arrangements – support for data collection	ECA Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS Simply Energy	Support collection of data on alternative debt arrangements and expanding the definition of energy debt to capture such arrangements. Alternative debt arrangements may mask payment difficulty indicators and result in consumers forfeiting available protections due to the lightly regulated nature of these services. Research has demonstrated some consumers are using Buy Now Pay Later services to pay for their energy bills but retailers may face challenges in the visibility of customers using these services.	We consider it necessary and appropriate to include 'alternative debt arrangements' reporting in the Guidelines to gain a clearer understanding of customer indebtedness beyond the typical debt metrics. The draft Guidelines will incorporate the collection of alternative debt arrangement data as proposed in the issues paper.

Issue		Submissions	Comments	AER response
10	Alternative debt arrangements – clarifications	ActewAGL(verbal) Momentum Energy Origin Energy Shell Energy Simply Energy	Have the capability to report on alternative debt arrangements but require more clarity on the definitions around what constitutes such as arrangement. Using the term 'alternative debt arrangements' within the definition could lead to confusion.	We recognise that ambiguity may arise around the term 'alternative debt arrangements'. A guidance note has been inserted in indicators S3.21 and S3.22 in the draft Guidelines to guide retailers on the type of arrangements that should be reported: 'For the purposes of this indicator, 'deferred debt arrangements' and 'alternative debt arrangements' are those not reported through the payment plan, hardship program or energy debt indicators. Many retailers allow customers to defer bill payments or utilise alternative debt arrangements rather than placing customers on payment plans or hardship programs.'
11	Average debt measurements – support	Energy Locals Ombudsmen (EWON, EWOQ and EWOSA) PIAC Shell Energy Simply Energy	Broadly support average debt measurement metrics. These metrics may provide a more informative picture of customers' debt experience and allow for better comparisons.	Based on our experience, we consider average debt measurements would provide valuable insight into customers experiencing debt and, in some cases, enable better comparisons not apparent within existing metrics. We have updated certain indicators to include an average measurement – for example, 'the average debt of customers at time of disconnection'.
12	Average debt measurements – clarifications	Origin Energy Shell Energy	Clarity required on which debt indicators will include an average measurement and what additional insight an average will provide – for example, debt as a driver of disconnection.	The draft Guidelines have flagged which debt indicators have been updated to include an average measurement in addition to the count of customers who are experiencing debt.

Issue		Submissions	Comments	AER response
Tariff and meter types				
13	Tariff & meter types – support for inclusion	Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS EnergyAustralia Shell Energy	Support the collection of additional tariff and meter type data to provide greater visibility of consumer arrangements beyond the 4/4A meter types collected under the current Guidelines. Additional metrics would demonstrate how different meters and tariff structures are applied to customers and whether such arrangements ultimately benefit electricity consumers.	We consider valuable insights will be gained by expanding the Guidelines to include meter types 5 and 6 as well as adding 'demand' as a tariff type. We support the view that having a more holistic view of meter types and tariff structures that customers are currently on will provide deeper insight into the impacts on consumers and inform policy development.
14	Tariff & meter types – network tariff pass through to retail tariff	PIAC Red Energy and Lumo Energy	PIAC is concerned that the issues paper assumes retailers simply pass distributor price signals to consumers and that the interaction between network tariffs and retail tariffs has been misunderstood. Red Energy and Lumo Energy questioned the utility of expanding indicators to collect additional meter and tariff data considering retailers have the flexibility to design a tariff that best reflects the customers' needs and are not obliged to automatically pass through the distributor's network tariff.	The expansion of this indicator will improve the visibility of the type of meter and tariff structures that customers are on and whether the underlying tariff is cost-reflective or not. It is not assumed by the AER that retailers are obliged to pass through the network tariff to their customers. Some retailers may decide to apply their own retail tariff based on their understanding of their customers.
15	Tariff & meter types – insufficient benefit for expansion	AGL Alinta Energy Momentum Energy	Several retailers do not consider that there is sufficient benefit in expanding meter and tariff type data collection. Issues raised included: • the acceleration of the AEMC's smart meter rollout in NECF regions would	We consider the benefit for inclusion of additional meter and tariff types outweighs the reasoned and valid issues raised by certain stakeholders.

Issue		Submissions	Comments	AER response
		Red Energy and Lumo Energy Simply Energy	preclude the need to collect types other than 4/4A (smart) meters • tariff and meter data is provided to the AER annually for the purposes of the Default Market Offer (DMO) determination • will not provide the AER with insight on whether retailers are compliant with their regulatory obligations and recommends this data should be collected from distributors • collating customer numbers on tariff types alone would not indicate whether a conscious decision has been made by the customer and so stakeholders consider that this data collection is better suited as data sampling combined with customer surveys.	While initiatives such as the AEMC's smart meter rollout may make the need for expanded categories obsolete in the future, the incremental rollout to 2030 makes the collection of the additional meter and tariff types highly relevant in the interim period. The AER often collects metering information on an ad hoc basis for other functions such as development of the annual Default Market Offer (DMO). By expanding metering data, we can reduce the need for ad hoc requests. As articulated in the issue paper, we are seeking a better view of the movement of electricity customers from older meters to more advanced meter types, and a deeper understanding of the underlying nature of tariff types that customers are on (whether cost-reflective or otherwise). While this information may feed into retailer compliance and performance monitoring, our goal is to better understand meter and tariff types being offered to customers.
16	Tariff & meter types – costly and complex	Origin Energy AEC	Expansion of tariff and meter type data collection will incur additional costs due to added complexity and the overall volume of data.	We have followed a measured approach that expands on similar meter and tariff data types that retailers are already providing (4/4A meters) under the current Guidelines. We consider that the information should be able to be provided in a similar format, mitigating some of the additional system cost.

Issue		Submissions	Comments	AER response
Prepayment meters and alternative meter types				
17	Prepayment meters – support for data collection	ANU Centre for Aboriginal Economic Policy Research Indigenous Consumer Assistance Network (ICAN) PIAC SACOSS	Support the AER capturing data on alternative meter types that are similar to prepayment meters.	The AER agrees that adjusting prepayment meter indicators to capture data on card-operated meter customers will improve our visibility of customers with this meter type.
18	Prepayment meters – definition	Alinta Energy	Clear definition of what constitutes an alternative meter type is required. The value of this potential indicator is questionable given limited use of these meters.	Prepayment meter indicators in Schedule 3 have been adjusted with a clear definition to specifically include card-operated meters. This will improve the transparency of customers using this meter type. The term 'alternative meter type' has not been used in the draft Guidelines.
19	Prepayment meters – additional metrics	ANU Centre for Aboriginal Economic Policy Research Indigenous Consumer Assistance Network	Urge the AER to collect data on card-operated meter customers prospectively and retrospectively. Propose additional related indicators on areas including life support and payment difficulties.	We have expanded the scope of prepayment indicators to also include card-operated meters and believe the current indicators are sufficient for quarterly performance reporting. If more information is required, our preference is to issue ad hoc data requests on areas that require further investigation by the AER.
Concessions				

Issue		Submissions	Comments	AER response
20	Concessions – support for indicator refinement	ANU Centre for Aboriginal Economic Policy Research ECA Indigenous Consumer Assistance Network Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS	Support the collection of information on how many eligible customers receive concessions. PIAC suggests adding additional subcategories to enable better analysis of the availability and uptake of concessions. For example, the number of concession recipients with energy debt, in hardship programs, on payment plans or disconnected. SACOSS seeks clarification from the AER on how this data would be collected in South Australia given that energy concessions are administered by the state government rather than retailers.	We recognise that there are instances where eligible customers are not receiving concessions, as articulated in the issues paper. However, after considering consistent feedback from retailers on their lack of visibility as well as key obligations for retailers under relevant legislation, we consider the adjustments to concessions indicators proposed in the issues paper would not yield the desired insights for retail performance reporting. The Guidelines will continue to capture the number of customers eligible to receive concessions, the number of hardship customers who were entitled to receive an energy concession and customers who were entitled to receive a concession and were disconnected.
21	Concessions – visibility of eligible vs. received	AGL Alinta Energy Aurora Energy EnergyAustralia Momentum Energy Shell Energy Simply Energy	Seek clarification as retailers already report on how many eligible customers receive concessions and would only know that a customer is entitled to receive energy concessions if the customer has applied and been approved. Retailers have no visibility on eligible customers who have not engaged with their retailer to validate their eligibility.	We recognise the consistent views of retailers regarding the lack of visibility and have withdrawn the proposed refinement to concessions indicators as we would not expect them to yield the desired insights for retail performance reporting.

Issue		Submissions	Comments	AER response
			Aurora Energy is supportive in principle but states that distinguishing between eligible and received would not yield a statistical difference as concessions are automatically applied to eligible customers in their system. Shell Energy understands the rationale but argues that the issue is customers that do not apply or do not reapply for a concession.	
22	Home Energy Emergency Assistance Scheme	ANU Centre for Aboriginal Economic Policy Research Indigenous Consumer Assistance Network	Support the AER's proposed amendments to concessions indicators. Provided an example where customers are ineligible to receive assistance such as the Home Energy Emergency Assistance Scheme due to their metering type.	For the purposes of the Guidelines, one-off forms of assistance such as the Home Energy Emergency Assistance Scheme are out of the scope of energy concessions collected. We recognise customers experiencing vulnerability may face barriers to receive financial assistance. However, the purpose of the refinement to concessions indicators proposed in the issues paper was to capture instances where a customer is eligible and hasn't received a concession. Customers who are deemed ineligible to receive assistance would not be captured.
Call centre indicators				
23	Expanding call centre indicators – supportive	Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS Simply Energy	Support expanding call centre indicators to include online contacts to reflect modern technology and changing customer preferences for contacting retailers. Simply Energy would support inclusion of new metrics to capture alternative types of	We support the need to expand customer service metrics to include reporting on when customers use online chat via a retailer's website portal to seek assistance. We consider this to be a moderate update to the Guidelines that reflects the emergence of

Issue		Submissions	Comments	AER response
			contact made by customers, if they were appropriately defined.	new technology channels that customers are choosing to use instead of more traditional mediums. The definition is tailored specifically to report on customers using online chat via a retailer's website portal. Retailers are not expected to collect information on other customer interactions initiated through social media services.
24	Expanding call centre indicators – clarifications	AGL EnergyAustralia Energy Locals Origin	Consider 'online chat' metrics, due to their nature, difficult to capture and establish automated processes to consolidate data. This could result in added implementation time, website changes and costs. EnergyAustralia sought clarification on instances where a customer's engagement with a retailer spans over multiple days and interactions. Energy Locals questions the necessity of expanding call centre indicators given the AER's focus on other metrics such as hardship program.	We recognise capturing online chat metrics (via the retailer's web portal) could result in reporting challenges and we are interested to work with stakeholders during this consultation process to refine this proposed metric to be as informative and consistent as possible. This includes the treatment of a single customer's engagement on the same query that may span over multiple interactions and/or over multiple days. Rather than expanding call centre indicators, the AER now proposes to expand customer service indicators to include 'online chat' interactions. This would provide a more holistic view of a customer's engagement with their retailer.
Refining complaint indicators				

Issue		Submissions	Comments	AER response
25	Refining complaint indicators – supportive, alignment with ombudsmen and the ESCV	AGL Alinta Energy EnergyAustralia Ombudsmen (EWON, EWOQ and EWOSA) SACOSS	Support refining complaint indicators to improve reporting insights into customer dissatisfaction. Stakeholder suggestions included: • increase granularity of the 5 broad complaint categories by expanding reporting to subcategories – e.g., complaints related to disconnections. (ombudsmen) • disaggregating into electricity and gas complaints categories (ombudsmen) • consolidation/removal of complaint categories that do not provide insightful information on customer dissatisfaction – e.g., ‘complaints-meter contestability’ (S3.8–3.13 of the current Guidelines) (Alinta Energy, EnergyAustralia) • better alignment with ESCV and ombudsmen scheme complaint categories (AGL).	We agree with stakeholder submissions that it would be beneficial to update complaint indicators (S3.5–3.14 in the current Guidelines) to better characterise customer dissatisfaction. Consequently, we are making several practical changes to complaint indicators to gather more informed insights on the nature of customer complaints. This includes adding a separate indicator for ‘complaints-meter contestability’ to capture complaints related to non-advanced meter types (i.e., meters that are not type 4 or 4A) and expanding the reporting of subcategories to be reported separately under ‘billing’. Given the outcome of the AEMC’s smart meter review and the recommendation to accelerate the rollout of smart meters to 2030, we consider it premature to consolidate meter contestability complaint indicators as part of this Guidelines review. The Guidelines’ current complaint category definitions and classifications are broadly consistent with those published by the ESCV and ombudsmen schemes. We have decided to keep electricity and gas customer complaints aggregated as a single ‘energy’ category because we consider there

Issue		Submissions	Comments	AER response
				to be limited tangible benefit in that level of refinement.
26	Refining complaint indicators – clarifications and suggestions	Energy Locals Origin Energy Simply Energy	Energy Locals proposes refining metering contestability complaint indicators to include all metering types in addition to advanced meters. This would avoid complaints relating to issues with legacy meters being grouped under general billing complaints. Origin Energy and Simply Energy seek clear definitions for any additional sub-categories of 'billing' complaints to avoid challenges in reporting.	We agree that it would be beneficial to include a separate category for 'complaints-meter contestability' to capture complaints related to non-advanced meter types (i.e., meters that are not type 4 or 4A) and expand the reporting of subcategories to be reported separately under 'billing' with clear definitions.
Other refinements				
27	Credit defaults	Energy Queensland	The intent of credit default metrics should be made clearer.	We recognise that the credit default metric places enduring reporting obligations on some retailers to seek information from third parties (where debt has been sold) to obtain data about the listing of a credit default against customers (including their former customers). We will seek further information in the upcoming draft Guidelines consultation to evaluate whether the definition needs updating to ensure this obligation is understood.
28	Disconnection and reconnection	Energy Locals	The AER should clarify indicator S3.38 of the current Guidelines because the reporting template and Guidelines provide 2 different definitions.	We have decided to remove indicator S3.38 because this data is not used in our performance reporting.

Issue		Submissions	Comments	AER response
29	Hardship	Alinta Energy Aurora Energy Energy Locals Origin Energy Red Energy and Lumo Energy	Stakeholders have identified several hardship program indicators (S4.4, S4.6, S4.8, S4.11, S4.13 and S4.15) for refinement in the Guidelines. Red and Lumo Energy sought clarification on whether customers under S4.4 and S4.6 should have equal customer counts. Aurora Energy suggests removal of certain subcategories within hardship indicators S4.8, S4.11 and S4.13 of the current Guidelines, which are already captured elsewhere.	We acknowledge that several hardship program indicators in the current Guidelines require refinement and/or greater definitional clarity to ensure there is consistent and comparable reporting across retailers. In response to stakeholder suggestions, S4.4, S4.8, S4.10 and S4.15 have been updated to improve definitional clarity. This is outlined in section 3.9.3 of this explanatory statement. We can confirm that S4.4 and S4.6 can have differing customer counts, considering S4.4 counts customers during the reporting period and S4.6 counts customers as at the last calendar day of the reporting period. We have decided not to amend subcategories within S4.11 or S4.13, considering that while there is some crossover in reporting metrics relating to a count of customers excluded from hardship program, each indicator is seeking to capture different aspects of reporting.
30	Rebates	EnergyAustralia	EnergyAustralia considers that rebate data may provide greater insights than the proposed amendments to concessions indicators and suggests the AER streamline processes by working with the ACCC.	Apart from collecting rebate information under hardship indicator S4.14, we do not intend to include rebates within the revised Guidelines.
31	Missed pay on time discounts	Red Energy and Lumo Energy	Recommend the AER align indicator S3.21 of the current Guidelines with the ESCV's reporting obligation, which measures missed bills.	Indicator S3.21 (Missed pay on time discounts) of the current Guidelines (S3.27 of the draft Guidelines) and the ESCV's reporting

Issue		Submissions	Comments	AER response
				obligation that measures 'missed bills' are not comparable metrics. Our preference is to maintain the scope of S3.21 in the current Guidelines to focus on discounts forfeited as a result of non-payment, as opposed to a broader missed bill indicator. This will maintain continuity of reporting on this important issue arising from the loss of customer benefits.
32	Small business data collection	ECA	Data on small businesses debt levels should be collected to the same extent as residential consumers.	To better understand payment difficulties faced by small business customers, data collection on both residential and small business customers with energy debt has been expanded to include debt that is 30–90 days old, average debt measurements and alternative debt arrangements, as described in section 3.3. Proposed refinements to payment plan indicators as described in section 3.9.1 will also capture the average fortnightly amount small business customers on payment plans are paying.

Appendix D: AER response to submissions on the issues paper – Other topics

Our consideration of issues and suggestions raised by stakeholders in submissions on the issues paper are summarised in Table D1.

Table D1 AER response to submissions on the issues paper – Other topics

Issue		Submissions	Comments	AER response
Frequency of data				
1	Frequency – supportive of more regular data collection	Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS Simply Energy Energy Locals	Broadly support the collection of more frequent monthly data for key indicators. Many submissions consider advantages include more meaningful comparison and analysis across key metrics such as hardship programs, and better alignment with the ESCV, which collects retail performance data monthly. Some stakeholders sought more clarity on the types of data proposed to be collected more frequently.	The AER agrees there is merit in collecting specific data at a more frequent (monthly) level to provide greater insights on seasonal trends and retailer activities that affect consumers experiencing vulnerability. However, we recognise the cost implications of this proposal on retailers and have decided to withdraw the proposal to collect data more frequently. We consider that the proposed suite of indicators under the draft Guidelines, collected on a quarterly basis, would still enhance the visibility of consumers experiencing vulnerability.
2	Frequency – challenges and concerns	AEC AGL Alinta Energy Aurora Energy EnergyAustralia Energy Queensland	Many stakeholders highlighted the challenges of providing more frequent data collection because it will require further resourcing and increase costs that would ultimately be borne by consumers. One retailer suggested a cost-benefit analysis be done to assess the merits for more frequent data. Submissions raised practical concerns, such as monthly data will be out of sync customers who	We recognise a change to monthly reporting for selected indicators will place increased reporting challenges on retailers and have withdrawn the proposal. As articulated in the issues paper, there are tangible benefits that flow from having more frequent data, including being able to observe and react to adverse market events more quickly

Issue		Submissions	Comments	AER response
		Momentum Energy Origin Energy Pacific Blue ZEN Energy	are billed quarterly. They also questioned the utility of monthly data to provide meaningful trends as distinct from quarterly reporting when considering the variances that come with seasonality and organic movement over time. Momentum urged the AER to only increase the frequency of data collection once the rollout of smart meters is complete.	and the ability to perform more detailed analysis allowing for more comprehensive trend analysis. We wish to flag that future improvements in data technologies at the AER and within retailer businesses may shift the 'cost versus benefit' balance that makes the prospect of more frequent data less cost prohibitive.
Granularity of data				
3	Granularity — supportive of more granular data collection	Ombudsmen (EWON, EWOQ and EWOSA) PIAC SACOSS	Stakeholders support the need for more granular data to assist in identifying gaps in consumer protections. For example, regional versus metropolitan data would be useful to assist with community engagement planning. PIAC cautions that care must be taken to avoid identification of individuals, particularly for those experiencing family violence.	Being cognisant of the complexity associated with collecting data at different levels of refinement (e.g., distributor, metro versus regional and postcode), we propose to collect data at the distribution network level for certain indicators. We consider distribution network level data reporting would not be as onerous for retailers and would be valuable for the AER's pricing and affordability analysis in retail performance reporting. Data would remain de-identified at this level.
4	Granularity — challenges and concerns.	AEC AGL Alinta Energy Aurora Energy EnergyAustralia Energy Locals	Many stakeholders raised concerns about increasing the granularity of data collection and states that collecting data along a metro/ regional divide would require retailers to collate data at a postcode level, which creates system complexity and risk of error that increases costs and resourcing needs.	We are mindful of stakeholder concerns and have decided not to proceed with seeking regional versus metropolitan or postcode-level data in the draft Guidelines. We consider collecting distribution network data as a compromise that provides a further level of granularity in some regions, which would enhance insights into core metrics.

Issue		Submissions	Comments	AER response
		Energy Queensland Origin Energy Momentum Energy Pacific Blue Red Energy and Lumo Energy Simply Energy	Certain stakeholders questioned whether the costs of providing more granular data outweighed the benefits derived, especially in a small jurisdiction.	
Consolidation and removal of indicators				
5	Consolidation – meter contestability – premature	PIAC SACOSS	Do not support consolidating metering contestability indicators. Consolidation would be premature given the AEMC smart meter review and the accelerated roll out of smart meters to 2030.	Given the outcome of the AEMC's smart meter review and the recommendation to accelerate the rollout of smart meters to 2030, we agree it is premature to consolidate meter contestability complaint indicators as part of this Guidelines review.
6	Consolidation – meter contestability – support	EnergyAustralia Ombudsmen (EWON, EWOQ and EWOSA) Origin Energy	Support consolidation of meter contestability indicators. Ombudsmen specifically support consolidation of indicators S3.8 and S3.9 on installation in the current Guidelines.	
7	Consolidation and removal – support	Alinta Energy Aurora Energy EnergyAustralia Momentum Energy Origin Energy PIAC	Agree with the AER's proposal to consolidate or remove identified indicators. PIAC broadly supports consolidation if the indicators being removed truly are duplications or unnecessary.	The AER has carefully considered indicators for removal or consolidation in the draft Guidelines as proposed in Chapter 5 of this paper to reduce unnecessary reporting burden without losing value.

Issue		Submissions	Comments	AER response
		Simply Energy		
8	Consolidation – IT considerations	AGL	Where the definition of an indicator substantively changes or where multiple indicators are consolidated into one, the AER should repeal the previous indicator and create a new one using unique numbering. This would not extend to minor or immaterial changes to the definition of an indicator.	We have maintained the numbering system when preparing the draft Guidelines for continuity and ease of comparison with the current Guidelines. We will consider a revised numbering system at the time of the final instrument once the scope of changes to the Guidelines has been confirmed.
9	Consolidation and removal – ESCV alignment	Pacific Blue	Recommend that if any indicators are consolidated or removed, it is done to align with those in the ESCV's performance reporting guideline.	The AER and ESCV operate under different regulatory regimes and where practical we have sought to bring our respective guidelines in closer alignment. The main intent of consolidation and removal as part of this Guidelines review is to remove indicators that do not provide any value to the AER's reporting and could be removed to reduce the number of indicators retailers are required to report on.
Indicators for distributors				
10	Distributor service standards and GSLs	Energy Queensland PIAC SACOSS	PIAC and SACOSS support the collection of information from distributors on service standards and GSL schemes on a quarterly basis. Energy Queensland sees no issue to provide distributor data as required.	We propose to withdraw incorporating indicators for distributors into the Guidelines as explored within the issues paper. Formalising data collection from distributors through Guidelines primarily focused on retailers would create unnecessary burden for distributors considering the earlier annual reporting timing in July and continued duplication of data collection (as data is collected again through Regulatory Information Notices later in the year).
11	Small compensation claims	Energy Queensland PIAC SACOSS	Energy Queensland recommends the AER undertake further consultation and provide more detail.	

Issue		Submissions	Comments	AER response
			PIAC supports in principle. SACOSS strongly supports the introduction of reporting requirements.	
12	Indicators for distributors – additional reporting requirements	SACOSS	SACOSS: • Urges the AER to include additional reporting requirements for distributors under the revised Guidelines because the data provided through Regulatory Information Notices is difficult to interpret and doesn't improve visibility of consumer impacts. • Strongly supports the AER consolidating all the reporting requirements for both retailers and distributors within the one guideline and reporting framework to enable clear assessments and cross referencing of the information provided.	We appreciate the benefit of collecting more data from distributors but the main intent of this Guidelines review is to make improvements to the data we collect to effectively monitor retail market outcomes as opposed to distribution network businesses. We do not intend to consolidate reporting requirements for distributors and retailers into one guideline considering the legislation underpinning these Guidelines.
Implementation				
13	6-month implementation time frame – reasonable	Momentum Energy	Considers the proposed implementation time frame of 6 months as reasonable and urges the AER to maintain a clear 6-month implementation time frame. Would appreciate the opportunity to review the time frame again once the scope of the final Guidelines is determined.	After considering stakeholder feedback, the scope of the new and revised indicators, and the shift in the original review timeline, we now propose an implementation date of 1 January 2025. Retailers would commence collecting data under the revised Guidelines on 1 January 2025, with the first submission being for Q3 2024–25.
14	6-month implementation	AEC Alinta Energy	These stakeholders either do not support the proposed 6-month implementation time frame and/or consider it costly and difficult to achieve	

Issue		Submissions	Comments	AER response
	time frame – unreasonable	Aurora Energy EnergyAustralia Energy Locals Origin Energy Shell Energy	considering business-as-usual requirements, ad hoc information requests and the large scope of proposed changes. Some retailers proposed later implementation dates, spanning from 1 January to 1 July 2025. Stakeholders provided additional points for consideration such as: • ensuring the implementation date is not aligned with any existing reporting requirements given the overlap in resources needed for implementation and existing reporting obligations • aligning implementation with other data reforms such as the ESB Data Strategy.	
15	Implementation time frame – more information needed	AGL Energy Queensland Simply Energy	The appropriate implementation time frame depends on the confirmed scope of proposed changes. The AER should first define the extent of the new and amended metrics before seeking views on implementation time frame.	We welcome stakeholder views on the extended implementation time frame considering the proposed scope of changes in the draft Guidelines.
Submission process				
16	Resubmissions	AGL Alinta Energy	AGL recommends a simplified mechanism that allows entities to provide revised data in the event of an error with one or a limited number of indicators without requiring formal CEO/delegate sign-off.	We agree with the suggestion to include additional information in the revised Guidelines on how to request extensions and the resubmission process. While we recognise that requiring retailers to obtain formal CEO/delegate sign-off to submit

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			Alinta Energy recommends the AER include additional information in the revised Guidelines on how to request extensions and the resubmission process.	revised quarterly data (through resubmitting the entire template) may seem arduous, it is an important authentication step in the process that ensures data integrity and robustness.
17	CEO sign-off	AGL Alinta Energy	AGL recommends an expanded line of delegation to streamline the sign-off process and reduce administrative burden. Alinta Energy asks the AER to consider limiting CEO or equivalent delegate sign-off to annual reporting rather than quarterly.	The CEO or delegate sign-off requirement remains an important step in the retail performance data submission process that ensures information is provided to the AER at a level of sufficient integrity and robustness, limiting the need for data resubmissions. We are not intending to alter this requirement in the revised Guidelines.
18	Submission time frame	Origin Energy	Asks the AER to consider extending submission times to accommodate the larger datasets proposed for collection within the issues paper.	While we recognise that expanding the number of indicators and datapoints will lead to retailers needing to provide larger datasets quarterly, we consider a calendar month is adequate time for a retailer to submit their retail performance report. Furthermore, the AER requires sufficient lead time between the timing of retailer data submissions and publication of performance reports to perform data cleaning and analysis. A later submission date would also reduce the available window for retailers to resubmit data if necessary and respond to AER queries. Those retailers that are experiencing difficulties submitting reporting can still contact the AER on an as-needs basis to seek approval for an extension.

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19	AER compliance reporting alignment	AEC AGL	Recommends the AER align the submission dates for performance reporting with its compliance reporting schedule.	We recognise that the AER compliance reporting schedule has longer submission time frames for the October to December and April to June quarters. We do not intend to adjust submission dates for retail performance reporting as the AER requires sufficient lead time between the timing of retailer data submissions and publication of performance reports to perform data cleaning and analysis.
20	Email submissions	Energy Locals	Recommends the AER keep email submissions as a fail-safe measure.	We will keep the AER Portal as the only method for retailers to submit retailer performance data. The system has been in place for several years and provides a robust submission framework.
Other				
21	Definitions	Alinta Energy	Recommend adding any definitions that reference the NERL within the Guideline itself.	Our preference is to keep references to the NERL and NERR to reduce the length of the Guidelines. We consider this would also ensure the Guidelines remain consistent with these key pieces of legislation in the event any definitions are amended through a rule change.
22	ESCV alignment	ECA Red Energy and Lumo Energy	ECA considers the AER should consider easier comparisons with Victorian data. For example, the ESCV currently publishes data on the number of customers on a retailer's best offer while the AER does not. Red Energy and Lumo Energy strongly support the AER bringing indicators into closer alignment with those of the ESCV.	The AER and ESCV operate under different regulatory regimes, which has led to differences in the type of data being collected and reported on by both regulators. However, there is also consistency across many areas of retail reporting between the AER and ESCV. Where practical, the AER will seek to align indicators and definitions where both collect similar types of data. The ESCV example given, relating to

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				'number of customers on a retailer's best offer', is out of scope of the AER's retail performance Guidelines.
23	Retailer report cards	ECA	The AER should review these report cards to ensure they are providing the most useful information in the most accessible format.	We agree there is scope to improve the use of retailer report cards as expressed in our *Towards energy equity strategy* and are progressing this review in a separate workstream. We expect the enhanced retail performance data collected through the revised Guidelines would be an input into the improved report cards.
24	Revised format	Alinta Energy Energy Locals	Alinta does not support the proposed revised format for the Guidelines and recommends the AER review handbooks published by ERAWA as examples of best practice guidelines. Energy Locals supports the revised format but asks the AER to consider a longer implementation time frame to modify systems to support the format change.	We propose to keep our current Guidelines format to maintain consistency in how requirements for each indicator are articulated. Although we do not intend to change the format of the Guidelines as proposed in the issues paper, we will endeavour to provide retailers with sufficient time to modify systems to meet the proposed implementation date of 1 January 2025.
25	Template	Alinta Energy Origin Energy ZEN Energy Shell Energy	Alinta would prefer the submission template to be in a data extract format (similar to the ESCV) because this would create reporting efficiencies in light of their internal reports. Origin Energy seeks clarification on how the revised reporting template format will function. ZEN Energy considers the template may present security issues due to its dependency on Excel macros. Recommends the AER	A revised version of the template will be released for testing and deployment before the commencement date of 1 January 2025 and will include all indicators required to be reported on under the revised Guidelines. We will work with retailers during the implementation period to ensure a smooth transition to the new reporting process. During this period, it is our intention to revisit the

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			consider a collection methodology that does not require the use of Microsoft macros. Shell Energy finds the current performance reporting template difficult to complete. With the addition of monthly data and more granular data, retaining the current performance reporting template would be unworkable for retailers. The AER should consider adopting a flat-file approach, similar to the ESCV updated performance reporting template.	functionality of the template and assess whether enhancements are needed as part of the broader implementation review. We appreciate that several retailers have flagged issues with the existing template submission process but consider it too premature to provide a detailed response to potential future updates to how data is submitted to the AER.