

29 July 2026

Manager, Energy Consumer Policy
Energy Consumer Policy Branch
Consumer, Community and First Peoples' Energy Transition
Department of Energy, Environment and Climate Action (Vic)
PO Box 500 East Melbourne VIC 8002

Emailed to energyretail@deeca.vic.gov.au

Dear Manager,

The Australian Energy Council (AEC) is the peak body for energy retailers and generators operating in competitive markets. Our members generate and sell energy to over 10 million homes and businesses and are committed to delivering a reliable, affordable and decarbonised energy system for consumers. The AEC supports net zero by 2050 and recognises the electricity sector's role in reducing Australia's emissions. Our members are major investors in renewables, firming and storage technologies that are critical to ensuring that customers continue to receive reliable and sustainable energy supply as we navigate the energy transition.

The Australian Energy Council and its members write to express our support for the proposal that would allow multiple business sites to be aggregated and treated as a single large customer for electricity or for gas market participation. The current restrictions prohibiting site aggregation in Victoria impose unnecessary regulatory burden and administrative costs on both retailers and business customers. These inefficiencies hinder competition and limit the capacity of energy providers to offer flexible and cost-effective solutions tailored to the needs of consumers.

Aligning Victoria's framework with the NERR by enabling multi-site aggregation would support more efficient market participation, enhance consumer choice, and reduce operational costs across the sector. It would improve regulatory alignment between jurisdictions, facilitating consistency in energy retail operations and customer offerings nationwide.

We commend the Department's initiative in progressing this important reform.

Please do not hesitate to contact me at jo.desilva@energycouncil.com.au or by telephone on 03 9205 3100 if you wish to discuss our submission further.

Yours sincerely,

Jo De Silva

Jo De Silva

General Manager Retail Policy