19 August 2026

[redacted]

ICRC Consumer Protection Code (CPC) issues paper

Evoenergy appreciates the opportunity to respond to the ICRC Consumer Protection Code Issues Paper. Our responses to the consultation questions are set out below.

Evoenergy considers the purpose and scope of the Code are generally clear and has no specific issues to raise in relation to questions 1, 4 or 9.

In relation to question 2, Evoenergy considers some clauses and service levels should be revised to remove ambiguity and support consistent interpretation and application. The obligations most relevant to Evoenergy are set out below.

- GSL-E1 should distinguish between two connection scenarios:
    - re-energisation after de-energisation, *where connection infrastructure already exists*; and
    - completion of a basic connection under the Model Standing Offer, *where connection infrastructure must be installed*.

  Separating these requirements would improve clarity and better reflect the different operational circumstances involved.
- GSL-E8 should be clarified. As drafted, it is unclear whether the obligation relates to customer communication, completion of work to address safety-related matters within a specified timeframe, or both. It is also unclear whether it applies to individual or group customer communications, or to Evoenergy's operational response to a fault, problem or concern. Defining key terms such as "response", "fault", "problem" and "concern" would support consistent application. Evoenergy would welcome further discussion with the ICRC on the intended scope and operation of this GSL, including its interaction with the Utilities Technical Codes and the National Electricity Law.
- The GSL rebate process should also be clarified to reflect the operation of the gas and electricity markets. As a distributor, Evoenergy transacts through the market, including with retailers, and does not have a direct billing relationship with customers. Retailers hold that direct transactional relationship. In practice, GSL rebates are processed by the distributor to the retailer as a credit, with an instruction to apply the credit as a rebate to the relevant customer. For electricity, Evoenergy processes these credits to retailers through market transactions at month-end and, for annual GSLs, at the end of the month following year-end. If the ICRC is considering tighter rebate timeframes, these should apply to the distributor's processing of the rebate through the market to the retailer, rather than requiring direct payment by distributors to customers. Direct customer payment would require significant investment in new systems and processes, including collecting and managing customer information distributors are not currently required to hold. This would increase compliance costs, place upward pressure on consumer prices and may be

inconsistent with the role separation between distributors and retailers under national energy market arrangements.

In relation to question 3, Evoenergy considers the current GSL categories, exclusions and payment amounts generally provide an appropriate balance between recognising consumer inconvenience and incentivising service performance. Customers remain able to raise claims outside the GSL framework, or in addition to any GSL payment, where appropriate.

For question 5, Evoenergy considers the regulatory framework should remain coherent and avoid overlapping incentives or penalties for substantially the same performance outcome.

For question 6, the Code could better reflect contemporary customer interactions by expressly recognising digital communication channels and modern notification methods. This could include notices published on utilities' websites, digital communications and automated processes, provided they give customers clear, accessible and timely information.

For question 7, Evoenergy would welcome removal of overlapping obligations where the same customer outcome is already adequately regulated under the NER. Equivalent direct customer rebate obligations do not exist under the national energy laws; however, distributors are subject to the Service Target Performance Incentive Scheme, which applies to similar reliability service levels for the duration and frequency of unplanned outages. To the extent the Code imposes GSL rebate requirements on electricity or gas distributors, those obligations should remain clear and distinct from national energy law requirements to avoid uncertainty or duplication.

For question 8, emerging risks relating to system security and extreme weather could be addressed through updated exclusion provisions. The CPC should not penalise utilities where a service outcome results from system security requirements, an emergency, external direction or another circumstance the distributor could not reasonably prevent or control. Evoenergy considers the exclusion provisions should be reviewed to address curtailment or backstop directions issued by AEMO, and to broaden force majeure coverage for events such as extreme weather, pandemic, biosecurity or terrorism events that cause significant service disruption but may not be formally declared an emergency by a Minister.

Thank you for the opportunity to respond. [redacted]

Yours sincerely

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