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Australian Energy Regulator
Consumer Policy Team
Attn. Mark Feather

By email: ConsumerPolicy@aer.gov.au

SUBMISSION: AUSTRALIAN ENERGY REGULATOR BETTER BILLS GUIDELINE

Dear Mark

Energy Consumers Australia appreciates the opportunity to comment on the Australian Energy Regulators (AER) Better Bills Draft Guideline consultation questions. Energy Consumers Australia is the national voice for residential and small business energy consumers. Established by the then Council of Australian Governments Energy Council in 2015, our vision is that consumer values, expectations and needs are realised through a modern, flexible, and resilient energy system.

Energy Consumers Australia sees considerable value in improved billing to deliver simpler, more understandable bills for energy consumers, and in the process, build consumer trust and confidence in the energy market. We support the extensive evidence based approach that underpins the AER's Draft Guideline, as consumer research and testing is a key catalyst for improving energy bills¹ and should continue to ensure consumer outcomes are at the heart of design decisions.

The energy market is in transition and will continue to see new services and data-driven smart technologies emerge that will change the way consumers interact with their energy provider. At the same time, we expect to see new business models and options emerge, such as bundling of offers, which could include nontraditional energy products and services and subscription pricing. We applaud the direction the AER has taken with these guidelines in being a more principles-based approach, allowing for innovation and flexibility in meeting the needs of consumers for relevant, timely and trusted information, to support their decision making about choice of energy provider.

However, we see an opportunity to further guide best practice, particularly in relation to digital accessibility which we note below, along with some commentary on cost to serve.

Accessibility

We appreciate the time the AER have taken to address design features of the bill to improve readability and comprehension, including accessible font size and style. However, we suggest the AER consider reference to accessibility guidelines and tools for digital applications such as emails, e-bill summaries, mobile devices, or an app to deliver a more holistic approach.

For example, Vision Australia state that the use of a Portable Document Format (PDF) without following the Web Content Accessibility Guidelines (WCAG) and tagging correctly may not be considered accessible for screen readers.² The Australian Human Rights Commission (AHRC) have

¹ ACCC [Retail Electricity Pricing Inquiry Final Report](#), 2018 p.289

² Vision Australian 'PDF's and common misconceptions' <https://www.visionaustralia.org/community/news/2019-08-23/pdfs-and-common-accessibility-misconception> accessed 20.01.2022



also expressed their concerns with providing only PDFs and PDFs that do not adhere to WCAG 2.0 techniques, as well as limitations on PDF accessibility on mobile phones.³

The WCAG is a widely accepted guideline for making web-based content 'more accessible to a broader range of people with disabilities, and state by applying the guidelines content is more user friendly for the elderly and all users more broadly.'⁴ Further, the WCAG is a mandated guideline for amongst others content by Australian Government agencies⁵. While the better bill guideline design principles note that proven practices must be applied in preparing the bill, we feel this position could be strengthened with the inclusion of the WCAG as a best practice approach.

We also suggest the AER consider guidance on the use of accessibility checkers⁶ on all relevant digital applications, to ensure any errors are rectified and that unintended detriment is mitigated as much as possible.

Cost to serve

We support the AER's objective of simplifying the regulatory framework and reducing cost to serve, while improving consumer outcomes. We understand that making changes to billing comes at a cost to retailers, but this is likely to be more than outweighed by the greater efficiencies for consumers. This means that time invested by consumers in comparing offers across retailers, in being able to compare like with like and in being informed when they could be on a better rate than their existing plan will all contribute to better outcomes for consumers. We note the AER are still seeking input from retailers into whether the simplification of bills, after allowing for the once off costs of making the initial changes, will reduce cost to serve. We reiterate that an appropriate balance between a proven 'better bill' for all consumers and any additional cost to serve must be met, and we invite transparency over cost to serve data, to help monitor how any increased costs are being passed through to consumers.

Addressing the barriers, and complexities that exist for consumers and industry with regards to a heavily regulated energy bill is long overdue. We welcome the more principles-based approach for innovation to thrive, and flexibility to deliver outcomes that meet consumer expectations however they choose to participate and engage with the energy market. Should you have any questions about our comments in this submission, or require further detail, please contact Melissa McAuliffe, Senior Policy Associate by email at [REDACTED].

Yours sincerely,

Lynne Gallagher
Chief Executive Officer

³ The Australian Human Rights Commission 'World Wide Web Access to Disability Discrimination Act Advisory Note ver 4.1 2014' <https://humanrights.gov.au/our-work/disability-rights/world-wide-web-access-disability-discrimination-act-advisory-notes-ver#pdf> accessed 18.01.2022

⁴ World Wide web Consortium <https://www.w3.org/standards/webdesign/accessibility> accessed 18.01.2022

⁵ Australian Government website 'Accessibility' <https://info.australia.gov.au/accessibility> accessed 20.01.2022

⁶ For example as listed on the Centre for Inclusive Design website <https://centreforinclusivedesign.org.au/index.php/services/guides/2020/03/31/accessibility-testing-tools/> 2020, accessed 20.01.2022