



13 November 2009

Gary Henry
Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

Dear Gary,

AGL Energy Limited (**AGL**) welcomes the opportunity to comment on the Draft Decision (**decision**) for Retailer Reporting Requirements published by the Queensland Competition Authority (**QCA**).

Quarterly reporting of complaints and disconnection data

AGL understands the QCA's intention to better understand the underlying dynamics in the energy retail market and to do so within a timely manner. AGL considers quarterly reporting requirements would fulfil this goal and supports their implementation. However, AGL does not consider that decreasing the timeframe within which these reports are due, is required.

AGL considers the current practise of reporting within two months is adequate and perfectly aligns with the aims of the QCA. AGL does not feel that decreasing the timeframe for reporting will improve the adequacy of the data. Nor will it improve the monitoring of the development of the gas and electricity markets by the QCA. AGL considers that the change to quarterly reporting requirements will give the QCA a much broader and insightful overview of the market. AGL does not consider the additional burden of decreasing the timeframe within which the reports are prepared will add any further value to the QCA's aims, especially when compared to the great cost it will impose upon retailers.

AGL considers that increasing the reporting requirements whilst simultaneously decreasing the timeframes for reporting would require the implementation of two extra reporting regimes in a short period of time. If new reporting requirements were to be implemented, AGL feels that retailers should be given time to develop and test the required system changes. AGL considers the commencement of the new reporting obligations in the June quarter 2010 do not allow enough time for this process to occur. AGL considers that if new requirements are implemented, the QCA should review its proposed timeframe for execution.

Reporting on Total Number of Disconnections

AGL does not support the intended requirement to report on the total number of disconnections during a given period. AGL is unable to recognise the rationale behind this requirement and considers that any result gained as a result of this reporting would be inaccurate. The total disconnection figure being reported would include situations where customers have been both rightly and wrongfully disconnected but would also include proxy disconnections, which would distort the resulting data.

AGL's systems currently record a disconnection event when completing routine business activities such as recontracting a customer or changing the name on an account. AGL's systems do not currently have the capacity to separate the physical disconnections from the systematic ones. AGL considers that it would also have to develop the reporting capacity for this requirement, as it does not currently

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exist. AGL will be unable to guarantee the integrity of any data obtained prior to these system changes.

The requirement to report on the total number of disconnections does not align with that of any other jurisdiction and AGL does not consider that this additional requirement would provide any further insight into the operations of the energy market in Queensland.

Please contact Nicole Wallis, Manager Retail Markets Regulation on (03) 8633 7440 if you have any questions in relation to this submission.

Yours sincerely,



Nicole Wallis

Manager Retail Markets Regulation

