



8 December 2021

Natasha Cheshire
ESCOSA
GPO Box 2605
Adelaide SA 5001

Dear Ms Cheshire

RE: Retailer Energy Productivity Scheme (REPS) Code review 2021

Shell Energy Australia Pty Ltd (Shell Energy) welcomes the opportunity to respond to the Essential Services Commission of South Australia's (ESCOSA) Retailer Energy Productivity Scheme (REPS) Code review 2021.

About Shell Energy in Australia

Shell Energy is Australia's largest dedicated supplier of business electricity. We deliver business energy solutions and innovation across a portfolio of gas, electricity, environmental products and energy productivity for commercial and industrial customers. The second largest electricity provider to commercial and industrial businesses in Australia¹, we offer integrated solutions and market-leading² customer satisfaction, built on industry expertise and personalised relationships. We also operate 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and are currently developing the 120 megawatt Gangarri solar energy development in Queensland. Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy.

www.shellenergy.com.au

General comments

Shell Energy considers that the proposed changes to the REPS Code are reasonable and fit-for-purpose given the aims of REPS and the changes compared to the previous Residential Energy Efficiency Scheme (REES). We largely support the proposed amendments to the code.

The consultation paper outlines that the changes to the fit and proper person provisions within the code are designed to improve clarity. To a great extent, the revised clause 6.6 and in particular clause 6.6.2 provides an improved level of detail on how to define a fit and proper person. Shell Energy considers that this clarity could be further improved by more explicitly setting out what ESCOSA sees as the minimum standard for a fit and proper person. This could include information such as a guide outlining the kinds of training or licences that may be required to demonstrate that a person meets the fit and proper person test. This would provide a greater degree of clarity to retailers and installers that they will remain compliant with the code.

We support ESCOSA's proposed changes to the training requirements to move away from requiring all training to be completed by 31 March. Under the draft code, all necessary training will have to be completed prior to

¹ By 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 2011-2020.



the person performing any REPS activities. This is a sensible change which brings additional flexibility to installers and retailers.

Shell Energy agrees that the changes to bring a more explicit link between obliged retailers and customers are likely to improve customer outcomes. We concur with ESCOSA that this change will ensure that where there are problems with an installation, consumers have other avenues to make complaints and to seek remediation. The proposed requirement to notify customers of the obliged retailer through the information statement prior to the commencement of the activity is a reasonable approach to take.

Similarly, the new requirement for obliged retailers to disclose the amount of any co-payment on the information sheet prior to the commencement of an activity is an appropriate addition to the code.

Finally, Shell Energy strongly supports the changes to the record keeping obligations. Currently, obliged retailers are required to keep possession of records for five years following the expiry of the Regulations (i.e. 2035). The proposed change to require obliged retailers to retain possession of records for five years after the completion of an activity is a notable improvement. This change will maintain strict record-keeping obligations but lower the compliance costs for retailers who under the current code may need to retain records for decades.

For more detail on this submission, please contact Ben Pryor (0437 305 547 or ben.pryor@shellenergy.com.au).

Yours sincerely

[signed]

Libby Hawker
GM Regulatory Affairs & Compliance