INTRODUCTION

The Shopping Centre Council of Australia (SCCA) represents Australia’s major owners, managers and developers of shopping centres. Our members own and operate shopping centres in metropolitan, regional and rural areas across Queensland.

We welcome the opportunity to provide a submission to the Department of Natural Resources, Mines and Energy on the Review of Queensland’s Energy Legislation, and specifically the Options Paper (October 2019).

We have provided previous comments to the 2018 Issues Paper as part of the review. The Options Paper notes some of our previous comments including in relation to ensuring alignment between national and state legislation.

As the Government is aware, we have also previously engaged on various Queensland reviews on energy policy and legislative issues, including providing comment on the Electricity and Other Legislation (Batteries and Premium Feed-in-Tariff) Amendment Bill 2017 (and 2018) to the Parliamentary State Development, Natural Resources and Agricultural Committee, and the Regulatory Impact Statement – On-supply customer access to energy rebates and the Energy and Water Ombudsman Queensland (November 2015) in January 2016.

Overall, based on our review of the Options Paper we don’t have specific issues to raise, noting the recommended alignment with the national regulation (Option 2 – National Alignment; section 2.4: Licensing; page 81), including the AEMC’s Updating the Regulatory Frameworks for Embedded Networks, finalised in June 2019, which we were heavily involved in. We also note there is no proposal for further ‘Queensland specific’ legislation.

Further, we note the proposal to extend access the Ombudsman scheme only applies to residential customers (e.g. Table 17), as opposed to non-residential customers.

We support this approach. We note that that this is also consistent with the AER’s position where it provided that “unlike residential customers, we have not received evidence of a need for small business customers to access ombudsman schemes” (Notice of Final Instrument: Revised AER Retail Exempt Selling Guideline Version 5: March 2018).

On this issue, we also refer to our previous submission on the Regulatory Impact Statement – On-supply customer access to energy rebates and the Energy and Water Ombudsman Queensland (November 2015) in January 2016.

CONTACT

We would be pleased to discuss this submission with the Government, if required.