



22 March 2024

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Sent via email to: [marketperformance@aer.gov.au](mailto:marketperformance@aer.gov.au)

RE: AER Performance Reporting Procedures and Guidelines – Draft Guidelines for Consultation, February 2024.

Shell Energy welcomes the opportunity to respond to the Australian Energy Regulator's (AER) draft Retail Performance Reporting Procedures and Guideline (the Guideline).

## About Shell Energy in Australia

Shell Energy is Shell's renewables and energy solutions business in Australia, helping its customers to decarbonise and reduce their environmental footprint.

Shell Energy delivers business energy solutions and innovation across a portfolio of electricity, gas, environmental products, and energy productivity for commercial and industrial customers, while our residential energy retailing business Powershop, acquired in 2022, serves households and small business customers in Australia.

As the second largest electricity provider to commercial and industrial businesses in Australia<sup>1</sup>, Shell Energy offers integrated solutions and market-leading<sup>2</sup> customer satisfaction, built on industry expertise and personalised relationships. The company's generation assets include 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and the 120-megawatt Gangarri solar energy development in Queensland. Shell Energy also operates the 60MW Riverina Storage System 1 in NSW.

Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy, while Powershop Australia Pty Ltd trades as Powershop. Further information about Shell Energy and our operations can be found on our website [here](#).

## General Comments



Shell Energy recognises and understands the importance of statistical monitoring of energy retail businesses, to provide guidance and transparency of retailing activity to the AER. However, we note that the AER has proposed to substantially increase the scope and scale of the performance reporting task, with the number of

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<sup>1</sup>By load, based on Shell Energy analysis of publicly available data.

<sup>2</sup> Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021.

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indicator data points increasing by approximately sixty percent. The dramatic increase in the complexity and number of reporting indicators heightens the regulatory compliance risk for the task, significantly increasing the regulatory compliance burden on energy retailers.

Shell Energy is also concerned that many of the new indicators in the Guideline have vague or ambiguous definitions or introduce subjective decision making to data classification. In our view, with the systemic risk and severe enforcement penalties attached to the provision of inaccurate data, the AER should not be introducing further complexity and compliance burden, but instead, accommodate simplification and provide clear definitions that will create consistency across the industry. We consider that the data requested should serve a specific purpose, so that more targeted and simplified statistical reporting can provide greater accuracy and consistent interpretation of data. This will provide the AER with optimal outcomes in monitoring the market and regulated entities, as well as distinguishing specific reporting parameters which gives both the AER and retailers full transparency of the purpose each indicator serves.

The dramatic increase in the number of required reporting indicators imposes considerable additional costs on retailers to develop systems, processes and training to accommodate the new requirements. This compliance burden is also exacerbated by the significant amount of time and resources involved for compiling, validating and control testing to deliver the reports to the AER. It is therefore important that there is a strong correlation between reporting requirements under the framework and the AER's purpose for (and use of) that data. It would be inefficient, if the expanded scope was to provide more data than what was to be used by the AER in undertaking its monitoring and enforcement tasks. Ultimately increasing the regulatory obligations of retailers comes at a cost to customers, at a time when cost pressures are particularly felt across the community.

## Regulatory drivers and rationale for the increased cost imposed

The AER has noted that improvements to the Guideline will enable the AER to "effectively monitor retail market outcomes without imposing unnecessary costs on retailers". In our view the AER has not adequately articulated the reasoning for several indicators, other than broadly for the purposes of monitoring "retail market outcomes to inform policy design and help target compliance and enforcement priorities". We would encourage greater communication with regulated entities regarding the AER's specific uses for each required data point, to help us to understand the value that offsets the cost that the regime imposes on retailers, which is considerable.

Shell Energy sees a need for the AER to prudently limit the number of new reporting indicators based on imperatives and remove those that have a speculative or uncertain value or have not been routinely used. We are concerned that the required level of granularity to a 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. Distribution areas are vast and contain diverse populations and we would argue that they provide no insight to inform regulatory policy for retailing provision. Besides jurisdictional cross border complexities, there are distribution level cross borders where customers on one side of a street may be in a different distribution area. We question what insights data segmentation to a distribution area will provide - particularly on indicators such as debt, payment arrangements, and disconnection. We consider that the AER's monitoring initiatives must be proportionate to the compliance risk and not impose significant costs with 'may be nice to have' data.

## Impact on systems

Retailers operating in the national market have been in a constant state of implementing regulatory-driven IT changes due to government intervention or at the request of regulators or the market operator. Further, the number of information data requests from regulators has placed great burden on operational teams, diverting them away from day-to-day activities. Many regulatory changes imposed on participants in recent times require major costly multi-million-dollar system changes. Others, perceived by rule makers to be 'minor' require significant



cost and time to implement as a separate IT project. This heightened level of intervention and regulatory change impacts heavily on IT resources that would otherwise be dedicated to further investing in innovation, expanding product development and design, and improving service offerings to customers.

Shell Energy has been concerned that policy makers and regulators do not seek independent retrospective reviews to assess whether regulatory changes and reform have indeed been worthy of the significant investment by retailers (and cost to consumers); that is, whether the societal benefits from the change have exceeded the costs. Similarly, we are concerned that proposed regulatory changes are not diligently tested or assessed in advance with cost benefit analyses. We have similar concerns with this proposed change, not being subject to cost benefit testing. We have provided indicative system costs (confidentially) for these proposed changes and encourage the AER to test these changes through a cost benefit lens.

In considering the complexity and system impacts, we note that the proposed changes create a new definition of a 'customer' being an account linked to a distribution area. This is a substantial change to our reporting system, as it will require a reconfiguration of all customer number-based statistics.



### Commencement Timing

We are concerned that the AER may have underestimated the impact of the proposed changes on automated reporting systems, with a suggested commencement date of 1 Jan 2025. The increase in reporting indicators will be extremely demanding and will have significant impact on the capacity of operational and reporting teams. This will mean that the current pipeline of IT improvements and product development will need to be redirected to meeting this change.

Shell Energy strongly believes that any rushed introduction of new indicators, without allowing time for proper preparation, poses additional costs on retailers and compromises accuracy and compliance. Retailers must be provided enough time to manage this regulatory change. Due to the significant reconfiguration required in this compressed timeframe, we will not meet the requirements for 1 Jan 2025. We propose an implementation date of 1<sup>st</sup> July 2025 to allow for system scoping, development, testing, procedure building and training for staff to capture information.

In the following pages we have inserted comments against change indicators. We would welcome further discussion with the AER to discuss in detail our concerns.

Yours sincerely,

Libby Hawker

General Manager - Regulatory Affairs and Compliance



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
<p>S2.1. The number of customers on standard retail contracts</p>	<p>Retailers are required to submit the total number of standard retail contracts as at the last calendar day of the reporting period for each of the following:</p> <p>Electricity standard retail contracts held by</p> <ul style="list-style-type: none"> <li>residential customers</li> <li>small business customers</li> <li>large customers.</li> </ul> <p>Gas standard retail contracts held by</p> <ul style="list-style-type: none"> <li>residential customers</li> <li>small business customers</li> <li>large customers.</li> </ul>	<p>Quarterly,</p> <p><a href="#">Distribution network (electricity)</a>,</p> <p><a href="#">Jurisdictional (gas)</a></p>	<p>For Powershop and Shell Energy Retail (SER), we cannot see the rationale for providing this data at a distribution level.</p> <p>SER - increase from 20 to 36 indicators; Powershop - increase from 24 to 36.</p> <p>Distributions are best placed to provide this data to the AER.</p> <p>This level of granularity is extremely complex for our multisite SME and multi-site large customers. Please see Confidential note in the Appendix.</p> <p>We also consider that the rationale for collecting data on this indicator, and other distribution level indicators, is lacking. There is no clear understanding of which trends the AER intends to capture when the count methodology changes between indicators.</p>
<p>S2.2. The number of customers on market retail contracts</p>	<p>Retailers are required to submit the total number of market retail contracts as at the last calendar day of the reporting period for each of the following:</p> <p>Electricity market retail contracts held by</p> <ul style="list-style-type: none"> <li>residential customers</li> <li>small business customers</li> <li>large customers.</li> </ul> <p>Gas market retail contracts held by</p> <ul style="list-style-type: none"> <li>residential customers</li> <li>small business customers</li> <li>large customers.</li> </ul>	<p>Quarterly,</p> <p><a href="#">Distribution network (electricity)</a>,</p> <p><a href="#">Jurisdictional (gas)</a></p>	<p>As above</p>

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Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
S2.3. The number of customers that have moved from standard to market retail contracts	Retailers are required to submit the total number of customers that have moved from standard to market retail contracts during the reporting period for each of the following: <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.large customers.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.large customers.</li> </ul> </li> </ul>	Quarterly, <ul style="list-style-type: none"> <li>■ Jurisdictional</li> </ul>	Shell Energy does not see the rationale for reporting large customers under this indicator.  Large customers moving from standard to market retail contracts are being captured by way of customer sites having basic meters and waiting for an upgrade – (being on a standing contract is purely an anomaly until their meter upgrade is completed). Large customers do not have standard contracts, and we propose removing this indicator for large customers.
S2.4. The number of customers that have moved from market to standard retail contracts	Retailers are required to submit the total number of customers that have moved from market to standard retail contracts during the reporting period for each of the following: <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.large customers.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.large customers.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>■ Quarterly, Jurisdictional</li> </ul>	Shell Energy does not see the rationale for reporting large customers under this indicator.  When a large business customer moves from a market to a standing offer, it is due to their contract expiring if they have not yet renewed or are in the process of moving to another retailer. These standard contracts are usually reversed through retrospective application. This indicator would not provide much insight for large customers.
S2.5. The number of customers on a market retail contract with an expired or changed benefit	Retailers are required to submit the total number of customers on market retail contracts where their benefit has changed or expired, as at the last calendar day of the reporting period for each of the following: <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>■ Quarterly, Jurisdictional</li> </ul>	



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
<p>S2.6. The number of customers placed on a deemed customer retail arrangement without a customer retail contract</p>	<p>Retailers are required to submit the total number of customers taking energy supply after 120 days on a deemed customer retail arrangement, as at the last calendar day of the reporting period for each of the following:</p> <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.large customers.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.large customers.</li> </ul> </li> </ul> <p>For the purposes of this indicator a bill must have sent by the retailer during the 120 days on a deemed customer retail arrangement.</p>	<p>Quarterly, <a href="#">Distribution network (electricity)</a>, <a href="#">Jurisdictional (gas)</a></p>	<p>Deemed contracts are not driven by customer choice but rather circumstance (move in, contract expiry). We do not see the rationale for breaking down deemed contracts by distribution area. Distribution level analysis will not drive regulatory policy outcomes. If this is purely driven to capture a lower level of granularity but not for an identified reason that improves outcomes for the majority of customers, then <b>we suggest it should remain at jurisdictional level.</b></p>
<p>S2.7. The number of customers with Type 4 or 4A smart meters and reasons for installation</p>	<p>Retailers are required to submit the total number of customers during the reporting period that had a Type 4 or 4A meter installed for each of the following:</p> <ul style="list-style-type: none"> <li>a. under the New Meter Deployment</li> <li>b. as part of a meter repair or replacement schedule</li> <li>c. as part of a new connection</li> <li>d. as per a customer's request.</li> </ul>	<p>Quarterly, <a href="#">Jurisdictional</a></p>	<p>We are unsure how the AER has used this data since its inception. We do not see any analysis from the AER using this indicator and suspect it is of little use now that Power of Choice reforms have been in place for the past seven years. Further, we query what analysis has been derived from large customers on this. <b>Propose to remove</b></p>
<p>S2.8. Types of tariff structures for electricity customers with</p>	<p>Retailers are required to submit the total number of customers with <del>a 4 or 4A (smart) meter</del> <a href="#">the following types of meter structures</a> installed, as at the last calendar day of the reporting period <del>for each of the following, receiving:</del></p>	<p>Quarterly, <a href="#">Distribution network (electricity)</a></p>	<p>A dramatic increase in the number of indicators to review and check, and <b>we propose removing this</b>. We do not see the rationale for providing this data at a Distributor level.</p> <p>For large customers, it is highly questionable what insight can be derived given large customer tariffs are bespoke, and unbundled. The prevalence of multi-site arrangements for large customers also makes this data one of the most complicated and convoluted to extract. With the number of assumptions and manipulation that will need to be built in, the data will be meaningless. <b>We suggest at a</b></p>



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
			minimum, large customers and multi-site customers are excluded from this indicator.
smart meters	<p>a. Type 4 or 4A (smart) receiving:</p> <ul style="list-style-type: none"> <li>i. a flat or block retail tariff with no controlled load retail tariff and with no underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>ii. a flat or block retail tariff with no controlled load retail tariff and with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>iii. a flat or block retail tariff with a controlled load retail tariff and with no underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>iv. a flat or block retail tariff with a controlled load retail tariff and with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>v. a time of use or flexible retail tariff with no underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>vi. a time of use or flexible retail tariff with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>vii. a demand retail tariff with no underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>viii. a demand retail tariff with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>ix. any retail tariff, other than a two-way retail tariff, with an underlying distributor-based two-way network tariff</li> <li>x. a two-way retail tariff with an underlying distributor-based two-way network tariff</li> </ul> <p>Type 5 receiving:</p> <ul style="list-style-type: none"> <li>i. a flat or block retail tariff with no controlled load retail tariff and with no underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>ii. a flat or block retail tariff with no controlled load retail tariff and with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>iii. a flat or block retail tariff with a controlled load retail tariff and with no underlying distributor-based time</li> </ul>		As above

Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
	<p>of use , demand or flexible network tariff (excluding two-way network tariffs)</p> <ul style="list-style-type: none"> <li>iv. a flat or block retail tariff with a controlled load retail tariff and with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>v. a time of use or flexible retail tariff with no underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>vi. a time of use or flexible retail tariff with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>vii. a demand retail tariff with no underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>viii. a demand retail tariff with an underlying distributor-based time of use, demand or flexible network tariff (excluding two-way network tariffs)</li> <li>ix. any retail tariff, other than a two-way retail tariff, with an underlying distributor-based two-way network tariff</li> <li>x. a two-way retail tariff with an underlying distributor-based two-way network tariff</li> </ul> <p>c. Type 6 receiving:</p> <ul style="list-style-type: none"> <li>i. a flat or block retail tariff with no controlled load retail tariff</li> <li>ii. a flat or block retail tariff with a controlled load retail tariff.</li> </ul> <ul style="list-style-type: none"> <li>a. a flat or block retail tariff with no controlled load retail tariff</li> <li>b. a flat or block retail tariff with a controlled load retail tariff</li> <li>c. a time of use or flexible retail tariff with no underlying distributor based time of use or flexible network tariff</li> <li>d. a time of use or flexible retail tariff with an underlying distributor based time of use or flexible network tariff.</li> </ul>		
S2.9. Types of feed-in tariff structures for solar electricity customers	<p>Retailers are required to submit the total number of customers during the reporting period that had:</p> <ul style="list-style-type: none"> <li>a. received a Government- funded feed-in tariff</li> <li>b. received a retailer (only) funded feed-in tariff.</li> </ul> <p>For the purposes of this indicator (b) refers to customers that are not receiving any Government feed-in tariff</p>	-Quarterly, Jurisdictional	

Schedule 3





Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S3.1. Total number of calls to an operator	<p>Retailers are required to report the total number of calls to an operator or customer service officer, including sales calls and any abandoned calls to an operator during the reporting period for all participating jurisdictions, customer categories and fuel types.</p> <p>For the purposes of this indicator:</p> <ul style="list-style-type: none"> <li>• Where retailers use an automated or IVR telephone system, any calls abandoned before the customer opts to speak to an operator should be excluded.</li> <li>• National data can be reported under a single 'energy' category.</li> <li>• Where one retail group holds a number of individual national retailer authorisations and a common IVR telephone system is used, separate reporting is not required.</li> <li>• Regulated entities with only large customers and no IVR telephone system in place are not obliged to report on this indicator.</li> </ul>	<a href="#">Quarterly, Jurisdictional</a> <del>Annual (financial year)</del>	<p>Jurisdictional segmentation is not feasible and cannot be delivered. When customers call using mobiles, the IVR cannot determine the geographical location which they are calling from when using a mobile.</p> <p>Further, this data is not useful for business landlines as it may only provide insight into where the head office, accounts payable or procurement teams are located. Generally our customers are not necessarily located in the same jurisdiction as the NMI they are enquiring about.</p> <p><b>These indicators should be at national level only and multi-site business customers should be removed.</b></p>
S3.2. Number and percentage of calls forwarded to an operator that are answered within 30 seconds	<p>Retailers are required to report the number of calls forwarded to an operator that are answered within 30 seconds during the reporting period for all participating jurisdictions, customer categories and fuel types. (The corresponding percentage will be automatically calculated in the reporting template.)</p> <p>For the purposes of this indicator:</p> <ul style="list-style-type: none"> <li>• Where retailers use an automated or IVR telephone system, the time to answer is measured from when the caller chooses to speak to an operator. In the case of non-automated or IVR telephone systems, the time commences when the call is received by the switchboard. Where a retailer's call centre provides an option to call the customer back within a defined period of time (rather than have the customer wait on hold until the next operator is available), the call will be considered to have been answered within 30 seconds providing the caller selected the option within 30 seconds and the telephone call was returned by the call centre within the defined time</li> </ul>	<a href="#">Quarterly, Jurisdictional</a> <del>Annual (financial year)</del>	As above
	<p>those calls where the caller chooses to speak to an operator.</p> <ul style="list-style-type: none"> <li>• National data can be reported under a single 'energy' category.</li> <li>• Where one retail group holds a number of individual national retailer authorisations and a common IVR telephone system is used, separate reporting is not required.</li> <li>• Regulated entities with only large customers and no IVR telephone system in place are not obliged to report on this indicator.</li> </ul>	-	As above



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
<p>S3.5. Total number of customer contacts made through the retailer's customer service website portal</p>	<p>Retailers are required to submit the total number of contacts made by customers through the retailer's customer service website portal during the reporting period for all participating jurisdictions, customer categories and fuel types.</p> <p>For the purposes of this indicator:</p> <ul style="list-style-type: none"> <li>• A retailer's customer service website portal includes any digital channels of engagement utilised by the customer to contact their retailer such as retailer apps, online chat, and websites. This does not extend to customer interactions with the retailer via third party social media services.</li> <li>• National data can be reported under a single 'energy' category.</li> <li>• Where one retail group holds a number of individual national retailer authorisations, separate reporting is not required.</li> <li>• Regulated entities with only large customers and no IVR telephone system in place are not obliged to report on this indicator.</li> </ul>	<p><u>Quarterly, Jurisdictional</u></p>	<p>We do not think this indicator is necessary. Rather than imposing quarterly mandatory regulatory compliance reporting obligations on retailers, the AER could gain insights through other means - e.g. surveying as to whether these services are being utilised and offered by retailers. Aggregated multi-site large customers should also be excluded as they operate like a large customer; only multiple sites sizes are smaller.</p> <p><b>We recommend that this indicator be removed, or aggregated multi-site large customers be excluded.</b></p>
<p>S3.6. Complaints— – billing</p>	<p>Retailers are required to submit the total number of complaints made during the reporting period about billing for each of the following by:</p> <ol style="list-style-type: none"> <li>a. residential customers               <ol style="list-style-type: none"> <li>i. prices (including high bills)</li> <li>ii. overcharging (including incorrect meter readings)</li> <li>iii. billing errors (including estimated reads problems)</li> <li>iv. payment terms and methods</li> <li>v. failure to receive government rebates or an energy concession</li> <li>vi. failure to provide advance notice of changes to price and benefits</li> <li>vii. debt recovery practices</li> <li>viii. imminent and actual disconnection</li> <li>ix. other billing complaint (not specified).</li> </ol> </li> <li>b. small business customers.               <ol style="list-style-type: none"> <li>i. prices (including high bills)</li> <li>ii. overcharging (including incorrect meter readings)</li> <li>iii. billing errors (including estimated reads problems)</li> <li>iv. payment terms and methods</li> <li>v. failure to receive government rebates or an energy concession</li> <li>vi. failure to provide advance notice of changes to price and benefits</li> <li>vii. debt recovery practices</li> <li>viii. imminent and actual disconnection</li> <li>ix. other billing complaint (not specified).</li> </ol> </li> </ol>	<p><u>Quarterly, Jurisdictional</u></p>	<p>With multiple complaint categories, capturing and reporting this data will introduce complexity and subjective decision making on the type of complaint by frontline staff. Multiple topics can also be raised at the same time, which would result in a duplication of complaint records. This will lead to inaccuracy or be subject to interpretation. This further breakdown will introduce complexity for front line staff, whose focus should be on customer service delivery and not working through complaint categorisation.</p> <p>We are also concerned that this indicator will create additional complexity. The ESCV and AER performance reports regarding complaints are largely aligned. This change would deviate from the existing reporting significantly, resulting in cost and complexity to separate the data and train staff.</p> <p><b>We recommend complaint categories be simplified to:</b></p>



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
	<p>vi. For the purposes of this indicator data for each jurisdiction can be reported under a single 'energy' category.</p>		<ul style="list-style-type: none"> <li>• <a href="#">Billing (including High Bill/Low Bill, read issues, etc)</a></li> <li>• <a href="#">Pricing (including incorrect pricing + no notice of change of price/ benefits)</a></li> <li>• <a href="#">Payment terms and payment methods</a></li> <li>• <a href="#">Failure to receive Govt. Rebates + Concessions</a></li> <li>• <a href="#">Debt Recovery</a></li> <li>• <a href="#">Disconnection</a></li> <li>• <a href="#">Other Billing</a></li> </ul> <p>Ideally, we consider that each category would also provide more detail about the types of complaints the AER is seeking to capture.</p> <p>For business customers, <i>v. failure to receive government rebates or an energy concession</i> has a short-term driver for the current Govt support and should not be an enduring indicator built into the compliance reporting regime. Note businesses do not get concessions.</p>
<p>S3.7. Complaints— – energy marketing</p>	<p>Retailers are required to submit the total number of complaints made during the reporting period about energy marketing by:</p> <ol style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ol> <p>For the purposes of this indicator data for each jurisdiction can be reported under a single 'energy' category.</p>	<p><a href="#">Quarterly, Jurisdictional</a></p>	
<p>S3.8. Complaints — customer transfers</p>	<p>Retailers are required to submit the total number of complaints made during the reporting period about customer transfers by:</p> <ol style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ol> <p>For the purposes of this indicator data for each jurisdiction can be reported under a single 'energy' category.</p>	<p><a href="#">Quarterly, Jurisdictional</a></p>	



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
S3.9. Complaints-meter contestability – meter installation	Retailers are required to submit the total number of complaints made during the reporting period about the installation of a Type 4 or 4A meter by: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	<u>Quarterly, Jurisdictional</u>	We are unsure as to how this data is being used as it seems to not be reported publicly. Power of Choice reforms occurred in 2017. <b>We suggest these indicators are no longer relevant and should either:</b> <ul style="list-style-type: none"> <li>a. be removed, or;</li> <li>b. a general ‘metering installation’ complaint category be used instead.</li> </ul>
S3.10. Complaints – meter contestability – meter installation delay	Retailers are required to submit the total number of complaints made during the reporting period about the delayed installation of a Type 4 or 4A meter by: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	<u>Quarterly, Jurisdictional</u>	Suggest removal - As above
S3.11. Complaints-meter contestability – de-energisation	Retailers are required to submit the total number of complaints made during the reporting period about issues relating to the de-energisation of a Type 4 or 4A meter as a result of the installation process by: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	<u>Quarterly, Jurisdictional</u>	Suggest removal - As above
S3.12. Complaints-meter contestability – meter data	Retailers are required to submit the total number of complaints made during the reporting period about access to or presentation of meter data by: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	<u>Quarterly, Jurisdictional</u>	Suggest removal - As above
S3.13. Complaints-meter contestability – privacy	Retailers are required to submit the total number of complaints made during the reporting period about privacy issues in relation to Type 4 or 4A meters: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	<u>Quarterly, Jurisdictional</u>	Suggest removal - As above
S3.14. Complaints-meter contestability – cost	In each participating jurisdiction, retailers must report the number of complaints made in the reporting period about the cost of a Type 4 or 4A meter: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	<u>Quarterly, Jurisdictional</u>	Suggest removal - As above
S3.15. <u>Complaints – non- smart meters</u>	<u>Retailers are required to submit the total number of complaints made during the reporting period in relation non-smart meters (any meter type that is not Type 4 or 4A) by:</u> <ul style="list-style-type: none"> <li>a. <u>residential customers</u></li> <li>b. <u>small business customers.</u></li> </ul>	<u>Quarterly, Jurisdictional</u>	We query how this data is used and for what purpose. <b>Suggest removal and a simplified general metering installation category.</b>



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S3.16.Complaints <del>—</del> —other	Retailers are required to submit the total number of complaints made during the reporting period about other matters by: <ol style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ol> For the purposes of this indicator data for each jurisdiction can be reported under a single 'energy' category.	Quarterly, <a href="#">Jurisdictional</a>	
S3.17.Number of small customers <a href="#">withrepaying</a> an energy bill debt	Retailers are required to submit the total number of customers <a href="#">withrepaying</a> an energy bill debt as at the last calendar day of the reporting period <a href="#">for each of the following</a> by: <ol style="list-style-type: none"> <li>a. <a href="#">residential electricity customers (excluding hardship program customers):</a> <ol style="list-style-type: none"> <li>i. <a href="#">which has been outstanding for at least 30 calendar days but less than 60 calendar days</a></li> <li>ii. <a href="#">which has been outstanding for at least 60 calendar days but less than 90 calendar days</a></li> <li>iii. <a href="#">which has been outstanding for at least 90 calendar days or greater</a></li> </ol> </li> <li>b. <a href="#">residential gas customers (excluding hardship program customers):</a> <ol style="list-style-type: none"> <li>i. <a href="#">which has been outstanding for at least 30 calendar days but less than 60 calendar days</a></li> <li>ii. <a href="#">which has been outstanding for at least 60 calendar days but less than 90 calendar days</a></li> <li>iii. <a href="#">which has been outstanding for at least 90 calendar days or greater</a></li> </ol> </li> <li>c. <a href="#">small business electricity customers:</a> <ol style="list-style-type: none"> <li>i. <a href="#">which has been outstanding for at least 30 calendar days but less than 60 calendar days</a></li> <li>ii. <a href="#">which has been outstanding for at least 60 calendar days but less than 90 calendar days</a></li> <li>iii. <a href="#">which has been outstanding for at least 90 calendar days or greater</a></li> </ol> </li> <li>d. <a href="#">small business gas customers:</a> <ol style="list-style-type: none"> <li>i. <a href="#">which has been outstanding for at least 30 calendar days but less than 60 calendar days</a></li> <li>ii. <a href="#">which has been outstanding for at least 60 calendar days but less than 90 calendar days</a></li> <li>iii. <a href="#">which has been outstanding for at least 90 calendar days or greater</a></li> </ol> </li> </ol> <ol style="list-style-type: none"> <li>a. <del>residential customers (excluding hardship program customers)</del></li> <li>b. <del>small business customers.</del></li> </ol>	Quarterly, <a href="#">Distribution network (electricity)</a> , <a href="#">Jurisdictional (gas)</a>	<p>AER metrics are clear that this excludes 'hardship' customers. However, AER metrics should also exclude customers on 'alternative debt arrangements', 'payment arrangements' and 'BNPL' arrangements, as these are reported separately.</p> <p>The AER should also be clear on whether the intention is to count customers once or multiple times in each metric. Particularly due to monthly billing, a customer could have 30-60, 60-90 and 90+ day debt (s3.17 and 3.20). To prevent double counting, a customer should only be counted in their oldest category.</p> <p>In Shell Energy/ Powershop's initial submission we highlighted concerns with:</p> <ol style="list-style-type: none"> <li>1. The lack of clarity within this metric;</li> <li>2. The potential for reporting the same customer under various different metrics where it may be misleading to do so.</li> </ol> <p>Firstly, a customer that is billed monthly and unable to pay will very likely have debt that falls into more than one category (i.e. 30-60 day, 60-90 day, and 90+ day debt)</p> <p>The current intent of this metric is unclear and open to various interpretations. It is Powershop's view that a customer should only be counted</p>



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments										
			<p>once within this metric under their oldest debt 'category' with their debt from other (earlier) categories aggregated under their oldest debt.</p> <p>For example, a customer's debt aging may look like this:</p> <table border="1" data-bbox="1753 480 2163 592"> <thead> <tr> <th></th> <th>Total Debt</th> <th>30-60 days</th> <th>60-90 days</th> <th>90+ days</th> </tr> </thead> <tbody> <tr> <td>Customer A</td> <td>\$300</td> <td>\$100</td> <td>\$100</td> <td>\$100</td> </tr> </tbody> </table> <p>For the purpose of S3.17 it is Powershop's view that this customer should be counted once (under 90+ days) and for the purpose of S3.20 this customer has \$300 of debt.</p> <p>Lastly, the AER should make attempts to align to the ESCV's performance reporting methodologies.</p> <p>Additionally, the proposed definitions allow for a customer to be counted multiple times. For example, a customer with 'energy bill debt' (counted in S3.15), may also be a customer on a 'payment plan' (S.3.22 &amp; S3.16), and may also be counted as a Centrepay customer (counted S3.20). With the proposed addition of new metrics and more complex metrics, each proposed metric discussed below, Powershop's view is that there is importance in ensuring that each metric is mutually exclusive. This ensures that a customer is not 'double counted' where it may not be appropriate to do so.</p> <p>The ESC's updated performance reporting guidelines provides clarity to retailers on this. For example, the ESC metric 'other residential/ small business accounts with arrears' (AS120, AS121), akin to AER's 'customers repaying an energy bill</p>		Total Debt	30-60 days	60-90 days	90+ days	Customer A	\$300	\$100	\$100	\$100
	Total Debt	30-60 days	60-90 days	90+ days									
Customer A	\$300	\$100	\$100	\$100									



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
			<p>debt', is clear that a 'other' customer is one that is not receiving standard/ tailored assistance (akin to payment plan or hardship) or a customer with a deferred payment (akin to 'alternative debt arrangements'.) Following this standard would allow for consistency between regulatory frameworks and in Powershop's view a better view of retailer performance.</p> <p>Powershop would also benefit for clarity for when former customers should, and should not, be counted within performance reporting metrics. For example, 'customers repaying an energy bill debt' is explicitly clear that a former customer is excluded from this metric, however, the same clarity is not provided for 'payment plan' customers.</p>
S3.18. Nature of payment plan – fortnightly amounts	<p>Retailers are required to submit the total number of customers (excluding hardship <a href="#">program</a> customers) on payment plans as at the last calendar day of the reporting period for each of the following:</p> <ul style="list-style-type: none"> <li>a. Electricity residential customers paying               <ul style="list-style-type: none"> <li>i. less than \$50 per fortnight</li> <li>ii. \$50 to less than \$100 per fortnight</li> <li>iii. \$100 to less than \$200 per fortnight</li> <li>iv. \$200 or more per fortnight.</li> </ul> </li> </ul>	Quarterly, <a href="#">Jurisdictional</a>	
	<ul style="list-style-type: none"> <li>b. Electricity small business customers paying               <ul style="list-style-type: none"> <li>i. less than \$50 per fortnight</li> <li>ii. \$50 to less than \$100 per fortnight</li> <li>iii. \$100 to less than \$200 per fortnight</li> <li>iv. \$200 or more per fortnight.</li> </ul> </li> <li>c. Gas residential customers paying               <ul style="list-style-type: none"> <li>i. less than \$50 per fortnight</li> <li>ii. \$50 to less than \$100 per fortnight</li> <li>iii. \$100 to less than \$200 per fortnight</li> <li>iv. \$200 or more per fortnight.</li> </ul> </li> <li>d. Gas small business customers paying               <ul style="list-style-type: none"> <li>i. less than \$50 per fortnight</li> <li>ii. \$50 to less than \$100 per fortnight</li> <li>iii. \$100 to less than \$200 per fortnight</li> </ul> </li> </ul>		<p>This should be restricted to small single customers only, not multi-site.</p>



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
	iv. \$200 or more per fortnight.		
S3.19. Nature of payment plan – average fortnightly amounts	Retailers are required to submit the average fortnightly amount customers on payment plans are paying, as at the last calendar day of the reporting period for each of the following: a. Electricity: i. residential customers ii. small business customers. b. Gas: i. residential customers ii. small business customers.	Quarterly, Jurisdictional	As above
S3.20. Average amount of energy bill debt for small customers	Retailers are required to report submit the average amount of energy bill debt as at the last calendar day of the reporting period for each of the following: a. residential electricity customers (excluding hardship program customers): i. which has been outstanding for at least 30 calendar days but less than 60 calendar days	Quarterly, Jurisdictional	As per 3.17 – similar comments - AER metrics are clear that this excludes 'hardship' customers. <b>However, we consider that AER metrics should also exclude customers on 'alternative debt arrangements', 'payment arrangements' and 'BNPL' arrangements, with debts for these customers all reported separately.</b> AER should also be clear on whether the intention is to count customers once or multiple times in each metric. Particularly due to monthly billing, for S3.17 and S3.20, a customer could have 30-60, 60-90 and 90+ day debt. The intention should not be to double count. i.e. the customer is only counted in their oldest debt category.
	ii. <a href="#">which has been outstanding for at least 60 calendar days but less than 90 calendar days</a> iii. <a href="#">which has been outstanding for at least 90 calendar days or greater</a> b. <a href="#">residential gas customers (excluding hardship program customers);</a>		Additionally, for S3.20 average debt, should all debt be counted. I.e. For a customer with 90+ day debt, should all debt (i.e. 30-60) be included, or just the 90 day+?





Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
	<ul style="list-style-type: none"> <li>i. <u>which has been outstanding for at least 30 calendar days but less than 60 calendar days</u></li> <li>ii. <u>which has been outstanding for at least 60 calendar days but less than 90 calendar days</u></li> <li>iii. <u>which has been outstanding for at least 90 calendar days or greater</u></li> <li>c. <u>small business electricity customers:</u> <ul style="list-style-type: none"> <li>i. <u>which has been outstanding for at least 30 calendar days but less than 60 calendar days</u></li> <li>ii. <u>which has been outstanding for at least 60 calendar days but less than 90 calendar days</u></li> <li>iii. <u>which has been outstanding for at least 90 calendar days or greater</u></li> </ul> </li> <li>d. <u>small business gas customers:</u> <ul style="list-style-type: none"> <li>i. <u>which has been outstanding for at least 30 calendar days but less than 60 calendar days</u></li> <li>ii. <u>which has been outstanding for at least 60 calendar days but less than 90 calendar days</u></li> <li>iii. <u>which has been outstanding for at least 90 calendar days or greater.</u></li> </ul> </li> <li>a. <del>residential customers (excluding hardship program customers)</del></li> <li>b. <del>small business customers.</del></li> </ul>		<p>This should be restricted to small single customers only, not multi-site</p>
<p>S3.21. <u>Number of customers on a deferred debt or alternative debt arrangement</u></p>	<p><u>Retailers are required to submit the total number of customers on a deferred debt arrangement or alternative debt arrangement as at the last calendar day of the reporting period for each of the following:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity:</u> <ul style="list-style-type: none"> <li>i. <u>residential customers</u></li> <li>ii. <u>small business customers</u></li> </ul> </li> <li>b. <u>Gas:</u> <ul style="list-style-type: none"> <li>i. <u>residential customers</u></li> <li>ii. <u>small business customers.</u></li> </ul> </li> </ul> <p><u>For the purposes of this indicator, 'deferred debt arrangements' and 'alternative debt arrangements' are those not reported through the payment plan, hardship program or energy debt indicators. Many retailers allow customers to defer bill payments or utilise alternative debt arrangements rather than placing customers on payment plans or hardship programs.</u></p>	<p><u>Quarterly, Jurisdictional</u></p>	<p>Small businesses do not have access to hardship assistance and there is no specific requirements around the types of payment plans that may be entered into. Small business should not be captured here as it is captured under general obligations under 3.19, 3.22.</p>



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
S3.22. Total amount of deferred debt or alternative debt arrangements	<p><u>Retailers are required to submit the total amount of deferred debt arrangements or alternative debt as at the last calendar day of the reporting period for each of the following:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity:</u> <ul style="list-style-type: none"> <li>i. <u>residential customers</u></li> <li>ii. <u>small business customers</u></li> </ul> </li> <li>b. <u>Gas:</u> <ul style="list-style-type: none"> <li>i. <u>residential customers</u></li> <li>ii. <u>small business customers.</u></li> </ul> </li> </ul> <p><u>For the purposes of this indicator, 'deferred debt arrangements' and 'alternative debt arrangements' are those not reported through the payment plan, hardship program or energy debt indicators. Many retailers allow customers to defer bill payments or utilise alternative debt arrangements rather than placing customers on payment plans or hardship programs.</u></p>	<u>Quarterly, Jurisdictional</u>	<p>As above</p> <p>Also, we request clarification on:</p> <ul style="list-style-type: none"> <li>a. Whether 'average deferred' rather than total amount deferred would be acceptable; and</li> <li>b. If the customer is making a partial payment, should the whole amount be counted as deferred, or only the amount of the partial payment?</li> </ul>
S3.23.Amount of residential customer energy bill debt	<p><u>Retailers are required to report submit the total number of residential customers (excluding hardship program customers) with energy bill debt, which has been outstanding for at least 90 calendar days or greater, as at the last calendar day of the reporting period that is:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity</u> <ul style="list-style-type: none"> <li>i. <u>over \$500 but less than \$1500</u></li> <li>ii. <u>over \$1500 but less than \$2500</u></li> <li>iii. <u>over \$2500.</u></li> </ul> </li> <li>b. <u>Gas</u> <ul style="list-style-type: none"> <li>i. <u>over \$500 but less than \$1500</u></li> <li>ii. <u>over \$1500 but less than \$2500</u></li> <li>iii. <u>over \$2500.</u></li> </ul> </li> </ul>	<u>Quarterly, Jurisdictional</u>	Request clarification on whether <i>all</i> debt be counted. i.e. For a customer with 90+ day debt, should all debt (i.e. 30-60) be included, or just the 90 day+?



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S3.24. Number of residential customers that have energy bill debt	<p><u>Retailers are required to report submit the total number of customers (excluding hardship program customers not on a hardship program) who have accrued an energy bill debt, which has been outstanding for at least 90 calendar days or greater, as at the last calendar day of the reporting period that is:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity</u> <ul style="list-style-type: none"> <li>i. <u>over \$1000 but less than \$1500 where the debt is more than 12 months old but less than 24</u></li> <li>ii. <u>over \$1000 but less than \$1500 where the debt is more than 24 months old</u></li> <li>iii. <u>over \$1500 but less than \$2500 where the debt is more than 12 months old but less than 24</u></li> <li>iv. <u>over \$1500 but less than \$2500 where the debt is more than 24 months old</u></li> <li>v. <u>over \$2500 where the debt is more than 12 months old but less than 24</u></li> <li>vi. <u>over \$2500 where the debt is more than 24 months old.</u></li> </ul> </li> <li>b. <u>Gas</u> <ul style="list-style-type: none"> <li>i. <u>over \$1000 but less than \$1500 where the debt is more than 12 months old but less than 24</u></li> <li>ii. <u>over \$1000 but less than \$1500 where the debt is more than 24 months old</u></li> <li>iii. <u>over \$1500 but less than \$2500 where the debt is more than 12 months old but less than 24</u></li> <li>iv. <u>over \$1500 but less than \$2500 where the debt is more than 24 months old</u></li> <li>v. <u>over \$2500 where the debt is more than 12 months old but less than 24</u></li> <li>vi. <u>over \$2500 where the debt is more than 24 months old.</u></li> </ul> </li> </ul> <p><u>For the purposes of this indicator 'energy bill debt' is the debt outstanding to the retailer for the period of time described in the indicator sub-category.</u></p>	<u>Quarterly, Jurisdictional</u>	Request clarification on whether <i>all</i> debt will be counted. i.e. For a customer with 90+ day debt, should all debt (i.e. 30-60) be included, or just the 90 day+?
S3.25. Number of residential customers using Centrepay	<p><u>Retailers are required to report submit the total number of residential customers that are using Centrelink's Centrepay to pay their energy bills during each reporting period for:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity customers</u></li> <li>b. <u>Gas customers.</u></li> </ul>	<u>Quarterly, Jurisdictional</u>	



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S3.26. Number of residential customers using buy now pay later services	<p><u>Retailers are required to submit the total number of residential customers that are using a buy now pay later service to pay their energy bills during each reporting period for:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity customers</u></li> <li>b. <u>Gas customers.</u></li> </ul>	<u>Quarterly, Jurisdictional</u>	
S3.27. Number of residential customers that have missed one or more pay on time (or conditional) discounts as a result of late payment	<p><u>Retailers are required to submit the total number of customers during the reporting period that have missed receiving pay on time (or conditional) discounts due to making a late or missed payment for each of the following:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity:</u> <ul style="list-style-type: none"> <li>i. <u>residential customers</u></li> <li>ii. <u>small business customers.</u></li> </ul> </li> <li>b. <u>Gas:</u> <ul style="list-style-type: none"> <li>i. <u>residential customers</u></li> <li>ii. <u>small business customers.</u></li> </ul> </li> </ul>	<u>Quarterly, Jurisdictional</u>	<p>Recommend removing small business customers as this looks to be an error.</p>
S3.28. Number of Small residential customers on a payment plan	<p><u>Retailers are required to report submit the total number of residential customers (excluding hardship program customers) that are on a payment plan as at the last calendar day of the reporting period for each of the following:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity</u> <ul style="list-style-type: none"> <li>i. <u>residential customers (excluding hardship program customers)</u></li> <li>ii. <u>small business customers.</u></li> </ul> </li> <li>b. <u>Gas.</u> <ul style="list-style-type: none"> <li>i. <u>residential customers (excluding hardship program customers)</u></li> <li>ii. <u>small business customers.</u></li> </ul> </li> </ul> <p><u>For the purposes of this indicator, the report should include customers in embedded networks and customers identified as affected customers on payment plans captured within indicators S6.4. and S6.14.</u></p>	<p><u>Quarterly.</u> <u>Distribution network (electricity).</u> <u>Jurisdictional (gas)</u></p>	<p>We consider that this is potentially a double up with debt arrangements above under 3.22. We recommend removing small business requirements from here which appears to be an error as it is captured elsewhere.</p>
S3.29. Number of residential customers who had their payment plans cancelled for non-payment	<p><u>Retailers are required to report submit the total number of residential customers (excluding hardship program customers) who had their payment plan cancelled by the retailer for non-payment during the reporting period for:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity</u></li> <li>b. <u>Gas.</u></li> </ul>	<u>Quarterly, Jurisdictional</u>	



Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
S3.30.Number of residential customers with two or more payment plans cancelled for non-payment in the last 12 months	<p><u>Retailers are required to report submit the total number of residential customers (excluding hardship program customers) who had their payment plan cancelled by the retailer for non-payment during the reporting period and who also had at least one other payment plan cancelled by the retailer for non- payment in the previous 12 months, for:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity</u></li> <li>b. <u>Gas</u></li> </ul>	<u>Quarterly, Jurisdictional</u>	
S3.31.Number of residential customers who successfully completed their payment plan	<p><u>Retailers are required to report submit the total number of residential customers (excluding hardship program customers) who successfully completed their payment plan, during the reporting period for:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity</u></li> <li>b. <u>Gas</u></li> </ul>	<u>Quarterly, Jurisdictional</u>	
S3.32. Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery	<p><u>Retailers are required to submit the total number of current or previous residential customers during the reporting period who were referred to an external credit collection agency for the purposes of debt recovery.</u></p> <ul style="list-style-type: none"> <li>a. <u>for electricity bill debt</u></li> <li>b. <u>for gas bill debt.</u></li> </ul>	<u>Quarterly, Distribution network (electricity), Jurisdictional (gas)</u>	
S3.33. Number of residential customers who have been referred to an external credit collection agency for the purposes of debt recovery – amount of debt	<p><u>Retailers are required to submit the total number of current or previous residential customers during the reporting period who were referred to an external credit collection agency for the purposes of debt recovery, where the energy bill debt is:</u></p> <ul style="list-style-type: none"> <li>a. <u>Electricity</u> <ul style="list-style-type: none"> <li>i.<u>up to \$500</u></li> <li>ii.<u>over \$500 but less than \$1500</u></li> <li>iii.<u>over \$1500 but less than \$2500</u></li> <li>iv.<u>over \$2500.</u></li> </ul> </li> <li>b. <u>Gas</u> <ul style="list-style-type: none"> <li>i.<u>up to \$500</u></li> <li>ii.<u>over \$500 but less than \$1500</u></li> <li>iii.<u>over \$1500 but less than \$2500</u></li> <li>iv.<u>over \$2500.</u></li> </ul> </li> </ul>	<u>Quarterly, Jurisdictional</u>	

Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
S3.34. <a href="#">Average amount of debt for residential customers referred to an external credit collection agency</a>	<p>Retailers are required to submit the average amount of debt for current or previous residential customers who were referred to an external credit collection agency for the purposes of debt recovery during the reporting period, for:</p> <ol style="list-style-type: none"> <li>a. <a href="#">Electricity</a></li> <li>b. <a href="#">Gas</a></li> </ol>	<a href="#">Quarterly, Jurisdictional</a>	
S3.35. Number of residential customers who have been credit defaulted – credit rating	<p>Retailers are required to submit the total number of current or previous residential customers during the reporting period who were referred to a credit collection agency, or through an internal credit collection process, for the purposes of debt recovery, for each of the following:</p> <ol style="list-style-type: none"> <li>a. <a href="#">Electricity</a> <ol style="list-style-type: none"> <li>i. <a href="#">where a credit default was applied against their name for debt associated with the retailer</a></li> <li>ii. <a href="#">where a credit default listing was reversed for the debt associated with the retailer.</a></li> </ol> </li> <li>b. <a href="#">Gas</a> <ol style="list-style-type: none"> <li>i. <a href="#">where a credit default was applied against their name for debt associated with the retailer</a></li> <li>ii. <a href="#">where a credit default listing was reversed for the debt associated with the retailer.</a></li> </ol> </li> </ol> <p><u>For the purposes of the indicator:</u></p> <ul style="list-style-type: none"> <li>• <a href="#">if a customer has been defaulted for multiple debts each must be recorded separately</a></li> <li>• <a href="#">if a customer has had separate listings reversed, each must be recorded separately.</a></li> </ul>	<a href="#">Quarterly, Jurisdictional</a>	

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Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
S3.43. Number of customers disconnected for non- payment	<p>Retailers are required to submit the total number of customers during the reporting period disconnected for non-payment for each of the following:</p> <ol style="list-style-type: none"> <li>a. <a href="#">Electricity</a> <ol style="list-style-type: none"> <li>i. <a href="#">residential customers</a></li> <li>ii. <a href="#">small business customers</a></li> <li>iii. <a href="#">hardship program customers</a></li> <li>iv. <a href="#">energy concession customers</a></li> </ol> </li> </ol>	<p>Quarterly,  <a href="#">Distribution network (electricity),</a>  <a href="#">Jurisdictional (gas)</a></p>	<p>Shell Energy does not see the rationale for reporting at a distribution level - see previous comments.</p> <p><b>Multi-site business customers should be removed.</b></p>



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
	<ul style="list-style-type: none"> <li>v.residential customers who have been on a payment plan in the previous 12 months</li> <li>vi.residential customers who have been disconnected for non-payment on more than one occasion in the previous 24 months.</li> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.hardship program customers</li> <li>iv.energy concession customers</li> <li>v.residential customers who have been on a payment plan in the previous 12 months</li> <li>vi.residential customers who have been disconnected for non-payment on more than one occasion in the previous 24 months.</li> </ul> </li> </ul>		
S3.44.Number of customers reconnected within 7 days of disconnection	Retailers are required to submit the total number of customers during the reporting period reconnected in the same name and address within seven days of disconnection for non-payment for each of the following: <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.hardship program customers</li> <li>iv.energy concession customers</li> <li>v.residential customers who have been on a payment plan in the previous 12 months</li> <li>vi.residential customers who have been disconnected for non-payment on more than one occasion in the previous 24 months.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.hardship program customers</li> </ul> </li> </ul>	Quarterly, Jurisdictional	See above comments
S3.43.Number of customers disconnected for non- payment	Retailers are required to submit the total number of customers during the reporting period disconnected for non-payment for each of the following: <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.hardship program customers</li> <li>iv.energy concession customers</li> <li>v.residential customers who have been on a payment plan in the previous 12 months</li> <li>vi.residential customers who have been disconnected for non-payment on more than one occasion in the previous 24 months.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers</li> <li>iii.hardship program customers</li> <li>iv.energy concession customers</li> </ul> </li> </ul>	Quarterly, Distribution network (electricity), Jurisdictional (gas)	See above comments



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
	v.residential customers who have been on a payment plan in the previous 12 months vi.residential customers who have been disconnected for non-payment on more than one occasion in the previous 24 months.		
	iv.energy concession customers v.residential customers who have been on a payment plan in the previous 12 months vi.residential customers who have been disconnected for non-payment on more than one occasion in the previous 24 months.		See above comments
Total number of residential customers reconnected in the same name at the same address	Retailers are required to submit the total number of customers reconnected in the same name and address in the reporting period for: a. Electricity b. Gas.	Quarterly	See above comments
S3.45. Total number of customers with debts at time of disconnection	Retailers are required to submit the total number of customers disconnected for non-payment during the reporting period with debts in the following ranges at the time of disconnection for each of the following: a. Electricity residential customers i.less than \$500 ii.over \$500 but less than \$1500 iii.over \$1500 but less than \$2500 iv.more than \$2500. b. Electricity small business customers i.less than \$500 ii.over \$500 but less than \$1500 iii.over \$1500 but less than \$2500 iv.more than \$2500. c. Gas residential customers i.less than \$500 ii.over \$500 but less than \$1500 iii.over \$1500 but less than \$2500 iv.more than \$2500. d. Gas small business customers i.less than \$500 ii.over \$500 but less than \$1500 iii.over \$1500 but less than \$2500 iv.more than \$2500.	Quarterly, Jurisdictional	See above comments  Further, we would like clarification on what the rationale is that the collection of this data will serve.
S3.46. Average amount of debt at time of disconnection	Retailers are required to submit the average amount of debt of customers disconnected for non- payment during the reporting period, for each of the following: a. Electricity i.residential customers ii. small business customers.	Quarterly, Jurisdictional	See above comments





Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
	<ul style="list-style-type: none"> <li>b. Gas               <ul style="list-style-type: none"> <li>i.residential customers</li> <li>ii.small business customers.</li> </ul> </li> </ul>		

Concessions

Indicator	Information and data required	Relevant reporting period/ <u>basis</u>	Shell Energy comments
S3.47.Number of energy concession customers	Number of residential customers that are recorded by the retailer as being entitled to receive an energy concession, where the concession is administered or delivered by the retailer as at the last calendar day of the reporting period for: <ul style="list-style-type: none"> <li>a. Electricity</li> <li>b. Gas.</li> </ul>	Quarterly, <u>Jurisdictional</u>	
S3.48.Number of security deposits held by retailers for residential and small business customers	Number of security deposits held by retailers as at the end of each quarter in the reporting period for: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	Quarterly, JurisdictionalAnnual (financial year)	
S3.49.Aggregate value of security deposits held by retailers for residential and small business customers	Aggregate value (\$) of security deposits held by retailers as at the end of each quarter in the reporting period for: <ul style="list-style-type: none"> <li>a. residential customers</li> <li>b. small business customers.</li> </ul>	Quarterly, JurisdictionalAnnual (financial year)	

Hardship



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S4.1. Number of customers on a retailer's hardship program	Retailers are required to submit the total number of customers on a retailer's hardship program as at the last calendar day of the reporting period for <del>each of the following</del> : a. Electricity hardship <a href="#">program</a> customers b. Gas hardship <a href="#">program</a> customers.	- Quarterly, <a href="#">Distribution network (electricity)</a> , <a href="#">Jurisdictional (gas)</a>	
S4.2. Type of contract for hardship program customers	Retailers are required to submit the total number of hardship <a href="#">program</a> customers as at the last day calendar of the reporting period for each of the following: a. Electricity hardship <a href="#">program</a> customers i. on a standard retail contract ii. on a market retail contract. b. Gas <a href="#">hardship program</a> customers i. on a standard retail contract ii. on a market retail contract.	- Quarterly, <a href="#">Jurisdictional</a>	
S4.3. Average debt upon entry into the hardship program	Retailers are required to <del>report</del> <del>submit</del> the average energy bill debt for customers who entered the hardship program during the reporting period for: a. Electricity hardship <a href="#">program</a> customers b. Gas hardship <a href="#">program</a> customers.  For the purposes of this indicator energy bill debt is at the time of entry into the hardship program.	- Quarterly, <a href="#">Jurisdictional</a>	
S4.4. Levels of debt of customers entering the hardship program	Retailers are required to submit the total number of customers who entered the hardship program during the reporting period, with an energy bill debt in the following ranges: a. Electricity residential <a href="#">hardship program</a> customers i. less than \$500 ii. over \$500 but less than \$1500 iii. over \$1500 but less than \$2500 iv. over \$2500 but less than \$3500 v. more than \$3500.	- Quarterly, <a href="#">Jurisdictional</a>	
	b. Gas residential hardship program customers i. less than \$500 ii. over \$500 but less than \$1500 iii. over \$1500 but less than \$2500 iv. over \$2500 but less than \$3500 v. more than \$3500. For the purposes of this indicator:		



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
	<ul style="list-style-type: none"> <li>▪ Eenergy bill debt is at the time of entry into the hardship program.</li> <li>▪ Customers who entered the hardship program with no energy bill debt should be included in the 'less than \$500' subcategories.</li> </ul>		
S4.5. Average debt of hardship program customers	<p>Retailers are required to submit the average energy bill debt of hardship program customers, as at the last calendar day of the relevant reporting period for:</p> <ol style="list-style-type: none"> <li>a. Electricity hardship program customers' average energy bill debt</li> <li>b. Gas hardship program customers' average energy bill debt.</li> </ol> <p>For the purposes of this indicator the calculation of the average energy bill debt amount must not include hardship program customers in credit</p>	Quarterly, Jurisdictional	
S4.6. Age of debt for customers on the hardship program	<p>Retailers are required to submit the age of the oldest energy bill debt for hardship program customers who entered the hardship program during the reporting period, as at the last calendar day of the reporting period for each of the following:</p> <ol style="list-style-type: none"> <li>a. Electricity               <ol style="list-style-type: none"> <li>i. less than 6 months</li> <li>ii. over 6 months but less than 12 months</li> <li>iii. over 12 months but less than 2 years</li> <li>iv. 2 years or more.</li> </ol> </li> <li>b. Gas               <ol style="list-style-type: none"> <li>i. less than 6 months</li> <li>ii. over 6 months but less than 12 months</li> <li>iii. over 12 months but less than 2 years</li> <li>iv. 2 years or more.</li> </ol> </li> </ol>	Quarterly, Jurisdictional	
S4.7. Number of hardship program customers receiving energy concessions	<p>Number of hardship program customers that are recorded by the retailer as being entitled to receive an energy concession, where the concession is administered or delivered by the retailer as at the last calendar day of the reporting period for:</p> <ol style="list-style-type: none"> <li>a. Electricity hardship program customers</li> <li>b. Gas hardship program customers.</li> </ol>	Quarterly, Jurisdictional	

Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S4.8. Number of hardship program customers on types of payment plans	<p>Retailers are required to submit the total number of hardship program customers making the following categories of payment plans, as at the last calendar day of the reporting period:</p> <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i. less than usage costs</li> <li>ii. meeting usage costs</li> <li>iii. meeting usage costs and expected to clear arrears within 12 months</li> <li>iv. meeting usage costs and expected to clear arrears over 12 months.</li> <li>v. meeting usage costs with no arrears</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i. less than ongoing usage costs</li> <li>ii. meeting usage costs</li> <li>iii. meeting usage costs and expected to clear arrears within 12 months</li> <li>iv. meeting usage costs and expected to clear arrears over 12 months.</li> <li>v. meeting usage costs with no arrears.</li> </ul> </li> </ul> <p>For the purposes of this indicator usage costs is the amount the customer is billed for usage and supply charges.</p>	Quarterly, Jurisdictional	
S4.9. Payment methods of hardship program customers	<p>Retailers are required to submit the total number of hardship program customers making payments using each of the following payment methods during the reporting period:</p> <ul style="list-style-type: none"> <li>a. Payment plan (excluding those who make their payment plan payments using Centrepay)</li> <li>b. Centrepay</li> <li>c. Prepayment meter (PPM)</li> <li>d. Australia Post</li> <li>e. Direct debit</li> <li>f. Buy now pay later service</li> <li>g. Any other payment method.</li> </ul>	Quarterly, Jurisdictional	
S4.10. Number of customers entering the hardship program	<p>Retailers are required to submit the total number of customers during the reporting period who entered the hardship program:</p> <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i. after the customer self identified as being in hardship</li> <li>ii. via a financial counsellor referral (or external agent acting on behalf of the customer in a professional capacity)</li> <li>iii. via a retailer referral.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i. after the customer self identified as being in hardship</li> <li>ii. via a financial counsellor referral (or external agent acting on behalf of the customer in a professional capacity)</li> <li>iii. via a retailer referral.</li> </ul> </li> </ul> <p>For the purposes of this indicator:</p>	Quarterly, Jurisdictional	

Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
	<ul style="list-style-type: none"> <li>• Self-identified means a residential customer who informs their retailer that they are experiencing payment difficulties due to hardship.</li> <li>• Financial counsellor referral means a residential customer who has been referred by a financial counsellor or other external agent acting on behalf of the customer in a professional capacity.               <ul style="list-style-type: none"> <li>○ Retailer referral means a residential customer who has been identified by a retailer as a customer experiencing payment difficulties due to hardship. This would be, but not limited 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.</li> </ul> </li> </ul>		
S4.11. Number of customers exiting the hardship program	<p>Retailers are required to submit the total number of customers during the reporting period who exited the hardship program for each of the following:</p> <p>a. Electricity</p> <ul style="list-style-type: none"> <li>i. after successfully completing the hardship program or exiting with the agreement of the retailer</li> <li>ii. as they were excluded or removed from the program for non-compliance (for example, where the</li> </ul>	Quarterly, Jurisdictional	
	<p>customer did not make the required payments, or where they failed to contact the retailer. This should also include those hardship program customers who leave the program because they feel they are not able to meet the program requirements or payments requested by the retailer)</p> <p>iii. switched, transferred or left the retailer.</p> <p>b. Gas</p> <ul style="list-style-type: none"> <li>i. after successfully completing the hardship program or exiting with the agreement of the retailer</li> <li>ii. as they were excluded or removed from the program for non-compliance (for example, where the customer did not make the required payments, or where they failed to contact the retailer. This should also include those hardship program customers who leave the program because they feel they are not able to meet the program requirements or payments requested by the retailer)</li> <li>iii. switched, transferred or left the retailer.</li> </ul>		
S4.12. Length of customer participation in a hardship program	<p>Retailers are required to submit the total number of hardship program customers that have continuously received assistance through the hardship program, as at the last calendar day of the reporting period for each of the following:</p> <p>a. Electricity</p> <ul style="list-style-type: none"> <li>i. under 1 year</li> <li>ii. over 1 year to under 2 years</li> <li>iii. more than 2 years.</li> </ul>	Quarterly, Jurisdictional	

Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
	<ul style="list-style-type: none"> <li>b. Gas               <ul style="list-style-type: none"> <li>i. under 1 year</li> <li>ii. over 1 year to under 2 years</li> <li>iii. more than 2 years.</li> </ul> </li> </ul>		
S4.13. Number of customers excluded from the hardship program	<p>Retailers are required to submit the total number of customers that have been excluded from participating in the hardship program, as at the last calendar day of the reporting period for each of the following:</p> <ul style="list-style-type: none"> <li>a. Electricity               <ul style="list-style-type: none"> <li>i. the customer did not agree to the suggested payment plan</li> <li>ii. the retailer was unable to contact the customer</li> <li>iii. the customer did not make the requested payments</li> <li>iv. it was more appropriate to return the customer to a normal payment plan or billing cycle</li> <li>v. other.</li> </ul> </li> <li>b. Gas               <ul style="list-style-type: none"> <li>i. the customer did not agree to the suggested payment plan</li> <li>ii. the retailer was unable to contact the customer</li> <li>iii. the customer did not make the requested payments</li> <li>iv. it was more appropriate to return the customer to a normal payment plan or billing cycle</li> <li>v. other.</li> </ul> </li> </ul>	Quarterly, Jurisdictional	
S4.14. Assistance provided to hardship program customers	<p>Retailers are required to submit data on the types of assistance provided to hardship program customers throughout the reporting period. Where possible retailers should provide quantitative data on the various types of initiatives and assistance provided to hardship program customers in the reporting period, including:</p> <ul style="list-style-type: none"> <li>a. Number of electricity hardship program customers that:               <ul style="list-style-type: none"> <li>i. were transferred to a different market retail contract</li> <li>ii. were transferred from a standard retail contract to a market retail contract</li> <li>iii. received concessions that they were not otherwise receiving</li> <li>iv. received a rebate that they were not otherwise receiving</li> <li>v. received new appliances through appliance replacement programs</li> <li>vi. received incentive payments or discounts</li> <li>vii. received debt reductions</li> <li>viii. had onsite energy audits completed by the retailer (or third party agency at the request of the retailer)</li> <li>ix. received reimbursement/credit of late payment fees</li> <li>x. received reimbursement/credit of lost pay on time discounts.</li> </ul> </li> <li>b. Number of gas hardship program customers that:               <ul style="list-style-type: none"> <li>i. were transferred to a different market retail contract</li> <li>ii. were transferred from a standard retail contract to a market retail contract</li> <li>iii. received concessions that they were not otherwise receiving</li> <li>iv. received a rebate that they were not otherwise receiving</li> </ul> </li> </ul>	Quarterly, Jurisdictional	



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
	<p>v. received new appliances through appliance replacement programs  vi. received incentive payments or discounts  vii. received debt reductions  viii. had onsite energy audits completed by the retailer (or third party agency at the request of the retailer)  ix. received reimbursement/credit of late payment fees  x. received reimbursement/credit of lost pay on time discounts.</p> <p>For the purposes of the indicator</p> <ul style="list-style-type: none"> <li>• individual customers must be counted in each category where assistance was provided</li> <li>• each initiative or assistance provided must be received by a customer to be counted.</li> </ul>		
S4.15. Disconnection of previous hardship program customers	<p>Retailers are required to report submit the number of residential customers disconnected for non-payment during the reporting period, who successfully completed the hardship program, or exited by agreement with the retailer, in the previous 12 months for:</p> <p>a. Electricity  b. Gas.</p> <p>For the purposes of the indicator, 'previous 12 months' is from the date of disconnection.</p>	Quarterly, Jurisdictional	
S4.16. Reconnection of previous hardship program customers	<p>Retailers are required to report submit the number of residential customers who were reconnected in the same name and at the same address within seven days of disconnection for non-payment during the reporting period who successfully completed the hardship program, or exited by agreement with the retailer, in the previous 12 months, for:</p> <p>a. Electricity  b. Gas.</p>	Quarterly, Jurisdictional	

Schedule 6

[Definitions](#)

Embedded network:

means a privately owned energy network, connected to the distribution network by a metering installation comprising one or more meters (a gate meter). Energy is delivered to customers via the private network. For the purposes of this reporting, a private embedded network connected to another privately owned network is also considered an embedded network.



means a contract between an authorised retailer and a customer in an embedded network only for the sale of the customer's energy, and not including network usage or other types of services provided by the embedded network operator and/or manager.

Off market contract:

means a contract between an authorised retailer or exempt seller and a customer in an embedded network for electricity supplied through a meter that has not been registered in the wholesale market settlement and transfer system (MSATS), which system is operated by the market operator, AEMO.

Shell Energy is unsure what this is trying to capture as we are unsure if there are any off market- authorized retailer arrangements in the NEM. We request clarification from the AER.

On market contract:

means a contract between an authorised retailer and a customer for the supply of electricity through a customer's meter that is registered in the wholesale market settlement and transfer system (MSATS), which system is operated by the market operator, AEMO.

Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S6.1. Number of electricity customers in embedded networks	<p>Retailers are required to submit the total number of customers in embedded networks, as at the last calendar day of the reporting period for each of the following:</p> <ul style="list-style-type: none"> <li>a. residential customers on a               <ul style="list-style-type: none"> <li>i.on market retail contract</li> <li>ii.off market retail contract</li> <li>iii.energy only retail contract</li> </ul> </li> <li>b. small business customers on a               <ul style="list-style-type: none"> <li>i.on market retail contract</li> <li>ii.off market retail contract</li> <li>iii.energy only retail contract</li> </ul> </li> <li>c. large customers on a               <ul style="list-style-type: none"> <li>i.on market retail contract</li> <li>ii.off market retail contract</li> <li>iii.energy only retail contract.</li> </ul> </li> </ul> <p>For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter. This does not make sense.</p>	Quarterly, Jurisdictional	<ul style="list-style-type: none"> <li>i. Is an on market retail contract &amp;</li> <li>ii. Energy only retail contract appears to be a double up</li> </ul> <div style="background-color: black; width: 100%; height: 40px; margin-top: 5px;"></div> <div style="background-color: black; width: 100%; height: 40px; margin-top: 5px;"></div> <div style="background-color: black; width: 100%; height: 40px; margin-top: 5px;"></div> <div style="background-color: black; width: 100%; height: 40px; margin-top: 5px;"></div>





			<p>[REDACTED]</p> <p>[REDACTED]</p> <p>The request here is a significant IT build item and we suggest there are other approaches the AER should take to seek insight of embedded networks; relying on the availability of data through the parent meter retailer will provide a patchy, inconsistent data set.</p>
<p>S6.2. Number of residential customers in embedded networks with electricity debt</p>	<p>Retailers are required to submit the total number of residential customers in embedded networks with energy bill debt as at the last calendar day of the reporting period for each of the following:</p> <ul style="list-style-type: none"> <li>a. residential electricity customers (excluding hardship program customers) <ul style="list-style-type: none"> <li>i. which has been outstanding for at least 30 calendar days but less than 60 calendar days</li> <li>ii. which has been outstanding for at least 60 calendar days but less than 90 calendar days</li> <li>iii. which has been outstanding for at least 90 calendar days or greater.</li> </ul> </li> </ul> <p>For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.</p>	<p>Quarterly, Jurisdictional</p>	<p>As gate meter retailer we have no insight or transparency. Note SER does not have residential customers.</p>
<p>S6.3. Average electricity debt of residential customers in embedded networks</p>	<p>Retailers are required to submit the average amount of electricity bill debt for residential customers in embedded networks as at the last calendar day of the reporting period for each of the following:</p> <ul style="list-style-type: none"> <li>a. residential electricity customers (excluding hardship program customers) <ul style="list-style-type: none"> <li>i. which has been outstanding for at least 30 calendar days but less than 60 calendar days</li> <li>ii. which has been outstanding for at least 60 calendar days but less than 90 calendar days</li> <li>iii. which has been outstanding for at least 90 calendar days or greater.</li> </ul> </li> </ul> <p>For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.</p>	<p>Quarterly, Jurisdictional</p>	<p>As gate meter retailer we have no insight or transparency. Note SER does not have residential customers.</p>
<p>S6.4. Number of residential customers in embedded networks on a payment plan</p>	<p>Retailers are required to submit the total number of residential electricity customers in embedded networks (excluding hardship program customers) that are on a payment plan as at the last calendar day of the reporting period.</p> <p>For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.</p>	<p>Quarterly, Jurisdictional</p>	<p>As gate meter retailer we have no insight or transparency. Note SER does not have residential customers.</p>



S6.5. Number of residential customers in embedded networks disconnected for non-payment	<p>Retailers are required to submit the total number of residential electricity customers in embedded networks disconnected for non-payment during the reporting period.</p> <p>For the purposes of this indicator, retailers that do not control an embedded network metering installation comprising one or more meters (a gate meter) are not obliged to report on this indicator.</p>	Quarterly, Jurisdictional	As gate meter retailer we have no insight or transparency. Note SER does not have residential customers.
S6.6. Average electricity debt at time of disconnection of residential customers in embedded networks	<p>Retailers are required to submit the average amount of electricity bill debt at time of disconnection for residential customers in embedded networks disconnected for non-payment during the reporting period.</p> <p>For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.</p>	Quarterly, Jurisdictional	<p>This indicator requires further explanation of the goal as well as the means of achieving it. As drafted, neither is clear.</p> <p>Also, as gate meter retailer we have no insight or transparency. Note SER does not have residential customers.</p>
S6.7. Number of residential customers in embedded networks on hardship programs	<p>Retailers are required to submit the total number of residential electricity customers in embedded networks on a retailer's hardship program as at the last calendar day of the reporting period.</p> <p>For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.</p>	Quarterly, Jurisdictional	As gate meter retailer we have no insight or transparency. Note SER does not have residential customers.
S6.8. Average debt of residential customers in embedded networks on hardship programs	<p>Retailers are required to submit the average amount of electricity bill debt for residential customers in embedded networks on retailer's hardship program as at the last calendar day of the reporting period.</p> <p>For the purposes of this indicator, retailers are required to provide embedded network data if there is a contractual arrangement with the gate (parent) meter and the customer at the child meter.</p>	Quarterly, Jurisdictional	As gate meter retailer we have no insight or transparency. Note SER does not have residential customers.

Life support

Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S6.9. <a href="#">Number of life support customers</a>	<p><a href="#">Retailers are required to submit the total number of life support customers as at the last calendar day of the reporting period for each of the following:</a></p> <ul style="list-style-type: none"> <li>a. <a href="#">With medical confirmation</a></li> <li>b. <a href="#">Without medical confirmation.</a></li> </ul>	<a href="#">Quarterly, Jurisdictional</a>	
S6.10. <a href="#">Number of life support customers registered</a>	<a href="#">Retailers are required to submit the total number of life support customers registered during the reporting period.</a>	<a href="#">Quarterly, Jurisdictional</a>	
S6.11. Number of life support customers deregistered	<a href="#">Retailers are required to submit the total number of life support customers deregistered during the reporting period.</a>	<a href="#">Quarterly, Jurisdictional</a>	We recommend clarifying whether the intention is to report <i>all</i> customers that have been deregistered, for example including customer advice, or deregistration due to failure to provide medical confirmation.



Indicator	Information and data required	Relevant reporting period/basis	Shell Energy comments
S6.12. <a href="#">Number of affected customers</a>	<a href="#">Retailers are required to submit the total number of customers identified as affected customers in the retailer's system, as at last calendar day of the reporting period.</a>	<a href="#">Quarterly, Jurisdictional</a>	We recommend this point needs clarification of whether customers who are no longer customers are included or excluded.
S6.13. <a href="#">Number of affected customers added to a retailer's system</a>	<a href="#">Retailers are required to submit the number of customers identified as affected customers that were added to the retailer's system during the reporting period.</a>	<a href="#">Quarterly, Jurisdictional</a>	This is an unusual definition – is the intent here to count new customers over the quarter?
S6.14. <a href="#">Number of affected customers on a payment plan</a>	<a href="#">Retailers are required to submit the total number of customers identified as affected customers (excluding hardship program customers) that are on a payment plan as at the last calendar day of the reporting period for:</a> a. <a href="#">Electricity</a> b. <a href="#">Gas.</a>	<a href="#">Quarterly, Jurisdictional</a>	Does this only include those customers affected <b>and</b> on a payment plan on the last day of the calendar month (in other words customers that have left during the quarter are not included?)
S6.15. <a href="#">Number of affected customers on a retailer's hardship program</a>	<a href="#">Retailers are required to submit the total number of customers identified as affected customers on a retailer's hardship program as at the last calendar day of the reporting period for:</a> a. <a href="#">Electricity hardship program customers</a> b. <a href="#">Gas hardship program customers.</a>	<a href="#">Quarterly, Jurisdictional</a>	



**UNRESTRICTED**