



19 February 2018

Sarah Proudfoot  
General Manager  
Retail Markets  
Australian Energy Regulator

Via email: [sarah.proudfoot@aer.gov.au](mailto:sarah.proudfoot@aer.gov.au)

Dear Ms Proudfoot

**Updated AER (Retail Law) Performance Reporting Procedures and Guidelines – request for feedback**

Thank you for giving us an opportunity to provide feedback on the updated version of the AER (Retail Law) Performance Reporting Procedures and Guidelines (**Guidelines**). Please see our comments below.

Reference	Change / Indicator Description	Origin feedback
2.2.2	New date for annual report submission (31 July instead of 31 August)	Preparing our performance indicator data is a rigorous process. Data reports are run, analysed, loaded up into templates, validated by a number of business stakeholders, endorsed at multiple levels and then CEO sign off is sought. The current one month timeframe for preparing quarterly submissions is already very tight, with additional time needed for the annual report to obtain CEO sign off. Origin therefore requests that (subject to comments below in relation to 2.3.5) consideration be given to an additional week for the proposed submission date.
2.3.5	Where there is more than a 10% variation in the data reported from the previous reporting period, an explanation for the variation must be provided.	Assuming this requirement will apply to each data point included in performance reports, Origin considers that this will be an intensive exercise, may produce significant duplication of comments given the large number of data points and potentially puts the ability to deliver quarterly data by the end of the following month at considerable risk. For OEEL last quarter, Origin validated 392 indicators – of which 235, or 60%, varied by more than 10%. This issue is particularly relevant where data points have relatively small numbers, where a small change in number creates a significant percentage change. Origin suggests that the requirement for comment be limited to discrete groups of performance indicators (as Origin currently provides), or to performance indicators of particular significance to the AER.

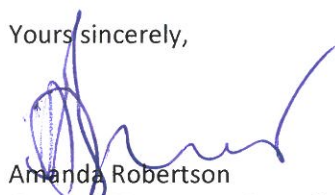
S3.18	New requirement re number of residential customers that have aged debt	Preparing data for this indicator will require complex and intensive data analytics. We would be grateful if you could elaborate on what is captured by this indicator. For example, does the indicator require retailers to monitor average account debt balances over time, and only include a record once the dollar value and time thresholds are met? Given the likely complexity, it would be useful to discuss with the AER exactly what it is seeking and see how this fits in with our system and data extraction capability before the indicator is finalised.
S3.20	New requirement re number of residential customers that have missed one or more pay on time (or conditional) discounts	We would be grateful if you could clarify if this means only pay on time discounts missed (per the information and data required criteria), or whether inclusion of the words 'or conditional' in the indicator description is meant to further define the term 'pay on time' discounts to also incorporate other forms of conditional discount.
S4.12	Amendment to existing hardship program denied entry indicator data	We would be grateful if you could clarify how items (c) and (d) in the information and data requirements relate to denial of entry into a hardship program. As drafted, these items arguably fit more clearly into indicator 4.13 which deals with the reason for customers exiting a hardship program (where they already currently appear). In relation to item (b), Origin would also be grateful if you could clarify how access to a retailer's hardship program can be denied if the customer cannot be contacted.

In addition, Origin makes the following general comments regarding the proposed changes:

- Given the scope of the changes proposed and likelihood that the AER will receive a wide range of comments from retailers, we would appreciate the opportunity to provide feedback on a further draft of the Guideline.
- We note that the draft Guideline has altered the current indicator ID's, using existing indicator ID's for new indicators (for example, 3.8 was 'Complaints Other' but is now 3.13, with 3.8 being used for one of the metering categories). Origin uses indicator ID's when compiling data and reports – with data, scripts and reports being tied together using the indicator ID reference (this includes validation against previous data – which will now have a different ID in some instances). If possible, Origin requests that existing indicator ID's remain the same with new ID's being created for new indicators.

If you have any questions about the feedback provided, please contact Ben Hercus on 03 8665 7517 or at [ben.hercus@originenergy.com.au](mailto:ben.hercus@originenergy.com.au)

Yours sincerely,



Amanda Robertson

**General Manager – Compliance, Risk & Assurance, Energy Markets**