

1 May 2023

Clare Savage
Chair
Australian Energy Regulator

[REDACTED]
[REDACTED]

Via email to [REDACTED]

Dear Clare Savage,

Re: Better Bills Guideline – Bill relief rebate message

Simply Energy welcomes the opportunity to provide feedback on the Australian Energy Regulator's (AER) proposal to include a specific bill relief rebate message as Tier 1 information under section 37 of the Better Bills Guideline.

The proposed bill message will be challenging to implement

Simply Energy understands the benefit of informing eligible customers that they are receiving rebates under the Energy Price Relief Plan. However, we are concerned that it will be challenging to only display this message for specific customers due to the short time for retailers to update their billing systems before the rebates commence. We expect that it will be particularly difficult to automate this message for the customers that we do not yet know are eligible, such as Family Tax Benefit and carer's allowance recipients, as this status is not currently recorded in retailer systems.

The proposal to also include the dollar amount of the rebate on the first page of the bill adds complexity and will further increase the risk of some customers not receiving an accurate bill message. The complexity is due to this message needing to be variable (rather than a static amount for each jurisdiction), as there will likely be instances where some customers will receive two rebates in a single billing period (such as Family Tax Benefit and carer's allowance recipients that will begin receiving these rebates in October).

Depending on each retailers' ability to ensure the bill message can be displayed only on eligible customer bills, there is a risk that ineligible customers will also receive the message and experience annoyance that their bill did not actually include any rebate. We expect this could lead to increased customer calls to those retailers' call centres and to Services Australia.

We urge the AER to consider alternative approaches to this message

Simply Energy suggests that there are alternative approaches that could address the challenges in the proposed bill relief rebate message. For example, the AER could approve a generic bill relief rebate message that could appear on all customer bills, such as:

'Your electricity bill may have been reduced by a rebate from the Commonwealth and state governments under the Energy Price Relief Plan. If you are eligible, you will see this rebate in the [insert section name] section of this bill.'

This message would also be received by ineligible customers, which would likely lead to some of the issues noted above with increased call levels. These issues may be partly offset if the message encourages some customers to apply for concessions that they were already eligible to receive.

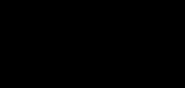
Another alternative approach is a one-off (or recurrent) letter that is sent to eligible customers at the time of their first rebate. For example, this may be a one-off government-drafted letter to eligible customers from 1 July (and from 1 October, for the subset of customers that will begin receiving these rebates at this time) that clearly sets out the total amount that the customer would receive and the schedule of the rebates over the next 12 months. These letters could be separately drafted for each customer type in each jurisdiction. Simply Energy expects that it could trigger these letters for customers that receive the Energy Price Relief Plan rebates on a bill.

If the policy objective is to advise customers of the details of the Energy Price Relief Plan and the benefits that they can expect to receive, our view is that this approach would be more informative for customers and would not be as easily missed as a bill message. We do acknowledge that this alternative could not be achieved through the Better Bills Guideline and would require collaboration between the AER, the Department, and industry to ensure that these letters were sent out to eligible customers.

Concluding remarks

Simply Energy welcomes further discussion in relation to this submission. To arrange a discussion or if you have any questions please contact Matthew Giampiccolo, Senior Regulatory Adviser, at [redacted] -

Yours sincerely



James Barton
General Manager, Regulation
Simply Energy