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Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

Via email: wholesaleperformance@aer.gov.au

To whom it may concern

Consultation: Significant price reporting guidelines

ACT Council of Social Service (ACTCOSS) is pleased to make a submission to the consultation on significant price reporting guidelines (Guideline). ACTCOSS advocates for social justice and represents the community sector in the ACT.

ACTCOSS leads the ACT Energised Consumers project which is co-funded by Energy Consumers Australia (ECA) and the ACT Government. Through this project ACTCOSS advocates for residential, not-for-profit and small business energy consumers in the ACT. Through this project ACTCOSS also advocates for a just transition to net zero greenhouse gas emissions in the ACT and fair and just outcomes for low-income households in relation to energy more broadly.

We thank the AER for its ongoing work to provide oversight of our energy markets and to ensure that customers are protected from detrimental actions or behaviours by generators and retailers.

The AER works with limited resources and it is important that these resources are used in ways that have the most value for stakeholders. ACTCOSS believes that the proposal to change the Guideline is an improvement on the current requirements.

Reports prepared under the Guideline explain the key drivers of high energy price events. The reports are aimed at providing information to assist stakeholders and policymakers to assess whether the market is functioning effectively. We support the AER's efforts to review and improve its reporting strategy to ensure the efficient provision of relevant and useful information.

Further, we support the proposed change to the Guideline for the following reasons:

- The amended Guideline broadens the scope of what will be reported on and still includes the \$5,000/MWh definition of a significant price outcome
- Requirements for reporting still include details of what must be reported on, but also allows the AER to consider other matters, giving greater scope than previously
- The amended Guideline provides flexibility to enable the AER to prioritise issues based on importance but still requires the AER to report on other issues as soon as practicable.

For minor significant price outcome events, the AER might consider publishing a high-level report with more detail to follow subsequently.

Thank you for considering the views of ACTCOSS.

Yours sincerely

A handwritten signature in black ink that reads "Campbell." with a period at the end.

Dr Emma Campbell
Chief Executive Officer

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