





Contents

Introduction	2
1. Changes to the energy rules	3
2. Enforcing compliance and resolving disputes	6
3. Energy offers and prices in 2017–18	8
4. Licensing energy businesses	13
What's next?	14
Appendix A: Electricity offers	16
Appendix B: Gas offers	21

Superseded

Introduction

Energy companies must regularly report to us on how they are performing in Victoria's energy market. This includes information on how many residential and small customers they have in Victoria, and the number of customers participating in their hardship program.

Unfortunately, in August 2018, AGL told us it could not submit their 2017–18 performance report by the required date of 31 August 2018. Although AGL provided us with the data on 31 October 2018, it was not provided with reasonable levels of assurance in time. This means we are unable to provide our regular annual report by the end of this year, which includes information on the performance of retailers in 2017-18.

This Victorian energy market snapshot provides a summary of the state's energy market in 2017-18 including:

1. changes to Victorian energy rules we have completed or begun
2. enforcement action against energy companies that have not complied with the rules
3. information on the extent customers have been wrongfully disconnected
4. an overview of the energy offers available in the market by the end of 2017–18.

This report meets our reporting obligations under Sections 54V and 54W of the Essential Services Commission Act 2001, Section 39A of the Electricity Industry Act 2000 and Section 47 of the Gas Industry Act 2001.

However, due to delays in reasonable assurance on AGL's performance data, this report does not report on the performance of retailers against indicators such as disconnections and reconnections, market share, customer service, and hardship program participants and debt levels.¹

We will publish our comprehensive 2017–18 annual report on the Victorian energy market in early 2019.

¹ As per section 54V(2)(c) and (d) and 54W(a)(i) and (b) of the Essential Services Commission Act 2001.



1. Changes to the energy rules

We regularly review the Victorian energy rules to promote the long-term interests of Victorian consumers. In 2017–18, we made several changes to the energy rules that affect Victorian customers.

New energy rules coming into effect

Assisting customers to participate confidently in the Victorian energy retail market

In 2017, the Independent Review into the electricity and gas retail markets in Victoria found that the benefits of competition in the energy sector have not been realised and that consumers were paying more for the same service.

As a result of the work arising from the review, we made changes to keep consumers informed of updates to their bills and better offers from their retailer.

The new energy rules mean that retailers:

- must tell customers on their bill whether they are on the retailer's cheapest energy plan and how much they could save by switching
- must notify customers at least five days prior to price or benefit changes that will affect the customer's bill – including a message about their 'best offer' for the customer.

Date of effect: **1 July 2019**

Help for customers facing payment difficulties

Following an inquiry into the experiences of customers in hardship, we worked closely with the energy industry and consumer advocates to make new rules that ensure customers receive meaningful assistance so that disconnection is only ever a last resort.

Retailers will need to provide customers with assistance from January 2019, to help pay their bills and manage energy costs.

Date of effect: **1 January 2019**



Responsibility based regulation

The Victorian retail energy market has faced a series of high profile reviews that have drawn attention to customers' negative experiences in this market.

We have been reviewing the retail energy rules over the past few years. In the process, we have found that traditional energy rules have focused retailers on a ticking-the-box approach to compliance, rather than aim for better outcomes for its customers. This type of regulation has not necessarily gained the trust of customers that the market is working effectively and efficiently.

We have therefore adopted a new approach to rule making – we call it **responsibility based regulation**.

Responsibility based regulation shifts the focus on energy businesses to take greater responsibility for the outcomes that their customers experience.

We have created new entitlements for customers to make it easier to understand when a better deal is available, and to provide minimum levels of support for customers finding it difficult to pay for their energy bills.



Protections for private energy network customers

If you live in an apartment complex, retirement home, caravan park, or you are a tenant in a shopping centre, you may receive your electricity via an embedded electricity network.

From 1 January 2019, you will receive similar protections to other Victorians electricity customers that include:

- access to free and independent dispute resolution via the Energy and Water Ombudsman (Victoria)
- clear information from the person who sells electricity to you about how much you will be paying and any terms or conditions that the sale is subject to
- the person who sells electricity to you also needs to get your explicit and informed consent before creating an agreement to sell electricity to you
- you cannot be charged more than a capped electricity rate in your area.²

Persons exempt from the requirement to hold a licence for selling or supplying electricity may also be required to register with the commission. We will publish their contact details on a public register of exempt persons. This helps you find the contact details of your electricity supplier.

In 2017–18, we registered 1,277 businesses who are exempt from holding a licence. You can access the register at www.esc.vic.gov.au/energy-licence-exemptions.

Date of effect: **1 January 2019**

New energy rules now in effect

A higher debt threshold for disconnections

Retailers can only disconnect you from your energy supply if your debt is \$300 (including GST) or more. Previously the threshold for disconnection was \$132 (including GST).

Date of effect: **1 July 2018**

Renewable customers receive a single or time-varying feed-in tariff

We set the minimum rate that customers receive for the electricity they export from their renewable energy systems, such as rooftop solar panels.

For 2018–19, customers receive a minimum single rate feed-in tariff of 9.9 c/kWh for any electricity they export to the grid. Retailers can offer rates above the minimum rate that we set. Retailers also have the option of offering a feed-in tariff that varies depending on the time of day the electricity is exported.

Date of effect: **1 July 2018**

New voltage limits to support bushfire prevention technology

In response to the recommendations of the Bushfires Royal Commission, the Victorian Government made changes to the regulations in 2016. This requires the installation of special bushfire mitigation equipment known as rapid earth fault current limiters. This type of equipment will be installed on parts of the network in areas of high bushfire risk with high voltage powerlines.

We reviewed and modified the voltage technical limits to support the compliant operation of the bushfire mitigation equipment in Victoria.

Date of effect: **20 August 2018**

² Unless determined by the commission or otherwise, the capped electricity rate is your local area retailer's standing offer price. The local area retailers are AGL, EnergyAustralia and Origin, depending on where you live.



Changes in progress

Family violence resources to help retailers support customers

We are developing resources to assist energy retailers to better support customers who may be struggling to manage their personal and financial security due to family violence.

We have been working closely with retailers, the community sector, family violence specialists and other service sectors to progress this work throughout 2018–19.

We anticipate amending the rules by March 2019.

Review of electricity distribution rules to promote stability and innovation

In Victoria, there are rules that electricity distribution businesses must follow. This includes rules for distributors on:

- notifying customers of planned or unplanned electricity outages
- payments to customers if they have experienced interruptions to their electricity supply
- protections for customers using life support equipment
- other technical standards related to the operation of the network.

We will commence our review of the electricity distribution rules with a forum in December 2018. This will involve consumer groups, distributors, energy retailers and other network users.

Improved electricity connection processes

In September 2018, we took steps to ensure that new property developments receive timely electrical connections. We consulted extensively with electricity distributors and property developers across the state.

Since September 2018, we have been supporting improvements to the system by:

- supporting a commitment from electricity distributors to improve response times, clarify expectations around the connections process

and improve their communication with the development industry

- chairing a governance committee to monitor the performance of the electricity network and the property development sector
- establishing a new feedback register where stakeholders can raise concerns about electricity connections to new property developments.

How can I get involved?

We want to hear from you.

Whenever we make any changes to the energy rules in Victoria, we seek feedback on our draft decisions before we finalise the rule changes.

If you are interested in participating in our consultation processes let us know by emailing us to notify you about specific projects.

You can also keep an eye out for open consultations at www.esc.vic.gov.au/current-consultations.





2. Enforcing compliance and resolving disputes

Compliance with the energy rules

We regulate the retail energy market in Victoria by setting energy rules and monitoring the compliance of energy businesses. When we identify a potential breach of the rules, we work with energy businesses to improve their performance. Where necessary, we take stronger action.

Alinta Energy pays \$300,000 in penalties for allegedly signing-up customers without their consent or knowledge

Alinta Energy paid penalties totaling \$300,000 after 15 customers were allegedly transferred to the business without their consent or knowledge.

Following an investigation into the matter, we found that between September and October 2016, sales agents working for Alinta Energy allegedly transferred customers to the energy company without their consent or knowledge. The affected customers were from locations across Victoria, including St Kilda, Morwell, Croydon and Warrnambool.

Customers have the right to choose their energy retailer and must give their consent to any changes made to their energy supply or contract.

Customers must be given all relevant information before they are asked to consent to a new contract or before they transfer to another energy retailer. Under the energy rules, energy companies must ensure that customers receive their contract information in plain language. Consent to any transaction must also be given in writing or verbally by a capable person.

Alinta Energy transferred all affected customers back to their original retailer.

The commission cautions retailers that they are responsible for the actions of third parties who interact with customers on the retailer's behalf.

Other compliance and enforcement actions

Energy retailers and distributors are required to report to us when they have identified a situation where they have may have breached the energy rules. In 2017-18, we reviewed 76 matters that were reported to us.

Most of the reported breaches were due to energy retailers failing to send welcome packs to new customers – retailers were subsequently able to issue welcome packs to customers. Some of the other matters included retailers not notifying customers of a tariff variation, overcharging, and delays in distributors providing customers with notification of planned outages.

Energy companies provided us with plans to fix the problems. Companies proposed a range of solutions, some of which included retraining staff, and reviewing and modifying IT systems and internal processes. We will audit these companies next year to check that there are no repeats of these problems. Our audits review the systems, processes and training of staff in both retailers and distributors.

We also referred some matters to more appropriate authorities. For example, we referred matters related to misleading advertising to the Australian Competition and Consumer Commission.



Wrongful disconnection payments

We set energy rules that retailers must strictly comply with before disconnecting a customer for not paying their energy bill. In 2017–18, retailers reported to us that they breached these rules and wrongfully disconnected 502 customers. In total, retailers paid \$638,398 in compensation to the affected customers (table 2.1).

In some cases where a retailer cannot resolve a disconnection dispute, these can be referred to

the Energy and Water Ombudsman (Victoria). If the ombudsman is unable to resolve the matter, it is then referred to us. We resolved eight wrongful disconnection payment cases referred to us in 2017–18 (table 2.2).

If a retailer disconnects a customer in breach of their contract with that customer, the retailer must pay \$500 in compensation for each day the customer was off supply.

Table 2.1 Reported wrongful disconnection payments between July 2017 and June 2018

Retailer	Total amount paid during the quarter				Total customers affected			
	Jul – Sep 2017	Oct – Dec 2017	Jan – Mar 2018	Apr – Jun 2018	Jul – Sep 2017	Oct – Dec 2017	Jan – Mar 2018	Apr – Jun 2018
AGL	\$99,723	\$79,822	\$20,132	\$39,556	39	33	16	30
EnergyAustralia	\$13,223	\$38,830	\$26,108	\$12,853	15	23	22	16
Origin Energy	\$7,258	\$4,937	\$14,792	\$21,820	10	7	18	12
Lumo Energy	\$14,982	\$8,054	\$9,792	\$18,091	10	4	10	19
Red Energy	\$5,087	\$75	\$6,082	\$10,713	7	1	9	18
Simply Energy	\$8,133	\$14,375	\$6,192	\$25,895	5	14	5	14
Alinta Energy	\$3,254	\$4,922	\$2,076	\$17,020	5	5	2	7
Click Energy (amaysim)	\$2,467	\$6,009	\$2,543	\$4,600	4	5	3	7
Dodo & Commander (M2 Energy)	-	\$1,704	-	-	-	2	-	-
Momentum Energy	\$5,121	\$210	\$28,099	\$6,676	9	1	11	14
Powerdirect	-	\$3,500	\$1,075	-	-	1	2	-
Powershop Australia	-	-	\$3,073	\$5,990	-	-	1	11
1st Energy	-	-	\$3,884	-	-	-	4	-
CovaU Energy	\$523	\$2,596	\$24,000	-	1	2	38	-
Tango Energy	\$264	\$1,165	\$1,062	\$40	2	3	4	1
TOTAL	\$160,035	\$166,199	\$148,909	\$163,225	107	101	145	149
YEARLY TOTAL				\$638,398				502

Figures may not add up precisely due to rounding. Excludes wrongful disconnections disputes resolved by the commission.

Table 2.2 Wrongful disconnection payment cases resolved by the commission in 2017–18

Retailer	Decision	Number of decisions	Total compensation amount
AGL	Disconnection wrongful	2	\$2,051
EnergyAustralia	Disconnection wrongful	3	\$973
	Disconnection not wrongful	2	-
Lumo Energy	Disconnection wrongful	1	\$615

Figures are based on wrongful disconnection payment cases referred by the Energy and Water Ombudsman (Victoria).

3. Energy offers and prices in 2017–18

We compared electricity and gas offers published by Victorian retailers on the government comparator website. However, we did not collect data on offers that are not generally available to the public, for example, when retailers make you a personalised offer over the phone.

We compared standard contract offers, and discounted and undiscounted market offers.

Energy price changes

The prices of energy offers have changed, depending on the type of offer available.

Our estimates of residential customer annual bills, and our estimates of price changes in 2017–18 are summarised in table 3.1.

Standard contract offers

We determine the terms and conditions of standard contracts, but we do not set the price. By law, retailers were only permitted to publish new standard contract prices in December 2017 and June 2018. Retailers will be able to publish standard contract prices on 30 November 2018.

If you have not changed your energy retailer in the past, you are likely to have what is called a standard contract.

We found that prices in standard contracts have increased by 16 and 14 per cent for electricity and gas, respectively (as shown in table 3.1). For electricity, this is a larger increase than the year before, which was an increase of four per cent.

The annual increase in standard contracts for gas was around the same amount in 2016–17, which means that gas prices have increased since 2015–16 by 32 per cent over the past two years.

Market offers

Although we determine some minimum standards for market contracts, most of their terms and conditions are set by the retailer. In many cases, your retailer can change the price of a market contract at any time.

If you are on a market contract, you will typically pay much less for your energy than if you are on a standard contract – provided you meet the conditions of the contract, such as those with discounts:

- **Discounted market offers** have discounts attached to their prices. These discounts might only be applied under certain conditions, such as for paying your bill on time or for agreeing to only be billed electronically.
- **Unconditional market offers** have no discounts attached to their prices.

If you have changed retailer before, you are likely to have what is called a market contract.

We found that the average price of discounted electricity and gas offers increased by five to six per cent in 2017–18, if all the conditions of these offers were met. If the conditions of the discounts were not met entirely, average prices would have increased by 11 to 12 per cent. Interestingly, the price of unconditional market offers (those without any discounts) decreased by two per cent for electricity and gas.

Figure 3.1 Annual energy price changes

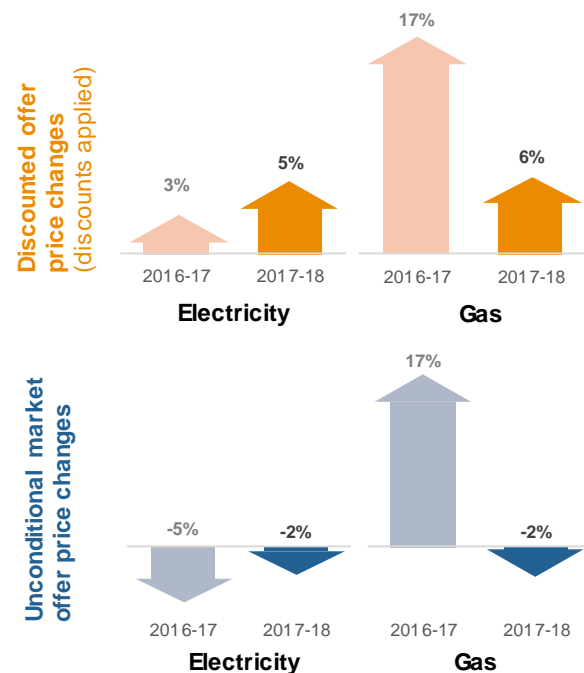




Table 3.1 Average estimated annual residential energy bills since 2014–15

	Electricity				Gas			
	2014-15	2015-16	2016-17	2017-18	2014-15	2015-16	2016-17	2017-18
Standard contracts	\$1,522	\$1,514	\$1,573	\$1,824	\$1,316	\$1,384	\$1,602	\$1,832
(% change from previous year)		↓ 1%	↑ 4%	↑ 16%		↑ 5%	↑ 16%	↑ 14%
Unconditional market contracts	\$1,345	\$1,437	\$1,358	\$1,326	\$1,207	\$1,316	\$1,540	\$1,513
(% change from previous year)		↑ 7%	↓ 5%	↓ 2%		↑ 9%	↑ 17%	↓ 2%
Discounted market contracts (with conditions applied)	\$1,253	\$1,251	\$1,283	\$1,352	\$1,179	\$1,221	\$1,423	\$1,507
(% change from previous year)		0%	↑ 3%	↑ 5%		↑ 4%	↑ 17%	↑ 6%
Discounted market contracts (without conditions applied)	\$1,465	\$1,521	\$1,622	\$1,807	\$1,329	\$1,401	\$1,615	\$1,815
(% change from previous year)		↑ 4%	↑ 7%	↑ 11%		↑ 5%	↑ 15%	↑ 12%

Estimated residential annual bills assume yearly electricity consumption of 4,000 kWh and gas yearly consumption of 54.4 GJ. 2016-17 and 2017–18 prices are based on published flat and multi-flat offers, excluding time-varying rates, controlled loads and standard contracts applying to fewer than 200 customers. Offers are based on those available on 30 June each financial year. Figures include GST.

Comparing energy offers from retailers

Comparing electricity offers

Retailers can offer a range of energy offers to Victorian customers.

We compared the range of electricity offers for residential customers available on 30 June 2018. As an example, we compared the offers available in the Jemena electricity distribution area.³

We estimated that the yearly amount a typical residential customer could pay for electricity ranged from \$1,074 to \$2,158, depending on the retailer market contract (and depending on whether any conditions of discounts were met).

In the Jemena distribution area, the retailers with the lowest electricity market offers were Momentum Energy, GloBird Energy, Powershop, Tango Energy and amaysim, ranging from \$1,074 to \$1,112. This is shown in figure 3.2, which

depicts the price range of all market offers from each Victorian retailer.

However, if the conditions of discounts were not met, the retailers with the highest market offers were People Energy, 1st Energy, and GloBird Energy, ranging from \$2,124 to \$2,158. This is shown in figure 3.3, which depicts the price range of only the discounted market offers from each Victorian retailer.

The potential yearly cost of not meeting the conditions for your discounts ranged widely between retailers, but could be as much as \$608 to \$767 for Alinta Energy, GloBird Energy and 1st Energy. This is shown as the orange bars in figure 3.3.

A comparison of residential electricity offers in all distribution areas of Victoria is found in an appendix to this report.

³ The Jemena distribution area covers north-west metropolitan Melbourne.



Figure 3.2 Range of all electricity offers available by a retailer (flat and multi-flat offers only), for a residential customer, in the Jemena distribution area

This figure shows the price range of all the market offers from a retailer (the pink bars) whether the offers are unconditional or have discounts that are met or not met. The blue bar shows the highest standard contract on offer from a retailer.

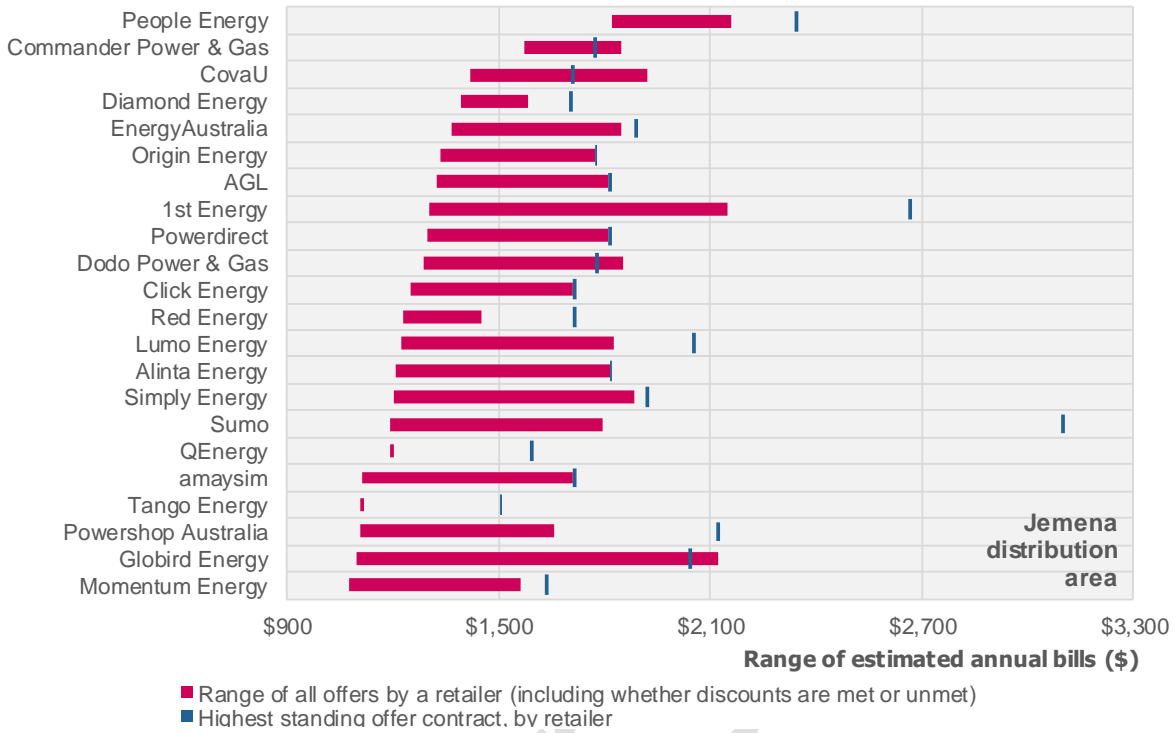
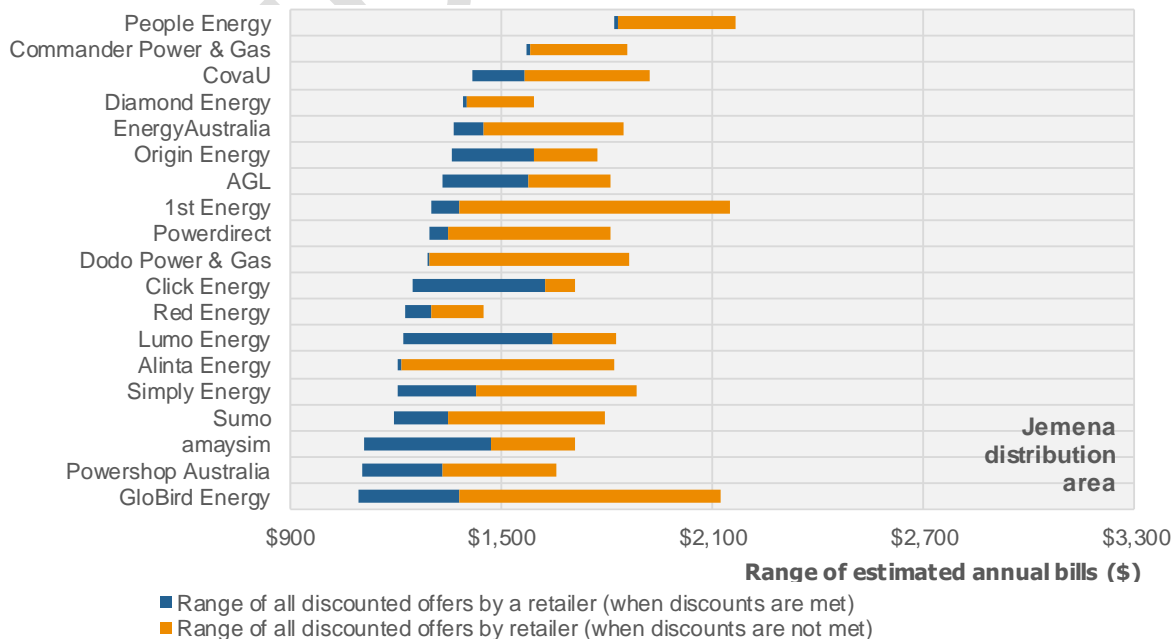


Figure 3.3 Range of all discounted electricity market offers available (flat and multi-flat), for a residential customer, in the Jemena distribution area

This figure shows the price range of only the discounted market offers from a retailer. Retailers who do not offer any discounted market offers are not shown in this figure. The blue bars show the price range of offers when discount conditions are met, and the orange bars show price ranges if discount conditions are not met.





Comparing gas offers

We compared the range of gas offers for residential customers available on 30 June 2018. As an example, we compared the offers available in the Central area of Australian Gas Network's gas distribution network (figures 3.4 and 3.5).⁴

A comparison of residential gas offers in all distribution areas of Victoria is found in an appendix to this report.

We estimated that the yearly amount a typical residential customer could pay for gas ranged from \$1,177 to \$2,117, depending on a retailer's market offer (and depending on whether any conditions of discounts were met). In the Central area of Australian Gas Network's gas distribution network, the retailers with the lowest gas market offers were Sumo and EnergyAustralia, ranging from \$1,177 to \$1,192 (as shown in figure 3.4).

However, if the conditions of discounts were not met, the retailers with the highest market offers were amaysim, Click Energy and Simply Energy, ranging from \$2,078 to \$2,117 (as shown in figure 3.5).

The potential yearly cost of not meeting the conditions for your discount, if you are a typical residential customer, could be as much as \$445 to \$550 for retailers such as amaysim and Click Energy (as shown by the orange bars in figure 3.5).

⁴ The Australian Gas Network – Central area covers the northern parts of metropolitan Melbourne as well as large parts of eastern Victoria including the Mornington Peninsula.



Figure 3.4 Range of all gas offers available from all retailers, for a residential customer, in the Australian Gas Network – Central distribution area

This figure shows the price range of all the market offers from a retailer (the pink bars) whether the offers are unconditional or have discounts that are met or not met. The blue bar shows the highest standard contract on offer from a retailer.



Figure 3.5 Range of all discounted gas market offers available from all retailers, for a residential customer, in the Australian Gas Network – Central distribution area

This figure shows the price range of only the discounted market offers from a retailer. Retailers who do not offer any discounted market offers are not shown in this figure. The blue bars show the price range of offers when discount conditions are met, and the orange bars show price ranges if discount conditions are not met.



Figures 3.2 and 3.3 assumes a yearly electricity consumption of a residential customer is 4,000 kWh. Figures 3.4 and 3.5 assumes the yearly gas consumption of residential customers is 54.4 GJ. Offers are based on those available on 30 June 2018. Figures include GST.



4. Licensing energy businesses

In Victoria, businesses involved in the supply of energy are generally required to hold a licence that is issued by the commission. This includes businesses operating power stations and high voltage transmission lines, those that deliver gas and electricity through pipes and wires, as well as the retailers that sell you energy.

Energy licences in 2017-18

In 2017–18, we granted nine energy licences to businesses in Victoria. We also updated existing licences as required. In summary we granted:

- six new licences to generate electricity, which included two solar farms and four wind farms, as shown in figure 4.1 – together these sites have the combined capacity to generate 400MW
- two new energy retail licences
- one electricity wholesale licence
- we varied twenty-three retail licences and two gas distribution licences.

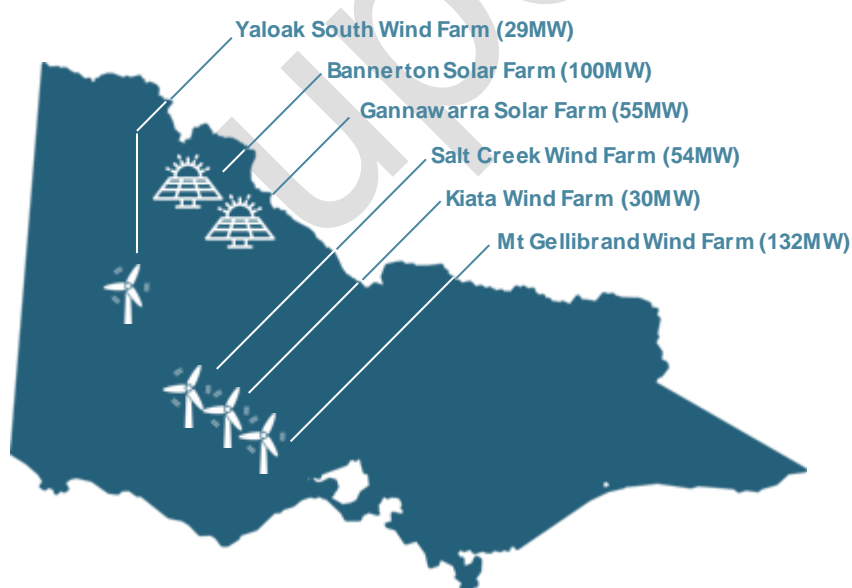


The Victorian energy licensing system

We grant licences to businesses that can demonstrate that they are financially viable, technically capable and are 'fit and proper' to hold a licence. Licences are granted on a range of conditions and obligations to comply with codes and guidelines we publish.

Some businesses are exempt from holding a licence, such as caravan parks or embedded networks. An embedded network is a privately-owned electricity network servicing customers in a specific site, like an apartment complex or shopping centre.

Figure 4.1 Location of licensed electricity generators in Victoria in 2017-18





What's next?

Our full comprehensive 2017–18 annual report on the Victorian energy market will be published in early 2019. The report will include:

- extended analysis on the performance of the energy sector and published energy offers
- information on the disconnections and reconnections of the energy supply of customers
- information about the performance of retailers, which include retailer customer numbers, complaints, energy debt and the experience of customers facing payment difficulty
- individual retailer profiles
- other market data, such as information on distribution performance
- customer information on the Victorian energy rules.

We regularly publish updated information on the Victorian energy market each year. More information can be found at

www.esc.vic.gov.au/victorian-energy-market-report.

We also consult with the public and the industry on any changes to the energy rules we make, or new licences that are under consideration for approval. You can participate in these consultation processes by following

www.esc.vic.gov.au/current-consultations.



Appendices:

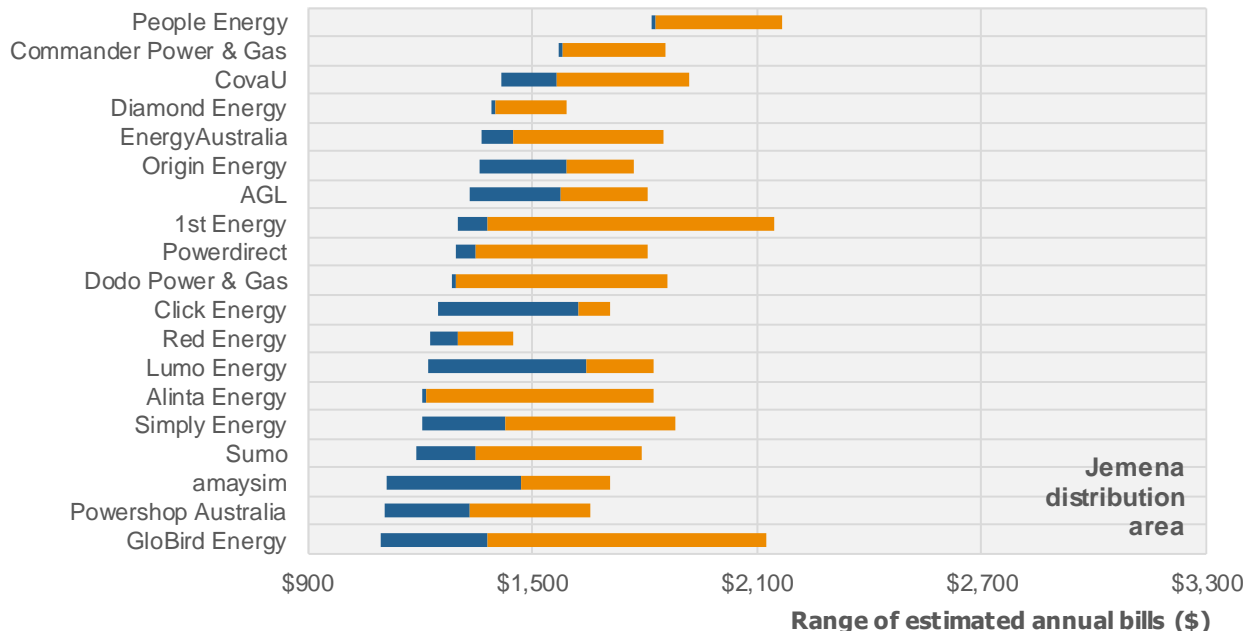
Energy offers by distribution area

Superseded

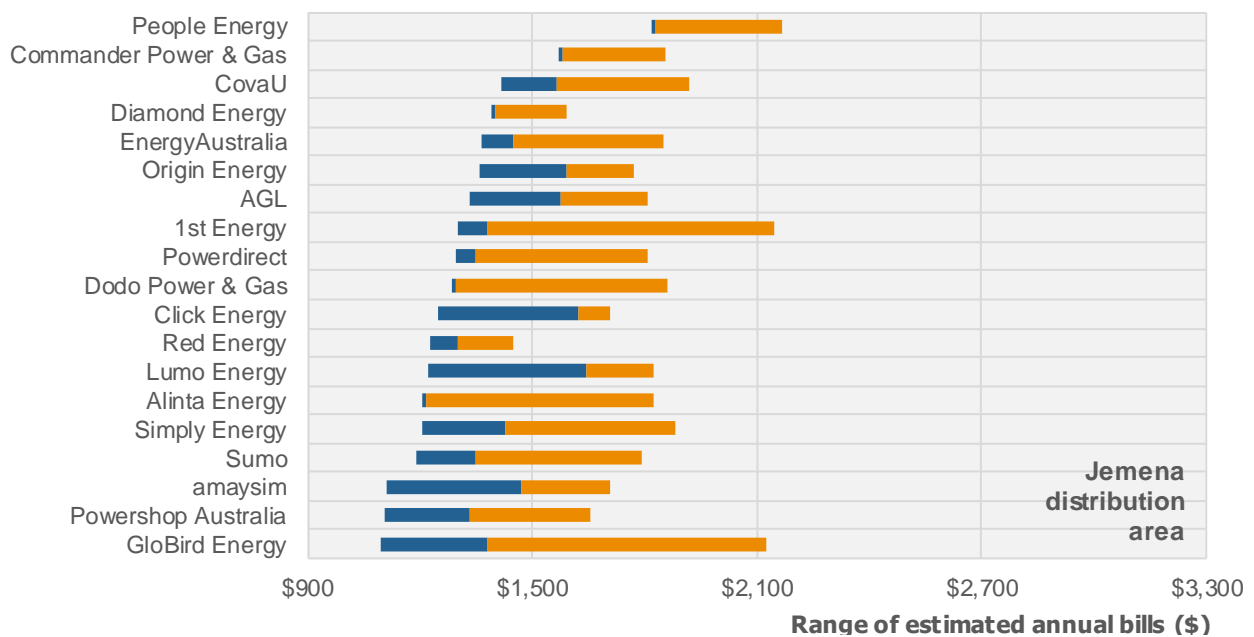
Appendix A: Electricity offers

All discounted offers available, by distribution area

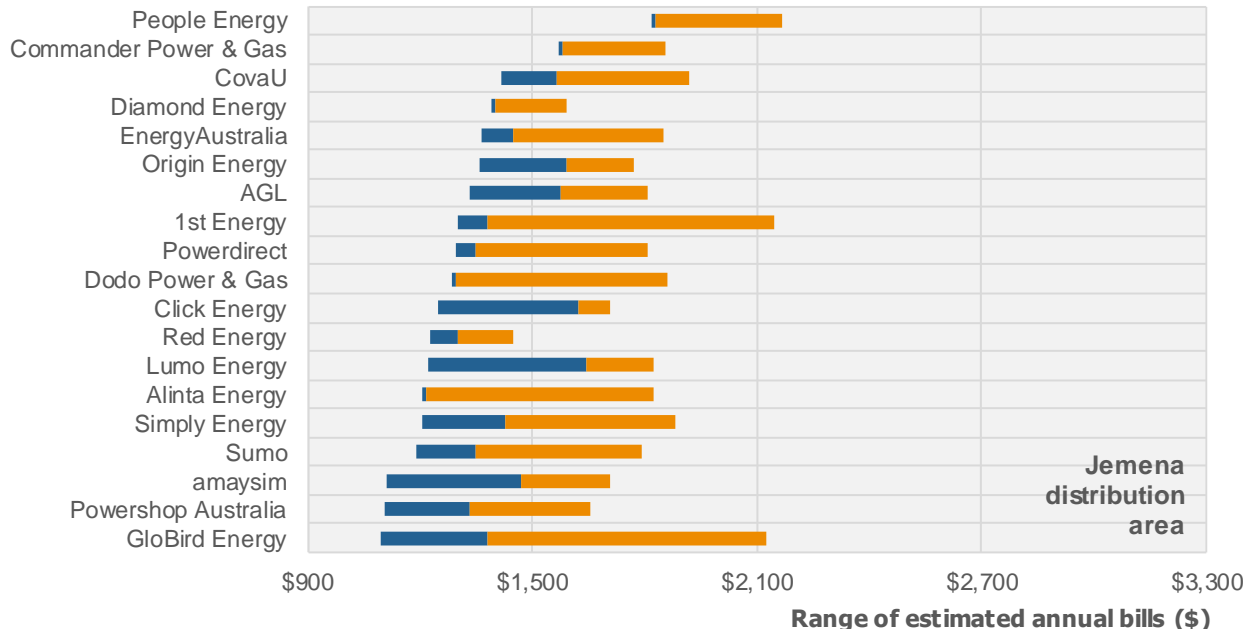
The following figures describe all the published discounted flat and multi-flat electricity offers (when discounts are met and not met) from all Victorian retailers across each of the distribution areas, as per the example in section 3. Estimated residential annual bills assume yearly electricity consumption of 4,000 kWh. Offers exclude time-varying rates and controlled loads, are based on those available on 30 June each financial year, and includes GST.



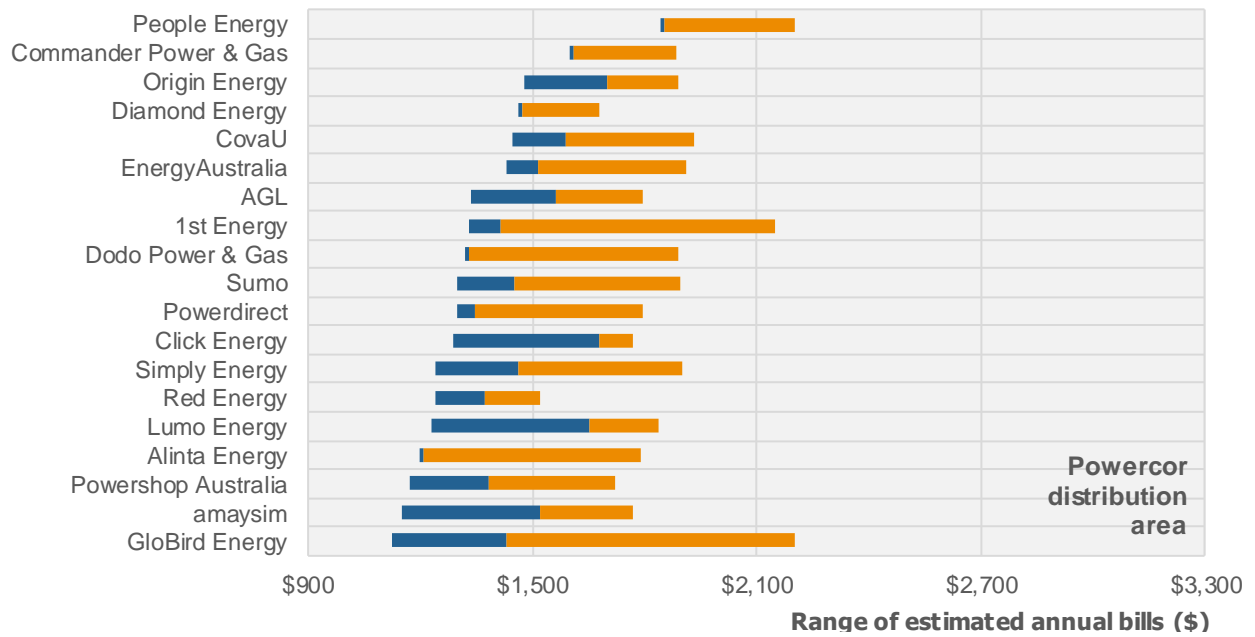
- Range of all discounted offers by a retailer (when discounts are met)
- Range of all discounted offers by retailer (when discounts are not met)



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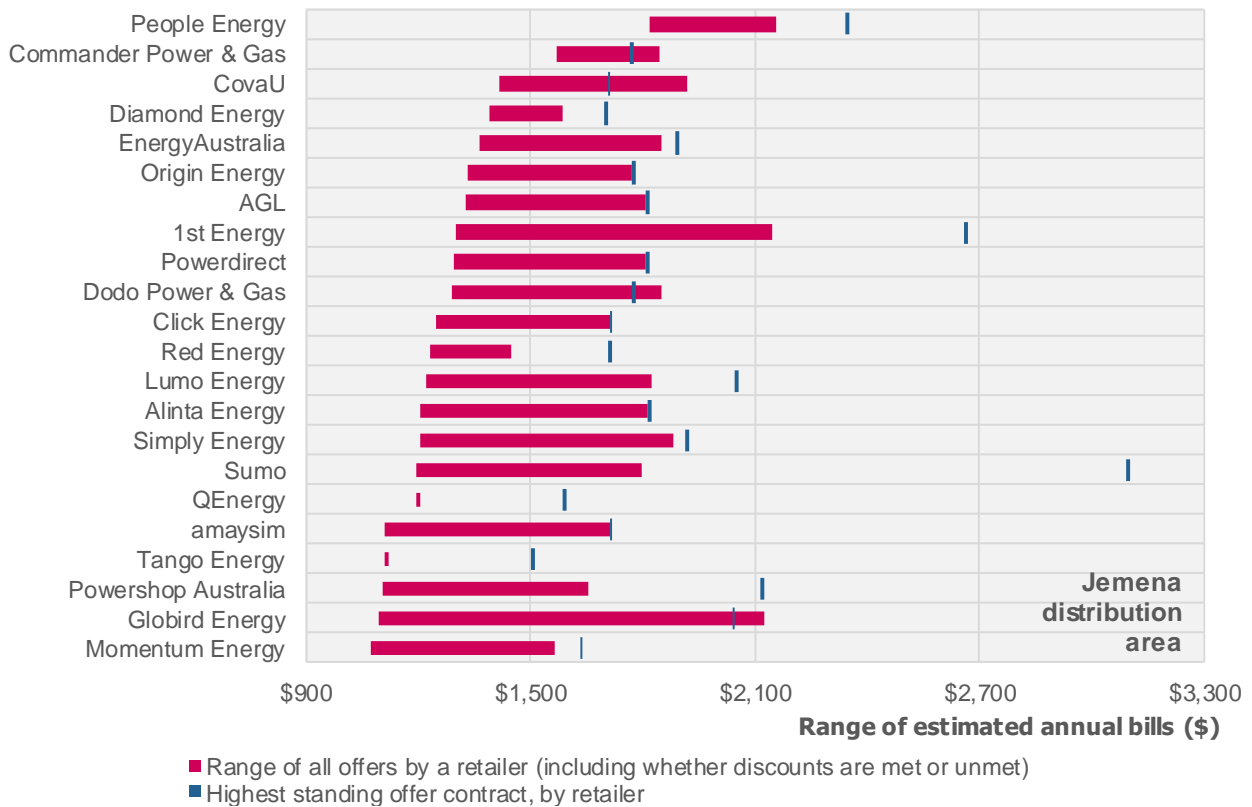


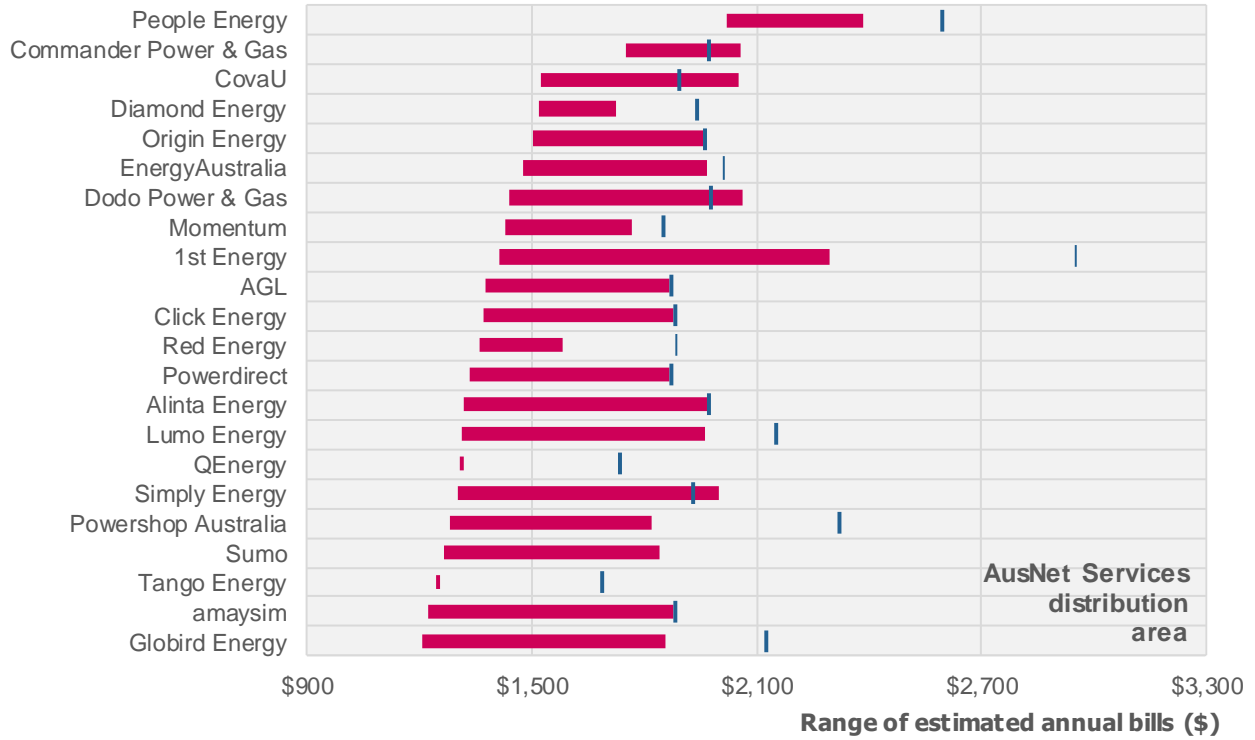
- Range of all discounted offers by a retailer (when discounts are met)
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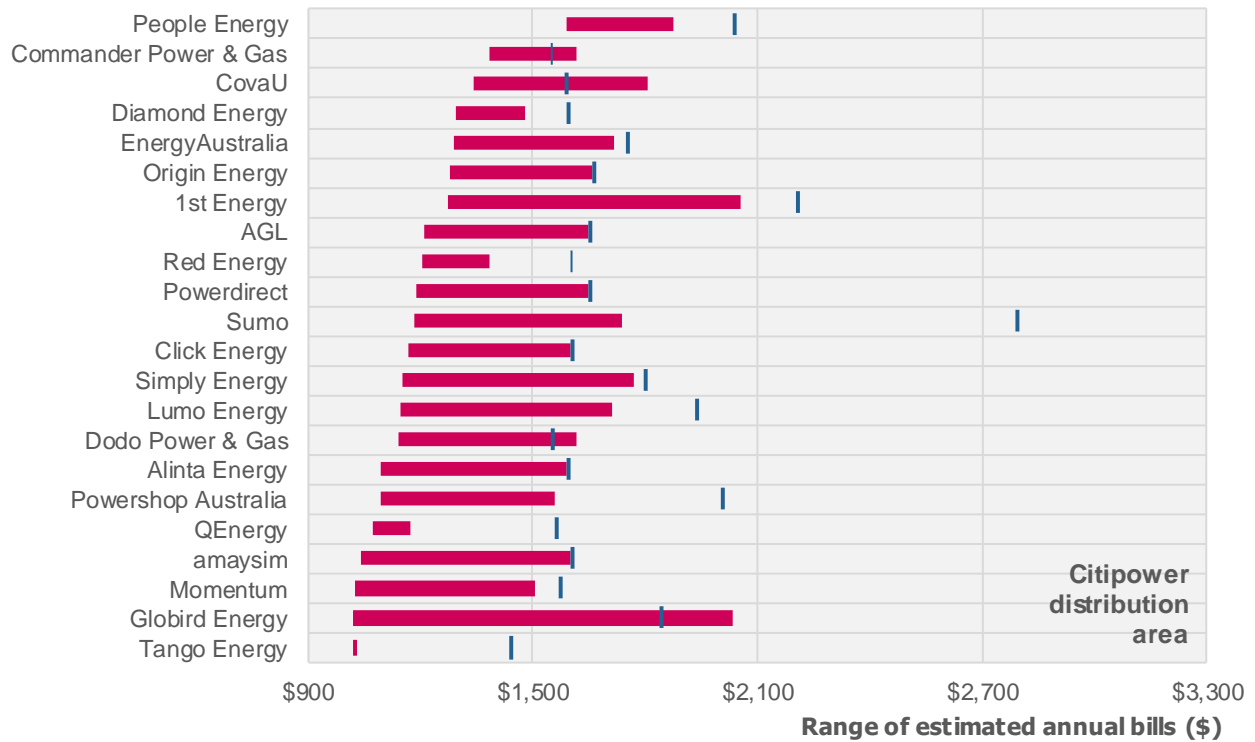
All offers available, by distribution area

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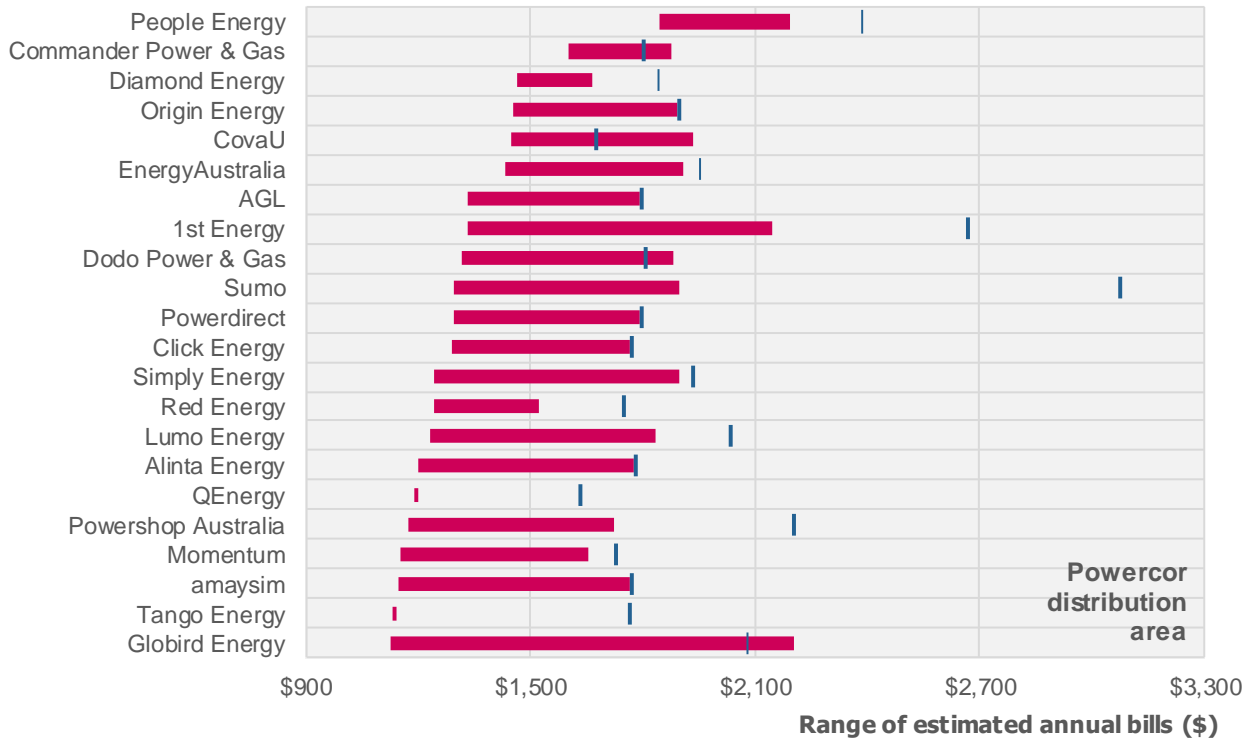




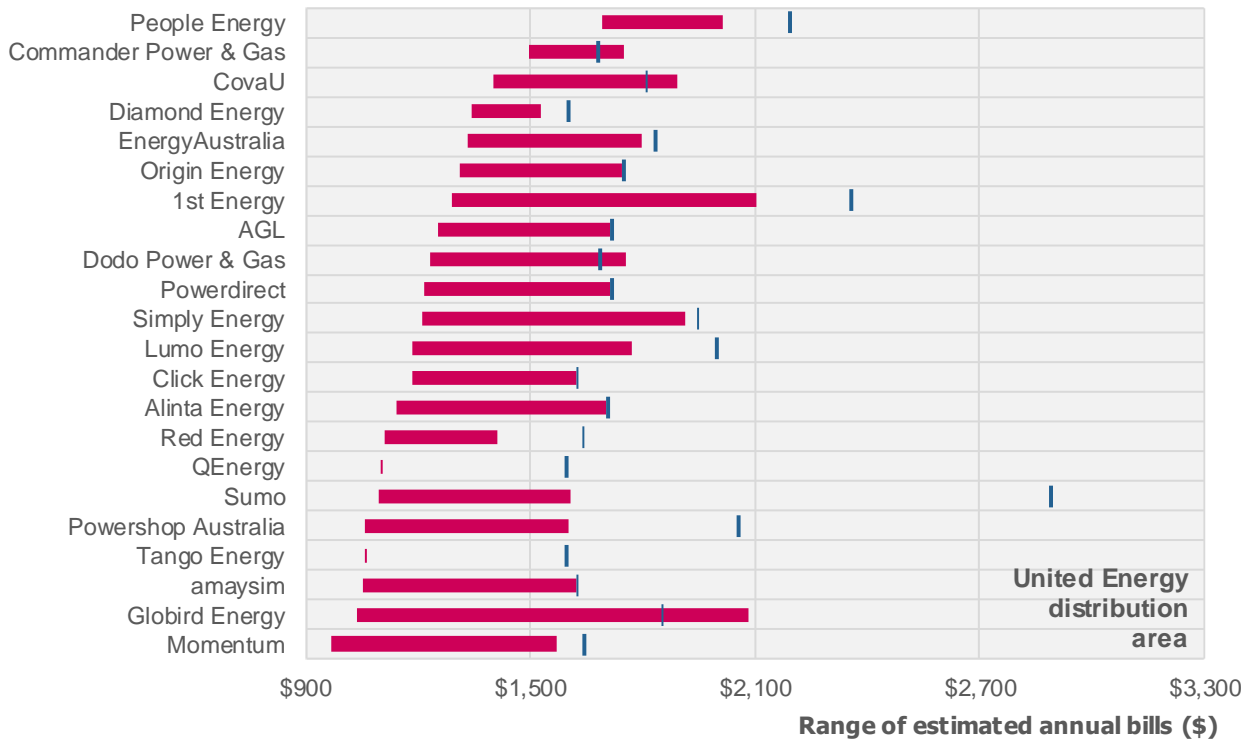
■ Range of all offers by a retailer (including whether discounts are met or unmet)
 ■ Highest standing offer contract, by retailer



■ Range of all offers by a retailer (including whether discounts are met or unmet)
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 ■ Highest standing offer contract, by retailer



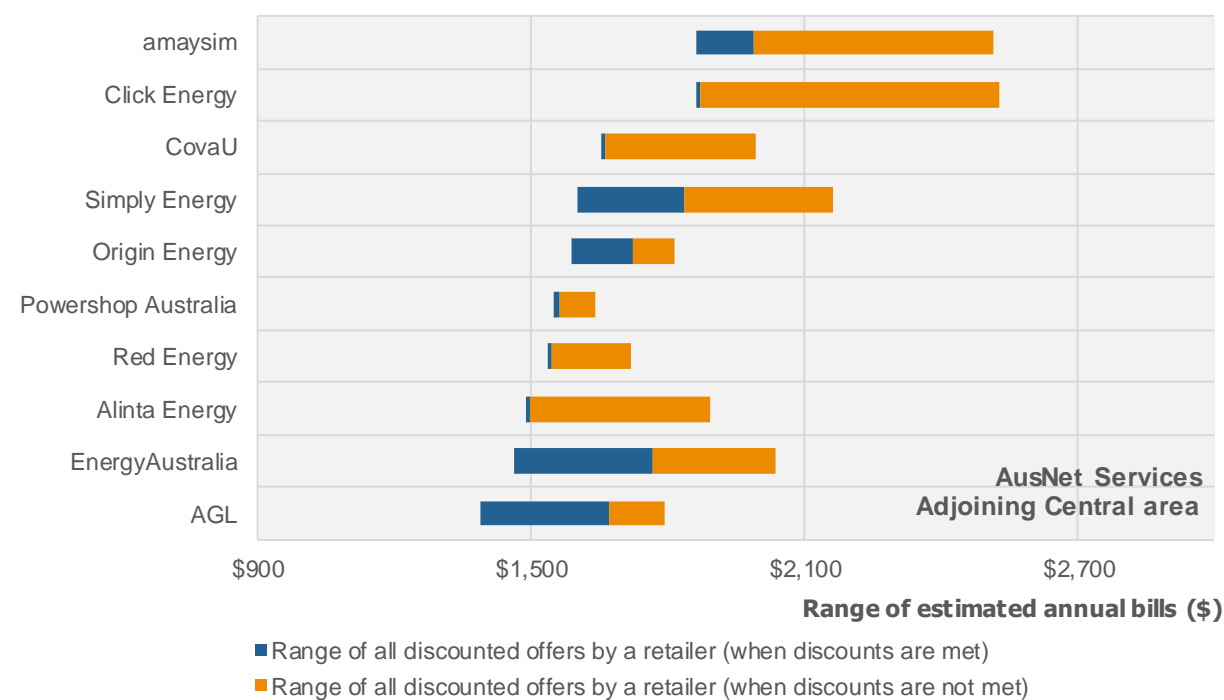
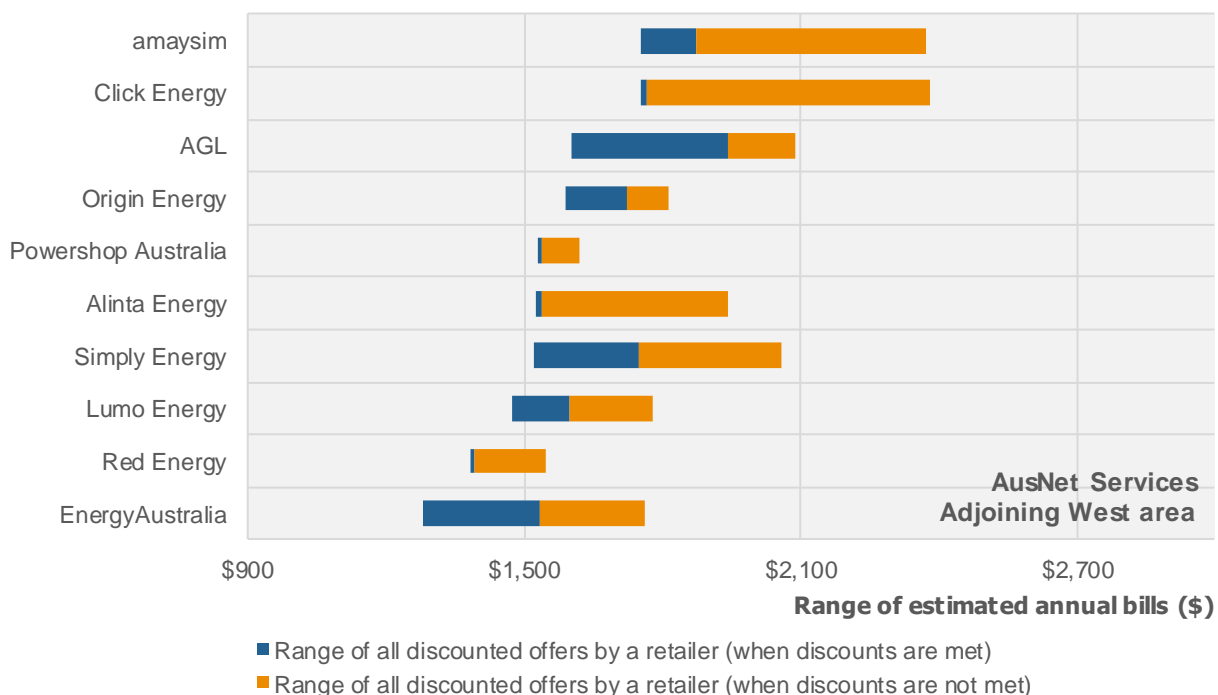
■ Range of offers by a retailer (including whether discounts are met or unmet)
 ■ Highest standing offer contract, by retailer

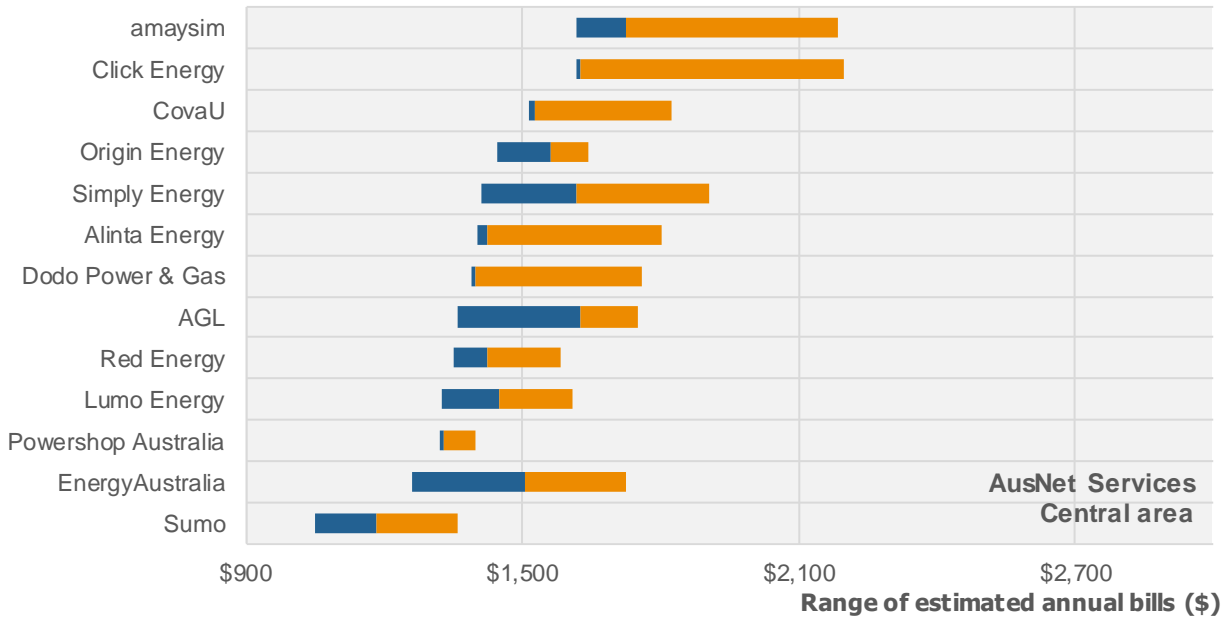


Appendix B: Gas offers

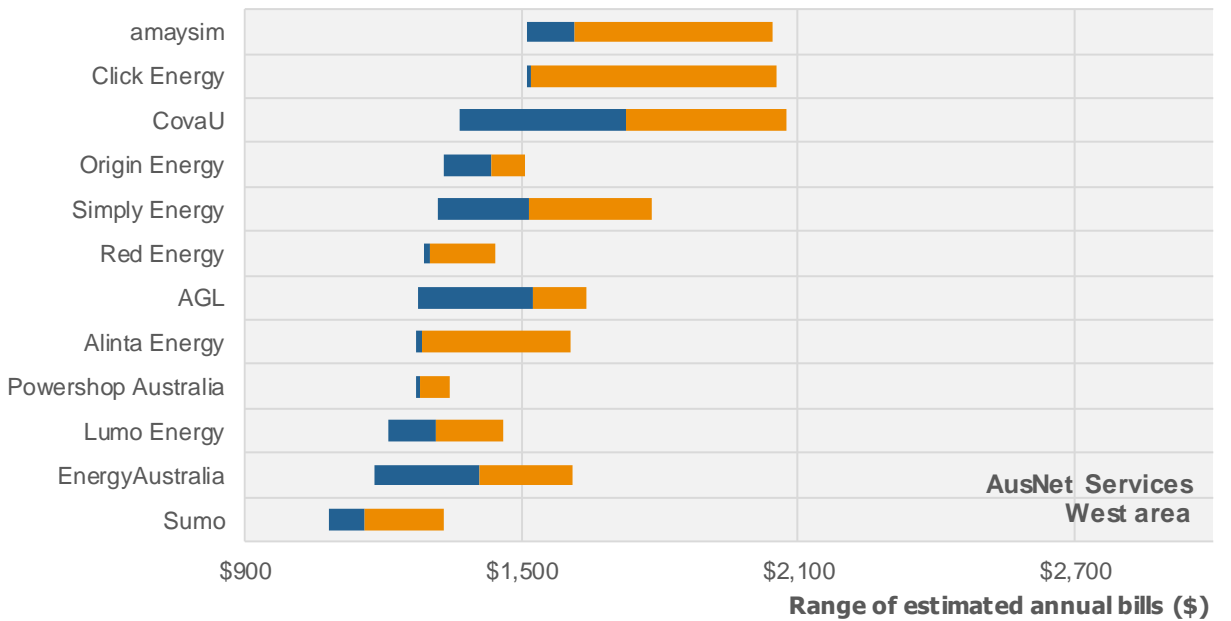
All discounted offers available, by distribution area

The following figures describe all the published discounted flat and multi-flat gas offers (when discounts are met and not met) from all Victorian retailers across each of the distribution areas, as per the example in section 3. Estimated residential annual bills assume yearly gas consumption of 54.4 GJ. Offers are based on those available on 30 June each financial year and includes GST.

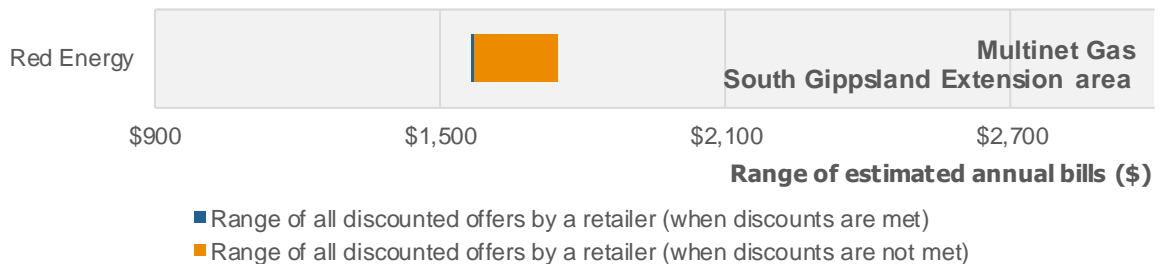
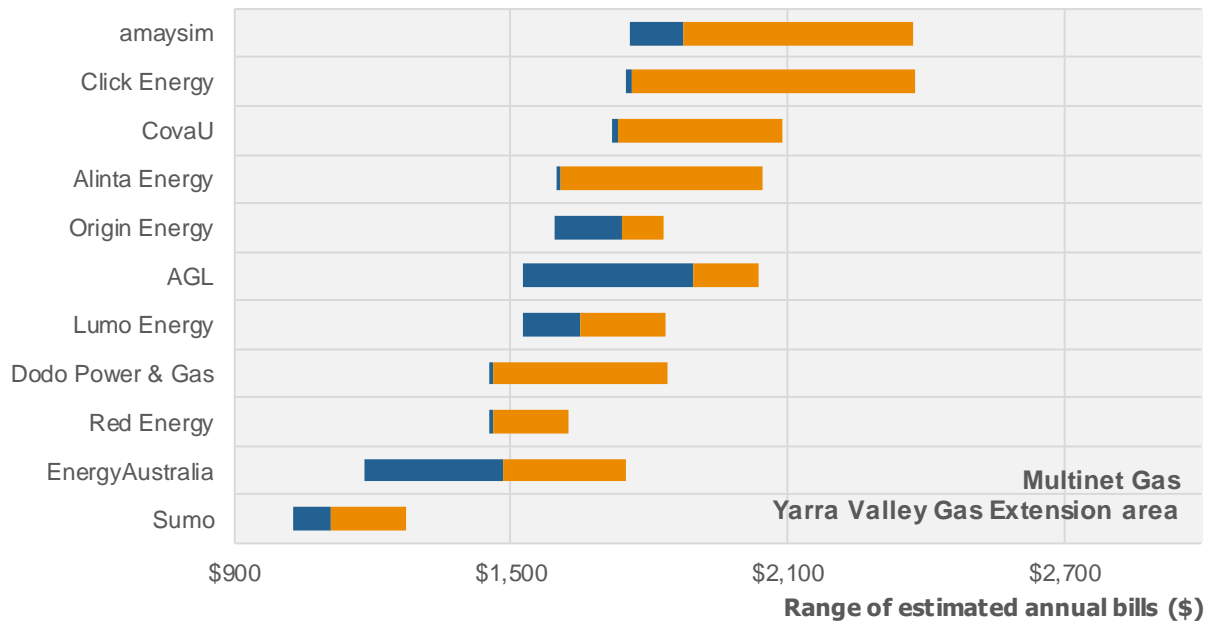
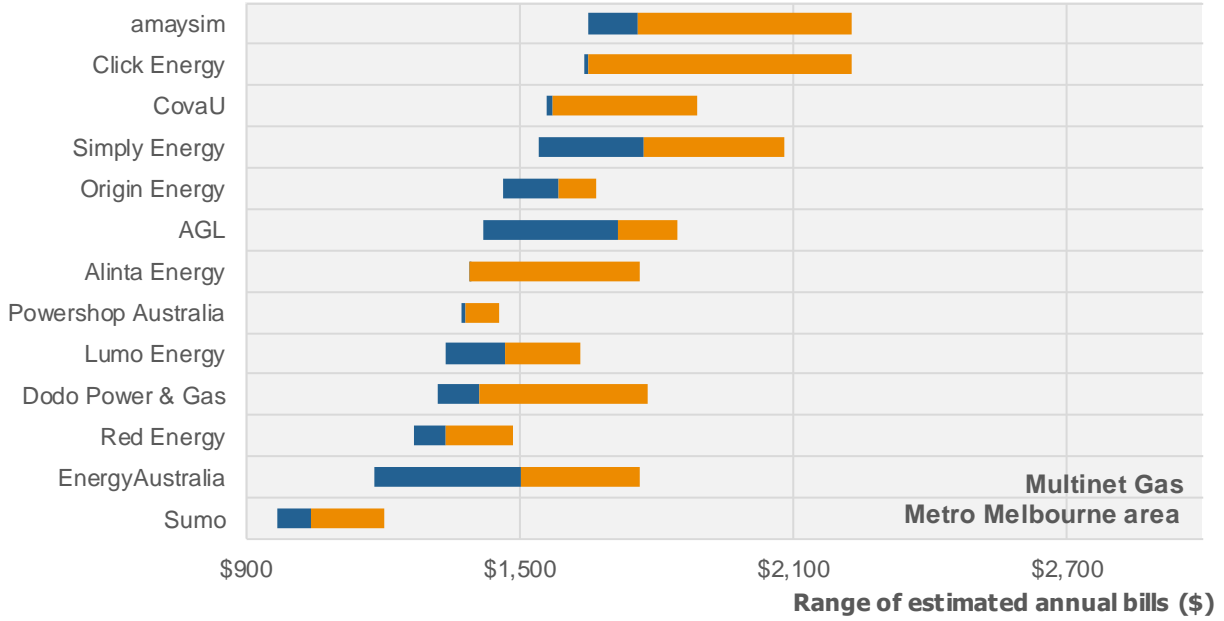


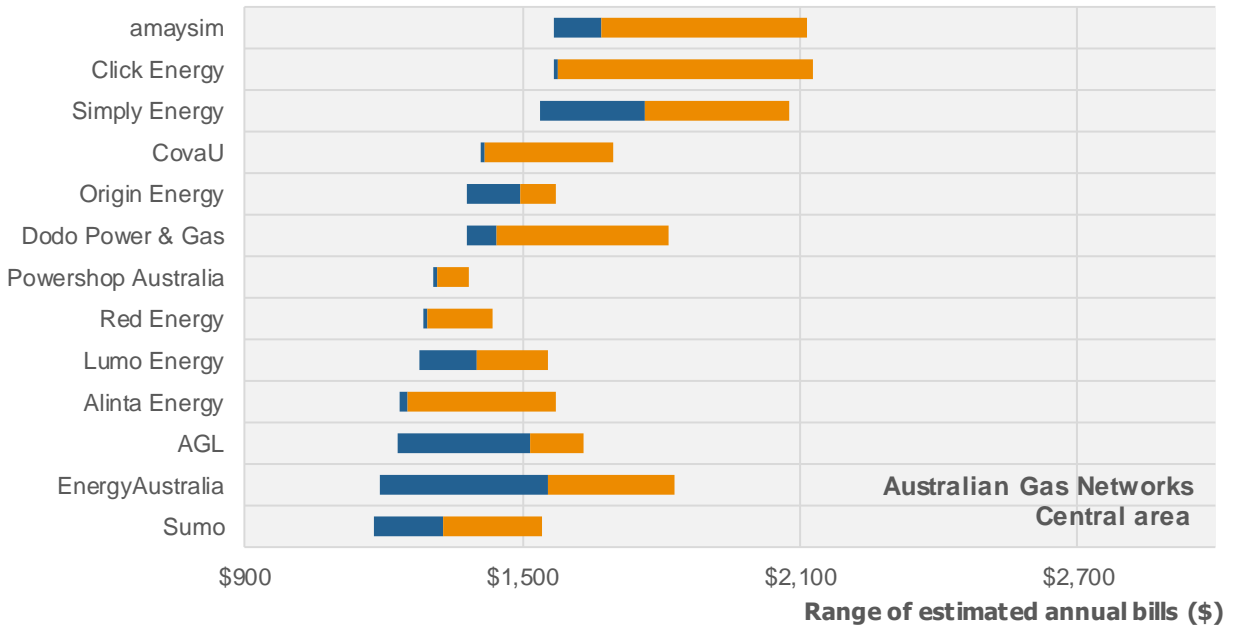


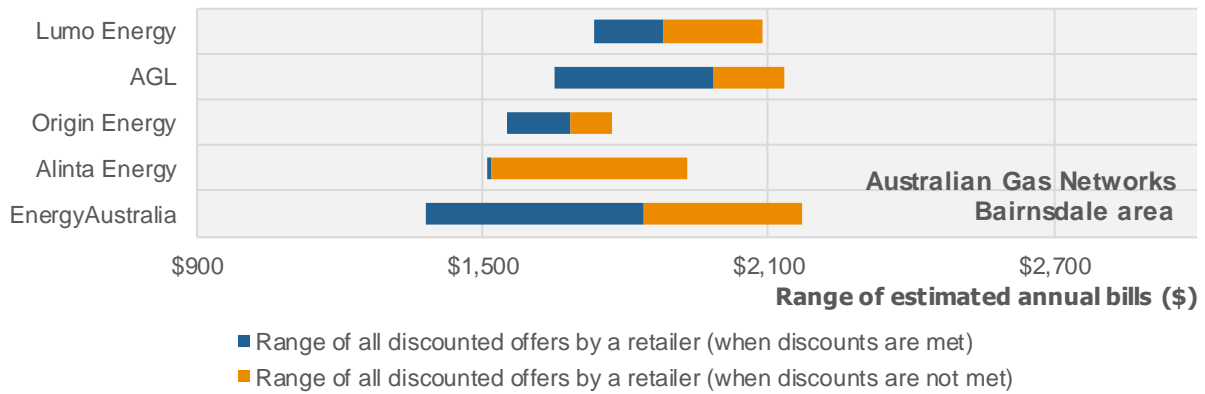
■ Range of all discounted offers by a retailer (when discounts are met)
■ Range of all discounted offers by a retailer (when discounts are not met)



■ Range of all discounted offers by a retailer (when discounts are met)
■ Range of all discounted offers by a retailer (when discounts are not met)



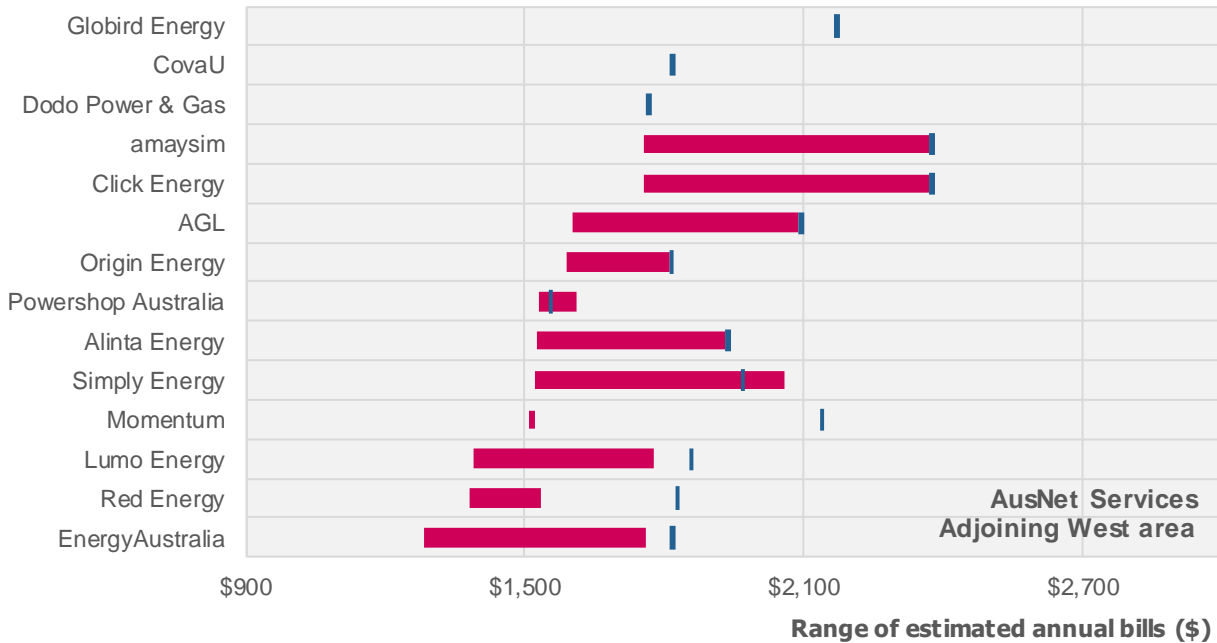




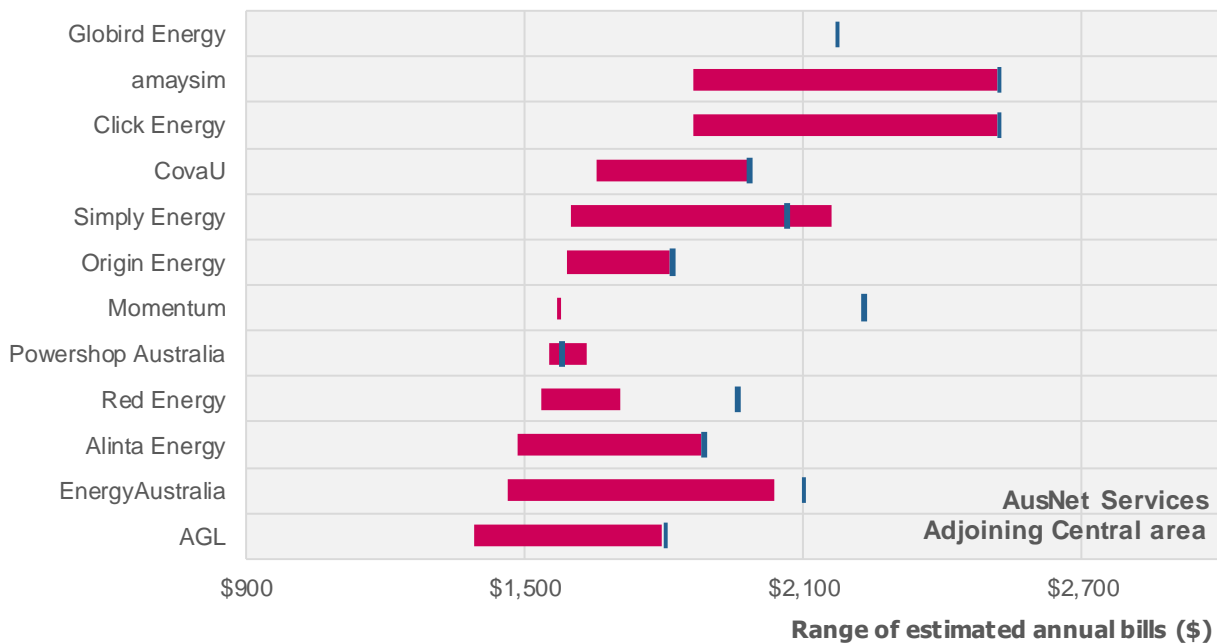


All offers available, by distribution area

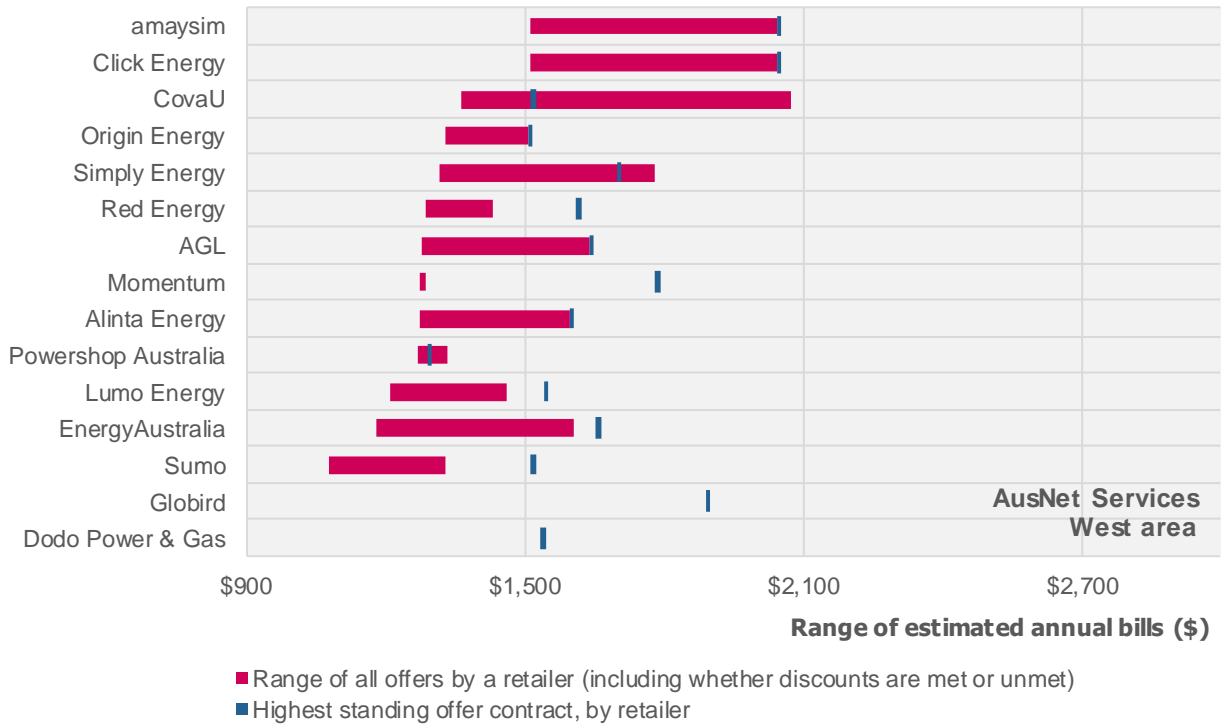
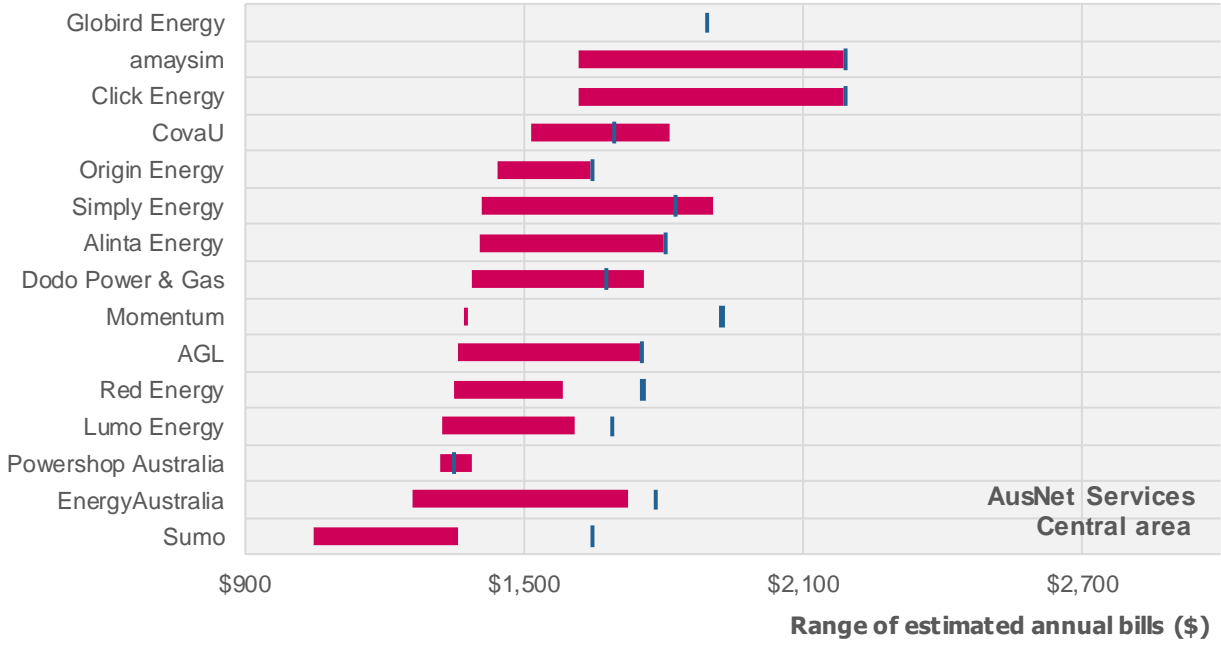
The following figures describe all the published flat and multi-flat gas offers (with and without discounts) from all Victorian retailers across each of the distribution areas, as per the example in section 3. Estimated residential annual bills assume yearly gas consumption of 54.4 GJ. Offers are based on those available on 30 June each financial year and includes GST.

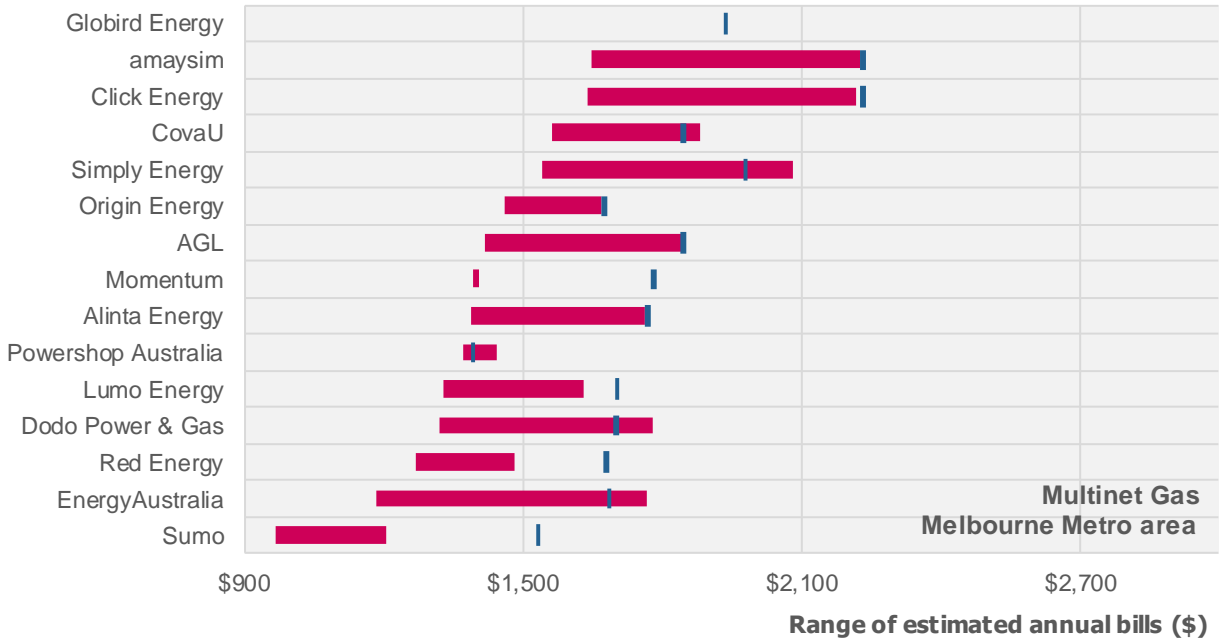


- Range of all offers by a retailer (including whether discounts are met or unmet)
- Highest standing offer contract, by retailer

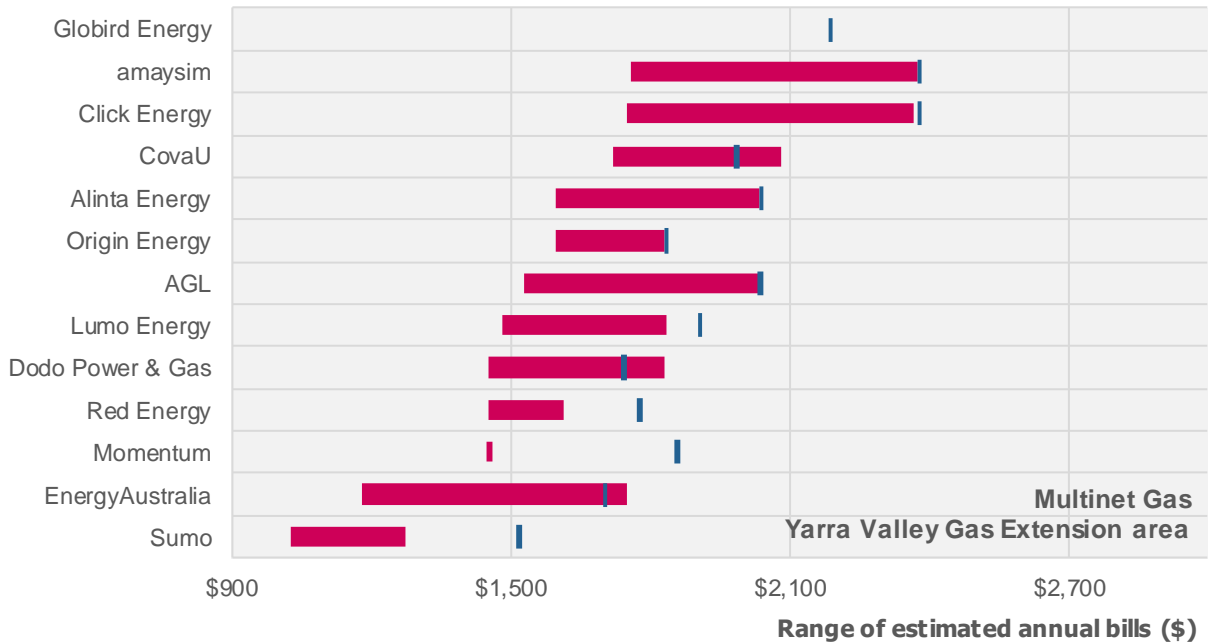


- Range of all offers by a retailer (including whether discounts are met or unmet)
- Highest standing offer contract, by retailer

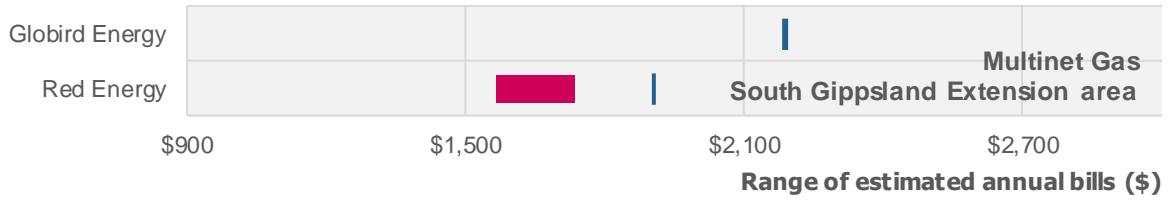




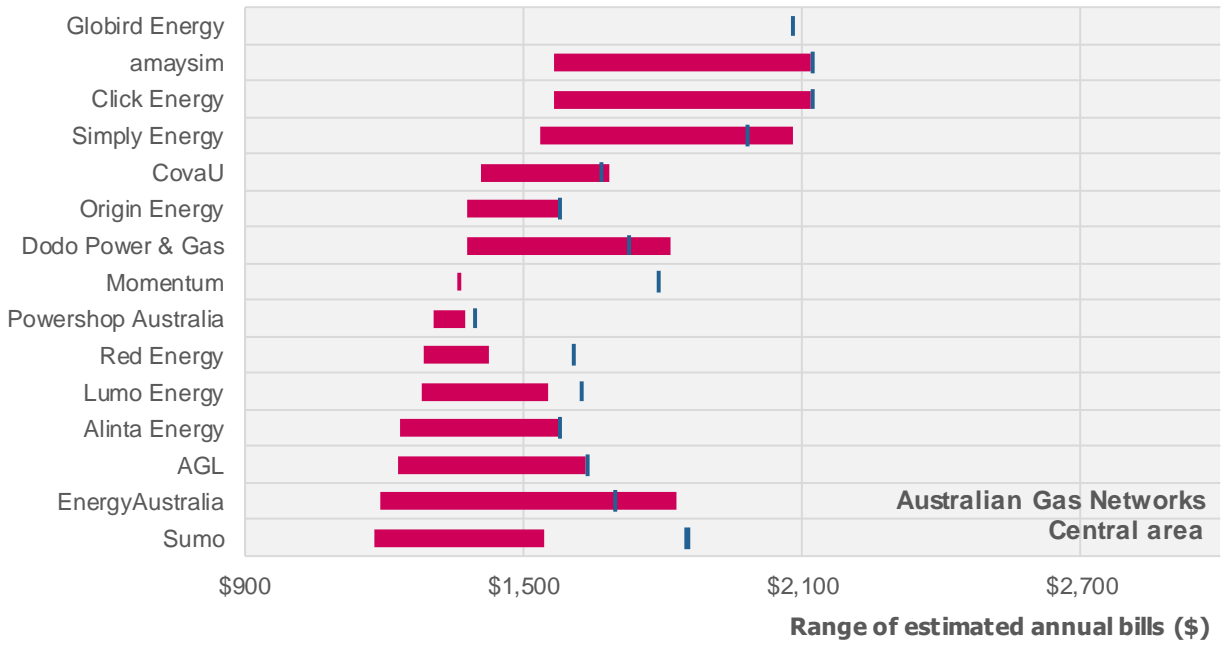
- Range of all offers by a retailer (including whether discounts are met or unmet)
- Highest standing offer contract, by retailer



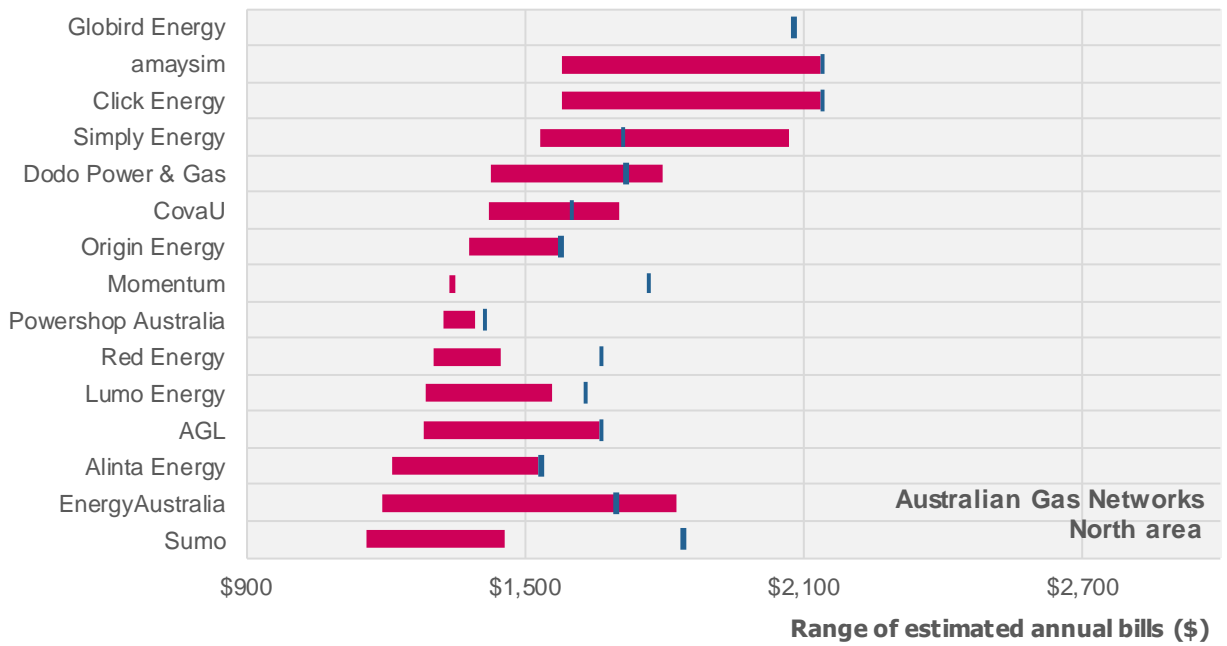
- Range of all offers by a retailer (including whether discounts are met or unmet)
- Highest standing offer contract, by retailer



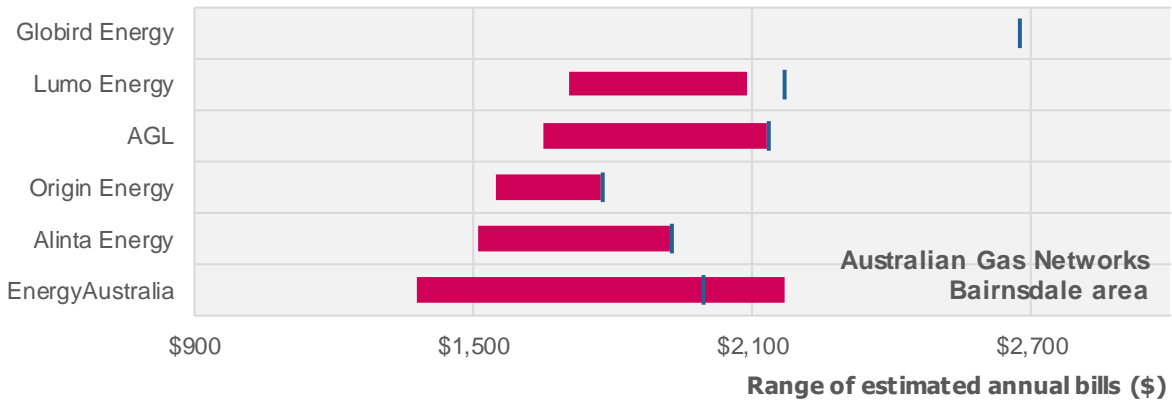
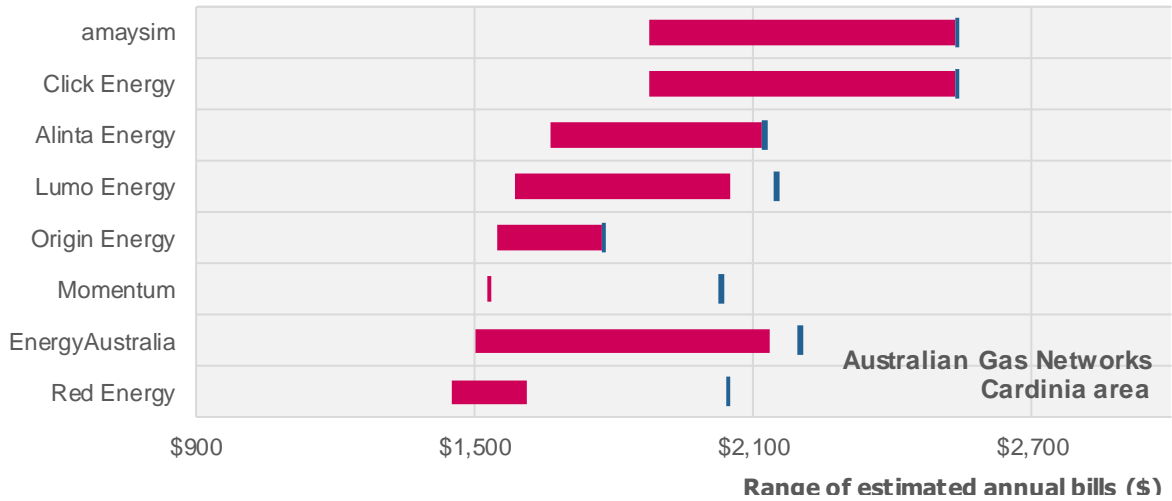
■ Range of all offers by a retailer (including whether discounts are met or unmet)
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■ Range of all offers by a retailer (including whether discounts are met or unmet)
 ■ Highest standing offer contract, by retailer



■ Range of all offers by a retailer (including whether discounts are met or unmet)
 ■ Highest standing offer contract, by retailer





Superseded



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