

20 March 2020

Pina Bria
Senior Policy Officer
Department for Energy and Mining
Energy and Technical Regulation Division
GPO Box 320
ADELAIDE SA 5001

Submission via email on **15 Minute Planned Interruptions Discussion Paper**

Dear Ms Bria,

Simply Energy welcomes the opportunity to provide feedback as a part of the consultation on the Proposal to amend Regulation 14 of the National Energy Retail Law (Local Provisions) Regulation 2013.

Simply Energy is a leading second-tier energy retailer with over 725,000 customer accounts across Victoria, New South Wales, South Australia, Queensland and Western Australia. While acknowledging the current proposal, Simply Energy has weighed the pros and cons of all three options provided in the consultation paper and is of the view that any change to the current arrangement should be considered from consumer-centric perspective. Simply Energy is of the view that Option 1 (extension of current derogation by another 5 years) and Option 2 (extending the current derogation indefinitely, with no sunset clause) are not preferred for the following reasons:

- Neither Option 1, nor Option 2 provides a greater level of service standards for end customers;
- There is no clear criterion published by SA Power Networks that determines outages under/over 15 minutes;
- Exact time taken for an outage are not adequately measured and reported;
- While unplanned interruptions are difficult to manage, planned interruptions are prepared well in advance and hence adequate notice should be provided to all affected customers, similar to how Retailers provide planned interruption notice as per National Energy Retail Rule (NERR) provisions in all NECF (National Energy Consumer Framework) jurisdictions;
- Inconsistent across other jurisdictions, hence compromising customer experience;
- Cost to provide these notices are not comparable to the last 5-year period (mid 2015 to mid-2020) as a number of these notices can now be emailed to the customer;
- Across other NECF jurisdictions, neither of three NSW distributors nor the two QLD distributors support this mechanism;
- Last but not least, life support customers are not adequately protected with this derogation.

Since network outage related complaints are not generally received by Retailers, Simply Energy is unable to provide a clear response on the type of complaints on this matter. However, Simply Energy has rolled out several thousand smart meters across NSW, SA and QLD and from our own experience, measuring the exact time of the outage, before the event, is extremely challenging to determine. As such, regardless of the time taken for an outage and/or nature of work (e.g. meter exchange, meter test etc.), Simply Energy fully complies with the NERR without the need of any such derogation.

Most importantly, Simply Energy considers this derogation as a risk to the customer protection due to lack of notice, should the outage exceed more than 15 minutes. Unfortunately, these are not reportable by the distribution networks.

In order to provide a consistent consumer experience and align with the key principles of NECF framework, **Simply Energy strongly supports Option 3**, i.e. remove the derogation altogether, thereby reverting to Rule 90 of the NERR with no variations, due to the above listed reasons. Simply Energy also suggest that moving forward, similar approach should be adopted in Tasmania.

Simply Energy looks forward to engaging with you on these matters. If you have any questions or would like to engage in discussions with Simply Energy, please contact Aakash Sembey, Industry Regulations Manager, on (03) 8807 1132 or Aakash.Sembey@simplyenergy.com.au.

Yours sincerely



James Barton
General Manager, Regulation