



22 May 2019

Susie Black  
Director, Adjudication Branch  
Australian Competition and Consumer Commission  
23 Marcus Clarke Street  
Canberra ACT 2601

Submitted via email: [adjudication@accc.gov.au](mailto:adjudication@accc.gov.au)

REF: AA1000439

Dear Ms Black

## **APPLICATION FOR AUTHORISATION OF NEW ENERGY TECH CONSUMER CODE – CONSULTATION PAPER**

Origin Energy Limited (Origin) welcomes the opportunity to comment on the ACCC's consultation for the New Energy Tech Consumer Code.

Origin has been involved in the development of the Consumer Code and believes it will help consumers to easily identify retailers who have voluntarily signed up to a code which maintains minimum standards of good practice and consumer protection for behind the meter products. The New Energy Tech Consumer Code builds on the Clean Energy Council Solar Retailer Code, and as a recent signatory to the Solar Code, Origin welcomes a smooth transition across to the new Code.

There are two key points that we wish to raise in our submission. Firstly Origin believes that customers who wish to self connect to the network should accept responsibility for doing so. Secondly a potential requirement of government tenders to specify only Code signatories is unlikely to reduce competition. We expand on these points below.

### *Consumer Self Connections*

One area that remains of concern is the requirement that signatories provide self-connecting applicants with detailed information on the connection process<sup>1</sup>. This includes information that is largely outside the control of the signatory such as third party timeframes or deadlines. A more preferable Clause would be to provide general information on obtaining an Energy Network connection and allow self-connecting applicants to retain the connection risk.

Origin's current business practices allow for an efficient connection process for all applicants and is the most cost effective way to ensure smooth installation of their product. Providing detailed information to self-connecting applicants risks a delayed process, incorrect information and inefficiencies which could result in higher costs.

### *Government Tender Requirements*

The Applicants have raised an issue around Government tender requirements. Specifically

“the impact of the Consumer Code could be magnified if, as expected, government funded or approved New Energy Tech incentive schemes or rebates are only available for products or services provided by signatories to the

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<sup>1</sup> Clause 33, Draft New Energy Tech Code, p.13-14

Consumer Code or if governments mandate Consumer Code subscription for classes of government purchasing/supply.”<sup>2</sup>

Origin does not believe this would hinder competition in the market generally and would only be a requirement of specific government tenders. It would incentivise and drive New Tech businesses to improve their customer service offerings and sign up to the Consumer Code.

Should you have any questions or wish to discuss this information further, please contact me via email [james.googan@originenergy.com.au](mailto:james.googan@originenergy.com.au) or phone, on (07) 3512 4138.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Googan', written in a cursive style.

James Googan  
Manager, Regulatory Policy  
Origin Energy

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<sup>2</sup> Clause 4, Application, page 4.