



20 March 2026

Mr Charles Millsteed
Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

Dear Mr Millsteed

QCA Amendments to the GSL Scheme 2026 – Consultation Paper

Origin Energy (Origin) welcomes the opportunity to respond to the Queensland Competition Authority's (QCA) Consultation Paper regarding Energy Queensland's (EQ) proposal to amend the Guaranteed Service Levels (GSLs) applicable to Energex and Ergon Energy.

Origin acknowledges EQ's concerns regarding the planned phase-out of cheque payments from 2028–29. While cheques may continue to be issued until 1 July 2028, banks may cease accepting cheques after 1 July 2029. There is an option for banks to withdraw cheque services earlier with appropriate customer notice.

In light of this, Origin considers it appropriate for GSL payments to be made via customers' retail bills. This would involve the distribution business crediting the network bill, with the retailer subsequently applying the corresponding credit to the customer's bill based on information provided through the network billing process.

While the concept is straightforward, several implementation issues require consideration, including timing, payment frequency and enforceability of arrangements.

We would require a lead time of approximately 3–6 months for implementation. This will allow time to test batch files with Energex and Ergon Energy to ensure that the information and associated payments are correctly transmitted, displayed and processed.

In terms of payment frequency, we support payments being issued on a monthly basis as this increases the likelihood that the credit is passed on to the affected customer. There are considerable administrative issues with distributors waiting for a year to process GSL payment as customers may have either moved out of the property or switched retailers which means retailers are left with funds they are unable to allocate to an account.

It would also be appropriate for retailers to apply credits to customer accounts within 10 business days of being received by the retailer.

To ensure consistency and transparency, Origin supports any changes to GSL payment arrangements being supported by jurisdictional instruments that operationalise the arrangements. It would appear that it would be appropriate to include the requirements within the Queensland Electricity Distribution Network Code.

Finally, Origin supports the proposed exclusion of late connection and reconnection GSLs during declared disaster recovery events, recognising that such circumstances are beyond a distributor's control.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on [REDACTED] or [REDACTED]

Yours sincerely

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Sean Greenup
Group Manager Regulatory Policy