

Enova Energy:

What are the practical and implementation considerations we should be aware of in considering ideas to simplify the regulatory framework, and in developing the draft Guideline? -

Considerations to simplify framework

For smaller retailers, the additional administration, resources and system-related costs to implement bill structure changes is concerning, particularly following the significant rule reform and associated business costs during 2021. Some of the implementation costs will be fixed regardless of the size of the organisation, which disadvantages smaller retailers from running an efficient business to enable the continuation of competitive pricing to consumers. Smaller retailers are critical participants in the energy market and help maintain competition by providing competitively priced options to consumers for energy as an essential service.

Would you like to provide other information for the AER to consider at this stage? - Other information

If the Better Bills guideline is to progress, we would be in strong support of a staged approach similar to the proposed roll out of the CDR requirements to the energy sector - this would allow smaller organisations some additional time to prepare, manage costs and learn from established processes.