



22nd May 2020

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Guide to the Electricity Retail Code Version 2 – Draft for Consultation

Alinta Energy welcomes the opportunity to make a submission to the Australian Competition and Consumer Commission (the ACCC) on the Guide to the Electricity Retail Code Version 2 – Draft for Consultation (the Draft Guide).

Alinta Energy supports the approach of the ACCC in developing and publishing guidelines setting out its interpretation of obligations under the Energy Retail Code. However, concerns arise where the interpretation creates ambiguity or lack of clarity in the application of the obligations.

One such concern centres around the Time of Use methodology, in particular the volume methodology for the Time of Use calculations. The approach to ascertaining volume for specific time periods takes a theoretical approach rather than a practical one.

The issue of public holidays is not addressed, further the approach to calculating weekend and weekdays makes the inherent assumption that 5 out of 7 days within a 365-day period will be weekdays. This is not the case, given that;

- i. A 365-day period is not divisible by 7;
- ii. Public holidays reduce the number of 'weekdays' in any period;
- iii. The 365-day period (year) doesn't necessary commence on a Monday (weekday)

The volume totals when added up do not equal the regulated volumes. This creates a fundamental problem as if there is volume "left-over" there is no direction on how this is to be dealt with.

Given that Time of Use is a recent inclusion covered by the Code and the level of complexity associated with it, we would seek further clarity on the approach to addressing the issues highlighted above.

In addition, we note that within the Guide examples of marketing information use flat rate tariff information, given the extension of coverage to Time of Use and Solar it would be helpful for the Guide to include examples of the presentation of information for Time of Use and Solar.

We would welcome the opportunity to discuss the issues we have raised, should you have any questions I can be contacted on (02) 9372 2653, or via email: shaun.ruddy@alintaenergy.com.au

Yours sincerely,



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