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31 January 2022

Australian Energy Regulator
Consumer Policy team
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To Whom It May Concern

Draft Better Bills Guideline submission

Thank you for the opportunity to comment on the Draft Better Bills Guideline (the Draft Guideline).

The comments set out in this letter reflect the views of the Energy and Water Ombudsman Queensland (EWOQ), Energy & Water Ombudsman South Australia (EWOSA) and Energy & Water Ombudsman NSW (EWON). Our offices have previously provided detailed comments on 21 and 22 September 2021 as part of the initial consultation on the development of the Better Bills Guideline.

We have collectively reviewed the Draft Guideline and endorse in principle its content which aims to improve consumer experiences with and understanding of energy bills.

As industry Ombudsman schemes, we strongly support the requirements set out in Part 3 of the Draft Guideline and the design principles relating to:

- The use of simple language
- Making the bill easy to understand through bill format and presentation
- Making the most important information most prominent and ordered
- A tiered approach to presenting billing information which includes Tier 1, Tier 2, and additional information
- The inclusion of a standardised plan summary; and
- Better offers information

We concur that these principles will aid retailers to create well designed and simplified energy bills which are easier for consumers to understand and provide the necessary information for customers to make informed decisions in their best interests, whilst also providing billing uniformity across the sector. We particularly commend the requirement to present billing information using a tiered approach, as supported in our earlier submissions, and welcome the inclusion of contact details for the Energy Ombudsman as part of Tier 1 information, in addition to those for retailer account enquiry and complaints. This will ensure that all energy bills provide easily accessible information upfront to customers on both internal and external dispute resolution options. To better cater for the increasing

online customer presence, we recommend that the requirements include a website as an additional contact method for Energy Ombudsman schemes.

One point of concern we note in the Draft Guideline relates to the classification of rebate information under the tiered approach. Under the current Rule 25, retailers are required to include “reference to the availability of government funded energy charge rebate, concession or relief schemes”. In the Draft Guideline, this is not required in Tier 1 or Tier 2 information but can be included as optional additional information. We strongly recommend the AER reconsider categorising rebate information as at least Tier 2 information to increase knowledge and uptake of rebates for customers who are eligible but not already receiving them.

We further note the Draft Guideline proposes a principles-based approach to language and terminology with no requirement for standardised language (with the exception of the Plan Summary) or for retailers to include definitions in bills. We continue to advocate that the standardisation of terminology, by using clear, simple language that is consistent between retailers, would likely have the most positive effects for customers and retailers.

Our closing comments relate to the inclusion of better offer information. The Draft Guideline proposes to include better offer information as Tier 1 information on the bill using a prescribed format and methodology and seeks further feedback from stakeholders on the costs, benefits and challenges associated with providing this information. We mirror the support voiced to date by consumer groups who advocate that well-designed better offer information on a bill would benefit consumers. We concur it adds transparency and provides guidance upfront on cost savings for consumers by indicating an alternative available plan, and has the potential to prompt market engagement. This will be further facilitated by accompanying its inclusion with details of the Energy Made Easy website. We endorse the simplified message proposed in the Draft Guideline to include on a small customer’s bill and the requirement for retailers to provide clear instructions as to how the customer could switch to the identified cheaper plan.

If you require any further information regarding our submission, please contact Ms Nicole Green, Senior Advisor (EWOQ) on 07 3087 9409, Ms Jo De Silva, Policy and Communications Lead (EWOSA) on 08 8216 1851 or Dr Rory Campbell, Manager Policy and Research (EWON) on 02 8218 5266.

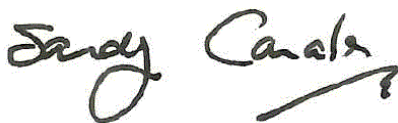
Yours sincerely



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