Date: 18 February 2026

Essential Services Commission
Level 8, 570 Bourke Street
Melbourne Victoria 3000

Submitted Via email: engage@esc.vic.gov.au

**Getting to Fair: Advancing Equity Consultation Paper**

Alinta Energy welcomes the opportunity to provide a submission to the Essential Services Commission (Commission) in response to its *Getting to Fair: Advancing Equity* Consultation Paper.

Alinta Energy, as an active investor in energy markets across Australia with an owned and contracted generation portfolio of nearly 3,000MW and more than 1.1 million electricity and gas customers has a strong interest in energy market design, particularly as it relates to consumer equity and participation in the evolving energy market.

Whilst being supportive of a principles-based approach to advancing equity across access to essential services, clear direction and guidance on expected outcomes from this policy direction is critical to ensuring its success.

As the energy transition continues to place pressure on the energy market to evolve, consumers may experience varying levels of impact, it is important to ensure that benefits from the transition are broadly shared across all consumers, whist limiting the potential for adverse impact across all consumer classes.

Equity fairness needs to be balanced with market and economic sustainability caution needs to be exercised to ensure that unintended consequences such as cross subsidies or price increases, that are not in the long-term interests of consumer do not emerge.

Data must be a cornerstone that is relied on when considering the introduction of any new interventions. Where cost reflectivity is also a key determining factor.

Consumer equity is not the sole remit of energy retailers, it is widely influenced by network distributors, generators along with Government policy settings and market design. Equity initiatives will only be successful where they are considered and introduced across the full spectrum of the energy supply chain.

Alinta Energy Pty Limited ABN 64 614 975 629
Grosvenor Place, Level 13, 225 George Street, Sydney NSW 2000 Australia
T +61 2 9372 2600 F +61 2 9372 2610 W alintaenergy.com.au

Any strategy needs to include early engagement of stakeholders who are responsible for the implementation of equity initiatives. Early engagement ensures that there is robust opportunity for review and consultation to ensure optimum solutions and strategies are being delivered, such that they have a greater opportunity for success.

The recognition of diverse differences of cultural themes across consumer cohorts is an important aspect of achieving consumer equity. This recognition should ensure that guidance for engagement of different cultural customer cohorts does not result in unintended consequences that may adversely impact some culturally different consumer cohorts, while benefiting others.

Equity strategies must be able to work hand in hand with existing consumer support mechanisms, such as the Payment Difficulty Framework, care should be taken to avoid creating overlapping or conflicting compliance burdens.

We look forward the further engagement with the Commission as it seeks to advance its consumer equity strategies.

should you have any questions or wish to discuss any aspect of our submission I can be contacted on [redacted] or via email: [redacted]

Yours Sincerely

**Shaun Ruddy**
Manager National Retail Regulation