



Essential Services Commission

Level 37, 2 Lonsdale Street

Melbourne, Victoria 3000

Online via: <https://engage.vic.gov.au/changing-back-billing-rules-retail-energy-customers>

26 March 2020

Changing the back-billing rules for retail energy customers – draft decision

AGL Energy (**AGL**) appreciates the opportunity to comment on the draft decision for changing the back-billing rules for retail energy customers (**draft decision**) released by the Essential Services Commission of Victoria (**ESC**) on 28 February 2020.

We welcome the ESC recognising the need to facilitate a separate consultation for the back-billing arrangements given the tripartite nature of the relationship between customer, retailer and distributor.

We support the ESC's proposed approach outlined in the draft decision, specifically the proposals to replicate the obligation in 6B.A3.1 of the National Electricity Rules (**NER**) within the gas and electricity distribution codes.

In light of the current environment regarding COVID-19, we encourage the ESC to be flexible regarding the commencement date 1 January 2021, especially if the situation worsens.

The ESC's proposed approach is practical and equitable for market participants. We refer the ESC to our submission to the recent consultation on Clear and Fair Contracts published 21 January 2019 for further detail on why it is appropriate to extend coverage of this obligation to distributors.¹

If you have any questions, please contact [REDACTED] on [REDACTED] or at [REDACTED].

Regards

[REDACTED]

G/M Energy Market Regulations

¹ <https://www.esc.vic.gov.au/sites/default/files/documents/AGL-response-clear-fair-contracts-draft-decision.pdf>