



6 April 2023

Sarah Woenne
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Dear Sarah

Consultation Draft: Electricity Industry Amendment (Alternative Electricity Services) Bill 2023

Alinta Energy is pleased to provide comment on the Consultation Draft of the *Electricity Industry Amendment (Alternative Electricity Services) Bill 2023 (AES Bill)*.

We agree with the three additional modifications presented in EPWA's Consultation Guide that will:

1. Extend the Alternative Electricity Services (**AES**) framework to large use customers whilst retaining the original intent of the framework to protect small use customers via the AES Code of Practice prepared and issued by the Minister under s. 59U of the AES Bill;
2. Include a fast-track registration option whereby the ERA is not required to consult publicly on AES applications, consistent with the policy intent to operate a low-cost, light-handed regulatory framework. We support the provisions under s. 59D that provide for regulations that may exempt an existing licensee from needing to separately register to provide an AES. The proposed 15-year AES registration aligns with current retailer licensing timeframes; and
3. Include pricing control obligations in the AES Code of Practice to assist in reducing negative customer outcomes related to pricing.

Additionally, we support:

- The condition of registration (s. 101C) that the AES provider join an "approved scheme" and be bound by any decisions of the electricity ombudsman under that scheme; and
- The authority for the ERA to initiate compliance audits (s. 59ZC) for registered AES providers. We consider this right should be extended to allow the ERA to request AES providers submit annual performance and compliance reports, as submitted by licensed energy retailers, and to provide any other information as required by the ERA in connection with its functions.

If you have any questions concerning the above, please contact me on [REDACTED] or [REDACTED]

Yours sincerely

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