



18 January 2013

Essential Services Commission of Victoria
Level 37 / 2 Lonsdale Street
Melbourne Victoria 3000

By email: elecindicators@esc.vic.gov.au

Submission on the Review of Energy Retail Performance Indicators

Alinta Energy Retail Sales Pty Ltd (Alinta Energy) welcomes the opportunity to comment on the Essential Services Commission (Commission) review of energy retail performance indicators (Review).

Alinta Energy is both a generator and retailer of electricity and gas in West Australia (WA) and the Eastern States energy markets. It has over 2500MW of generation facilities and in excess of 700,000 retail customers, including around 90,000 customers in Victoria and South Australia. As an incumbent retailer in WA and a new entrant retailer in the National Energy market, Alinta Energy is well placed to comment on this review.

We commend the Commission on its decision to conduct the review with the view to seek to align the performance indicators retailers are required to report on in Victoria with those that retailers are required to report on in jurisdictions that have adopted the National Energy Retail Law (NERL).

Alinta Energy supports the national harmonisation of retailer's performance reporting requirements. With this in mind it is the view of Alinta Energy that the Commission should seek to ensure that the retailer performance indicators in Victoria are aligned with those used under the NERL. This includes the cessation of any current Victorian specific performance indicators that are not required under the NERL.

The continuation of divergent performance indicators unique to a particular jurisdiction puts at risk the potential benefit that can be achieved from harmonisation. If the Commission were to continue to require retailers to report on a performance measure unique to Victoria it should only do so where it can demonstrate there is a significant risk of market failure in the absence of the reporting measure, or there is a significantly unique market structure that only exists in Victoria that dictates the need for a reporting measure that does not exist under the NERL.



Should you have any questions or wish to discuss our submission further, I may be contacted on (02) 9372 2653, or via email: shaun.ruddy@alintaenergy.com.au

Yours sincerely

Shaun Ruddy
Manager National Retail Regulation