



EnergyAustralia

LIGHT THE WAY

13 September 2024

Monitoring the retail electricity and gas markets
Independent Pricing and Regulatory Tribunal
Lodged electronically via [REDACTED]

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IPART 2023-24 Retail Energy Market Monitoring Report

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise more than 5,000 MW of generation capacity.

EnergyAustralia appreciates the opportunity to provide comments to the Independent Pricing and Regulatory Tribunal (IPART) on Monitoring the Retail Electricity and Gas report. We strongly support IPART's continued use of publicly available data reported by other regulatory bodies, such as the Australian Competition and Consumer Commission (ACCC) and Australian Energy Regulator (AER). By leveraging these established sources, IPART can continue to monitor market dynamics in NSW without imposing unnecessary regulatory costs - ultimately borne by consumers.

Pricing, Competitive Dynamics, and Consumer Participation

The ACCC and AER will examine changing pricing structures, including time of use (TOU) and demand tariffs. Recent updates to the AER's Retail Law Performance Reporting Guidelines will provide comprehensive insights into pricing structures that customers are on. For example, see AER indicator 2.8 and 2.9 in the **Attachment**. Quarterly retailer reporting by the AER from 2025 onwards can be supplemented by existing public information to provide IPART with valuable insights on different pricing structures and how these change over time. The increased granularity and frequency in AER reporting will provide IPART with an increased understanding of evolving pricing structures without requiring additional data collection from retailers. By leveraging the updated AER reporting, IPART can avoid duplicating efforts and imposing unnecessary regulatory

burdens, ensuring that costs to consumers are minimised while maintaining thorough oversight.

Further, the ACCC is expected to publish its report in November/December 2024 that will include reporting on how different pricing structures, such as TOU and demand tariffs, affect the prices customers face. While this report may not be published in time for IPART's upcoming report, early engagement and sharing of insights between regulators could provide useful – or at least provide early insights for future reports.

Additionally, we understand that the next review of the Electricity Retail Code, to be undertaken by the Department of Climate Change, Energy, the Environment and Water, is scheduled to commence in November 2024. The ACCC recommended the areas of reporting should include:

- Consumer disengagement and barriers to consumer engagement
- The increasing complexity of retail tariff structures
- Interactions with other reforms made after the communication requirements in the Electricity Retail Code were introduced, such as the Australian Energy Regulator's Better Bills Guideline.¹

We encourage IPART to leverage this upcoming work to inform future analysis of pricing dynamics and consumer participation, before initiating any new data collection efforts.

Virtual Power Plant Programs: EnergyAustralia recognises the growing importance of Virtual Power Plants (VPPs) and is actively participating in several initiatives aimed at exploring consumer propositions, including:

- [SA Energy Masters](#)
- [Ausgrid's Community Batteries](#)
- [Project Edith](#)

General information on EnergyAustralia's VPPs can be found on our website: [Solar Battery Virtual Power Plant \(VPP\) | EnergyAustralia](#).

While VPPs hold great promise for our future energy system, the market remains in its early stages of development. Public resources such as those we have referenced on VPP initiatives showcase that the market is still evolving. We encourage IPART to focus on available sources and allow the market to mature. By allowing the market to grow organically, participants have the flexibility to develop consumer-centric solutions. As engagement increases and the market matures, there will be more value in regulated monitoring efforts.

Other Emerging Issues

The energy retail regulatory environment is evolving as new consumer protections are being implemented to promote fairness and transparency. Minister Bowen recently submitted a package of seven proposed consumer-focused retail rule changes to the

¹ ACCC, [Inquiry into the National Electricity Market: December 2023 Report \(acc.gov.au\)](#), p 10.

AEMC.² These proposed consumer-focussed reforms and safeguards, combined with industry-led initiatives, will provide consumers with greater support. We encourage IPART to take these developments into account before considering ongoing monitoring efforts as increasing the prevalence of data requests can place undue costs on retailers and, ultimately, consumers.

If you have any questions in relation to our submission, please contact me

[REDACTED]

Regards,
Maria Ducusin
Regulatory Affairs Lead

² See for example, [Ensuring energy plan benefits last the length of the contract | AEMC](#)

ATTACHMENT

AER (Retail Law) Performance reporting procedures and Guidelines - Version 4 - 28 August 2024

Indicator	Information and data required	Relevant reporting period/basis
S2.8. Types of tariff structures for electricity customers	<p>Retailers are required to submit the total number of customers with the following types of meter structures installed, as at the last calendar day of the reporting period for each of the following:</p> <p>a) Type 4 or 4A (smart) receiving:</p> <ul style="list-style-type: none"> i. a flat or block retail tariff with no controlled load retail tariff and with an underlying distributor-based flat network tariff. ii. a flat or block retail tariff with no controlled load retail tariff and with an underlying distributor-based time of use or demand network tariff. iii. a flat or block retail tariff with a controlled load retail tariff and with an underlying distributor-based flat network tariff. iv. a flat or block retail tariff with a controlled load retail tariff and with an underlying distributor-based time of use or demand network tariff. v. a time of use retail tariff with an underlying distributor-based flat network tariff. vi. a time of use retail tariff with an underlying distributor-based time of use or demand network tariff. vii. a demand retail tariff with an underlying distributor-based flat network tariff. viii. a demand retail tariff with an underlying distributor-based time of use or demand network tariff ix. any retail tariff, other than a two-way retail tariff, with an underlying distributor-based two-way network tariff x. a two-way retail tariff with an underlying distributor-based two-way network tariff xi. any retail tariff not captured by the above descriptors. <p>b) Type 5 receiving:</p> <ul style="list-style-type: none"> i. a flat or block retail tariff with no controlled load retail tariff and with an underlying distributor-based flat network tariff. ii. a flat or block retail tariff with no controlled load retail tariff and with an underlying distributor-based time of use or demand network tariff. iii. a flat or block retail tariff with a controlled load retail tariff and with an underlying distributor-based flat network tariff. iv. a flat or block retail tariff with a controlled load retail tariff and with an underlying distributor-based time of use or demand network tariff. v. a time of use retail tariff with an underlying distributor-based flat network tariff. 	Quarterly, Jurisdictional

Indicator	Information and data required	Relevant reporting period/basis
	<ul style="list-style-type: none"> vi. a time of use retail tariff with an underlying distributor-based time of use or demand network tariff. vii. a demand retail tariff with an underlying distributor-based flat network tariff. viii. a demand retail tariff with an underlying distributor-based time of use or demand network tariff ix. any retail tariff, other than a two-way retail tariff, with an underlying distributor-based two-way network tariff x. a two-way retail tariff with an underlying distributor-based two-way network tariff xi. any retail tariff not captured by the above descriptors. <p>c) Type 6 receiving:</p> <ul style="list-style-type: none"> i. a flat or block retail tariff with no controlled load retail tariff ii. a flat or block retail tariff with a controlled load retail tariff. <p>For the purposes of S2.8 indicator:</p> <p>Refer to Schedule 1 for a clear distinction amongst tariff types, which vary by time-of-use and demand components, and rebates. For example, a tariff with both demand and time-of-use charging components should be considered a demand tariff for reporting purposes. However, a time-of-use tariff is a consumption only tariff and will not contain demand charging components.</p>	
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"> a) received a government-funded feed-in tariff b) received a retailer (only) funded feed-in tariff. <p>For the purposes of this indicator (b) refers to customers that are not receiving any government feed-in tariff.</p>	Quarterly, Jurisdictional