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Independent Pricing and Regulatory Tribunal
PO Box A2449
Sydney South NSW 1235

Submitted electronically: ESS@ipart.nsw.gov.au

Re: Consultation - Combined audit process for scheme participants

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to make this submission on the Independent Pricing and Regulatory Tribunal's (IPART's) proposal to combine the audit process for the Energy Savings Scheme (ESS) and the forthcoming Peak Demand Reduction Scheme (PDRS). We strongly support measures to reduce the regulatory burden on energy businesses. Therefore, we support IPART's proposal to combine the audit process for the two schemes, which as IPART notes, should streamline the audit process and allow scheme participants to appoint a single auditor for both tasks.

However, the consultation paper seems to contain some minor errors and creates some confusion about the timing of key events under both schemes. Therefore, we would welcome IPART's clarification of our precise requirements. For example, we note the following:

- The consultation paper refers to 15 February as the due date for PDRS annual statements, while the chart that depicts the timeline identifies the date as 15 December.
- The chart states the IPART will provide AEMO data to scheme participants by mid-August but we understand the *Electricity Supply Act 1995* requires IPART to nominate the 4 days with the highest maximum demand by 30 April to allow scheme participants to calculate their individual liabilities.
- Furthermore, any delays to the release of AEMO data by IPART could create problems for scheme participants. At present, AEMO data for the ESS is released in early February and the subsequent reporting deadline is 30 April. Delaying the release of this data in line with the chart in the consultation paper would effectively reduce the time available to prepare ESS statements from over 2 months to one month. If this is the case, we encourage IPART to consider allowing scheme participants to submit their statements on 31 October, rather than 30 September.
- Depending on the date by which IPART makes AEMO data available, it may be able to account for 30 week revisions, rather than the 20 week revisions to which the consultation paper refers.

About Red and Lumo

We are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in Victoria, New South Wales, Queensland, South Australia and in the ACT to over 1.2 million customers. Please contact [REDACTED] if you have any further queries or want to discuss this submission in more detail.

Yours sincerely



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