



05 February 2019

Essential Services Commission
Level 27, 2 Lonsdale Street
Melbourne, Victoria 3000

Dear Essential Services Commission

Draft Decision: Helping customers engage confidently in the retail energy market

Powershop Australia Pty Ltd (**Powershop**) thanks the Essential Services Commission (**ESC**) for the opportunity to provide comments on the ESC's draft decision, *Helping customers engage confidently in the retail energy market*.

Powershop supports the approach of the ESC to harmonise these new obligations with those in the National Energy Customer Framework (**NECF**) provided it enhances customer experience and is cost effective to implement. Our response to the draft decisions are set out in the table below.

Draft decision	Powershop Response
<p>Draft decision 1:</p> <p>A new Victorian energy plan fact sheet will replace the existing price and product information statements and offer summaries.</p>	<p>Powershop supports this draft decision in its intent to harmonise with the NECF, but strongly encourage the ESC to consider the consequences of 'partial harmonisation'.</p> <p>That is, the ESC cannot achieve harmonisation until it permits retailers to generate price sheets through the Australian Energy Regulator's (AER) Energy Made Easy (EME) retailer portal or the Department of Energy, Land, Water and Planning (DELWP)'s Victorian Energy Compare (VCE) portal is developed sufficiently. Adopting the proposed complicated comparison table would only achieve partial harmonisation of price sheets.</p>
<p>Draft Decision 2:</p> <p>The form and content of the fact sheet will be based on the requirements of the Australian Energy Regulator's (AER) energy fact sheets, drawing on the research undertaken to support document design.</p>	<p>Powershop supports this draft decision.</p>
<p>Draft Decision 3:</p> <p>The Victorian energy fact sheet will include a comparison tool that uses typical customer usage profiles to estimate annual costs under the plan to help consumers compare alternatives.</p>	<p>Powershop supports this draft decision however questions the usefulness to customers who do not provide actual data to the EME website.</p>

<p>Draft Decision 4:</p> <p>The typical customer usage profiles that will be used in the Victorian energy fact sheet will align the AER's methodology for calculating typical usage profiles.</p>	<p>Powershop supports this draft decision provided that the number of gas mains connections is factored into customer's usage profiles.</p>
<p>Draft Decision 5:</p> <p>The Victorian energy fact sheet must be made available to customers:</p> <ul style="list-style-type: none"> • on request by a customer (electronically or postage) • on retailers' website • on third party comparator websites • as an initial step in any online search or sign up process • for any telemarketing activity. <p>These rules are aligned with equivalent rules within the national framework.</p>	<p>Powershop supports this draft decision.</p>
<p>Draft Decision 6:</p> <p>If a retailer or its agent markets energy plans, using mass or social media channels including magazines, the internet, newspaper or billboards that reference prices, discounts, or the value of existing or potential plans, the following statement must be made in clear and easily readable text:</p> <p>'[Fact sheet(s) for plan(s) available at [insert link to the retailer/agent website where the fact sheet is located]'</p> <p>In circumstances where character limitations prevent the prescribed text (above) to be included, a retailer must include the text in a prominent location on the first webpage linked to the advertisement.</p> <p>These rules are aligned with equivalent rules within the national framework.</p>	<p>Powershop supports this draft decision.</p>
<p>Draft Decision 7:</p> <p>We will initiate a separate technical consultation on the code amendments required to give effect to draft decisions 2, 5 and 6, and to develop the methodology for the usage profiles in draft decision 4.</p>	<p>Powershop supports this draft decision.</p>
<p>Draft Decision 8:</p> <p>The Energy Retail Code is to be aligned with the Australian Energy Market Commission's (AEMC) final determination on estimated meter reads.</p>	<p>Powershop supports this draft decision.</p>
<p>Draft Decision 9:</p> <p>The anticipated commencement date for the new marketing and information disclosure code amendments is 1 July 2019.</p>	<p>Powershop's support for a commencement date of 1 July 2019 for the new price sheets is dependent on the completion of the VEC in a timely manner and the outcomes from the technical delivery workshops with the department.</p>

Draft Decision 10: The new customer read estimate requirement is to take effect from 1 July 2019.	Given Powershop's customer-centric model, we already allow customers to enter their own meter read via the Powershop app. Powershop does not support the ESC in "expanding and refining our retailer reporting requirements".
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To better manage the implementation of the changes detailed in this submission, Powershop would suggest a go-live date of 1 January 2020 given:

- industry still needs to participate in, and assess the outcomes from the DELWP's technical delivery requirements for the new Victorian energy fact sheets;
- DELWP confirming that VEC has been developed to produce the required Victorian energy fact sheets accurately and in a timely manner; and
- confirmation the significant work required to:
 - implement the obligations arising from Recommendations 3G – 3H;
 - amend solar FIT obligations; and
 - manage the introduction of the Victorian Default Offer.

If you have any queries or would like to discuss any aspect of this submission, please do not hesitate to contact me.

Yours sincerely,



Haiden Jones
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Powershop Australia Pty Ltd