

Dr Annette Weier
Chief Executive Officer
Independent Competition and Regulatory Commission
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ACT 2608

5 August 2021

Dear Dr Weier

ACT Retail Electricity (Transparency and Comparability) Code Guideline - consultation

ActewAGL welcomes the opportunity to respond to the Independent Competition and Regulatory Commission's (ICRC's) Consultation Draft: ACT Retail Electricity (Transparency and Comparability) Code Guideline released (Draft Guideline) on 2 July 2021.

ActewAGL is in general agreement that the ICRC's draft guideline will assist retailers to understand how to comply with responsibilities under the ACT Retail Electricity (Transparency and Comparability) Code 2021 (ACT Code).

ActewAGL would like to see further harmonisation of the Draft Guideline with the Australian Competition and Consumer Commission (ACCC) Retail Electricity Code Guideline (ACCC Guideline) for calculating and presenting the comparison percentage in advertising. In the Draft Guideline, the examples for calculating the comparison percentage use two decimal places. Whilst the ACCC Guideline also calculates the comparison percentage to two decimal places, it then recommends communicating to customers the whole number percentage of the nearest percentage point¹. ActewAGL considers that the Draft Guideline should also round the comparison percentage to the nearest full percentage point to improve consistency across jurisdictions, reduce the cost of IT system development specifically for ACT customers and simplify advertising and communications to customers.


As previously noted during consultation on the ACT Code, ActewAGL is currently working on an IT system to implement three key regulatory changes (including Customer Switching and Five-Minute Settlement). These changes are also due on 1 October 2021. Implementation of the reference price obligation in the ACT Code requires ActewAGL to make IT system changes to billing systems in addition to the three regulatory changes noted above. ActewAGL is currently working on the ACT Code changes for the reference prices and aims to be compliant by 1 October 2021, however notes there is significant pressure on a limited number of staff with the required skills to manage these additional requirements.

¹ ACCC (June 2021) Guide to the Electricity Retail Code p.16, 19

ActewAGL appreciates the inclusion of transitional arrangements in the ACT Code and Draft Guideline to provide more time for retailers to adapt their billing systems for the better offer checks.

If you wish to discuss any aspect of ActewAGL's submission, please contact [REDACTED] on [REDACTED]

Yours sincerely



General Manager Retail