



27 March 2020

Ms Kate Symons
Chairperson
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne, Victoria 3000

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

Dear Ms Symons,

RE: Changing the back-billing rules for retail energy customers

Origin Energy appreciates the opportunity to provide a submission in response to the Essential Services Commission consultation *Changing the back-billing rules for retail energy customers*.

Origin supports the intent of the ESC's proposed changes to the Energy Retail Code (ERC) to limit retailer back-billing to four months. We agree that this decision will minimise bill shock and customer complaints regarding their bills. We also support the decision to apply consistent obligations on the distribution networks to ensure that retailers are not fully exposed to potential financial losses.

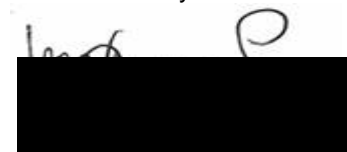
However, Origin does consider that there are some circumstances in which the billing limitation may not be in industry or customers best interests. We believe it is important to afford retailers flexibility when responding to Force Majeure events. Retailers often support customers in areas affected by natural disasters by placing a pause on activities such as billing and proactively providing additional support to customers and communities.

We believe that the exclusion of Force Majeure events as described in the Model Terms should be included in the proposed updated rule. This would enable retailers to continue their practice of placing bill suppressions on areas affected by natural disasters, such as bushfires and flooding. When a disaster is particularly devastating or widespread, it may be many months before any party is able to establish the appropriate next steps. In these cases, retailers should be able to resume billing and provide assistance to customers without the limitation applying.

By definition, such events are unforeseen and largely acts of nature that nobody is responsible for. In these times, retailers need to retain flexibility to respond in the best interests of customers

If you have any questions regarding this submission, please contact [REDACTED] in the first instance on [REDACTED] and or [REDACTED].

Yours sincerely


[REDACTED]

[REDACTED]
Group Manager Regulatory Policy
sean.greenup@originenergy.com.au