AER (Retail Law) Performance Reporting Procedures and Guidelines Review

Final instrument – explanatory statement

August 2024

AUSTRALIAN ENERGY REGULATOR

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Amendment record

Version	Date	Pages
Version 1	August 2024	58

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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
MSATS	Market Settlement and Transfer Solutions
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 *AER (Retail Law) Performance Reporting Procedures and Guidelines* (final 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, through a retailer submission process, 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 Australian Capital Territory (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,* which aims to, among other things, improve support for consumers experiencing vulnerability, improve the way the market operates and prioritise and target actions to address or prevent consumer harm.

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 are 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.

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1 National Energy Retail Law, section 282.

We consulted on the following potential changes to the Guidelines:

- introduction of new indicators to enhance our retail performance reporting framework
- refinement of current indicators, clarification of definitions and improvement in the comparability of indicators to provide more clarity to retailers and users of retail performance data
- increase to the frequency and granularity of some of the data we collect to better observe retail market dynamics
- consolidation of indicators, including removing indicators that do not add value to our reporting, to reduce any unnecessary reporting burden on retailers
- collection of annual data from distributors on guaranteed service levels (GSL) and the small compensation claims regime
- improvement to clarity and readability of a revised format
- better alignment of 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.

1.2.2 Draft Guidelines

To inform the final Guidelines, we conducted a comprehensive draft Guidelines consultation process over 4 weeks from 20 February to 19 March 2024. This included a public forum, targeted workshops attended by all major and a sampling of smaller retailers, and a series of one-on-one meetings. A key focus of this consultation period was to refine the indicators, so we sought feedback on definitions to ensure indicators were clearer and comparable.

We received 20 written submissions on our draft Guidelines. The list of stakeholders that provided a written submission is provided in Appendix A: List of submissions.

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

Table 1.1 Retail Guidelines review project timeline

Milestone	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	August 2024
Implementation date	1 July 2025

1.3 Key outcomes of the consultation period

In developing the final Guidelines, we reviewed the insights and feedback provided through the stakeholder forums, workshops, one-on-one meetings and written submissions. In reaching our positions in the final 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 draft Guidelines 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 protection obligations and improve the transparency of new areas of regulation and policy interest.

The scope of the final Guidelines seeks to incorporate indicator refinements from the consultation period, 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 demonstrated concern with an indicator was received from stakeholders, some new indicators and refinements proposed within the draft Guidelines have been adjusted or withdrawn within the final Guidelines. 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.

In response to concerns raised in stakeholder submissions, we have taken further steps to reduce the reporting burden proposed under the draft Guidelines. Several significant changes are outlined in the following sections which include:

- the withdrawal of distribution network level data reporting
- the withdrawal card-operated meter indicators
- an extension on the implementation date from 1 January 2025 to 1 July 2025
- the introduction of a transitional 6-week data submission period for retailers

New indicators

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

Refinements to current indicators

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

Frequency and granularity of data

We have withdrawn the proposal to collect selected indicators at higher levels of frequency (monthly) and granularity (distribution network level). Chapter 4 summarises our response to stakeholder feedback on the frequency and granularity of data.

Implementation and submission date

The draft Guidelines proposed a 6-month implementation timeframe with an implementation date of 1 January 2025. Most stakeholders who provided written submissions believed that the implementation timeframe of 1 January 2025 would be challenging from a system and resourcing perspective and advocated strongly for an extension beyond this timeframe.

After considering stakeholder feedback and the scope of the new and revised indicators, we have extended implementation by 2 reporting quarters from 1 January 2025 to 1 July 2025. We have also extended the retail data submission date to 6 weeks for the first 2 quarterly reporting periods before reverting to back to 1 month (transitional arrangement). Retailers should commence collecting data under the final Guidelines on 1 July 2025 and first submit this data for Q1 2025–26 by 12 November 2025. The submission of data for Q2 2025-26 is 11 February 2026.

Other changes

Outcomes of other areas consulted on in the draft Guidelines are summarised in Chapter 5, including the:

- consolidation or removal of indicators
- format of the final Guidelines
- submission process

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

2 New indicators

Our issues paper explored the addition of new indicators covering embedded networks, life support customers and customers affected by family violence. In the draft Guidelines, new indicators were chosen to increase transparency for the AER and other 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 final Guidelines. Our response to issues and suggestions raised by stakeholders is summarised in Appendix B: AER response to submissions on the draft Guidelines – new indicators.

2.1 Embedded networks

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

In the draft Guidelines, we proposed new indicator categories to gather more insightful information. This would allow us to monitor embedded networks to ensure consistent and adequate protections for these customers.

We retained all the indicators proposed on embedded networks within the final Guidelines, with some definitional adjustments.

During the consultation period, we explored how retailers currently collect information on customers they directly supply within embedded networks. This entailed investigating whether retailers can distinguish information relating to embedded networks, including:

- the contract type of an embedded network customer those retailers directly supply
- 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 or hardship programs

The consultation revealed that retailers could identify the indicator category proposed in the draft Guidelines and this helped inform our final position.

Many stakeholder submissions requested definitional clarity on several of the new indicators to ensure the structure of the reporting is consistently applied and understood by retailers. Considering this feedback, we have made several changes to definitions and guidance notes throughout the embedded network indicators.

Some retailers also suggested that they should have the option to ‘flag’ whether they have embedded networks customers as part of the data submission process, which would generate customised reporting for embedded networks. We appreciate this suggestion and will pursue it, along with other simplifications to reporting mechanisms, as part of the Guidelines implementation phase.

Table 2.1 describes our adjustments for indicators covering embedded networks in the final Guidelines.

Table 2.1 New indicators for embedded networks

Indicators	Change from 2019 Guidelines	Response to consultation
Embedded networks (indicators S6.1 to S6.8)	New indicators introduced: • New embedded networks indicators requiring reporting of contract types and metrics relating to customer payment difficulty covering energy debt, payment plans, hardship programs and disconnections. Update from draft Guideline consultation: • S6.1 to S6.8. – guidance note adjusted to remove reference to gate meter. • S6.1 – 'on-market retail contracts' amend to include text 'excluding energy only retail contracts'. • Schedule 6 Glossary – included reference to 'Energy Debt' definition is from Schedule 3. Schedule 6 Glossary – included reference to 'Payment Plan' definition is from Schedule 3.	The embedded network guidance note has been updated to clearly reflect the retailer's reporting obligation if there is a 'contractual arrangement with the customer at the child meter.' The reference to the parent meter has been removed. The definition for contract subcategories 'on-market', 'off-market' and 'energy-only' contracts have been adjusted to ensure there is a clearer delineation between each. We will pursue options to redesign the performance data submission process to allow retailers to select filters to customise their reporting to the AER – e.g., giving retailers the option to specify that they service embedded network customers only.

2.2 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 introduced several indicators covering life support customers. This decision followed our consultation on the value of seeking regular reporting as part of our issues paper consultation.

We retained the proposed life support indicators within the final Guidelines, with a practical amendment to now require separate reporting for electricity and gas customers. It is our goal to improve transparency and our monitoring of this customer group through regular reporting.

Several stakeholders raised specific questions and concerns around the new reporting obligation for life support indicators. This includes aspects such as the potential for a 'double count' across electricity and gas types, and ambiguity on how Part 7 of the NERR categorises a customer, which could lead to potential inconsistencies in reporting. A number also advocated for life support reporting to be obtained from distributors to help alleviate the cumulative burden on retailers.

We have updated our guidance within the Guidelines and explanatory documents to reduce ambiguity and ensure consistent reporting across indicator categories. Our position is that retailers are often the first point of contact for life support customers and have an obligation under the Rules to collect this information and reconcile data with distributors on a quarterly basis.

Table 2.2 describes our adjustments to these indicators covering life support customers in the final Guidelines.

Table 2.2 New indicators for life support customers

Indicators	Change from current Guidelines	Response to consultation
Life support (indicators S6.9, S6.10 and S6.11)	New indicators introduced: • Several new indicators requiring reporting on life support customers and life support registration /deregistration within a period. Update from draft Guidelines consultation: • Split into electricity and gas components across life supports S6.9, S6.10 and S6.11.	To limit potential duplication, we have amended life support indicators to now be reported separately by electricity and gas. This is a minimal change that will remove ambiguity when life support is flagged for both fuel types. We have clarified that the definition under Part 7 of the NERR covering life support equipment reporting is required at a 'customer level' as opposed to a site or meter level. Guidance has been provided on practical considerations, such as a life support customers relocating premises during the reporting period.

2.3 Customers affected by family violence

Following the introduction of family violence obligations on retailers in May 2023, we seek to better understand the impact of these new customer protections and how retailers are complying with the associated obligations under the NERR.

Our issues paper considered the implications of seeking enhanced reporting from retailers for a particularly vulnerable customer segment. This led to the proposal of several new indicators in our draft Guidelines. We have maintained all proposed 'customers affected by family violence' indicators within the final Guidelines.

Stakeholders commented on several aspects in their submissions. These included the inappropriateness of the definition in the NERR, which includes 'former customers of the retailer', and the sensitivity of the subject matter restricting the ability to validate or provide insights into any changes in trends over time and/or to accurately assessed compliance with obligations based on the reporting metrics.

We acknowledge the sensitivity around this issue and for the affected customer group but still consider that data collection is necessary and beneficial. This considers the key responsibilities of retailers to offer support to this cohort and recognises the potential for affected customers to also experience payment difficulties and/or hardship. Like other retail performance data, all information on the number of customers affected by family violence will be collected as an aggregate at the retailer level and be de-identified. Where appropriate, information from smaller retailers will be grouped together to ensure confidentiality is maintained. We do not seek any data on individual customers or any information that could lead to the identification of specific customers.

In response to stakeholder feedback, we have provided clarification in the explanatory statement that we are not expecting retailers to comment on external social issues that may be contributing to changes in the numbers of affected customers.

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.

Table 2.3 summarises our position for indicators on customers affected by family violence in the final Guidelines.

Table 2.3 New indicators for customers affected by family violence

Indicators	Change from current Guidelines	Response to consultation
Customer affected by family violence (indicators S6.12 to S6.15)	New indicators introduced: • Several new indicators requiring reporting on the number of customers affected by family violence. Update from draft Guidelines consultation: • Clarified definition and retailer obligations in response to stakeholder feedback.	Under the Retail Rules, the definition of affected customer means any customer, including a former customer of a retailer, who is or was a small customer and who may be affected by family violence. We have used this definition for the purposes of reporting under the Guideline. The indicators are designed to provide some core metrics around the number of affected customers; however, we have emphasised that the AER is not expecting retailers to comment on external social issues that may be contributing to changes in data volumes over time.

3 Refinements to current indicators

The consultation period outlined refinements that could be made to the final Guidelines to make existing indicators clearer and more comparable. This chapter lists the specific changes we made to current indicators.

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 draft Guidelines – refinements to current indicators.

We have retained our proposal to include data validations in the final Guidelines.

Data validation requirements are designed to promote reporting consistency across data metrics reported by retailers. Validation rules will be applied across indicator categories where there are similar counts required on comparable groups of customers. Table 3.1 shows examples of several data validation requirements that will be instituted under the Guidelines. Retailers will have the opportunity to provide commentary to explain variances in totals between comparable indicators.

Table 3.1 Examples of data validation requirements

Total indicator	Subcategory/matching indicators
Schedule 3 – Retail market activities report	
S3.22. Number of small customers on a payment plan	S3.16. Nature of payment plan – fortnightly amounts.
S3.26. Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery.	S3.27. Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery – amount of debt.
S3.36. Number of customers disconnected for non-payment	S3.39. Total number of customers with debts at time of disconnection.
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.

3.1 Debt indicators

Understanding the extent that customers experience payment difficulties and accumulate energy bill debt is a core part of our retail performance reporting and monitoring work. Collecting data on customer debt allows us to assess how retailers are supporting their customers who are accumulating energy bill debt and are experiencing ongoing challenges meeting their repayments.

We incorporated several refinements and additions to the debt metrics in the draft Guidelines to enhance the monitoring of customer indebtedness. We have retained all the proposed changes in the final Guidelines, including refining the definition of debt metrics to provide greater clarity, and amending and expanding several existing debt indicators. We have also unveiled new indicators to capture alternative debt arrangements and average debt to enhance our insights in this critical area.

Overall, stakeholders generally agreed with the proposed amendments to debt indicators, with a number seeking greater definitional clarity on several of the indicators to ensure that reporting is consistently applied and understood universally among retailers. For example, retailers sought guidance on aspects such as 'the point when debt is overdue' and whether 'an alternative debt arrangement' could include arrangements where there is no debt (such as a payment extension prior to the bill's due date).

We have updated guidance notes and definitions in several debt indicators to further clarify debt reporting methodologies. Examples showing a practical demonstration of energy bill debt count and calculation methods are provided in Appendix C: AER response to submissions on the draft Guidelines – refinements to current indicators.

Table 3.2 describes the changes to indicators covering debt.

Table 3.2 New refinements to debt indicators

Indicators	Change from current Guidelines	Response to consultation
Glossary – energy bill debt definition	Inserted text 'in arrears' to ensure the retailer reports debt metric after the energy bill due date.	Glossary updated to provide clarity that 'energy bill debt' is calculated from the bill's due date. To be specific, the debt clock starts as soon as the energy bill debt becomes outstanding, as in, the day after the due date – which can be categorised as 'day 1'.
	Removed the clause from the definition that energy bill debt amounts need to be 'outstanding for 90+ days or more' to be reported.	'Energy bill debt' definition is updated to broadly encompass all debts outstanding for a retailer.
Debt	Energy bill debt split by 'electricity' and 'gas'.	Separate reporting required 'electricity' and 'gas' customer types.

Indicators	Change from current Guidelines	Response to consultation
(indicator S3.15 and S3.17)	The description of energy bill debt ranges has been amended to make the relevant reporting period sought under the indicator. An additional guidance note added to provide direction of how ‘customer in debt’ and their respective ‘average debt’ is to be recorded/reported.	Energy bill debt definitions and guidance notes amended to provide greater clarity and consistency across indicators.
Energy debt (indicator S3.46 and S3.47)	Updated deferred /alternative debt arrangements’ guidance notes to provide an example.	An example added to the guidance note to give retailer clarity on the types of arrangements to include in the indicator.

3.2 Tariff and meter types

The consultation period 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).

Consumer groups generally supported the collection of additional tariff and meter type data (Type 5 and 6 meters), citing that the expanded data will provide greater insights on the impact of meter types on consumer outcomes.

Several retailers questioned the benefit of reporting additional tariff and meter data. Given the mandated accelerated rollout of smart meters, these stakeholders argued that there is little incentive for retailers to spend resources on metrics that will be redundant in the future.

Stakeholder feedback indicates a need for clearer definitions of various tariff types to ensure that they are current and adaptable for future tariff reforms. They emphasised the importance of ensuring these definitions are mutually exclusive to avoid any potential overlaps in reporting. For example, a stakeholder questioned whether time of use tariffs exclude demand tariffs, or whether two-way tariffs may incorporate feed-in tariffs.

We reviewed stakeholder feedback and acknowledged the concerns raised in the written submissions. However, we consider that there is significant value in collecting additional tariff and meter data. By expanding indicator S2.8 to include Type 5 and 6 meters for residential and small business customers, and by segmenting the meters into non-cost reflective network tariffs (single-rate, block or flat) and cost-reflective network tariffs (time of use and demand), we gain a more comprehensive understanding of consumers’ experience in the energy markets. Understanding the pace of the transition to more advanced meters and shifts in the use of certain tariff types will further provide insight into the extent to which consumers are responding to retailer action on both metering and tariffs. Through stakeholder engagement, we modified the definitions of these tariff types to reflect the most appropriate reporting structure to meet this goal.

While initiatives like the proposed AEMC accelerated smart meter rollout[2] may eventually eliminate the need for expanded categories, the current timeline for the rollout means it will not be complete until 2030. This makes collecting additional meter and tariff types under the Guidelines highly relevant in the interim period, considering that the AEMC draft Rule change intention is to report on the number of meters replaced in a financial year whereas the Guidelines will provide a holistic view of all meters in NECF jurisdictions.

We have revised the definitions of various tariff types to eliminate any potential overlap. This will enable consistent interpretation of the tariff types and standardise data collection.

Table 3.3 describes our adjustments to tariff and meter type data collection in the final Guidelines.

Table 3.3 Refinements to tariff and meter type data collection

Indicators	Change from current Guidelines	Response to consultation
Tariffs and meter types (Schedule 1 and indicator S2.8)	• Indicator name has been amended. • Indicator expanded to require retailers to report on customers with Type 5 or 6 meters, and underlying network tariff structures. Update from draft Guidelines consultation: • Tariff definitions adjusted in the Schedule 1 glossary to provide greater clarity to retailer to distinguish between 'flat rate', 'time of use', 'demand' and 'two-way' tariffs. • Wording change: 'flexible' tariff changed to a 'other' tariff. • Guidance note provided under S2.8 to provide additional information on how to appropriately categorise a tariff type based on its underlying structure.	Tariff definitions in the glossary and indicator S2.8 guidance note have been refined to limit the potential for duplicated counts across deferent tariff structures where overlap may occur. E.g., a demand retail tariff with an underlying distributor-based time of use or demand network tariff could be categorised under multiple indicators. The guidance note will assist retailer to classify tariffs appropriately.

3.3 Prepayment meters

Current retail performance reporting shows that there are almost no prepayment meters as defined in the NERL still in use. In the draft Guidelines, we proposed to introduce the reporting of card-operated meters within the scope of indicators and definitions for prepayment meters in Schedule 3. However, based on stakeholder feedback and our consultations, we decided to withdraw this proposal.

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2 AEMC, Accelerating smart meter deployment, Australian Energy Market Commission.

Consumer groups welcomed the extension of reporting obligations to capture data on card-operated meter customers. Given that mandatory prepayment meters impact residents in remote communities, they support the AER extending reporting obligations to these meter types. One stakeholder recommended the need to clarify and make the distinction between meters with a prepayment functionality installed and those that are actively used by a retailer.

In contrast, Ergon Energy questioned the value in collecting data on card-operated meters, citing that self-disconnections are not always indicative of payment challenges, particularly for vulnerable consumers in remote communities. The retailer also:

- questioned what insights the AER will derive from collecting this data, noting that the continued use of this meter type in these communities stems from a Queensland Government policy decision – card-operated meters are currently monitored through regular reporting to the Queensland Government
- cited that the prepayment meter rules indicate that this meter can only be offered under a market retail contract. As Ergon Energy may only offer standard retail contracts under notified prices determined by the Queensland Competition Authority, the Queensland Government modified the application of the NERL as it relates to card-operated meters such that the definition of a prepayment meter does not include a card-operated meter, thereby removing them from the prepayment framework

Noting these provisions and policies, we decided to exclude the reporting of card-operated meters from the prepayment meter framework under Schedule 3 of the final Guidelines.

We will continue to engage with stakeholders to explore the feasibility of collecting similar prepayment meter types. Broadening our understanding of prepayment meters aligns with our objective to monitor consumer outcomes, which the current Guidelines limit our ability to do for remote regions where this meter type is used. This data holds significant value because it informs various functional areas within the AER. For example, in our review of payment difficulty protections in the NECF, we are exploring protections for customers on similar prepayment meters or prepaid billing arrangements.[3] We recognise the benefit customers find in prepayment type meters, and this review seeks feedback on how the identification, engagement and assistance for these customers could be improved.

Table 3.4 Refinements to prepayment meter indicators

Indicators	Change from current Guidelines	Response to consultation
Pre-payment meters (indicators S3.29 to S3.35)	Update from draft Guidelines consultation: • Added a guidance note for S3.29 to S3.35: for the purposes of this indicator, reporting is contingent with the actual usage of the prepayment meter, rather than whether the meter has a prepayment meter functionality. Card-operated meters have been excluded from the scope and associated definitions for	Guidance note added to provide additional clarity on how to classify a prepayment meter.

3 AER, Review of payment difficulty protections in the National Energy Customer Framework, 2024.

Indicators	Change from current Guidelines	Response to consultation
	prepayment meters in Schedule 3 of the final Guidelines.	

3.4 Call centre indicators

We explored redesigning call centre indicators to better reflect the way customers contact their retailers for assistance and to capture the customer experience through different contact channels, including online chat services.

Many retailers raised questions about the definitions related to the expanded call centre indicators. They require clarification on what qualifies as a ‘customer contact’ and whether it includes routine interactions, such as logging into an account, or whether it focuses on distinct service requests and inquiries.

Some retailers reported technical difficulties in tracking unique customer interactions across different service mediums, such as transitioning from a phone call to online. They also question whether repeated contacts about the same issue should be recorded separately for reporting purposes.

Other stakeholders opposed the expansion of the call centre indicators. They sought to understand the AER’s rationale for collecting this data, citing concerns on the increased reporting burden on energy retailers as well as additional implementation costs imposed.

We expanded call centre indicators to include online contact data to reflect the shift in customer preferences to use online applications and chat services in place of traditional call centres when seeking assistance. This expansion will allow us to better capture and analyse a spectrum of customer interactions with their retailers. In turn, this will provide us with deeper insights into the varying levels of interactions with retailers – for example, at times where there are price increases or significant market events.

Rather than implementing a complex redesign of customer service indicators, we included 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 different channels that customers use to engage their retailer for assistance.

In response to the concerns raised by various stakeholders, we made amendments to the terminology of the call centre contacts indicator. Specifically, we have removed the term ‘customer’ from the indicator name, thus referring to any ‘contact made to a retailer’s website’. We envisage that this alleviates the issue of determining whether a contact is a customer or not and assists in streamlining both the collection and reporting process for retailers.

For clarity, ‘contacts to a retailer’s website’ refers to any type of interaction between a visitor and a retailer via an online platform, including retailer apps, client service portals or online chats. These include both routine interactions (such as logging in from any online channel) and inquiries or service requests from customers. A contact is also one that requires a response from a retailer. If there are contacts that span from various mediums (such as starting with a phone call then transitioning to online communication), each interaction should be considered separate and recorded accordingly.

With regard to unique customers and transitions between various mediums (such as moving from a phone call to an online chat), the AER views these as separate contacts. While this may involve a degree of double counting, this indicator's objective is solely to understand the number of interactions visitors have with a retailer through an online platform, regardless of their status as an existing customer or not. The AER sees limited value in tracking inquiries from visitors across different mediums because linking them would introduce additional complexities for retailers when reporting this data.

Table 3.5 describes the changes to indicators covering customer service in the final Guidelines.

Table 3.5 Refinements to customer service indicators

Indicators	Change from current Guidelines	Response to consultation
Call centre contacts (indicator S3.43)	• New indicator to capture the total number of contacts made through the customer service website portal. This does not extend to customer interactions through third party social media services. Update from draft Guidelines consultation: • Removed the term 'customer' from indicator name to read 'Total number of ~~customer~~ contacts made through the retailer's customer service web portal'. • Added a guidance note for S3.43: A 'contact' refers to any interaction between a visitor (whether a customer or not) and a retailer via a retailer's customer service website portal. These include both routine interactions (such as logging in from any channel) and instances where a visitor makes an inquiry or service request. If contacts span across various mediums for the same visitor, each interaction is distinct and should be recorded separately.	Call centre contacts definition updated to ensure it remains consistent with current customer service definition S3.1 to S3.4 that counts 'contacts' rather than 'customers'. Additional guidance note added to provide greater clarity on how a web portal visitor interaction should be categorised.
Call centre contacts (indicators S3.1 to S3.4)	Call centre indicators have been adjusted to be reported and submitted on a quarterly basis.	n/a

3.5 Complaint indicators

We sought to improve complaints data in response to a reporting trend where current complaint indicators classify a high proportion of complaints as 'billing' or 'other'. This broad characterisation of complaint indicators into 2 groups limits the effectiveness to provide insight into the causes of customer dissatisfaction.

We introduced new subcategories to increase the visibility and transparency of critical areas that have a significant impact on customers. This will enable us to focus our compliance and enforcement resources on areas where data shows concerning trends and ensure billing obligations on retailers are fit for purpose.

Furthermore, this data will allow the AER to capture insights on what causes customer dissatisfaction and provide opportunities to gain insight (for both stakeholders in analysing the data and retailers considering it internally) into the potential causes – for example, to identify whether there may be any breakdowns in retailer procedures or any gaps in consumers protections for customers.

More information on billing complaints will also support informed policymaking. This is beneficial as the energy transition introduces new complexities to the energy market and customers' bills – billing complaints will be a critical source of information to identify potential issues as they emerge, rather than waiting until the impacts result in poor consumer outcomes.

Feedback from consumer groups indicated that they 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 aligning with the ESCV and ombudsmen scheme complaints, and disaggregating indicators into electricity and gas customers.

Retailers have raised a range of technical, practical and thematic issues with the expansion of the billing complaints into subcategories:

- concerns about the ability for frontline staff to accurately record the newly proposed billing subcategories – multiple subcategories may lead to subjective reporting by frontline staff
- how complaints are categorised when a single customer raises multiple issues – stakeholders question the approach that staff should take when there are multiple complaints in a single interaction
- for a single interaction, whether the new billing indicators cover multiple complaints, or if it is only covering the primary complaint of the customer – retailers have outlined a risk of over-reporting as the billing subcategories are not mutually exclusive

To address concerns about the potential misinterpretation and overlap of the new billing subcategories, we established clearer and more distinct billing subcategories. We also recognise that there is a degree of subjectivity and discretion employed by a retailer's frontline staff and/or through its systems and processes to categorise complaints based on their interaction with the customer (written or verbal). However, we expect that a retailer would have adequate system and staff training protocols in place to capture the type of complaints being raised.

Table 3.6 describes the changes to complaint indicators in the final Guidelines.

Table 3.6 Refinements to complaint indicators

Indicators	Change from current Guidelines	Response to consultation
Complaints – billing (indicator S3.5)	• Expanded billing subcategories to be consistent with ESCV and ombudsman schemes. Update from draft Guidelines consultation: • Removed the subcategories: – imminent and actual disconnection for consolidation – payment terms and methods (including contract terms) • Adopted neutral language for the billing subcategories – that is, – ~~failure to receive~~ government rebates or energy concessions – ~~failure to provide advance~~ notice of changes to pricing, tariffs and benefits – refund or credit (including potential overcharging and incorrect meter readings) • Changes for the billing subcategories – that is, – high bill (including perceived or unexpectedly high bill), instead of ~~prices (including unexpectedly high bills).~~ – payment difficulties (including hardship) instead of ~~debt recovery practices (including payment difficulties and collection)~~.	Based on stakeholder feedback from the draft Guidelines consultation, the S3.5 billing subcategories definitions were amended to be more concise in their categorisation.
Complaints – billing (indicator S3.5)	Update from draft Guidelines consultation: • Added a guidance note on how to record and categorise complaints.	Each individual customer contact (written or verbal) that is a complaint should be recorded and categorised as a complaint, irrespective of the number of times the customer has engaged with their retailer on an issue. Multiple billing complaints can be recorded in one interaction.

Indicators	Change from current Guidelines	Response to consultation
Complaints – non-smart meters (indicator S3.44)	Addition of a separate complaint indicator to capture complaints related to non-smart meter types (meters that are not Type 4 or 4A).	This indicator captures complaints related to non-smart meter malfunctions and issues, rather than general complaints where a non-smart meter is present.

3.6 Other refinements

Feedback received on the draft Guidelines has enabled us to identify opportunities to improve and refine additional areas in the final Guidelines. We consider these to be straightforward changes that will improve consistency between related indicators as well as insights drawn from current indicators.

3.6.1 Payment plan indicators

Stakeholders sought clarification on how to report average fortnightly amounts (indicator S3.45). They questioned whether they should report on the actual payment made by a customer, the amount proposed by the customer or the amount the customer is committed to paying. They also questioned whether monthly or weekly payments made by customers should be proportionally adjusted.

To enable uniform reporting of this indicator, the AER refined the definition of this metric to reflect the amount customers are committed to paying for their payment plans. We recommend retailers to proportionally adjust any weekly or monthly amounts to reflect the average committed fortnightly amount.

Changes to payment plan indicators in Schedule 3 of the draft Guidelines are summarised in Table 3.7.

Table 3.7 Refinements to payment plan indicators

Indicators	Change from current Guidelines	Response to consultation
Nature of payment plan – average fortnightly amounts (indicator S3.45)	New indicator to capture the average fortnightly amount customers on payment plans are paying. Update from draft Guidelines consultation: • Included the word 'committed' to indicator description: Retailers are required to submit the average fortnightly committed amount customers on payment plans are paying, as at the last calendar day of the reporting period.	Definition updated to guide retailers of the appropriate calculation method.

3.6.2 Hardship program indicators

Stakeholders sought clarification on the definition of indicator S4.8. This indicator refers to the number of hardship program customers on types of payment plans. They questioned whether customers who haven't made payments and whose debt has changed since setting up their plans should be included in the definition. Another stakeholder questioned whether payment plans pertain to the customer's actual payment amount or committed amount.

Like the change made for indicator S3.45, the AER refined the definition of this metric to encompass the amount customers are committed to paying for their payment plans. This adjustment accurately represents the actual payments that will be incurred.

Table 3.8 outlines the amendments to hardship program indicators.

Table 3.8 Refinements to hardship program indicators

Indicators	Change from current Guidelines	Response to consultation
Number of hardship program customers on types of payment plans (indicator S4.8)	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. Update from draft Guidelines consultation: • Added a guidance note for indicator S4.8: A customer's payment plan refers to the amount they are committed to paying under the plan.	Definition updated to remove ambiguity and to guide retailers of the appropriate calculation method.

4 Frequency and granularity of data

4.1 Monthly data

In the draft Guidelines we stated that we had withdrawn the proposal to collect monthly data on certain core indicators. Based on stakeholder feedback to the draft Guidelines and our own considerations, we have decided not to include monthly data in the final Guidelines. Although some stakeholders advocated for the collection of specific data more frequently (monthly) to gain greater insights on seasonal factors within retail performance data, we consider the cost to retailers in system adjustments and resources outweighs the benefit of more frequent data collection.

Our response to issues and suggestions on monthly data raised by stakeholders is summarised in Appendix D: AER response to submissions on the draft Guidelines – other topics.

4.2 Distribution network level data

In the draft Guidelines, we proposed collecting data at the 'distribution network level' for a suite of core indicators (see Table 4.1) covering contract, meters/tariffs, energy bill debt, payment plan, credit collections, disconnections, and hardship programs. To limit complexity, we only required a simple 'count' of indicators as opposed to indicators that require calculations – for example, average debt.

Our earlier issues paper explored options of collecting data at other levels – for example, regional versus metropolitan areas or by postcode. However, we settled on 'distribution network level' based on stakeholder feedback and to balance the need for greater refinement against the cost imposed on retailers to meet obligations.

Based on our review of stakeholder feedback, we have now removed the distribution network level data reporting requirement in the final Guidelines. We consider that the additional reporting burden placed on retailers to provide distribution network level data outweighs the benefits of more refined data.

We initially considered that this level of detail would better inform the market and our regulatory functions. Energy prices – and, therefore, affordability – can vary between distribution zones. Having distribution network level disaggregation would have allowed the AER to directly assess the impact of energy affordability in each pricing region on debt, payment plan and hardship program metrics, and in turn, retailer performance in proactively addressing payment difficulties.

However, several stakeholders questioned the value of collecting data at the distribution network level and rejected this proposal. Many retailers expressed concerns that this granular level of data would not provide the necessary insights based on the demographic and geographic diversity of distribution regions to adequately inform regulatory policy or the stated reporting goals of the AER. Other retailers focused on the practical challenges of implementing the new reporting framework, citing the significant undertaking to reconfigure systems, processes and staff training requirements. This raised many concerns among retailers, who highlighted issues ranging from development costs to submission template complexity.

Our response to issues and suggestions on Distribution Network Level Data raised by stakeholders is summarised in Appendix D: AER response to submissions on the draft Guidelines – other topics.

Table 4.1 lists all electricity indicators that were proposed to be reported on at a distribution network level in the draft Guidelines. These indicators are no longer required to be reported at the distribution network level.

Table 4.1 List of proposed indicators to be collected at the distribution network level which has been withdrawn

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
S3.15. Number of small customers with an energy bill debt
S3.22. Number of small customers on a payment plan
S3.26. Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery
S3.36. Number of customers disconnected for non-payment
Schedule 4
S4.1. Number of customers on a retailer's hardship program

5 Other changes

We implemented several other changes, such as removing indicators, extending the implementation timeframe and submission deadline for the first 2 quarters' worth of data and improving the submission process. A summary of these changes is provided below, with further detailed information in Appendix D: AER response to submissions on the draft Guidelines – other topics.

5.1 Removal of indicators

During the draft Guidelines consultation, we considered stakeholder views on the removal of any indicators that either did not add value or where retailers did not have access to the information sought under the Guidelines. Most retailers identified buy now pay later services as an area where there are distinct limitations in obtaining meaningful data. They expressed significant challenges in identifying these payments and do not anticipate reporting anything under this proposed indicator. Typically, payments from buy now pay later services appear as BPay transactions or are categorised under an indiscernible payment type, such as a PayPal payment. Due to a lack of visibility into customers' usage of buy now pay later services, retailers find it impractical to report this data.

Due to the challenges in retailers' ability to track customers usage of these services, we have decided to remove this indicator from the final Guidelines. Our stakeholder consultations and analysis of retailer submissions indicate that the AER is unlikely to draw any meaningful insights from this indicator.

If there were instances where retailers reported zero usage under this metric, we previously deemed it to be potentially valuable information. However, the lack of visibility of residential consumers using buy now pay later services persists, even in cases where retailers are partnered with payment entities such as PayPal. This makes it challenging to ascertain whether consumers are using buy now pay later services.

In June 2024, the Australian Government introduced a Bill into Parliament that proposed amending Treasury Laws related to the National Consumer Credit Protection Act 2009 to apply the National Credit Code to Buy-Now-Pay-Later contracts.[4] Once introduced, these reforms will require users of buy now pay later arrangements to be subject to credit checks. Given these pending changes, there some consideration as to whether that some customers experiencing vulnerability will move to using high-cost credit products and other emerging payment arrangements to pay their energy bills. We will continue to explore ways in which we can monitor how customers are paying for their energy bills, including the proportion of customers using high-cost credit products, such as wage advance arrangements, pay day loans and the emerging crowd-sourcing funding products, such as HelpPay.

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4 The Hon Stephen Jones MP, Assistant Treasurer and Minister for Financial Services, Government introduces consumer protections for Buy Now Pay Later, media release, 5 June 2024.

Given the increasing prevalence of alternative debt arrangements such as promise-to-pay arrangements and payment extensions, we will continue to explore other avenues to capture this data in the future to gain a holistic understanding of energy debt held by customers.

Table 5.1 Indicators to be removed in the final Guidelines

Indicators	Change from draft Guidelines	Consultation notes
Number of residential customers using buy now pay later services. (indicator S3.21)	'Buy now pay later services' indicator removed.	Indicator withdrawn based on stakeholder feedback.

5.2 Implementation

Retailer submissions generally argued that the proposed January 2025 implementation timeframe was unfeasible. They cited challenges such as required changes to reporting systems, additional time needed for data validation and approval, compliance with other data reforms, resource constraints and the need for staff training. They also emphasised that these changes would incur additional costs, which would be passed on to consumers.

Considering these implementation challenges, we have extended the implementation date from 1 January 2025 to 1 July 2025. Additionally, we have extended the retail data submission date to 6 weeks as a transitional measure to assist with the first 2 reporting deadlines under the final Guidelines. The first submission is now due on 12 November 2025.

5.3 Submission process and deadlines

During the consultation period, stakeholders outlined that they require additional time to submit quarterly retail performance submissions. Several stakeholders emphasised that a calendar month is an inadequate amount of time for retailers to conduct data governance, perform data validation and complete internal review processes.

In response, the retail data submission date, currently set for one month after the end of the reporting quarter, will be extended to 6 weeks for an interim transitional period. We consider the additional time will assist retailers in adjusting their systems and processes to meet the new and/or refined reporting obligations.

An enhanced data submission process (formerly retailers submitted reporting to the AER via an Excel data submission template) will be developed and deployed to allow retailers to meet the reporting requirements under the final Guidelines. The AER will consult and work with retailers to effectively implement these changes to the submission process.

5.4 Submission template and digital submission process

Stakeholders have expressed concerns about the complexities associated with the submission templates, particularly due to the need to provide distribution network level data. This would lead to a considerable increase in data points and permutations in the new submission template. In response to these concerns, as outlined in Section 4.2, we removed the requirement of reporting core indicators at the distribution network level.

A revised version of the template and/or digital submission process will be released for testing and deployment and will include all indicators required to be reported on under the final Guidelines. We will work with retailers during the implementation period to ensure a smooth transition to the new reporting process.

Furthermore, the AER will review its current data template submission process to identify areas for improvement. Our goal is to enhance the functionality of templates and/or the digital submission process and will endeavour to reduce the regulatory burden on energy retailers by ensuring more efficient data collection processes.

5.5 Indicator numbers

Some retailers advised the AER to maintain the existing performance reporting indicators from the current Guidelines (2019). They argue that retailers have established programming within their IT systems with the current performance reporting IDs.

We have reverted to the original indicator numbers from the current Guidelines. New indicators introduced in the final Guidelines have been assigned with unique indicator numbers. If an indicator has been removed, the pertinent indicator number has been retired. While this means not all indicators will be in sequential order, feedback indicated that this approach would help retailers with system reconfiguration.

Appendix A: List of submissions

Following release of the draft Guidelines on 20 February 2024, we invited stakeholder submissions. Stakeholders who provided a written submission are listed below.

Academia

1. Australian National University Centre for Aboriginal Economic Policy Research (ANU)

Ombudsman schemes

2. Energy and Water Ombudsman NSW (EWON), Energy and Water Ombudsman Queensland (EWOQ) and Energy and Water Ombudsman South Australia (EWOSA)

Industry groups

3. Australian Energy Council (AEC)
4. Compliance Quarter

Retailers and distributors

5. AGL
6. Alinta Energy
7. Next Business Energy
8. EnergyAustralia
9. Energy Locals
10. Ergon Energy Queensland (EEQ)
11. Momentum Energy
12. Origin Energy
13. Pacific Blue
14. Red Energy and Lumo Energy
15. Shell Energy and Powershop
16. ENGIE (Simply Energy)

Consumer advocacy groups

17. Indigenous Consumer Assistance Network (ICAN)
18. Public Interest Advocacy Centre (PIAC)
19. South Australian Council of Social Service (SACOSS)
20. Safe & Equal (email submission, not published)

Appendix B: AER response to submissions on the draft Guidelines – new indicators

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

Table B1 AER response to submissions on the draft Guidelines – new indicators

Indicator		Stakeholder feedback	AER response
Embedded networks			
S6.1	Number of electricity customers in embedded networks	**Embedded networks guidance note clarification**[5] Several retailers consider that the guidance note, in its current form, which refers to the retailer having a contractual arrangement with the gate meter and the child meter, will likely cause confusion. For example, it may exclude child meters from AER reporting. Furthermore, there is additional ambiguity around whether the gate meter should be included in indicator counts. There is also the aspect of whether each child meter should be treated as a separate customer or defined by the business entity operating the relevant meter. **Refining contract types and definitions**[6]	**Embedded networks guidance notes clarification** To improve clarity, we have modified that guidance note to remove the reference to a gate meter. It will now read: 'For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the customer at the child meter within an embedded network.' It is not expected that retailers count the gate meter within section 6 of the revised Guidelines unless they have access to the child meter. Each child meter to be treated as a separate 'customer' when reporting by residential, small business and large electricity customer types. **Refining contract types and definitions** We have updated the sub-indicator categories in S6.1 to
S6.2	Number of residential customers in embedded networks with electricity debt		
S6.3	Average electricity debt of residential customers in embedded networks		
S6.4	Number of residential customers in embedded networks on a payment plan		
S6.5	Number of residential customers in embedded		

5 Refer to submissions by AGL, EnergyAustralia and Origin Energy.

6 Refer to submissions by EnergyAustralia, Next Business Energy and Origin Energy.

Indicator		Stakeholder feedback	AER response
	networks disconnected for non-payment	Several retailers sought further clarification on allocation across the customer breakdown categories, including overlap between on/off market and energy or network only arrangements. One retailer contends that most on-market embedded network customers are energy only, and the 'energy only' subcategory should be removed. Another requested updated definitions for on-market and off-market contract types. **Definitions consistently applied across schedules**[7] One retailer recommends that the definition of 'energy bill debt' and 'payment plans' in Schedule 6 – New indicators, should be explicitly clarified as having the same meaning as in Schedule 3. **Refining debt definitions**[8] One retailer sought clarification on whether energy debt indicators S6.6 and S6.8 refer to energy debt amounts outstanding 90 calendar days or more from the due date. **Expand Guidelines to include exempt sellers**[9] One retailer suggested that the AER should extend these reporting obligations to exempt sellers to gain	delineate more clearly between 'on-market' contracts and 'energy only' contracts to assist retailers to appropriately categorise these metrics. An 'on-market embedded network customer' is a customer in an embedded network who is registered (visible) in MSATS. An 'off-market embedded network customer' is a customer in an embedded network who is not registered (not visible) in MSATS. **Definitions consistently applied across schedules** We have updated the Schedule 6 Glossary to ensure 'energy bill debt' and 'payment plans' are defined consistently with the definitions outlined in Schedule 3. **Refining debt definitions** Indicators S6.6 and S6.8 have been specifically updated to reflect only energy debt amounts outstanding 90 days or greater. **Expand Guidelines to include 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. This does not extend to exempt sellers. However, exempt seller related issues will be considered as part of the AER's Exemptions Framework review. **Retailer reporting burden**
S6.6	Average electricity debt at time of disconnection of residential customers in embedded networks		
S6.7	Number of residential customers in embedded networks on hardship programs		
S6.8	Average debt of residential customers in embedded networks on hardship programs		

7 Refer to submission by AGL.

8 Refer to submission by Origin Energy.

9 Refer to submission by Energy Locals.

Indicator		Stakeholder feedback	AER response
		greater visibility, especially considering that exempt sellers are a large segment of the market. **Retailer reporting burden**[10] One retailer supported the inclusion of specific indicators focused on embedded network customers but urges the AER to consider whether all new indicators in these areas are necessary considering the increased costs required to meet the additional reporting requirements.	We are cognisant of the additional reporting burden placed on retailers and sought in the final Guidelines to only collect embedded network data where there is a clear justification and broader benefit to do so. We agree that much of the data sought under specific embedded network indicators are currently reported within the current Guidelines Schedules 2, 3 and 4. However, this information is aggregated with all customers in the NECF and we are unable to identify embedded network customers as a subcategory. As a result, we have identified core indicators that provide useful insights that will assist 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.
Life support customers			
S6.9	Number of life support customers	**Customer-level reporting**[11] Several retailers sought clarification on the intention of this indicator and whether it seeks to capture data at a customer-level (rather than at a fuel, device or	**Customer-level reporting** The intention is to capture data at a customer-level rather than at a fuel, device, address level and/or individual meter (NMI/MIRN).
S6.10	Number of life support customers registered		

10 Refer to submission by Energy Locals.

11 Refer to submissions by AGL and Red/Lumo Energy.

Indicator		Stakeholder feedback	AER response
S6.11	Number of life support customers deregistered	address level) by virtue of the definition of a 'life support customer'. For example, a single customer may have life support flagged for both electricity and gas at a single premise or a customer may have life support flagged against electricity at 2 separate premises. In each of the preceding examples, these could be recorded as a single, discrete 'life support customer' or multiple instances for each fuel/premise. Stakeholders recommend counting each life support customer at a meter or site level. **Life support customers moving address**[12] One retailer sought guidance on how to report a life support customer who moves out of address A and moves in to address B and whether they would be considered as reportable under both S6.10 and S6.11. **Preference for distributors to report**[13] Several retailers argued that life support reporting obligations should be on distributors rather than retailers. This would allow for consistency in reporting across a wider geographic footprint (where a single distributor reports in place of multiple retailers), while ensuring accuracy in reporting given the dynamic way in which customers, including life support customers, move between retailers.	The indicator is bound by the application of Part 7 of the NERR covering life support equipment, which states 'This Part applies in relation to a customer who is a party to a contract with a retailer for the sale of energy.' We recognise that, depending on the individual arrangements, there may be multiple counts for a single life support customer. To alleviate part of this duplication, we have amended life support indicators to separate by electricity and gas. This is a minimal change that will remove ambiguity when life support is flagged for both fuel types. **Life support customers moving address** The reporting obligation under indicators S6.10 and S6.11 is applied irrespective of the circumstances – e.g., the customer moving address during the reporting period resulting in a count (or multiple count) under both indicators. **Preference for distributors to report** Retailers are often the first point of contact for customers and have an obligation to collect life support registration information and reconcile data with distributors on a quarterly basis. We recognise life support customer obligations also apply to distributors. However, we maintain that, because it's a retailer

12 Refer to submission by AGL.

13 Refer to submissions by Alinta Energy, EnergyAustralia and Energy Locals.

Indicator		Stakeholder feedback	AER response
		Furthermore, by placing the obligation on distributors, this would alleviate the cumulative burden to retailers.	requirement as well, retailers can report this information to the AER.
Customers affected by family violence			
S6.12	Number of affected customers	**Definitions consistently applied across schedules**[14] One retailer recommended that the definition of 'energy bill debt' and 'payment plans' in Schedule 6 – New indicators, should be explicitly clarified as having the same meaning as in Schedule 3. **Broader indicator feedback**[15] Several retailers have outlined concerns: • there is a possibility that these metrics may be overstated where retailers flag affected customers and these flags are not removed • that they are unable to validate or provide insight into any changes over time and the ongoing volume will be cumulative limiting the value of analysis • that only a single indicator is required, being 'number of affected customers', multiple indicators serve little utility • it is unclear how a retailer's compliance can be assessed based on reporting metrics alone as, for example, any increasing or decreasing trends of customers being affected by family	**Definitions consistently applied across schedules** We have updated the Schedule 6 Glossary to ensure 'energy bill debt' and 'payment plans' are defined consistently with the definition outlined in Schedule 3. **Broader indicator feedback** Under the Retail Rules, the definition of affected customer means any customer, including a former customer of a retailer, who is or was a small customer and who may be affected by family violence. We recognise that this could lead to a situation where a particular affected customer is reported in the metrics of multiple retailers. The indicators are designed to provide some core metrics around the number of affected customers, but we are not expecting retailers to comment on external social issues that may be contributing to changes in data volumes over time. While it could be argued that only a single count of 'customers affected by family violence' is necessary, the decision was made to include further metrics to provide clarity on a retailer's ongoing engagement with this vulnerable customer group. These new indicators will be used to provide information that will inform our compliance function. However, it is only one of the tools used by the AER to monitor retailer compliance
S6.13	Number of affected customers added to a retailer's system		
S6.14	Number of affected customers on a payment plan		
S6.15	Number of affected customers on a retailer's hardship program		

14 Refer to submission by AGL.

15 Refer to submissions by Alinta Energy, EnergyAustralia, Origin Energy and Pacific Blue.

Indicator		Stakeholder feedback	AER response
		violence may not necessarily be attributable to a potential compliance breach **Protecting customer confidentiality[16]** Stakeholder feedback: • Recommend that any space for free commentary is accompanied by clear Guidelines for staff completing the report and/or training to ensure that the information provided is de-identified and aligns with family violence best practice – alternatively, it is advised that free commentary is not available within family violence reporting. • Urges the AER to consider adding a reporting box stating that unable to report due to concerns about potential identification of customer or zero – do not recommend reporting the reason why. • Request the AER consider adding a sentence that 'while this data represents customers who have disclosed family violence, the actual number of customers affected by family violence is likely to be far greater due to the barriers to disclosure. Therefore, there are significant limitations to these statistics.	activity. **Protecting customer confidentiality** The AER acknowledges these concerns. • The retail performance Guidelines submission process gives retailers the discretion to provide commentary on all indicators. We will incorporate a statement in the retail performance data submission process (commentary) reminding retailers of the sensitive nature of the data and their obligations, including making it clear that no information that could identify an affected customer should be included in free commentary. • To address concerns about potential identification of customers, where appropriate we will group together information from smaller retailers prior to publishing. We consider a statement could be incorporated into AER publications such as the Annual retail markets report or Quarterly retail performance update to recognise that the data represents only those customers who are recorded as affected customers in a retailer's system and the actual number of customers experiencing family violence is likely to exceed the number reported.

16 Refer to submission by Safe & Equal.

Appendix C: AER response to submissions on the draft Guidelines – refinements to current indicators

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

Table C1 AER response to submissions on the draft Guidelines – refinements to current indicators

Indicator		Stakeholder feedback	AER response
Energy debt indicators			
S3.15	Number of small customers with an energy bill debt	**Updating 'repaying debt' definition**[17] Two retailers do not anticipate any issues in reporting concerns with the revised approach to reporting debt. However, they sought clarity on when former customers should be counted and whether retailers are required to report on customers who have missed the due date of one energy bill. **Expanding debt metrics to 30–59, 60–89 & 90+ day ranges**[18] Several retailers sought clarity on whether customers should be counted once or multiple times in each metric. Particularly due to monthly billing, a customer could have 30–60, 60–90 and 90+ day debt. Furthermore, if the goal is to prevent double counting, a customer should only be counted in their oldest category. These stakeholders were also of the view that customers should only be counted once within this	**Updating 'repaying debt' definition** This change to the energy debt definition was designed to remove any ambiguity that restricted debt reporting via associated debt indicators based on the criteria that a customer must make a repayment in that period to be counted. Retailers should report only current active (not former) customers with debt. Furthermore, retailers should report from the point in time when a customer's energy bill debt is in arrears after the bill's due date. To be specific, the debt clock starts as soon as the energy bill debt becomes outstanding – that is, the day after the due date, which can be categorised as 'day 1'. **Expanding debt metrics to 30–59, 60–89 & 90+ day ranges** The goal of expanding the debt metric to capture ranges from 30–59 and 60–89 days is to provide greater visibility on customers experiencing payment difficulties in the earlier
S3.17	Average amount of energy bill debt for small customers		

17 Refer to submissions by EnergyAustralia, Energy Locals and Shell Energy.

18 Refer to submissions by AGL and Shell Energy.

Indicator		Stakeholder feedback	AER response
		metric under their oldest debt 'category' with their debt from other (earlier) categories aggregated under their oldest debt.	stages. Similar information has been provided voluntarily by retailers previously. Consistent with this goal, customers with energy bill debt in arrears should be counted based on the age of the debt within the defined ranges. As an example, if a customer has a monthly billing cycle and has not settled a bill in 4 months, they will have debt in the 30–59 day range, the 60-89 day range and the 90+ day range. In this instance, the retailer would count customers separately under each debt range and the oldest debt outstanding in each range. To demonstrate this calculation method practically: Customer A: Total debt = $350, 30–59 days old = $100, 60–89 days old = $100, 90+ days old = $150. Retailer reports debt for customer A: • 30–59 days = $100, customer count 1 • 60–89 days = $100, customer count 1 • 90+ days = $150, customer count 1
S3.46	Number of customers on a deferred debt or alternative debt arrangement	**Definition and methodology**[19] Several retailers sought: • confirmation on whether these arrangements include defer payment where there is no debt. For example, a customer defers paying their bill before the due date with a promise to pay. Additionally, to avoid confusion, consider amending the S3.21 and	**Definition and methodology** All deferred or alternative debt arrangements should be included in the metric irrespective of whether a customer's energy bill is overdue or not. This would include instances where the retailer has deferred or extended a future bill's due date. To clarify the operation of alternative/deferred debt:
S3.47	Total amount of deferred debt or		

19 Refer to submissions by AGL, Origin Energy and Shell Energy.

Indicator		Stakeholder feedback	AER response
	alternative debt arrangements	S3.22 label name to remove the reference to debt, considering that in the scenario outlined above, the indicator reference debt that has not yet outstanding. • clarity on whether the intention of this metric is to count debt only as distinct from future payment obligations or both. It is recommended that the definition be modified to explicitly consider the total agreed arrangement amount at the point of creation of the arrangement. • guidance on whether the intention is to capture the total number of arrangements or the total amount of debt pertaining to these arrangements. Additionally, if the total amount of debt is required, please also include clarification within the indicator as to whether debt refers to amounts outstanding 90 calendar days or more from the due date. • whether 'average deferred' rather than total amount deferred would be acceptable. • if the customer is making a partial payment, whether the whole amount be counted as deferred, or only the amount of the partial payment.	• Indicator S3.21 counts the total number of customers on a deferred or alternative debt arrangement as at the last calendar day of the reporting period. • Indicator S3.22 aggregates the total amount ($) of those deferred or alternative debt arrangement reported under S3.21. • Furthermore, indicator S3.22 should calculate the total debt of those debt of arrangement – i.e., it is not based amounts outstanding 90 calendar days or more from the due date. To ensure the consistency of reporting throughout the Guidelines, the AER will require retailers to provide data metrics within a standardised form as stipulated by the indicator's definition. In this instance, the total amount deferred is the information sought under the indicator. The expectation is for retailers to report the total deferred amount in dollars (not the average amount) of all arrangements at a point in time (last calendar day of the reporting quarter) based on its current value.
S3.18	Amount of residential customer energy bill debt	**Continuation of 90+ day debt range** [20]	**Continuation of 90+ day debt range**

[20] Refer to submission by Origin Energy.

Indicator		Stakeholder feedback	AER response
S3.19	Number of residential customers that have energy bill debt	Under the current Guidelines (2019), 'energy bill debt' was defined as debt amounts outstanding for 90+ days or more. In these revised final Guidelines removes 'debt amounts outstanding for 90+ days or more' from the energy debt definition. Given this amendment, retailers have sought further clarification as to whether existing indicators that require the amount of debt to be reported, refers to 'amounts outstanding 90 calendar days or more' from the due date.	Unless the energy debt range is clearly stated in the indicator, the expectation is that the total debt outstanding would be used for reporting purposes. To ensure continuity with several existing indicators for reporting in the current Guidelines, we have updated indicators S3.18, S3.19, S3.27 and S3.39 and new indicator S6.6 to explicitly reference that energy bill debt is calculated on 'amounts that have been outstanding for 90 calendar days or more'.
S3.27	Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery – amount of debt		
S3.39	Total number of customers with debts at time of disconnection		
Tariff and meter types			
S2.8	Types of tariff structures for electricity customers with smart meters	**Support data collection changes** [21] Consumer groups support the collection of additional tariff and meter type data (Type 5 and 6 meters). Collecting additional data will help better understand the impact of meter types on consumers. **Limited benefit in expanding data** [22]	**Support data collection changes** The expansion of this indicator will allow the AER to gain insights on the transition of electricity consumers to advanced meters. The data will provide a holistic view of customer responses to cost-reflective price signals. **Limited benefit in expanding data**

21 Refer to submissions by EWON, EWOQ, EWOSA, PIAC and SACOSS.

22 Refer to submissions by Australian Energy Council, ENGIE and Ergon Energy Queensland.

Indicator		Stakeholder feedback	AER response
		Stakeholders question whether the benefits of reporting additional data will justify the costs for industry and consumers. They argue that with mandated rollouts, retailers have little incentive to invest in soon-to-be-outdated metrics, and that understanding meter types and customer transitions should be part of mandated compliance duties. One retailer questioned the value of the amendments and how the AER will use the data, since tariffs are set by the Queensland Competition Authority and governed by the Queensland Government. **More explicit definitions** [23] Retailers sought more explicit definitions of this indicator. They suggest that the definitions of tariff types should be mutually exclusive and not overlap. **Implementation costs** [24] Retailers indicated that reporting this data at the distribution level necessitates substantial reconfigurations to reporting systems. They argue that these additional costs will be passed to consumers. Given this, they requested for a longer implementation and submission periods. **New tariffs** [25]	While initiatives such as the AEMC's accelerated smart meter rollout may eliminate the need for expanded categories in the future, the incremental rollout to 2030 makes collecting additional data highly relevant in the interim period. Collecting additional data will help in understanding how energy consumers are transitioning to advanced meters and cost-reflective tariffs. [26] We acknowledge that regional tariff regulations may limit the types of tariffs reported, potentially reducing insights. To ensure consistency, we will implement the new obligations uniformly across all regions, regardless of regional regulations. **More explicit definitions** We revised several tariff definitions and added a guidance note to help retailers categorise and report tariff types more clearly. This change involves classifying tariff types based on their composition. For example, if a tariff includes both demand and time-of-use components, then it should be classified a demand tariff for reporting purposes. **Implementation costs** Considering the anticipated increase in costs associated with additional reporting responsibilities, we are extending the implementation period by 2 reporting quarters until 1 July 2025. We made this adjustment to allow more flexibility to retailers in

23 Refer to submissions by AGL and EnergyAustralia.

24 Refer to submissions by EnergyAustralia and Origin Energy

25 Refer to submission by Ergon Energy Queensland

26 AMEC, AEMC on smart meters: 100% by 2030, new customer information, real-time data and protections, viewed 28 June 2024.

Indicator		Stakeholder feedback	AER response
		Given that the NEM is transitioning to other energy resources such as solar PV and batteries, tariffs will evolve and new products will be introduced. Therefore, a more prescriptive approach is required to prevent new tariffs from being captured.	implementing changes to their systems and processes. Furthermore, we excluded the requirement of distribution network level reporting for this indicator. **New tariffs** Gathering data on all meter and tariff types would assist in understanding how consumers are transitioning from older meters to advanced meter types. We've expanded our tariff definitions to capture a broad range of tariffs in the market. As a result, we have not adopted a prescriptive approach.
Prepayment meters (PPM)			
S3.29	Total number of PPM customers	**Functionality** [27] One retailer suggested distinguishing between meters with a prepayment functionality installed and those actively used by a retailer. They propose that the technical capabilities of a meter should not initiate reporting obligations. **Support reporting of card-operated meters** [28] Consumer representatives welcomed the extension of reporting obligations to capture data on card-operated meter customers. Given that mandatory prepayment meters do impact residents in remote communities, they welcomed the AER extending reporting obligations to these meter types.	**Functionality** We agree that reporting should be contingent on the actual usage of the meter, rather than whether the meter has a prepayment meter functionality. This is added as a guidance note for indicators S3.29 to S3.35. Our reporting seeks to identify customers subject to prepayment metering as well as the impacts it has on them. This is distinct from gathering data on the technology that provides the service. **Support reporting of card-operated meters** Discussions with retailers indicate that almost no prepayment meters, as defined by the NERL, are still in use. Given that these indicators return nil reports, collecting data on similar-
S3.30	Total number of PPM customers that receive an energy concession		
S3.31	Number of PPMs removed due to payment difficulties		
S3.32	Number of PPM customers using a PPM system capable of detecting and		

27 Refer to submission by AGL.

28 Refer to submissions by ICAN and SACOSS.

Indicator		Stakeholder feedback	AER response
	reporting self-disconnections	**Insufficient benefit of reporting card-operated meter data** [29] Ergon Energy questioned the value of collecting specific card-operated meters. They note that: • Self-disconnections are not always indicative of payment challenges, particularly for vulnerable customers in remote communities. • without understanding the policy, customer practices and preferences behind the continued use of this meter type in isolated communities, the insights the AER expects to infer from card-operated-meter data are unclear. • reporting card-operated meter data through a separate retail platform adds complexity to the reporting process for Ergon Energy. They seek clarity on how and for what purpose the AER will use this data. • continued use of this meter type stems from Queensland policy decision – card-operated meters are currently monitored through regular reporting to the Queensland Government. As Ergon Energy may only offer standard retail contracts under notified prices determined by the Queensland Competition Authority, the Queensland Government modified the application of the NERL as it relates to card-operated meters such that the	functioning meters, like card-operated meters, was viewed to be beneficial. We are aware that there may be other meter types that function similarly to prepayment meters but fall under a different name (for example, card-operated meters). To improve the quality of our data analysis, we proposed a separate category to capture card-operated meters in the draft Guidelines. However, based on stakeholder feedback, we decided to withdraw the collection of card-operated meter data. **Insufficient benefit of collecting data on card-operated meters** We intended to collect data on card-operated meters to improve our visibility of customers with this meter type, especially those in remote communities. However, we accept the position outlined by Ergon Energy that card-operated meters remain distinct from the prepayment meter definition and monitored through regular reporting to the Queensland Government. We have decided to withdraw our draft Guidelines proposal to collect reporting on card-operated meters as a component of prepayment meter reporting under Schedule 3 of the final Guidelines. **Retrospective reporting** We agree that it is important to understand energy insecurity particularly for vulnerable communities, but the AER has weighed the benefits versus costs of pursuing retrospective reporting and consider that it would introduce further complexity
S3.33	Number of PPM customers using a COM system capable of detecting and reporting self-disconnections		
S3.34	Total number of PPM self-disconnection events		
S3.35	Average duration of self-disconnection events		

[29] Refer to submission by Ergon Energy Queensland.

Indicator		Stakeholder feedback	AER response
		definition of a prepayment meter does not include a card- operated meter, thereby removing them from the pre-payment framework. **Retrospective reporting** [30] Two stakeholders encouraged the AER to consider retrospective reporting to gauge a better understanding of energy insecurity, particularly for vulnerable communities (i.e., from the introduction of smart meters in 2016). The ANU stated that a baseline is required so that data from 1 January 2025 can be compared against. **Definitions** [31] While the draft Guidelines includes card-operated meters, one stakeholder suggested that for future reviews, these definitions should be re-examined to include/encompass any new arrangements.	towards retailers' reporting obligations. On this basis, we have decided not to pursue this option. **Definitions** While the definitions may not fully accommodate any future arrangements, we believe a closed definition allows retailers to consistently report data.
Call centre indicators			
S3.43	Total number of customer contacts made through the retailer's customer	**Definitions and reporting challenges** [32] Many retailers have raised definitional concerns on the expanded call centre indicator. In summary, retailers have either:	**Definitions and reporting challenges** We revised the indicators descriptor, changing it from 'customer contact' to 'contacts to a retailer's website'. We removed the term 'customer' to streamline both the collection and reporting

30 Refer to submissions by Australian National University and ICAN.

31 Refer to submission by Australian National University.

32 Refer to submissions by AGL, Alinta Energy, EnergyAustralia, Energy Locals, Momentum Energy and Pacific Blue.

Indicator		Stakeholder feedback	AER response
	service website portal	• emphasised the importance of defining the term ‘customer’ because not all visitors may qualify as one – they cite technical difficulties in determining whether a visitor is a customer • requested additional information on what constitutes as a ‘customer contact’ and questioned whether it includes routine interactions like logging into an account • expressed technical difficulties in tracking unique customer interactions across different mediums, like starting from phone call then switching to online • expressed technical difficulties in reporting metrics from various mediums, such as apps and customer service portals, which operate from independent sources • questioned whether the customer contacts should be for both prospective customers and existing customers, or only existing customers • questioned whether repeated contacts about the same issue across different mediums should be recorded separately • questioned the value of the metric because there is a degree of subjectivity and inconsistencies on how retailers report the data • argued that the definition should be confined to instances where a customer interacts with a human representative of a retailer through digital channels	process for retailers, avoiding the complexities associated with determining whether a visitor is a customer or not. A guidance note is added to clarify what constitutes a contact. ‘Contacts to a retailer’s website’ refer to any type of interaction between a visitor and a retailer via an online platform, including retailer apps, client service portals or online chats. These include both routine interactions (such as logging in from any online channel) and where there is an inquiry or service request from a customer. A contact is also one that requires a response from a retailer. If there are contacts that span from various mediums (such as starting with a phone call then transitioning to online communication), each interaction should be considered separate and recorded accordingly. With regards to unique customers and the transitions between various mediums, such as moving from a phone call to an online chat, we view these as separate contacts. While this may involve a degree of double counting, this indicator’s objective is solely to understand the number of interactions visitors have with a retailer through an online platform, regardless of their status as an existing customer or not. **Implementation costs** While the Guidelines currently cover a limited range of online mediums, evolving technology suggests that visitors may use emerging channels in the future. We changed the wording of the descriptor from ‘customer contact’ to ‘contacts to a retailer’s website’ to ensure consistent data collection across all interactions, regardless of authentication.

Indicator		Stakeholder feedback	AER response
		because there are difficulties in differentiating contacts across different mediums **Implementation costs** [33] Retailers highlight that the complexities of collecting this data will impose significant changes to their systems and processes, leading to increased implementation costs. Given that there are various forms of online mediums, there are technical difficulties in distinguishing interactions between actual customers and non-customers, particularly in authenticated and unauthenticated environments. **Limited benefit in collecting data** [34] Two retailers have outlined that the AER has not outlined the benefit of reporting this data. They seek a better understanding of the AER's rationale for requesting additional data on online interactions.	To minimise implementation costs, rather than redesigning all call centre indicators to reflect the way customers are contacting their retailers for assistance, we decided to introduce only one additional indicator to collect data on the number of contacts made through a retailer's website portal. As customers increasingly engage with retailers through online channels, collecting such data becomes crucial. **Limited benefit in collecting data** Rule 166 of the NERR requires the retail performance report to contain information and data about the number of customers of each retailer. We have decided to expand call centre indicators to include online contact data to reflect the shift in customer preferences to use online applications and chat services in place of traditional call centres when seeking assistance. This reflects the emergence of new technology channels that customers are using to engage their retailer for assistance.
S3.1	Total number of calls to an operator	**Difficulties in reporting jurisdictional data** [35] One retailer notes that interactive voice response (IVR) systems cannot determine callers' geographical locations on mobile phones. They argue that this data may not be relevant for business landlines, as it might only indicate the location of head offices rather than actual customer locations. They suggest that these	**Difficulties in reporting jurisdictional data** For this indicator, we note that regulated entities with only large customers and no IVR telephone system in place are not obliged to report on this indicator. This is outlined in a guidance note.

33 Refer to submissions by AGL, Momentum Energy and Pacific Blue.

34 Refer to submissions by Pacific Blue and Energy Locals.

35 Refer to submission by Shell Energy.

Indicator		Stakeholder feedback	AER response
		indicators should be national-level only and that aggregated multi-site large customers should be excluded.	The AER acknowledges the constraints of IVR systems but urges retailers to exercise their discretion in accurately categorising the location of customers.
Refining complaint indicators			
S3.5	Complaints – billing	**Support expanding the billing subcategories** [36] Consumer groups support expanding the billing subcategories. Since billing represents the largest category of complaints, they state that it is crucial to have a more detailed breakdown to guide future interventions in improving customer experiences. **Complexities in data collection** [37] Many stakeholders expressed concerns about the ability for frontline staff to accurately record the proposed billing subcategories. They state that having multiple subcategories may lead to subjective reporting by frontline staff, which impacts customer service quality. Some retailers emphasised that frontline staff would require further training and education. **Reporting challenges** [38]	**Support expanding the billing subcategories** These subcategories will enhance the visibility and transparency across various areas that impact customers. For instance, they will enable focused compliance efforts and ensuring billing obligations are adequate. This additional data will also provide insights into customer dissatisfaction, allowing stakeholders to identify breakdowns in procedures or gaps in consumer protections. A detailed breakdown of billing complaints will also support informed policymaking, particularly as the energy transition introduces new complexities to the market and customers' bills. **Complexities in data collection** To address the issue around subjectivity, we revised the billing subcategories. More accurate reporting from retailers' frontline staff will enable the AER to better understand the factors that drive complaints and customer dissatisfaction. **Reporting challenges**

36 Refer to submissions by EWON, EWOQ, EWOSA and PIAC.

37 Refer to submissions by Australian Energy Council, Alinta Energy, EnergyAustralia, ENGIE, Ergon Energy Queensland, Pacific Blue and Shell Energy.

38 Refer to submissions by AGL, Alinta Energy, EnergyAustralia, Momentum Energy, Pacific Blue and Shell Energy.

Indicator		Stakeholder feedback	AER response
		Many retailers have outlined risks to over-reporting as the proposed billing subcategories are not mutually exclusive. They question: • how complaints are categorised when a single customer raises multiple issues • for a single interaction, whether the proposed billing indicators cover multiple complaints, or if it is only covering the primary complaint of the customer. **Concerns of non-compliance** [39] Some retailers are concerned that proposed billing subcategories may infer non-compliance, such as the 'failure to provide advance notice of changes to price and benefits'. They suggest using neutral language to describe the nature of complaint. **Alternative sources of data** [40] Several retailers questioned whether the data received from ombudsman schemes may be a more valuable metric in understanding the nature of billing complaints because the ombudsman complaint process allows for 'root cause investigation'. **Implementation costs** [41] Two retailers expressed the view that the expansion of the proposed billing subcategories will require an	For clarity, if a single customer raises multiple, distinct complaints, then the retailer should report separate billing complaints. We are interested in understanding the nature of billing complaints, rather than understanding the root cause of the complaint. For example, if a customer makes a billing complaint, then makes an incorrect metering complaint during the same call, then 2 complaints should be recorded. In contrast, if a single customer raises the same complaint across various mediums, then this interaction should be reported as a one complaint. **Concerns of non-compliance** The AER agrees that neutral language should be used. Our aim is to gather more informed insights on the nature of billing complaints, not to infer non-compliance from retailers. In response, we amended the language of the billing subcategories. **Alternative sources of data** Retailer and ombudsman data provide different levels of insight into compliance activity. They are complementary in extracting insights on customer dissatisfaction. **Implementation costs** We intend to balance the collection of complaints data to inform an area of high importance and the commensurate burden on retailers. The new billing subcategories seek to provide deeper

39 Refer to submissions by AGL, Alinta Energy and ENGIE.

40 Refer to submissions by AGL, Alinta Energy and EnergyAustralia.

41 Refer to submissions by Alinta Energy and EnergyAustralia.

Indicator		Stakeholder feedback	AER response
		overhaul to their existing billing and complaints system. They stress that this will necessitate staff training and increase costs.	insights on the causes of customer dissatisfaction. We envisage that this information would assist retailers in improving current business processes to mitigate complaints in the future.
S3.8 – S3.13	Complaints – meter contestability – meter installation, meter installation delay, de-energisation, meter data, privacy, cost	**Consolidation of indicators** [42] Two retailers sought clarity on how this data will be used by the AER. They suggested either removing or consolidating the metering installation indicators S3.8 to S3.13 Another suggestion was to combine all these complaint indicators into a general meter contestability indicator.	**Consolidation of indicators** The data will assist the AER in gathering more informed insights on the nature of complaints relating to Type 4 or 4A meters. These indicators provide a very granular look at the different types of issues customers may experience with meters. The data will also provide insight into the issues customers are facing with increased smart meter uptake. Given the outcome of AEMC's smart meter data review and the recommendation to accelerate the rollout of smart meters to 2030, we consider it as premature to consolidate meter contestability and meter installation complaint indicators.
S3.44	Complaints – non-smart meters	**Clarifications sought** [43] One retailer sought clarification as to whether the complaint must relate to the functioning of a non-smart meter, or if any complaint where a non-smart meter is present at the customer's premise should be included. Another retailer raised uncertainty on the type of complaints the AER intends to record. They note that complaints related to the inaccuracy of readings of a non-smart meter could be captured under the billing complaints indicator.	**Clarifications sought** The AER seeks to capture complaints related to non-smart meter malfunctions and issues, rather than general complaints where a non-smart meter is present. We acknowledge that there may be overlapping complaints across different indicators. We added 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'. Separating these 2 data sources

[42] Refer to submissions by AGL and Shell Energy.

[43] Refer to submissions by AGL and ENGIE.

Indicator		Stakeholder feedback	AER response
			provides a more holistic overview of non-smart meters in the system.
Other refinements			
S3.45	Nature of payment plan – average fortnightly amounts	**Clarifications sought** [44] Several stakeholders questioned: • whether they should report the actual payment made by a customer, the amount proposed by a customer or the amount the customer is committed to paying • whether monthly or weekly payments made by customers in their payment plan should be proportionally adjusted to fortnightly amounts • if a customer on a payment plan does not meet a repayment amount, whether this constitutes an energy bill debt for the purposes for indicator S3.17	**Clarifications sought** To enable uniform reporting of this indicator among all retailers, the AER refined the definition of this metric to encompass the amount customers are committed to paying for their payment plans. This adjustment accurately represents the actual payments that will be incurred. A guidance note is added in the Guidelines to reflect this. To accommodate the various payment frequencies that consumers have on their respective plans, we recommend retailers proportionally adjust them to reflect average committed fortnightly amounts. Energy bill debt metrics (S3.15 & S3.17) and Nature of payment plan – average fortnightly amounts (S3.45) are distinct indicator categories. It is expected that retailers would report under each separately. For example, if a customer has a payment plan and also has accrued debts greater than 90 days, reporting would be required under all categories based on the individual indicator definitions.

44 Refer to submissions by AGL, Alinta Energy, EWON, EOQ, EWOSA, Momentum Energy and Origin Energy.

Indicator		Stakeholder feedback	AER response
S3.22	Number of small customers on a payment plan	**Support indicator refinement** [45] Several stakeholders endorsed the reporting of small business customers, alongside residential customers, on a payment plan. **Removal of indicator** [46] One retailer suggested the removal of small business requirements from this indicator because it appears to be a duplicated under debt arrangements in indicator S3.19.	**Support indicator refinement** This refinement was made to be 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. **Removal of indicator** We note that recording the number of customers on a payment plan is distinct from the amount of deferred debt or alternative debt arrangements. These represent separate indicators.
S4.8	Number of hardship program customers on types of payment plans	**Clarifications sought** [47] Two retailers have: • sought clarification on whether payment plans pertain to the customer's actual payment amount or the committed amount • questioned whether customers who haven't made payments and whose debt has changed since setting up their plans should be included in the definition • sought calculation clarifications – specifically, for customers who are on hardship programs:	**Clarifications sought** Like the change made for indicator S3.45, the AER refined the definition of this metric to encompass the amount customers are committed to paying for their payment plans. For calculation clarity, customers on hardship programs and are meeting usage costs (ii) includes: • (iii) meeting usage costs and expected to clear arrears within 12 months • (iv) meeting usage costs and expected to clear arrears over 12 months • (v) meeting usage costs with no arrears.

45 Refer to submission by EWON, EWOQ and EWOSA.

46 Refer to submission by Shell Energy.

47 Refer to submissions by AGL and Origin Energy

Indicator		Stakeholder feedback	AER response
		– whether those customers ‘meeting usage costs’, (ii) include customers who are ‘meeting usage costs and expected to clear arrears within 12 months (iii), over 12 months and (iv) with no arrears (v) – whether those customers meeting usage costs (ii) include just customers who are meeting usage costs and are expected to clear arrears within 12 months (iii) and over 12 months (iv). This is because since (v) covers customers meeting usage costs with no arrears, then as a corollary, (ii) covers customers meeting usage costs with arrears.	A new category has been introduced to capture those customers who are on a hardship program agreement but do not currently have an active hardship payment plan in place because usage costs cannot be calculated: • (vi) unable to determine usage costs.
S4.10	Number of customers entering the hardship program	**Clarifications sought** [48] One retailer supports the inclusion of ‘financial counsellor referral’ in the definition with the caveat that it applies only if the customer hasn't already been referred to a financial counselling service by their retailer. Another retailer stated that while a retailer can infer, based on available information, that a customer may be facing payment difficulties or hardship, it’s crucial to consider inputs from the customer, such as their personal circumstances and ability to pay. Consequently, there’s a risk that the current definitions may classify most hardship referrals as ‘self-identified’ even if the retailer has proactively identified hardship and engaged with the customer.	**Clarification of ‘retailer referral to a hardship program’** If a retailer has engaged a customer who is facing payment difficulties or hardship based on available data, the AER considers this is to be a retailer referral. This may include, but is not restricted to, the retailer’s early response to customers experiencing payment difficulties such as those with a history of late payments, broken payment plans, payment extension requests, receiving a disconnection warning notice and/or been disconnected for non-payment.

48 Refer to submission by AGL.

Indicator		Stakeholder feedback	AER response
S2.9	Types of feed-in tariff structures for solar electricity customers	**Clarification on feed-in tariffs** [49] Stakeholders emphasise the importance of recognising that some consumers receive a partly government funded feed-in tariff. This will offer clarity to retailers who only report on customers who receive a partly government funded feed-in tariff.	**Clarification on feed-in tariffs** In circumstances where a customer has only received a 'partly' government-funded feed-in tariff, we anticipate this to fall under the former category (i.e., received a government-funded feed-in-tariff). At present, the AER has not recognised any significant business requirement to introduce additional granularity to this indicator.

49 Refer to submissions by Compliance Quarter and Next Business Energy.

Appendix D: AER response to submissions on the draft Guidelines – other topics

Our consideration of issues and suggestions raised by stakeholders in submissions on the draft Guidelines are summarised in Table D1.This covers submissions on the frequency and granularity of data, removal of indicators and implementation (including data submissions process and commencement timing of the Guidelines).

Table D1 AER response to submissions on the draft Guidelines – other topics

Issue	Stakeholder feedback	AER response
Frequency of data		
Monthly data	**Monthly data** [50] Several stakeholders see merit in retailers providing monthly data but acknowledge the cost implications on retailers. As an alternative, perhaps quarterly reporting could be broken down into monthly data to provide more granular data for key issues like disconnections and life support. One retailer supported the withdrawal of proposed collection of selected indicators monthly.	**Monthly data** In the draft Guidelines review determination, we withdrew the proposal to collect certain core indicators on a monthly frequency. Although this would provide insights on seasonal factors within retail performance data and assist in understanding the impact of significant events on retail markets, we decided the cost to retailers in system adjustments and resources outweighs the benefit of collecting monthly data.
Granularity of data		
Distribution network level data	**Support for more granular data** [51] Some stakeholders support the collection of data at the distribution network level for certain indicators. They also agree that collecting this	**Support for more granular data** AER recognised potential benefits from collecting distribution level data, however, have decided the benefits of insights

50 Refer to submissions by AGL, EWON, EWOQ and EWOSA.

51 Refer to submission by EWON, EWOQ and EWOSA.

Issue	Stakeholder feedback	AER response
(Indicators S2.1, S2.2, S2.6, S2.8, S3.15, S3.22, S3.26, S3.36, S4.1)	data will be valuable for the AER's pricing and affordability analysis, assessment of network tariff reform and examination of competition and consumer engagement. Consumer groups who responded are generally supportive of the improvements to Guidelines and suggest the increased granularity could offset by consolidating some data categories that are not informative. **Retain reporting at a jurisdictional level** [52] Several stakeholders do not support reporting at a distribution network level. Several retailers have articulated an array of issues that will impact their business with the introduction of this level of reporting. Some would like to understand the rationale for obtaining data at a distribution rather than jurisdiction level. **Limited insights gained from refined data** [53] One retailer is concerned that changing the required granularity to distribution level appears to be an approach of wide and indiscriminate canvassing for lower-level data without a discreet purpose or policy driver for retailer data to be defined to a distributor. They argue the distribution areas are vast and contain diverse populations and question whether this data would provide the necessary insights to inform regulatory policy for retailing provision. They make a further point that besides jurisdictional cross border complexities already raised, there are distribution level cross borders where customers on one side of a street may be in a different distribution area. They make a particular reference to lack of insight from segmenting indicators such as debt, payment arrangements and disconnections.	derived from this data may not outweigh the cost to retailers in providing it to the AER. **Retain reporting at a jurisdictional level / Limited insights gained from refined data** We recognise the additional burden that would be placed on stakeholders to report distribution network level data. Accordingly, we have withdrawn our proposal to collect data at this level of granularity. In our draft Guidelines, we argued that 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 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, and in turn allow us to assess retailer performance in proactively addressing affordability issues. However, in consideration of the additional retailer burden placed onto retailers, we have withdrawn the proposal to collect more refined data. **Significant work required to implement / Difficulty meeting submission deadlines / Extend submission deadlines**

52 Refer to submissions by AGL, Australian Energy Council, EnergyAustralia, Energy Locals, Next Business Energy, Pacific Blue and Shell Energy.

53 Refer to submission by Shell Energy.

<table>
<tr><th>Issue</th><th>Stakeholder feedback</th><th>AER response</th></tr>
<tr><td></td><td> Significant work required to implement [54] Some stakeholders consider the requirements for reporting distribution network data and quarterly reporting for specific indicators, along with the other changes, will still be a significant undertaking that will increase cost and burden. One retailer highlights a range of concerns covering ‘development effort and costs’, ‘submission template complexity’, ‘review effort’, ‘responsiveness to problem statement’, ‘pricing and affordability analysis’, ‘intra distribution zone shifts’ and ‘cross bordering’ that taken together constitute increased resourcing cost and burden. For example, the introduction of subcategories for debt age banding introduces significant complexity into this indicator especially because this metric is also subject to distribution network overlay. As a result, there will be a significant number of permutations for this dataset (iii. Which has been outstanding for equal to or greater than 90 days). Difficulty meeting submission deadlines [55] One retailer stated that the additional reporting granularity proposed increases the number of data points significantly (especially about indicators such as tariff types S2.8). As described above, applying appropriate scrutiny and governance to this larger and more complex dataset within the same submission deadlines may not be feasible. Extend submission deadlines [56] </td><td> We accept that more granular distribution network level data imposes additional technical, governance and reporting burdens on retailers as part of their quarterly retail performance data submission process. We have implemented several practical steps to assist in alleviating the new distribution level reporting requirements for retailers: The retail data submission date, which is 1 month after the end of the reporting quarter will be extended to 6 weeks.
The AER will actively improve the data submission technologies and processes to make it less manual and cumbersome.
As outlined in the implementation section, the Guidelines commencement date will be extended 2 quarters to Q1 2024–25 (first submission due 12 November 2025). This will give retailers extra time to develop their reporting system logic and processes to meet new reporting obligations.</td></tr>
</table>

54 Refer to submissions by AGL, EnergyAustralia, AEC, Energy Locals.

55 Refer to submission by Origin Energy.

56 Refer to submission by Australian Energy Council.

<table>
<tr><th>Issue</th><th>Stakeholder feedback</th><th>AER response</th></tr>
<tr><td></td><td>One stakeholder stated that should this proposal be implemented, retailers should have double the time to collate and submit this data from 1 month to 2 months.</td><td></td></tr>
<tr><td colspan="3">Removal of indicators</td></tr>
<tr><td>Number of residential customers using buy now pay later (BNPL) services</td><td>Support for BNPL indicator [57]

Consumer groups endorse the reporting of residential customers using buy now pay later services. While there may be inconsistencies in the visibility retailers have in identifying BNPL products, this data would hold substantial value.

Significant reporting issues [58]

Many retailers expressed significant challenges in identifying these payments from BNPL services and do not anticipate reporting anything under this indicator. Since retailers lack visibility into customers’ usage of BNPL services, they cannot feasibly report against these indicators.

One retailer argued that there’s an underlying assumption that retailers will always be aware that customers use these services, which may not be accurate. Customers can independently engage with a BNPL provider without involving the retailer. Consequently, the retailer cannot identify or report instances where customers use these services.

Another retailer understands that government will introduce legislation to regulate this area and questions its interaction with AER functions and reporting. They state that the driver for legislation relates to the lack of affordability checks for consumers. They recommend the AER consider this interaction as the policy develops.</td><td>Support for BNPL indicator

We have considered collecting information on customers using buy now pay later services because these services can mask energy payment difficulty. This was proposed as a general payment method indicator to better survey modern payment methods used by customers.

Significant reporting issues

The AER acknowledges the technical difficulties associated with reporting the usage of BNPL services among customers.

Due to the challenges in retailers’ ability to track customers using these services, we have opted to remove this indicator. Through our stakeholder consultations and analysis of retailer submissions for the draft Guidelines, it appears unlikely that meaningful insights can be drawn from this indicator. The lack of visibility of consumers using BNPL services persists, even in cases where retailers are partnered with payment entities such as PayPal, makes it challenging to ascertain whether consumers are using BNPL services.</td></tr>
</table>

57 Refer to submissions by EWON, EWOQ, EWOSA and PIAC.

58 Refer to submissions by AGL, Alinta Energy, EnergyAustralia, ENGIE, Ergon Energy Australia and Origin Energy.

Issue	Stakeholder feedback	AER response
		Considering the growing prevalence of alternative debt arrangements, such as promise to pay arrangements and payment extensions, the AER will continue exploring other avenues where we can capture this similar data to get a holistic understanding of energy debt held by customers.
Implementation		
Implementation	**Inadequate implementation timeframe** [59] While many stakeholders acknowledge that the AER has extended the originally proposed timeframes from July 2024 to January 2025, there was a strong consensus among retailers that the proposed January 2025 implementation timeframe is not feasible. The key themes outlined by retailers are summarised below: • retailers are involved in multiple other reforms that require substantial system changes (e.g., ESB Data Strategy reforms) • significant reconfiguration required by retailers – a later implementation date is required to account for system scoping, development, testing, procedure building, resourcing constraints and staff training • delays in the final guideline publication by the AER would require a corresponding change to the implementation date • the AER must allow retailers sufficient time to test the new regulatory reporting framework such that retailers can mitigate	**Inadequate implementation timeframe** We reviewed the feedback provided by retailers and acknowledge that the challenges that many indicated will hinder the successful rollout of the final Guideline changes by January 2025. In consideration of the stakeholder feedback and the scope of the new and revised indicators, we have extended the implementation date to 1 July 2025. Subsequently, the commencement date will be extended by 2 quarters to Q1 2025–26 (first submission due 12 November 2025). We consider this to be a balanced approach, which will allow the AER to work with retailers to ensure that the data is being reported accurately and consistently for Q1 of 2025–26. This will provide confidence in the data from the start of the full reporting year of 2025–26. **Implementation costs** In the draft Guidelines, we addressed stakeholder concerns and have decided not to proceed with seeking regional versus

59 Refer to submissions by AGL, Australian Energy Council, Compliance Quarter, EnergyAustralia, Energy Locals, Ergon Energy Queensland, Momentum Energy, Origin Energy, Pacific Blue, Red/Lumo Energy and Shell Energy.

Issue	Stakeholder feedback	AER response
	against risks associated with data integrity and higher costs derived from a rushed implementation **Implementation costs** [60] Many retailers expressed concern with the costs associated with the Guidelines, citing that changes to their reporting processes will impose additional costs being passed through to consumers. They question whether the AER has struck the right balance between the benefits of collecting additional data under the new and revised indicators, with the reporting complexity and cost of doing so. A few retailers have recommended the AER carry out a cost-benefit analysis to assess the merits for the proposed changes.	metropolitan or postcode-level data. However, we consider collecting distribution network data as a compromise that would enhance insights into core metrics. We outlined the rationale behind these changes in all public-facing documents (issues paper and explanatory statement for draft Guidelines). Reasons include better alignment with the AER's strategic focus, enhancing compliance monitoring, effectively regulating competitive markets through monitoring and reporting, improving retailer performance reporting, and providing greater visibility or a more holistic view of certain reporting indicators, especially those related to customers facing payment difficulties.
Submission process		
Submission process	**Inadequate submission timeframe** [61] To accommodate for increased data volume requests and changes in the Guidelines, many stakeholders require additional time to make submissions. They express that a calendar month is an inadequate amount of time for retailers to submit their performance reports because it does not allow for appropriate data governance, data validation and internal review processes. Two stakeholders suggested that an additional month for each data submission is more feasible, and one retailer suggested the addition of an extra month to both Q2 and Q4 schedules. This adjustment accounts for end-of-year leave in Q2 and the additional half-yearly	**Inadequate submission timeframe** We acknowledge that expanding the number of indicators and datapoints will lead to retailers needing to provide larger datasets quarterly and internal review processes. To address this, the retail data submission date, which is one month after the end of the reporting quarter, will be extended to 6 weeks for an interim transitional period. We consider 6 weeks to be adequate time for a retailer to submit their quarterly retail performance reports during the initial transitional phase. Those retailers that are experiencing difficulties submitting reporting can still contact the AER on an as-needs basis to seek approval for an extension.

60 Refer to submissions by Alinta Energy EnergyAustralia, Momentum Energy, Origin Energy, Pacific Blue, Red/Lumo Energy and Shell Energy.

61 Refer to submissions by AGL, Alinta Energy, Compliance Quarter, EnergyAustralia and Origin Energy.

Issue	Stakeholder feedback	AER response
	reporting requirements (i.e., NSW Social Code) in Q2 and Q4. An ideal case would be 2 months for all submissions (Q1 – Q4). **Submission templates** [62] A few stakeholders are concerned about the complexities associated with the submission templates. These complexities stem from the additional distribution-level breakdowns, which results in significantly more data points and permutations on the new submission template. This also adds regulatory and data quality risks for retailers. One retailer proposed the reconfiguration of the submission template to combine all indicators into a single data table to help streamline the submission process. They argued that this will reduce the time cost of this stage in the process by allowing for more efficient transfer of data from internal reports. Another retailer suggested that a test template be provided to technical teams in advance. This will ensure ample time to test new functionality before the go-live date. They are concerned that if this new template is not available until late 2024, it will not allow sufficient time for testing for data validation and various assurance and approval steps.	**Submission templates** A revised version of the template and/or digital submission process will be released for testing and deployment before the commencement date of 1 July 2025 and will include all indicators required to be reported on under the final 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 functionality of the template and assess whether enhancements are needed as part of the broader implementation review.
Indicator numbers		
Indicator numbers	**Indicator numbers** [63] Some retailers advised the AER to not change indicator numbers for existing performance reporting indicators. They argue that retailers have established programming within their IT systems with the current performance reporting IDs. Alinta Energy suggests that any new	**Indicator numbers** We revised the indicator numbering system proposed in the draft Guidelines and reverted to the original indicator number series under the existing retail Guidelines (2019).

[62] Refer to submissions by AGL, Australian Energy Council and Origin Energy.

[63] Refer to submissions by Alinta Energy and Energy Locals.

Issue	Stakeholder feedback	AER response
	reporting indicators should be assigned unique IDs to simplify their integration into retailers' systems.	Where new indicators have been introduced in the final Guidelines, we have allocated a new unique number as a reference. Where an indicator has been removed, the pertinent indicator number has been retired. This change will mean that not all indicators will be in sequence number order. However, based on stakeholder feedback, we evaluated that this change would assist retailers with their system reconfigurations and simplify the transition to the new Guidelines.
Indicators for distributors		
Indicators for distributors	**Indicators for distributors** [64] One stakeholder believes the AER's reasons for not including additional indicators for distributors are insufficient. They argue that mandatory reporting on key indicators related to consumer experience, cost impact and accountability is not overly burdensome and that the AER has not properly considered consumer benefits. This stakeholder opposes using a single data collection channel through RINs, as this data is less accessible to consumers. They advocate for mandatory reporting on indicators by distribution companies and retailers due to factors like reducing grid demand, smart meter rollouts, rising network costs and the small compensation claims scheme in South Australia. They are also concerned that the AER has not included indicators for distributors, such as grid consumption data, seeing it as a missed opportunity to inform equitable policy development during the energy transition. Additionally, this stakeholder is concerned about the impact	**Indicators for distributors** We appreciate the benefit of collecting more data from distributors. However, we wish to reiterate the case made in our draft Guidelines explanatory statement that 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 different legislation underpinning these Guidelines.

64 Refer to submission by SACOSS.

Issue	Stakeholder feedback	AER response
	of remote disconnections on vulnerable households and stresses the need for data to monitor these disconnections.	