



31 January 2022

Kathie Standen
Executive General Manager – Consumers, Policy and Markets
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001

Lodged electronically: ConsumerPolicy@aer.gov.au

Dear Ms Standen

AER Draft Better Bills Guidelines

Origin Energy appreciates the opportunity to provide comment on the Australian Energy Regulator (AER) *Draft Better Bills Guidelines* (Draft Guidelines).

Origin supports the objective of the Draft Guidelines to ensure billing information is presented in an easy to read format so that consumers can clearly understand and make choices about their energy usage. Bills are particularly important given that they are the key form of communication between an energy retailer and consumer.

However, we believe the Draft Guidelines are too prescriptive regarding how retailers must structure and present customer bills. We are concerned that this prescription may lead to bills that do not logically flow and key information is unable to be grouped. As a result, our concern is that the intent of the Guideline will be compromised.

We agree that the Guidelines ought to prescribe design principles and content requirements. However, this needs to be balanced with allowing retailers to continue to have responsibility for determining their own bill format based on their engagement with their customers. Retailers are best placed to understand how and in what format customers prefer information to be delivered about their accounts and ensure related information is presented together. Furthermore, allowing retailers to determine the format of their bills provides the necessary flexibility to tailor bill formats in response to evolving product, service and ongoing needs of customers.

Specifically, the AER ought to reconsider the requirements around Tier 1 and Tier 2 information. We agree that there is key information that should be presented on page one of a bill, but this should not restrict retailers putting additional information on page one when it is appropriate to do so; such as highlighting to the customer support available during Covid. If the AER is confident in its design principles, allowing this flexibility will still result in accessible and easy to understand bills.

Origin's response to questions raised in the Consultation paper are set out below. In addition, we have provided detailed comments on specific clause in the Guideline in **Attachment A**.

Question 1: Given the requirement of the rule for the guideline to take effect by 31 March 2023, what actions need to be taken to ensure that this can occur? How might risks or challenges be overcome?

Origin will need to scope, design and test new bill design formats based on various scenarios and jurisdictional requirements. Complexities arise to the extent that state-based requirements are required within the bill and adequate testing scenarios are undertaken to ensure small customers receive compliant bills. In terms of setting the effective date, the AER ought to be mindful of other key reforms that require significant system upgrades such as CDR and 5MS and where practicable dates should be coordinated to minimise the cost and resource burden on retailers.

Question 2: Noting the proposed consistency and simplification of bills in the draft Guideline, would this reduce the cost to serve? If so, how and by how much?

Question 3: Beyond the Guideline, in what other ways could the retail market regulatory framework be simplified? What impact would this have in terms of quantified relative costs and benefits?

Retail cost to serve is generally dependent on the level of prescription in the regulatory framework. The more prescriptive the framework, the less flexibility retailers have to adjust the requirements to fit within current systems and processes – thus, the costs of complying with the requirements increase. For example, the prescriptive nature of Tier 1 and 2 information requirements will mean that there could be blank spaces left on bills (as only tier 1 information can be presented on the front page) which leads to longer bills and greater production costs.

Question 4: Are there any significant reasons why the proposed design principles should not be adopted? What are the relevant benefits and quantified costs the AER should consider? We invite stakeholders to provide evidence of research and testing with their responses.

While the design principles appear reasonable, we have concerns with the subjective nature of them and question how they will be enforced. For example, “A bill **must** enhance customer comprehension through use of: appropriate colour, ...accessible font sizes and font styles...”.¹ Origin’s interpretation of font size and style to enhance a consumer’s comprehension of a bill will differ to another retailer - thus the subjective nature of the requirements will bring uncertainty to both implementation and enforcement.

Further, we are concerned that the design principles and the tiered approach conflict each other. For example, a design principle states that “a bill **must**...group and present related information together”², however, the tiered approach prevents this from occurring as additional information cannot be provided before Tier 1 and 2 information – even though the information is related. Examples of this are provided below in our tiered approach response.

Origin believes the AER should reframe the design principles to be either clear obligations where the outcome is measurable for retailers’ implementation, or higher level objectives are adopted to the drafting of the design principles that are then applied to the tiered approach.

Design

Section 8 of the Draft Guidelines refers to retailers applying consumer research and testing on bill designs and language and updating bills in response to findings from consumer testing. Origin seeks further clarification on the application of this requirement. Specifically, whether recent research can be applied or whether new testing needs to be conducted for the implementation of the Guidelines.

¹ Section 13, Draft Better Bills Guideline

² Section 17, Draft Better Bills Guideline

If we are required to undertake further testing, despite having recently performed this, it will impose a significant cost and may provide limited benefits given the tiered restrictions on the placement of data on the bill. While consumer research may determine that consumers have a preference for a graphical representation of usage on the front page of the bill, this would not be allowed under the Guidelines.

The AER should allow for previous consumer testing to apply to retailer's design of a bill.

Question 5: What are the costs and benefits associated with the proposed tiering requirements?

Question 6: Do stakeholders consider there is other information that should be included in the standardised plan summary to enhance comprehension and make it easier to compare plans? E.g. benefit conditions, payment options (direct debit only), bill frequency. What are the relative costs and benefits of including this information?

Question 7: Do stakeholders consider there is specific or different information that should be provided for small and medium businesses who fit the definition of 'small customer'? What type of information is required and why? E.g. Australian Business Number, Australian Company Number, bill issue date. What are the relative costs and benefits of requiring this information?

Costs and Benefits

We believe the costs of adopting the tiered approach will outweigh the benefits. The tiered approach limits the use of space on the bill and the flexibility to adapt a bill to changing products and services. This is given that Tier 1 data is limited to the front page of the bill and no other information can be presented here. Further, Tier 2 data cannot be presented on the same page as Tier 1.

Further, the tiered approach lends itself to duplication of information between the 'understanding your bill' requirements and the data included in the billing section of the bill (ie current tariff rates and timings are included in the billing section and the table). This additional information will require layout changes and may result in longer bills.

We question whether the AER has considered the printing costs for retailers where this additional information will result in longer bills and a larger number of pages.

We feel that the benefits to consumers from the new bill requirements will be limited. Origin has undertaken extensive customer engagement to identify the format and style of a bill that customers prefer. We have a bill format that is simple and presented in a way that is easy for customers to understand. On reviewing the key design principles and bill content requirements, we have found that our bills already conform to these principles and our bills largely include all the bill content requirements in the Draft Guidelines (with the exception of better offers in NECF states). However, the tiered approach and the table requirements will result in significant coding and billing change costs for what may be limited benefits.

Tiered Approach

We believe that the tiered approach will result in retailers being unable to present related information together. We also believe this requirement is inconsistent with the design principles.

Sections 27 and 28 of the Draft Guidelines set out the specific requirements in relation to the placement of information. These sections set out that Tier 1 information is to be presented on page 1, Tier 2 on page 2 and any additional information must be presented after Tier 1 and 2 information. Following on from this, section 17 of the Draft Guidelines sets out a key design principle that "*bills must...group and present related information together*".

These features of the Draft Guidelines are inconsistent with each other. While information must be presented together, retailers are unable to present the data together if the information is not prescribed as part of Tier 1 or Tier 2 information. Examples include:

- ‘average daily cost’ information could not be provided with ‘average daily usage’ information. ‘Average daily usage’ information is Tier 2 information while ‘average daily cost’ is not prescribed information and would need to go at the end of the bill;
- if an estimated read is provided on a bill, information on how a consumer can submit a self-read to replace the estimated read cannot be provided together. Information about how to conduct a self-read would need to go after the placement of Tier 2 information;
- the inability to provide information about late payment fees with the payment due date. The payment date is page 1 information while fees and charges are page 2 information. The separation of this information may lead to a consumer incurring a late payment fee if the bill is paid after the due date; and
- an “estimated date of next schedule read” is important information for consumers who rely on this information when there is no access to the meter. Once again, removing this from Tier 2 information may result in the information being lost at the end of the bill.

Origin requests the tiered requirements for the placement of information be removed. While we agree that the Guidelines should define the information that must be included on a bill, we believe that retailers are best placed to determine the placement of information based on their own experiences and consumer research.

If this approach is not accepted by the AER, then an exception framework should be developed for Tier 1 and 2 information that allows additional information to be included within these tiers where:

- there are regulatory requirement to provide information (ie concession details, late payment fees); and/or
- it fits within section 17 of the Draft Guidelines where the information is related and logically fits together (ie self reads with estimated reads; average daily cost with average daily usage).

Additional Tier 1 Information

Only Tier 1 prescribed information can appear on the first page of the bill. We have concerns that this approach will not efficiently utilise space on a page and, as discussed above, the tiered approach will not always lead to a logical presentation of information.

Further, from time to time, retailers need to communicate important messages to its’ customer base. These messages generally appear on the front page of the bill given the importance of the message. For example, financial assistance during COVID or an amendment to fees and charges. Bills are the most effective means of providing these messages.

Under the Draft Guidelines, important messages would not appear on page 1. These messages would fall within the ‘additional information’ category and would need to appear at the end of the bill. We do not believe that this will provide for a satisfactory customer experience.

We request that an additional item be included within Tier 1 information to allow for ‘important messages’ to appear on the front pages of bills.

Standardised Plan Summary

Section 31 of the Draft Guidelines states that *“the plan summary must be presented in a standardised form, using the following format, order and terminology...”*. While we generally support the information requirements, we do not support the rigid format. We request flexibility in the order of the information to be presented in line with the retailer’s own consumer research. Origin’s questions and comments on the standardised plan summary table are provided below:

- Current plan details – we understand that data to be included in the Current Plan information is only related to the consumer’s current plan details. For example, if a consumer has changed plans during the billing period, only the latest plan details need to be displayed. We assume

that same would apply if a consumer moves from a flat rate to a TOU rate during the billing period – that is, only the latest plan details would be displayed.

- Displaying tariff and rates – this information already appears as part of the ‘understand your bill’ requirements. Inclusion of this information will mean it will be duplicated on the consumer bill. Duplication of information is costly and may not benefit the consumer.
- Time of Use times – we question if the breakdown to applicable times (TOU) best sits with the standardised plan or whether it would be better displayed as part of the ‘understand your bill’ (where we currently show it). We request some flexibility for retailers to determine where this information best fits in terms of the flow of their individual consumer bill.
- Benefit levels to be included in information – we believe that the table should be flexible to allow benefits of current plan arrangements to be included. That is, whether the consumer is receiving 20% discount, Everyday Rewards points, fixed price for 12 months, ongoing lower rate that you never need to renew. These provide are an important distinguishing feature when a consumer seeks to compare offers.
- Benefit type and benefit change – we believe that there should be a note similar to the renewable sources or carbon offset to make it explicit that if there is no benefit end date that this information is not required to be displayed.
- Benefit expiry date – information presented in a timely manner in benefit change notice and it is unclear whether this will provide additional benefits to consumers on bills.

Overall, there appears to be overlap between the information included as part of this information and data included in other sections of the bill (ie current tariff rates). We believe that it would be best for the information to logically sit in the appropriate area of the bill and not the formalised table.

Question 8: What are the quantified costs to retailers of providing better offer information of the type described above?

Question 9: What are the benefits to customers and the market?

Question 10: What are the challenges associated with providing better offer information in a bill where the customer does not have a smart meter or has an accumulation meter?

Question 11: Other than billing information, what barriers or challenges do customers face when seeking to access the best energy plan for them?

Question 12: What other feedback do stakeholders have in relation to the approach proposed/methodology above?

Origin has contributed to an additional AEC piece of work with regards to the costs and benefits of including ‘better offer’ information on bills. Generally, if the ‘better offer’ requirements continue to form part of the Guidelines, the requirements should be similar to Victoria to allow for synergies with the current requirements.

Question 13: What do stakeholders consider are the most appropriate measures of impact or success for the Guideline?

Question 14: How should impact or success be communicated?

The reason these Guideline are being developed are in response to the Rule change submitted by Minister Taylor that stated that the current rules do not deliver bills that energy consumers can easily understand. Therefore, we believe any measure of success must be linked to solving the original problem. To do this effectively there ought to be a baseline with consistent measures (qualitative and/or quantitative). That way the AER can measure how satisfied customers were with their bill pre and post this Guideline on a comparable basis.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on [REDACTED] or [REDACTED].

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Greenup', written over a light grey rectangular background.

Sean Greenup
Group Manager Regulatory Policy

ATTACHMENT 1: Origin’s Comments on the Content Requirements of Bills

Part 2, Draft Better Bills Guidelines - Contents of bills – transitional requirements

Bill Requirements	Origin Comment
<p>Part 2 Contents of bills – transitional requirements</p> <p>Section 8...(j) the values of meter readings (or, if applicable, estimations) at the start and end of the billing period;</p>	<p>Change requested. <i>Guideline reflect the current National Energy Retail Rules (NERR) for the start and end meter read values on small customer bills. OR Schedule 3, Part 4, Rule 8 of NERR be repealed and the Guidelines be explicit that previous and current reads do not apply to interval meters.</i></p> <p>Section 8(j) of the Draft Guidelines requires the value of meter reads at the start and end of the billing period. We do not disagree with this requirement. However, it needs to reflect the current drafting of the NERR – that is, the Guideline needs to make clear that it does NOT apply unless the required metering data is reasonably available.</p> <p>The provisions of the current NERR are set out below:</p> <p><i>“Rule 25 (j) NERR - the values of meter readings (or, if applicable, estimations) at the start and end of the billing period;</i></p> <p><i>Note: For details on the application of this subrule to different types of meters, see Schedule 3, Part 4, rule 8</i></p> <p>Schedule 3, Part 4, Rule 8 Application of start and end meter reads on small customer bills</p> <p><i>(1) In this rule:</i></p> <p><i>interval meter is a meter that measures and records consumption of electricity derived from interval metering data (within the meaning of the NER).</i></p> <p><i>(2) Subrule 25(1)(j) applies without modification if a small customer’s meter measures and records consumption of energy only on an accumulation basis.</i></p> <p><i>(3) If a small customer has an interval meter, the requirements of subrule 25(1)(j) do not apply unless the required metering data is reasonably available.”</i></p>

Part 3, Draft Better Bills Guidelines – Tier 1 and 2 Information

Bill Requirements	Origin's Comments
Tier 1 Information	
customer name and address/es (of the premises to which the energy is being supplied as well as the customer's mailing address, if different)	No comment.
customer account number	No comment.
National Metering Identifier (NMI)' or 'National Metering Identifiers (NMI)', using this prescribed wording	<p>Change requested. <i>The term Meter Installation Registration Number (MIRN) be a prescribed term for natural gas meters on bills.</i></p> <p>National Metering Identifier (NMI) is an electricity specific term.</p> <p>Meter Installation Registration Number (MIRN) is the term used to identify a meter in the natural gas industry and included on consumer bills. MIRN is used in market systems, market procedures, communication and training manuals. The removal of the term MIRN from natural gas bills could have the following impacts:</p> <ul style="list-style-type: none"> • Dual Fuel bills – confusion to customers when they are requested to provide the meter numbers for both electricity and gas meters. This could be when they are requested to fill out transfer details (an incorrect meter number will lead to a delay in transfer) or when they phone a call centre; • System changes – to amend terminology to align bills and systems; • Communication and training material – will need to be amended to both train staff and communicate with customers with regards to the metering terminology and how to distinguish between a gas and electricity meter number. <p>While we note that MIRN has been included under the National Metering Identifier definition in section 7 of the Draft Guidelines, we believe that Meter Installation Registration Number (MIRN) should be included as an acceptable term on consumer bills.</p>
a link to the Energy Made Easy website: www.energymadeeasy.gov.au	No comment. However, it will require a change to current bills.

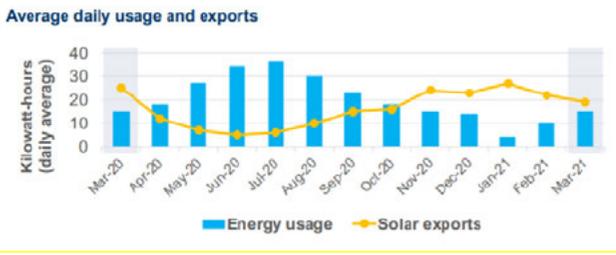
Bill Requirements	Origin's Comments
'better offer' information (see section 33)	Change requested. This is discussed further in the main section of the submission above. Any requirement to include 'better offer' information will be costly in terms of development, coding and testing.
amount due and due date	<p>Change requested. Allowance to include any fees and charges that are required to meet regulatory obligations (ie late payment fees)</p> <p>Origin has concerns with the inability to include any fees and charges that are related to bill payment date. Currently, we provide notification that a late payment fee may apply if the bill is paid after the due by date (in jurisdictions where this is allowed). This assists in clearly communicating with the customer about relevant fees and reduces customer complaints with regards to the application of fees.</p>
payment methods	No comment.
bill issue date	No comment.
retailer identifying information (see section 7) <i>Retailer identifying information means a retailer's trading name, logo and website</i>	No comment.
a telephone number for the customer to: <ul style="list-style-type: none"> • make account enquiries and complaints; • contact the relevant energy ombudsman 	<p>Change requested. Extend contact details for the retailer on page 1 of the bill to allow for email or website address to be included. Reconsider the inclusion of Energy Ombudsman's details in Tier 1 data requirements.</p> <p>Make account enquiries and complaints The Draft Guideline has been drafted to limit contact details for the retailer on page 1 of the consumer bill to a telephone number. This will potentially increase call volumes and increased costs to a retailer. It may also cause customer frustration for those customers who prefer to contact their retailer via other channels (ie email or website form).</p> <p>Under the Draft Guidelines, it appears further contact details would need to appear after Tier 2 information. We do not believe that this will deliver a satisfactory consumer experience and the Guidelines should be extended to require "contact details for account enquiries and complaints" (ie it should not be limited to telephone number).</p> <p>Inclusion of Energy Ombudsman telephone number (Tier 1)</p>

Bill Requirements	Origin's Comments
	<p>We support Energy Ombudsman details on consumer bills. However, we question the placement of this information on the bills next to the enquires and complaints details. We have a concern that the current placement of the details will drive calls to the Energy Ombudsman in the first instance rather than contacting the retailer to resolve the issue in the first instance.</p> <p>This may overload Energy Ombudsman schemes and does not provide for a satisfactory consumer experience if all the Ombudsman does is refer the consumer to their retailer. Further, retailers are charged by Ombudsman bodies for referring the consumer back to the retailer.</p> <p>We believe that these contact details should be included with Tier 2 information and included with additional information regarding concessions and grants.</p>
the name and telephone number of the relevant distributor for the customer to make fault inquiries and report emergencies	No comment.
<p>headings intended to assist a customer's understanding of prescribed Tier 1 information.</p> <p><i>Example: A 'Need help?' heading may be included to assist a customer's understanding of the above telephone numbers.</i></p> <p><i>Note: If a better offer information requirement is prescribed in the Guideline, it will likely include a requirement to include a link to Energy Made Easy with this information.</i></p>	No comment.
NEW Important Messages section	<p>Change requested. <i>Request that an additional item be included in Tier 1 information to include an 'important messages' section.</i></p> <p>From time to time, retailers need to communicate important messages to its' customer base. For example, financial assistance during COVID, change or metering or an amendment to tariffs. Given the only interaction with a consumer is the bill, the bill is the most effective means of providing these messages.</p> <p>Due to the importance of these messages, they will generally appear on page 1 of Origin's energy bills. Under the Draft Guidelines, this would not be allowed.</p> <p>We believe that the Guidelines should allow for important messages to be placed on page 1 (when required).</p>

Bill Requirements		Origin's Comments			
Tier 2 Information					
a standardised plan summary (see sections 30 to 32)		<p>Change requested: <i>Information to be included as part of the bill content.</i></p> <p>There appears to be a drafting error. Reference to standardised plan summary is sections 30 and 31 of the Draft Guidelines. Section 32 relates to Better Offer.</p> <p>It is noted that section 31 of the Draft Guidelines states that “<i>the plan summary must be presented in a standardised form, using the following format, order and terminology...</i>” We have concerns with the rigid format and request flexibility in the order that the information is presented.</p> <p>In terms of the table and the specific data requirements, Origin provides the following comments and questions:</p> <ul style="list-style-type: none"> • Current plan details: we understand that data to be included in the Current Plan information is only related to the consumers current plan details. For example, if a consumer has changed plans during the billing period, only the latest plan details need to be displayed. We assume that same would apply if a consumer moves from a flat rate to a TOU rate during the billing period – only the latest plan details would be displayed. • Displaying tariff and rates: this information already appears as part of the understand your bill’ requirements. Inclusion of this information will mean it will be duplicated on the consumer bill. Duplication of information is costly and may not benefit the consumer. • Time of Use times: we question if the breakdown to applicable times (TOU) best sits with the standardised plan or would be better displayed as part of the ‘understand your bill’ (where we currently show it). We request some flexibility for retailers to determine where this information best fits in terms of the flow of their individual consumer bill. • Benefits – we believe that the table should be flexible to allow benefits of current plan arrangements to be included. That is, whether the consumer is receiving 20% discount, Everyday Rewards points, fixed price for 12 months, ongoing lower rate that you never need to renew. These is an important distinguishing feature when a consumer seeks to compare offers. 			
<p>30. The standardised plan summary must include the following information:</p> <ul style="list-style-type: none"> • plan name (if applicable); • a summary of applicable tariffs, charges, peak/off peak times, discounts and concessions that have been applied to the bill; • percentage of energy generated by renewable sources and carbon offsets (if applicable to a small customer’s plan); and <p><i>Note: A retailer is required to include, in a plan summary, the percentage of energy generated by renewable sources and carbon offsets where this is a specific feature of the small customer’s plan. A retailer is not required to include this information where it is not a feature of a small customer’s contract.</i></p> <p>benefit type and benefit change date (see section 7).</p> <ul style="list-style-type: none"> • 31. The plan summary must be presented in a standardised form, using the following format, order and terminology, designed in a way that meets the design principles in this Part: 					
<table border="1"> <thead> <tr> <th>Plan Name</th> <th>Plan feature</th> </tr> </thead> <tbody> <tr> <td>Plan charge details</td> <td> <p>\$X.XX per day supply charge</p> <p>XX cents per kWh peak usage (Xam – Xpm)</p> <p>XX cents per kWh off-peak usage (other times)</p> </td> </tr> </tbody> </table>	Plan Name		Plan feature	Plan charge details	<p>\$X.XX per day supply charge</p> <p>XX cents per kWh peak usage (Xam – Xpm)</p> <p>XX cents per kWh off-peak usage (other times)</p>
Plan Name	Plan feature				
Plan charge details	<p>\$X.XX per day supply charge</p> <p>XX cents per kWh peak usage (Xam – Xpm)</p> <p>XX cents per kWh off-peak usage (other times)</p>				

Bill Requirements		Origin's Comments
<p>XX cents per kWh paid to you for solar exports</p> <p>XX% usage discount</p> <p>[Concessions applied, if relevant]</p> <p>Energy from renewable sources or carbon offsets (if applicable) XX%</p> <p>Benefit expires (if applicable) [benefit type] ends [DAY MONTH YEAR]</p>	<ul style="list-style-type: none"> • Benefit type and benefit change – we believe that there should be a note similar to the renewable sources or carbon offset to make it explicit that if there is no benefit end date that this information is not required to be displayed. <p>Overall, there appears to be overlap between the information included as part of this information and data included in other sections of the bill (ie current tariff rates and timings are included in the billing section. This additional information will require layout charges and may result in longer bills. We question whether the AER has considered the printing costs for retailers where this additional information will result in a larger number of pages?</p>	
<p>a breakdown of how the amount due was calculated (the 'Understand your bill' section), including by reference to the following (where applicable):</p> <ul style="list-style-type: none"> • billing period (date-to-date) 	<p>Change requested. <i>Billing period should be allowed to be also included as Tier 1 information.</i></p> <p>Billing period is vital information used to inform the customer of the period for which the bill relates. This is even more important for monthly or frequent billing.</p> <p>We believe that this should be included as Tier 1 information (as well as Tier 2 information) so customer can easily identify the period that the particular bill relates. It is important that a consumer can reference this information on the front page.</p>	
<ul style="list-style-type: none"> • previous reading; • current reading 	<p>Change requested. <i>Guideline reflect the current National Energy Retail Rules (NERR) for the start and end meter read values on small customer bills. OR Schedule 3, Part 4, Rule 8 of NERR be repealed and the Guidelines be explicit that previous and current reads do not apply to interval meters.</i></p> <p>Previous and current reads are not relevant to interval meters. This discussed above in Part 2 above.</p>	
<ul style="list-style-type: none"> • usage (for electricity, in kilowatt-hours kWh; for gas, in megajoules MJ) 	<p>No comment.</p>	
<ul style="list-style-type: none"> • rates/tariffs, in dollar figures 	<p>No comment.</p>	
<ul style="list-style-type: none"> • charges, in dollar figures 	<p>No comment.</p>	
<ul style="list-style-type: none"> • peak usage 	<p>Change requested. <i>Suggest that usage should be described as the basis on which tariffs are determined.</i></p>	

Bill Requirements	Origin's Comments
<ul style="list-style-type: none"> off-peak usage 	<p>There are various different pricing scenarios that determine the basis in which usage is calculated. There could be demand based usage, seasonal pricing – pricing structures are not limited to peak and off-peak usage.</p>
<ul style="list-style-type: none"> usage discount 	<p>Change requested. <i>Discount should be displayed on the bill, but the discount applied to each of the rates should not be displayed.</i></p> <p>Discounts are generally embedded into energy rates. We include a statement to note the discounts that are applicable. We seek confirmation that this is the intent of this requirement.</p>
<ul style="list-style-type: none"> rebates, concessions and grants 	<p>Comment. We assume that this includes hardship information.</p>
<ul style="list-style-type: none"> GST 	<p>Change requested. <i>GST only displayed on the total of the bill and not sub elements of the bill.</i></p> <p>GST is not itemised for individual elements of a consumer bill. It is only shown based on the total of the bill. The Guideline should reflect current requirements.</p>
<ul style="list-style-type: none"> solar exports; solar usage; 	<p>Change requested. <i>The requirement should reference start and end date of meter reads and solar exports.</i></p> <p>Origin views that solar usage and export generally means the same. We are uncertain what the difference is. We support the requirements reflecting current practices – this being the inclusions of meter read start and end dates as well as the export amount.</p> <p>We assume in this section that solar rates would also be included with this information.</p>
<ul style="list-style-type: none"> average daily usage and exports, in kWh or MJ (daily average) if a bill was issued by the same retailer for the corresponding billing period in the previous year, the particulars of the customers' consumption in that previous billing period/s; <p><i>Note: An example of an 'Understand your bill' section is given below</i></p>	<p>Change requested. <i>Allow 'average daily cost' information to be included with 'average daily usage' information.</i></p> <p>Origin provides 'average daily cost' information with 'average daily usage' information. This has not been catered for in the Draft guidelines (it is a requirement in Victoria). If there is no ability to include this information here, it would need to be dropped to below Tier 1 and 2 information – this would not logically make sense to consumers to have this information separate.</p>

Bill Requirements	Origin's Comments																																										
<p>Average daily usage and exports</p>  <table border="1"> <caption>Average daily usage and exports (Estimated Data)</caption> <thead> <tr> <th>Month</th> <th>Energy usage (kWh)</th> <th>Solar exports (kWh)</th> </tr> </thead> <tbody> <tr><td>Mar-20</td><td>15</td><td>25</td></tr> <tr><td>Apr-20</td><td>18</td><td>15</td></tr> <tr><td>May-20</td><td>25</td><td>10</td></tr> <tr><td>Jun-20</td><td>32</td><td>10</td></tr> <tr><td>Jul-20</td><td>35</td><td>10</td></tr> <tr><td>Aug-20</td><td>30</td><td>15</td></tr> <tr><td>Sep-20</td><td>22</td><td>15</td></tr> <tr><td>Oct-20</td><td>18</td><td>20</td></tr> <tr><td>Nov-20</td><td>15</td><td>22</td></tr> <tr><td>Dec-20</td><td>12</td><td>25</td></tr> <tr><td>Jan-21</td><td>5</td><td>25</td></tr> <tr><td>Feb-21</td><td>10</td><td>20</td></tr> <tr><td>Mar-21</td><td>15</td><td>18</td></tr> </tbody> </table>	Month	Energy usage (kWh)	Solar exports (kWh)	Mar-20	15	25	Apr-20	18	15	May-20	25	10	Jun-20	32	10	Jul-20	35	10	Aug-20	30	15	Sep-20	22	15	Oct-20	18	20	Nov-20	15	22	Dec-20	12	25	Jan-21	5	25	Feb-21	10	20	Mar-21	15	18	
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<p>contact details to enable a small customer to access:</p> <ul style="list-style-type: none"> financial assistance; interpreter services (in community languages); and services for customers with hearing and speech impairments (e.g. the National Relay Service) 	<p>Comment. Retailers have regulatory obligations to provide information on bills with regards to concession scheme (eg Queensland bill requirement). This information is generally provided with financial assistance information and other services available to consumers. It would seem appropriate that these concessions contact details continue to be provided with this information.</p>																																										
<ul style="list-style-type: none"> whether the bill amount is based on metering data or on an estimation of the customer's consumption of energy. Where a bill amount is based on an estimation of the customer's consumption of energy, the bill must state that the relevant amount is 'based on an estimation' and must not use an abbreviation of this, for example the letter 'E'. 	<p>Change requested. 1) Allow for regulatory messages to be included as to how customers can submit self reads and 2) include estimated date of next scheduled meter read.</p> <p>Currently where a bill is estimated, we include text on how a consumer can submit a "customer self read". This is to allow a consumer to submit a meter read that more closely aligns with the actual meter if the consumer would like this. If this is not included in Tier 2 information, the ability for a consumer to submit a self read may be lost at the end of the bill.</p> <p>Further, an "estimated date of next schedule read" is important to consumers who rely on this information where there is no access to the meter. Once again, removing this from Tier 2 information may result in the information being lost at the end of the bill.</p> <p>Origin supports a general clause which allows retailers to 'enhance' Tier 1 or 2 information where it makes logical sense to do so and in response to their own consumer research, without detracting from the importance of Tier 1 and 2 information.</p> <p>We note that section 17 of the Better Bills Guideline requires that the bill must "group and present related information together". We are in risk of breaching this if the information is not presented together.</p>																																										