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Queensland Competition Authority  
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**Submitted via online portal.**

19 June 2026

Dear Sir or Madam,

### **Proposed amendments to the Guaranteed Service Levels scheme**

AGL welcomes the opportunity to provide feedback to the Queensland Competition Authority's (**QCA**) consultation on the Guaranteed Service Level Scheme (**GSL**). The GSL plays an important role in Queensland's energy sector by underpinning minimum service standards, placing clear obligations on distributors and providing customers with payments when performance falls short.

While AGL welcomes the proposed amendments and their alignment with other jurisdictions, we have concerns from a retailer perspective regarding the shift in payment obligations and the operational impacts of extending GSL exclusions.

#### *Shifting onus of GSL payments to retailers*

AGL supports the proactive move to phase out cheque payments for GSLs and considers the proposed shift of payment obligations to retailers appropriate, noting this aligns with other jurisdictions. However, further consideration is required regarding the operational implications, particularly the frequency of payments.

As a retailer, AGL is required to apply GSL payments to the relevant account holder but can only do so once the corresponding credit has been received from distributors. Under the current annual payment cycle, this creates challenges where customers have moved premises or closed their accounts in the intervening period and an active or open account is no longer held by that customer with AGL. This may result in credits having to flow through to unclaimed monies processes instead of directly to account holders.

To mitigate this, AGL recommends reviewing the payment frequency under GSL, with a view to moving to more regular payments. This would improve the likelihood of payments reaching affected customers in a timely manner.

AGL therefore encourages the QCA to recommend that the Queensland Government amend *Chapter Two* of the *Electricity Distribution Network Code*<sup>1</sup> to prescribe a (more frequent) payment frequency, addressing these operational challenges, promoting greater consistency across the industry and leading to better consumer outcomes by ensuring customers more readily receive the credits they are entitled to.

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<sup>1</sup> <https://www.qca.org.au/project/retailers-and-distributors/electricity-distribution-network-code/>



It would be additionally valuable for QCA to communicate whether identifiers will be required for GSLs in billing. Without GSL identifiers being a requirement under regulation, it could pose significant administrative challenges for retailers to manage these payments going forward, requiring further resource.

Another issue worth noting is the ambiguity around customer manual claims. While inferred under the proposal of phasing out the use of cheques, it is unclear as to whether manual claims will be phased out of the GSL. If this is not being proposed, AGL requests clarity from the QCA as to which party will be managing these claims going forward, the retailer or distributor, and whether the expectation is for this process to remain similar to what it is presently.

AGL finally encourages the QCA to communicate whether the current process for customer complaints under the GSL<sup>2</sup> will remain considering the sharing of onus for payments between distributors and retailers. While we understand this may be implicit, it should be clearly noted once amendments are made that customers should first contact their distributor e.g., Energex, to avoid any confusion and unnecessary actions on a customer's behalf.

#### *GSL exclusions*

AGL supports the proposed extension to additional GSLs. We agree that natural disasters are beyond a distributor's control and are not a reflection of poor customer services. However, a cautionary approach should also be applied, like in any process surrounding the supply of essential services.

There is a risk that the exclusion mechanism may be overused in practice. AGL encourages the QCA to closely monitor distributor incident reporting through regular audit processes, supported by transparent reporting of compliance and non-compliance, to ensure the scheme's intent is upheld.

If you have any queries about our submission please contact Manager, Policy and Market Regulation, Emma Holloway at [eholloway@agl.com.au](mailto:eholloway@agl.com.au).

Yours sincerely,

Liam Jones

Senior Manager, Policy and Market Regulation

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<sup>2</sup> <https://www.ewoq.com.au/make-a-complaint/common-complaints/power-outages-and-supply>