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Submitted via email: [reviews@escosa.sa.gov.au](mailto:reviews@escosa.sa.gov.au)

## Electricity Distribution Code Review 2025 – 2030 Implementation

AGL Energy (AGL) welcomes the opportunity to provide feedback to the Essential Services Commission of South Australia (the Commission) on the draft Electricity Distribution Code Review – 2025 Implementation Consultation Paper.

Proudly Australian since 1837, AGL delivers around 4.5 million gas, electricity, and telecommunications services to our residential, small and large business, and wholesale customers across Australia. AGL operates the largest electricity generation portfolio in Australia of any ASX-listed company, with a total operated generation capacity<sup>1</sup> of 7,982 MW as of 30 June 2024. Since 2006, AGL has invested billions of dollars in the construction and delivery of over 2 GW of renewable and firming capacity in the National Electricity Market (NEM).

AGL's feedback to this consultation is based on our longstanding history as one of the largest providers of electricity to South Australians<sup>2</sup> as well as our extensive experience operating as a gas and electricity retailer in the NEM.

Number	Consultation Question	AGL Comment
1.	<i>Do you support the proposal to delay introducing separate service standards for first contact</i>	AGL notes that the decision was made and that SAPN invested to attempt to capture performances in 2022. As such, AGL sees no reason to not continue with these KPIs.
2.	<i>Do you support the proposal to delay introducing separate service standards for telephone responsiveness and a customer service quality measure (such as first</i>	AGL appreciates the issues that have led to this delay; however, we are concerned that the inherent problems with the monitoring from 2022 to 2024 were not identified and rectified earlier.

<sup>1</sup> FY24 installed capacity is the AEMO registered capacity, also taking into account the three 25MW upgrades to the Bayswater Power Station Units 4, 2 and 3 in FY20, FY22 and FY23 respectively.

<sup>2</sup> [AGL ESG Data Centre FY24](#): Servicing 353,517 electricity customers in SA as at 30 June 2024, including residential, small business and commercial and industrial customers.



*contact resolution) for the Builders and Contractors' customer service until 1 July 2028?*

AGL considers that SAPN should be required to provide feedback to ESCOSA on the development and implementation of any changes and should have an independent audit undertaken to ensure that the processes and survey that have been implemented are appropriate for the outcomes sought.

AGL would be very disappointed if, by 2027, another fundamental flaw was identified and the appropriate KPIs were again delayed.

Further, AGL considers that SAPN's responsiveness to retailers coordinating new connections or off supply matters should also be tracked and have an appropriate KPI associated with that responsiveness.

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**3.**      *What measure would best capture customer service quality for Builders and Contractors?*

AGL considers that a successful resolution of the customer's issue is more important than just answering the phone. Problems facing builders and contractors are likely to be more complex and potentially involve coordination with SAPN and other service providers, such as metering providers.

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**4.**      *Do you support the proposal to require public reporting on the timely repair of street light faults and other public lighting reporting requirements? Why or why not?*

AGL supports the proposal for public lighting repair times to be made public. Public lighting is a service which effectively all SAPN customers pay for, either through local government or roads authority payments (supported by SA customers) or through any electrical losses applied to SA retailers.

Further, poor public lighting management is one of the few areas of SAPNs performance, which is broadly visible to, and impacts, the public at large, and ongoing reporting of SAPNS responsiveness provides a reference point for other services.

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**5.**      *Do you support the proposal to require public reporting on complaint responsiveness and escalation? Why or why not?*

See AGL's response to question 5 above.

Public awareness of complaint responsiveness and resolution should provide consumers with a basis for comparison and assist them in determining how their matter (or how their constituents' matters) are being managed. Further, this should also allow the Ombudsman additional insight into SAPN's responsiveness.

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**6.**      *Do you support the proposal to remove the definition of 'interruption' from the Code, and instead describe what 'interruption' means in each relevant clause?*

AGL understands the intention to separate the various interruptions into different categories. AGL supports this proposal insofar as the data that will be available is able to be compared with similar data from other networks.



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| <b>7.</b> <i>Do you support the proposal to include a provision that the distributor must provide a copy of the Code to customers on request</i> | It seems reasonable that SAPN should be obligated to make consumers aware of the Code. However, given ESCOSA is responsible for managing the Code, it would seem preferable to ensure that SAPN provides a link to the relevant page on ESCOSA's website so that consumers are always directed to the latest version.  |
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| <b>8.</b> <i>Do you support the proposed changes to Part A – Preliminaries of Electricity Guideline No. 1?</i>                                   | <p>3.2 - AGL notes the consideration that the Guideline has been generalised to apply to other distributors, however, it is not unreasonable for the Guideline (or the website where the Guideline resides) to clarify that, at the time of publishing, SAPN was the single regulated network providing distribution services to SA customers. This ensures that SA customers are clear who is responsible for meeting the obligations within the guidelines.</p> <p>3.3 - AGL considers that a summary matrix should be provided referencing the information to be collected, the KPI and the parties to whom this information is available. AGL considers that all information should be publicly available at a broad level, noting the variation in target audiences (e.g., public and public lighting customers).</p> |
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| <b>9.</b> <i>Do you support the proposed changes to Part B – Requirements for reporting to other parties of Electricity Guideline No. 1?</i>     | <p>AGL seeks to understand that the obligation to report to public lighting customers would mean that SAPN would have to monitor faults, repairs and replacements of public lighting infrastructure by local government, roads authority and any other public lighting customers separately.</p> <p>AGL could see SAPN's public lighting customers would have an interest in such information but considers that there is likely a distinct variation between management of urban equipment and rural equipment. Until metering is applied to public lighting equipment, this may be complex and difficult to report. However, once public lighting metering is in place, AGL would expect that management of public lighting assets would not need to be triggered by public reporting.</p>                               |
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| <b>10.</b> <i>Do you support the proposed customer service operational reporting requirements</i>  | <p>See previous response.</p> <p>AGL notes the value of this reporting and queries how ESCOSA or SAPN will provide this information and actions against poor performance to these key stakeholders.</p>  |



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| 11. | <i>Do you support introduction of reporting and monitoring of the number of complaints received and the number escalated to EWOSA? Why or why not?</i>                    | <p>AGL supports such performance reporting. The number of complaints is a crucial indicator of poor performance, and the number raised to ESCOSA is a further indication of performance.</p> <p>AGL does, however query how complaints from Builders and Contractors are adequately captured and assessed. AGL would expect that the calls from builders and contractors would be split between support calls to problem calls (or both). SAPN's processes need to capture such splits of call category.</p> |
| 12. | <i>Do you support the proposed reliability of supply operational reporting requirements? Why or why not?</i>  | <p>See AGL's response to Question 11 above.</p>  |
| 13. | <i>Do you support the proposed GSL scheme operational reporting requirements?</i>   | <p>AGL has no specific comment.</p>  |
| 14. | <i>Do you support the proposed street light repair operational reporting requirements</i>   | <p>AGL considers the proposed reporting requirements are presently adequate.</p> <p>AGL notes that as public lighting metering comes online, then that data should enable more effective street lighting fault analysis and more responsive repairs.</p>   |
| 15. | <i>Do you support the Technical Regulator operational reporting requirements proposed for the 2025 – 2030 regulatory period?</i>  | <p>AGL supports this change.</p>   |
| 16. | <i>Do you support the Commission's proposal to remove the Technical Regulator operational reporting requirements from the start of the 2030 – 2035 regulatory period?</i> | <p>AGL considers that this matter should be reviewed closer to 2030 before a final decision is made. AGL proposes this on the basis that over the next five years, SAPN will be receiving substantial information on customer supply through the provision of Power Quality data provided by metering businesses (to support various programs such as neutral integrity) and potentially more information relating to Customer Energy Resources (CER).</p>   |



As such, SAPN's technical ability and programs may start to change substantially over this next period and warrant further monitoring.

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17.      *Do you support the proposed statistical information operational reporting requirements?*      AGL has no specific comment.

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18.      *Do you support removal of embedded generation operational reporting requirements?*      AGL has no specific comment.

If you would like to discuss any aspect of AGL's submission, please contact Valeriya Kalpakidis at [vkalpakidis@agl.com.au](mailto:vkalpakidis@agl.com.au).

Yours sincerely,

A handwritten signature in black ink that reads 'Liam Jones'.

Liam Jones

Senior Manager Policy and Market Regulation

**AGL Energy**