



20 March 2026

Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

Lodged at webpage: www.qca.org.au/submissions/

Dear QCA,

RE: Proposed amendments to the Guaranteed Service Levels scheme

Shell Energy Australia Pty Ltd (Shell Energy) welcomes the opportunity to provide feedback to the Queensland Competition Authority (QCA) on the Interim Consultation Notice and Issues Document, which includes proposals from Energy Queensland (EQ) seeking two amendments to the Guaranteed Service Level (GSL) arrangements that apply to Energex and Ergon Energy.

We understand that the QCA will consider feedback from this consultation which will inform a Draft Report covering material issues and draft proposed Electricity Distribution Network Code (EDNC) amendments.

About Shell Energy in Australia

Shell Energy is Shell's renewables and energy solutions business in Australia, helping its customers to decarbonise and reduce their environmental footprint.

Shell Energy delivers business energy solutions and innovation across a portfolio of electricity, gas, environmental products and energy productivity for commercial and industrial customers, while our residential energy retailing business Powershop, acquired in 2022, serves households and small business customers in Australia.

As the second largest electricity provider to commercial and industrial businesses in Australia¹, Shell Energy offers integrated solutions and market-leading² customer satisfaction, built on industry expertise and personalised relationships. The company's generation assets include 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and the 120 megawatt Gangarri solar energy development in Queensland.

Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy, while Powershop Australia Pty Ltd trades as Powershop. Further information about Shell Energy and our operations can be found on our website [here](#).

¹By load, based on Shell Energy analysis of publicly available data.

² Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021.

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General Comments

Shell Energy appreciates the QCA consulting stakeholders on the proposed changes included in the Interim Consultation Notice and acknowledges that it is more effective to run this consultation outside the EDNC review undertaken in 2023. We have reviewed the consultation documents and provide our feedback below on the two proposed amendments: the first relates to the impending national phase-out of cheques, and the second seeks to remove the exemption for connection and reconnection GSL payments during declared disaster events.

Retailer facilitated credits for GSL payments

Shell Energy acknowledges that this proposed amendment arises from the national phase-out of cheque payments and that the QCA must consider alternative mechanisms for administering payments, including the GSL scheme. However, this change represents an additional risk for retailers, and when viewed alongside the growing number of compliance obligations placed on retailers generally, these amendments are cumulative and significantly increase retailers' overall exposure.

Increased processing of GSL payments

Although retailers already have established payment arrangements for retailer-facilitated bill credits for GSL payments in other jurisdictions, extending these arrangements to Queensland does not reduce the complexity for retailers. Section 2.4.1 of the QCA paper states that retailers operating across multiple jurisdictions should already have processes and system capability to implement the amendments. However, we are concerned that relying on this assumption places additional obligations on Queensland retailers without addressing the systemic issues that retailers continue to face with GSL payment arrangements in other jurisdictions.

In practice, the following examples illustrate the recurring challenges retailers experience in facilitating bill credits for GSL payments:

1. Not all retailers, particularly smaller retailers, have access to automated tools (e.g., the Energetics NBV product/system). As a result, identifying GSL payments on DBs' network bills is often difficult and time-consuming;
2. Different codes used by DBs for GSL payments;
3. Inconsistent practices for issuing network bills to retailers mean bills may arrive in different file formats and layouts, and at varying times and frequencies. For example, one DB may issue a single network bill file each month, while another may issue several files per week; and
4. Expansion to an additional state—and therefore increasing the volume of GSL payments to be processed—will require retailers to allocate additional resources to apply customer credits.

Furthermore, the requirement to apply credits within 10 business days creates operational pressure, particularly where retailers receive multiple credits across separate network bills and must identify and process each credit within the mandated timeframe.

Shell Energy Recommendations

1. Obligation on DBs to maintain a consistent practice to provide GSL payment information to retailers. For example, Ausnet will provide a separate email to retailers in addition to the network bill, outlining and summarising all GSL payments including NMI/MIRN and amount; and
2. Compensation in the form of an administration fee could be paid to retailers to cover the cost of resourcing to facilitate credits for GSL payments if proposal 2 is approved. If the scheme is expanded



and more payments are occurring by removing the exemption for declared disaster events, more frequent payments will put resourcing pressure on retailers. An example of this is under the Utility Relief Grant Scheme in Victoria, retailers are paid an administration fee to cover some of the cost of processing.

Conclusion

Shell Energy is broadly supportive of the need to consider alternative payment options arising from the national cheque phase-out. However, if increased volume of GSL payments are going to be facilitated by retailers, we strongly encourage QCA to ensure that there are obligations placed on the Distributor to implement a consistent billing practice for GSL payments as described in our submission.

We welcome the opportunity to discuss our submission further. Please contact Tessa Liddelow at [REDACTED] for any queries regarding this submission.

Yours sincerely

Libby Hawker

General Manager - Regulatory Affairs & Compliance

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