

7 August 2023

Mr Gavin Fox
General Manager, Market Performance Branch
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

By email: marketperformance@aer.gov.au

Dear Mr. Fox,

Aurora Energy welcomes the opportunity to provide feedback on the Australian Energy Regulator's (AER) *Retail performance reporting procedures and guidelines (2023 update) Issues Paper* ('Issues Paper').

Aurora Energy has reviewed the AER's issues paper and analysed the impact of the changes on its business. Broadly speaking, Aurora supports the AER reviewing the guidelines to ensure the data provided by retailers is high quality and relevant, however notes that any changes to the guidelines need to be considered in the context of increasing retailer complexity and flow on cost to consumers.

Aurora Energy considers the cost versus benefit of any changes should be carefully considered so that additional costs are not passed on to customers without commensurate benefits.

Aurora Energy address each of the consultation questions in the sections below.

Question 1: Do you have any comments on the proposed implementation time frame of 6 months and commencement date of 1 July 2024 and what steps the AER can take to minimise the costs of reporting under the revised Guidelines?

Aurora Energy hold some concerns with the proposed implementation timeframe, based on a lack of clarity on what metrics are being introduced and altered. To further understand the feasibility of the AER's timeframe for introducing the changes, Aurora Energy recommends the Final Guidelines be published as early as possible, with a final decision for implementation made following further consultation with retailers.

Question 2: What is your view on the indicators we have identified to potentially add to our suite of indicators? Are there any additional benefits or potentially unforeseen costs of adding these indicators and are there other indicators we should consider adding?

Aurora Energy provides feedback in relation to the specific proposals below:

Embedded Networks: The National Energy Customer Framework (NECF) rules for retailing to embedded networks do not apply to Tasmania as per the National Energy Retail Law Application Act 2012 (Tasmania). There are only a small number of registered embedded networks, which is unlikely reflective of the total number of embedded networks in Tasmania. This lack of registration, in combination with the non-application of the NERL, makes it impossible for Aurora Energy report this statistic.

Life Support: Aurora Energy supports the proposed Life Support reporting obligation alterations, including subcategories of, Registered Medically Confirmed, Registered Non-medically confirmed and the type of devices registered.

Family and Domestic Violence: Aurora supports the proposed Family and Domestic Violence reporting.

Question 3: What are your views on the proposed changes to current indicators?

Aurora Energy is broadly supportive of the proposed changes to current indicators, with further commentary listed below:

Aurora Energy supports the reporting of debt levels other than 90+ days, as it is likely to help the AER make policy decisions based on more relevant data. In relation to 0-day debt, whilst Aurora Energy has the functionality to report on these customers, it is likely that reported numbers from retailers will not be consistent nor comparable due to varying due dates of bills set by retailers. The National Energy Retail Rules (NERR) specify that *'The pay-by date for a bill must not be earlier than 13 business days from the date on which the retailer sent the bill to a small customer.'* Nevertheless, in practice, retailers have the flexibility to choose any due date that extends beyond the 13-day period. It is therefore recommended the AER focus on a 30, 60, 90+ day split to ensure data remains comparable.

Aurora Energy is supportive of the proposed change to energy concessions in principle, however, Aurora Energy automatically provides concessions to its eligible customers during registration/validation through its Customer Management System. Therefore, distinguishing between eligible customers and those receiving payments will not yield a statistical difference from Aurora Energy's perspective should the change be introduced.

Question 5: What are your views on providing more frequent data for selected indicators?

Aurora Energy considers that this change needs to be closely considered in terms of the costs v benefits of implementation. The change will entail additional implementation efforts, as well as ongoing work to provide necessary support depending on the indicators that are included in this change.

Question 6: What are your views on providing more granular data for selected indicators?

Aurora Energy does not support the proposed change. Tasmania has only one distributor (TasNetworks), there would be minimal benefit to Tasmania given the size of the state and any benefits are likely to be outweighed by the cost to introduce.

Question 7: What is your view on the indicators proposed to be consolidated or removed in the revised Guidelines? Are there any additional indicators that could fall under this category?

Aurora Energy supports the proposed changes to consolidate complaints, in particular the Advanced meter complaint categories and the removal of unnecessary reporting indicators listed by the AER in the issues paper and in addition:

- S4.8a(ii) The total number of Hardship customers meeting usage costs
 - This statistic is covered in S4.8a(iii) and (iv)
- S4.13a(iv) 'Number of customers excluded from the hardship program'
 - This statistic is covered in S4.11a(i)
- S4.11a(ii) 'Number of customers exiting the hardship program',
 - This statistic is covered in S4.13a(i,ii,iii and v)

If you have any questions regarding the submission, please contact Heath Gilmour, Lead Compliance Advisor via heath.gilmour@auroraenergy.com.au or 0408 651 611.

Yours sincerely,



Oliver Cousland
Company Secretary / General Counsel