

Retail guidelines review

Consultation paper

November 2025

© Commonwealth of Australia 2025

This work is copyright. In addition to any use permitted under the *Copyright Act 1968* all material contained within this work is provided under a Creative Commons Attributions 4.0 Australia licence with the exception of:

- the Commonwealth Coat of Arms
- the ACCC and AER logos
- any illustration diagram, photograph or graphic over which the Australian Competition and Consumer Commission does not hold copyright but which may be part of or contained within this publication.

The details of the relevant licence conditions are available on the Creative Commons website as is the full legal code for the CC BY 4.0 AU licence.

Parties who wish to re-publish or otherwise use the information in this publication should check the information for currency and accuracy prior to publication.

Inquiries about this publication should be addressed to:

Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601
Email: aerinquiry@aer.gov.au
Tel: 1300 585 165

AER reference: 24010022

Contents

Introduction	1
1 Executive summary	2
1.1 Scope of the review	3
1.2 Consultation questions.....	4
1.3 Request for submissions.....	5
2 Background	6
2.1 Objectives	7
2.2 Approach to combining the guidelines.....	7
3 Key issues for feedback	8
3.1 Improving retail communications	8
3.1.1 <i>Using design principles</i>	8
3.1.2 <i>Making communications clearer and more accessible</i>	8
3.1.3 <i>Improving benefit change notices</i>	9
3.2 Managing increasing complexity	10
3.2.1 <i>Communicating secondary settlement points</i>	10
3.2.2 <i>Differentiating requirements for different types of plans</i>	10
3.2.3 <i>Making plan names easier to understand</i>	11
3.3 Making it easier to access a better offer	12
3.3.1 <i>Clarifying better offer messages</i>	12
3.3.2 <i>Providing better offer messages in more places</i>	13
3.3.3 <i>Defining the deemed better offer</i>	14
3.4 Improving price transparency.....	15
3.4.1 <i>Making fees and charges easier to understand</i>	15
3.4.2 <i>Increasing transparency for embedded network customers</i>	15
3.5 Improving payment assistance information	16
3.5.1 <i>Making hardship policies more consumer friendly</i>	16
3.5.2 <i>Helping customers access concessions and rebates</i>	16

Introduction

Energy is an essential service for every Australian and the Australian Energy Regulator exists to ensure energy consumers are better off now and in the future.

In October 2022, we launched our [Towards energy equity](#) strategy for an inclusive energy market. Since then, we've identified and advocated for reforms that would address gaps in consumer protections and improve outcomes for energy customers.

Now, we are looking at what we can do to simplify energy communications and ensure customers are receiving clear, useful and timely information and support. We are doing this by reviewing 4 enforceable guidelines that influence how retailers communicate with and assist their customers.

We will combine these guidelines into a single, easy-to-use document. While each guideline has its own scope and purpose, they also overlap in many ways. Reviewing and combining the guidelines will:

- simplify the regulatory framework
- help retailers navigate what they're required to do for their customers
- make energy plans, bills, notices and hardship policies easier to understand
- support better outcomes for all customers by reducing the cost of regulations that may be overly prescriptive or out of date.

Updating the guidelines will also help deliver new rules that protect customers experiencing payment difficulty, as well as those who may be unable to engage fully in the energy market.

This review is an opportunity to refresh and consolidate our guidelines amid broader changes to the market. Your feedback to this consultation paper will inform how we do this.

We look forward to engaging with you on these important issues.

1 Executive summary

The Australian Energy Regulator (AER) is reviewing 4 enforceable retail guidelines by September 2026. The guidelines apply to authorised retailers operating in the ACT, NSW, Queensland, South Australia and Tasmania. We are reviewing:

- the [Benefit Change Notice Guidelines](#), which set out obligations for retailers in relation to notifying small customers when a benefit in their contract is expiring or changing
- the [Better Bills Guideline](#), which sets out obligations for retailers in relation to preparing and issuing bills that make it easy for small customers to understand billing information
- the [Customer Hardship Policy Guideline](#), which sets out obligations for retailers in relation to their customer hardship policies
- the [Retail Pricing Information Guidelines](#), which set out obligations for retailers in relation to the presentation of standing and market offer prices, including on our price comparator website [Energy Made Easy](#).

We are taking a holistic approach to reviewing these guidelines, with a view to combining them into a single, easy-to-use document. This approach will make it easier for retailers to understand their obligations, which will result in better experiences for energy customers.

In this consultation paper, we are seeking initial feedback on opportunities to simplify the guidelines, improve retail communications, manage increasing complexity, make it easier to find a better offer, and improve access to information about prices and payment difficulty assistance.

We are accepting stakeholder feedback on this consultation paper until 23 December 2025.

Figure 1. Consultation process for the retail guidelines review



This process means that the final combined guidelines will be published soon after changes to benefit change notices come into effect under the National Energy Retail Rules. We consider that consulting on the guidelines together will ensure they are as clear, simple and effective as possible, which will ultimately deliver important benefits for energy retailers and customers. The combined consultation will also make the process of stakeholders providing feedback more efficient. Until this review is completed, we expect retailers to comply with the current versions of the relevant guidelines.

1.1 Scope of the review

We are considering a range of issues to ensure the guidelines are clear, effective and fit for purpose over time. These issues and the reasons they are important are summarised below.

Improving retail communications

- **Using design principles:** Customers should be able to easily understand the information retailers give them. Consistent, clear and simple design principles across all communications could help.
- **Making communications clearer and more accessible:** Energy information should be accessible to everyone, including customers with low English literacy or other specific needs. Our guidelines could make sure these needs are considered.
- **Improving benefit change notices:** Energy Made Easy is now easier to use, so some requirements for benefit change notices are no longer as helpful for customers as they used to be. Our guidelines could be updated to make benefit change notices more useful for customers while simplifying obligations for retailers.

Managing increasing complexity

- **Communicating secondary settlement points:** [New rules](#) have introduced secondary settlement points for small customers. Customers should be able to easily understand information about these voluntary additional metering points if relevant to their plan.
- **Differentiating requirements for different types of plans:** As the energy market changes, customers on complex plans might need very different information from customers on more traditional plans. Our guidelines could differentiate between these types of plans to help retailers tailor information for these different customers.
- **Making plan names easier to understand:** Stakeholders have raised concerns that some energy plan names can be confusing. Our guidelines could help customers by making plans easier to identify.

Making it easier to access a better offer

- **Clarifying better offer messages:** Some better offer messages refer to plans that have the same name as a customer's current plan, which people can find confusing. Customers may also be confused about why they are receiving a better offer message for a plan they can't access, which could damage consumer trust. Our guidelines could help make sure better offer messages are clear and relevant for customers.
- **Providing better offer messages in more places:** [New rules](#) require comparison information to be included in communications that accompany a bill, like cover emails. Our guidelines need to specify what comparison information is required and when. The better offer message has been successful in encouraging customers to switch, so we could require this to be included in more places. It could also replace other kinds of comparison information that are currently required, which would simplify the guidelines.
- **Defining the deemed better offer:** [New rules](#) mean hardship customers must be offered a better offer if available. Whenever they are not on a better offer, they must receive a financial benefit equivalent to the amount they would have saved if they were. To enable this, we must define the term 'deemed better offer' in our guidelines.

Improving price transparency

- **Making fees and charges easier to understand:** [New rules](#) update requirements for fees and charges, and prohibit certain fees. Our guidelines could help ensure customers receive better information about fees and charges, including when they are comparing energy plans.
- **Increasing transparency for embedded network customers:** Recent changes to our [Retail Exempt Selling Guideline](#) improved price transparency for embedded network customers of exempt sellers, but embedded network customers of authorised retailers don't currently have the same protections. Our guidelines could bridge this gap.

Improving payment assistance information

- **Making hardship policies more consumer friendly:** Customer hardship policies can be inconsistent or include statements that act as a barrier for customers accessing assistance. We can update our guidelines to improve consistency and reflect what we've learned about better practice.
- **Helping customers access concessions and rebates:** Many customers aren't receiving energy concessions they are entitled to. Our guidelines could be updated to better support customer awareness of concessions through messages on energy bills.

1.2 Consultation questions

To help us consider these issues, we are seeking your feedback on the following questions:

1. How can we make sure the combined guidelines are easy for stakeholders to use, including retailer staff who will be responsible for implementing the requirements?
2. How could we adapt the design principles to different communications and where is more specific formatting guidance required?
3. How could we make communications more accessible for customers?
4. How could benefit change notices be improved to make it easier for customers to understand and take action when their benefit is changing?
5. How will secondary settlement points change energy plans and energy plan information?
6. How could our guidelines make complex energy plan information more relevant and easier to understand?
7. How could we improve transparency and reduce customer confusion in relation to energy plan names?
8. How could we ensure better offer messages are clear, relevant and trusted?
9. Where should customers receive better offer messages and how could we ensure the messages are clear and appropriate for different kinds of communications?
10. What should we consider in defining the term 'deemed better offer', including in relation to how better offers are identified and how much a customer would need to save?
11. How could we improve transparency of fees and charges in plan information and on Energy Made Easy without making plan information too complex for customers?
12. What information would be useful for customers in embedded networks to understand their energy plan and how it compares with others in the market?
13. What specific changes could we make to the standardised statements in hardship policies to make them more consumer friendly?
14. What concession and rebate information should be included on energy bills?

1.3 Request for submissions

Interested parties are invited to make submissions to the AER regarding this consultation paper by close of business on Tuesday, 23 December 2025.

Submissions should be emailed to consumers@aer.gov.au.

Alternatively, you may mail submissions to:

Executive Director, DMO and Consumers
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

We are also accepting verbal feedback in consultation meetings. You can book a meeting [here](#) or using this QR code:



You can also email us at consumers@aer.gov.au to schedule a meeting directly.

The AER prefers that all submissions be publicly available to facilitate an informed and transparent consultative process. Submissions will be treated as public documents unless otherwise requested. All non-confidential submissions will be placed on the AER's website. For further information regarding the AER's use and disclosure of information provided to it, see the [ACCC/AER Information Policy](#) available on the AER's website.

Parties wishing to submit confidential information are requested to:

- clearly identify the information that is the subject of the confidentiality claim
- provide a non-confidential version of the submission in a form suitable for publication.

If you have enquiries about this paper or lodging a submission, or would like to meet with us to discuss issues raised in this paper, please contact the AER Consumers team on consumers@aer.gov.au or book a meeting [here](#).

2 Background

The AER is reviewing and updating 4 of our enforceable retail guidelines, as summarised in Figure 2. The guidelines we're reviewing shape many customer experiences, including choosing and comparing plans, receiving bills, understanding changes to plan benefits and accessing payment difficulty assistance.

Figure 2. Guidelines included in this review



Benefit Change Notice Guidelines

Retailers must send customers a benefit change notice when a benefit on their energy plan is changing. These guidelines help retailers meet this obligation by specifying the manner and form of benefit change notices.



Better Bills Guideline

Energy bills must contain important information and should be presented in a way that is easy for customers to understand. This guideline contains requirements for preparing and issuing energy bills.



Customer Hardship Policy Guideline

A retailer's customer hardship policy explains what the retailer will do to meet its obligations to help customers experiencing payment difficulty due to hardship. All retailer hardship policies are approved by the AER. This guideline includes requirements for the approval process and sets out what hardship policies must include, including standardised statements that must be included in every policy.



Retail Pricing Information Guidelines

Consistent requirements for presenting and marketing energy plans and prices help customers consider and compare their features. These guidelines set out how pricing information must be presented to customers, including on our price comparison website Energy Made Easy.

In addition to new rules that require us to update these guidelines, we think there are opportunities to update them to better reflect the energy market of today and tomorrow.

Australians are embracing consumer energy resources like solar, batteries and electric vehicles. According to the Clean Energy Council's 2025 rooftop solar installation report, there have now been 4.2 million rooftop solar installations across Australian homes and businesses, representing a combined generating capacity of about 26.8 gigawatts.¹

While these changes offer great opportunities to consumers, it can also make the energy market more confusing. Customers who can't invest in these new technologies tend to have higher bills and sometimes receive irrelevant communications that are a barrier to finding a cheaper plan. It's important that our guidelines are simple to comply with and make the energy market easy to understand for everyone, no matter how they receive their energy.

¹ Clean Energy Council, [Rooftop solar and storage report: January–June 2025](#), p 5.

2.1 Objectives

In this review, we aim to:



Achieve intended outcomes for consumers



Clarify, simplify and streamline regulatory obligations



Ensure the guidelines can be efficiently implemented and effectively enforced



Ensure that the benefits of any changes exceed the costs



Minimise the potential need for a further review of the guidelines in the next 3–5 years

To help us achieve these objectives, we are considering the implications of other ongoing reform processes, including Energy Ministers' [Better Energy Customer Experiences reform program](#) and [Default Market Offer \(DMO\) review](#), the Australian Energy Market Commission's [pricing review](#), and the Essential Services Commission of Victoria's [review of the Energy Retail Code of Practice](#). Considering these reform processes will help us achieve better outcomes, simplify the regulatory framework and ensure the guidelines can adapt more readily to future reforms.

2.2 Approach to combining the guidelines

We've decided to combine the 4 guidelines into a single, easy-to-use document.

Each guideline has its own purpose, scope and requirements set out in the National Energy Retail Law, National Energy Retail Rules, or both. However, there is also some overlap between the guidelines. This review is an opportunity to simplify the retail regulatory framework by reducing duplication, improving alignment across the guidelines and removing obligations that are no longer relevant. Combining the guidelines into a single document will also make it easier for stakeholders (like retailer staff responsible for implementing the guidelines) to identify and understand their obligations.

The combined guidelines will include some provisions that apply across different types of communications. For example, we aim to set clear and consistent expectations for presenting information that apply to all communications regulated by the 4 guidelines we're reviewing.

The combined guidelines will also include separate obligations that are relevant to specific guidelines, so that retailers can easily find out what they need to do.

Question 1. How can we make sure the combined guidelines are easy for stakeholders to use, including retailer staff who will be responsible for implementing the requirements?

3 Key issues for feedback

3.1 Improving retail communications

3.1.1 Using design principles

The Better Bills Guideline introduced design principles for energy bills, as well as tiered information requirements that limit the amount of information that can be included on bills.

The design principles in the Better Bills Guideline were informed by behavioural insights and research from the Behavioural Economics Team of the Australian Government (BETA).² This research highlighted that simple, well-designed communications are easier for customers to understand and act on. Recent evaluation research by BETA showed that the Better Bills Guideline has been effective in simplifying bills and encouraging customers to act on the information to compare plans on Energy Made Easy, our energy plan comparison site.³

Similar design principles could promote clear and simple retailer communications across other kinds of information. This would mean that, no matter the retailer, customers would always receive information that's easy for them to understand. It would also simplify obligations for retailers by applying a consistent standard across a broad range of communications and reducing the need for more specific formatting requirements.

Question 2. How could we adapt the design principles to different communications and where is more specific formatting guidance required?

3.1.2 Making communications clearer and more accessible

While the Better Bills Guideline has improved customer understanding of their bills, more could be done to help people with specific needs (such as customers with low English literacy).⁴ Our guidelines could also improve communications for people with accessibility needs (such as low vision or blindness) by updating the design principles to address them.

As part of our evaluation of the Better Bills Guideline, we asked ombudsmen to track relevant data over a 12-month period. They found that more customers contacted their ombudsman in error (instead of their retailer) after the Better Bills Guideline required ombudsmen information to be included on bills. We could make minor amendments to help retailers clarify this information on bills.

Question 3. How could we make communications more accessible for customers?

² Behavioural Economics Team of the Australian Government (BETA), [Energy bill contents and bill requirements: Literature review](#), Department of the Prime Minister and Cabinet, October 2021; BETA, [Improving energy bills: Final report](#), Department of Prime Minister and Cabinet, October 2021.

³ BETA, [Better bills impact report](#), Department of the Prime Minister and Cabinet, August 2025, p 4.

⁴ BETA, [Better bills impact report](#), Department of the Prime Minister and Cabinet, August 2025, pp 4–5.

3.1.3 Improving benefit change notices

Benefits can play an important role in a customer's overall perception of their energy plan's value. Benefit change notices tell customers that a benefit they may value is changing or ending. They also prompt customers to consider whether they should look for another plan.

Benefit change notices must be provided in writing 20–40 business days before the benefit change date. Certain minimum information must be included in the notice, like the customer's metering identifier and information about Energy Made Easy.

Our Benefit Change Notice Guidelines require retailers to set out information on benefit change notices in a specific way. However, some of these requirements are no longer as helpful for customers as they used to be. For example, changes to how Energy Made Easy works mean the information provided to help a customer compare their plan after a benefit changes may no longer be relevant to most customers. This review is an opportunity to update the guidelines to ensure benefit change notices are as useful as possible for customers.

With the growing variety of energy plans and energy plan benefits available to customers, this review is also an opportunity to clarify retailer obligations when there's a change to a customer's benefit. We could consider, for example, the difference between financial and non-financial benefits, or clarify how a change to a benefit that impacts tariffs and charges should be communicated to customers.

Question 4. How could benefit change notices be improved to make it easier for customers to understand and take action when their benefit is changing?

3.2 Managing increasing complexity

3.2.1 Communicating secondary settlement points

New rules will introduce secondary settlement points for residential and small business customers in December 2026.⁵ Secondary settlement points are voluntary additional metering points that allow customers to be charged separately for different parts of their energy use. For example, a customer with an electric vehicle could pay lower rates for that part of their usage when charging their vehicle during periods of low demand. They might then sell excess energy when demand is higher, bringing benefits to the customer and energy system.

Secondary settlement points are likely to create more innovative retail plans and new energy services. Our review will need to consider how we address secondary settlement points through our guidelines to ensure they are communicated clearly and transparently. When a customer can easily tell which settlement point relates to their usage and costs, it will be easier for them to take advantage of their energy plan's features.

Too much information can be overwhelming for customers. It is likely that information about secondary settlement points will be most useful to customers if it can be personalised to their circumstances. For example, a customer will best be able to understand their electric vehicle usage and rates if it is listed on their bill or other communications as 'electric vehicle' usage. This may not be possible for all retailers yet, so it will be important to provide flexibility and tell retailers how to clearly communicate secondary settlement points where they are unable to personalise this information for customers. It will also be important to balance the needs of customers with secondary settlement points and those on more traditional plans.

Question 5. How will secondary settlement points change energy plans and energy plan information?

3.2.2 Differentiating requirements for different types of plans

The range and diversity of new energy services and personalised plans will bring benefits to customers, but will also make the retail energy market more complex. To help retailers communicate clearly with different types of customers on different types of plans, our guidelines could differentiate requirements for these plans. For example, customers on subscription and wholesale cost pass-through plans might benefit from different kinds of communication than customers on flat tariffs. Differentiating between plans could allow obligations to be tailored to different types of plans and customers, which could make information more relevant for customers and reduce retailer costs.

Question 6. How could our guidelines make complex energy plan information more relevant and easier to understand?

⁵ AEMC, [National Energy Retail Amendment \(Unlocking CER benefits through flexible trading\) Rule 2024](#), Final determination, 15 August 2024, p 87.

3.2.3 Making plan names easier to understand

Energy retailers give plans many different names. Retailers use plan names to differentiate offers available to customers or attract customers to a particular plan. However, stakeholders have raised concerns that some plan names may be:

- misleading, for example plans that include a term like ‘savings’ even though their prices are higher than others available
- confusing, for example:
 - two plans that have the same name but different prices or terms
 - plans that use terms like ‘variable’ in a different way than customers are used to (such as to represent a dynamically updating interest rate in a variable rate mortgage).⁶

Introducing new requirements for energy plan names could help increase transparency or reduce confusion. Other sectors such as healthcare have taken a very prescriptive approach to this, where product names for tiers of insurance are prescribed based on the level of coverage (Gold, Silver, Bronze and Basic). There may be more flexible options for ensuring energy plan names are clear and easy for customers to understand.

Alternatively, plan names could be presented alongside other unique information that would enable customers to more easily identify a specific plan. For example, every plan has a unique plan identifier on Energy Made Easy, which could be included whenever plan information is presented.

Question 7. How could we improve transparency and reduce customer confusion in relation to energy plan names?

⁶ CHOICE, [CHOICE files energy retailer ‘super complaint’ with the ACCC](#), 21 May 2025.

3.3 Making it easier to access a better offer

3.3.1 Clarifying better offer messages

The Better Bills Guideline introduced the better offer message, which encourages customers to switch to the best plan for them. A better offer message tells a customer how much money they could save on another plan with the same retailer if there's a cheaper plan available. If there isn't a cheaper plan available from their retailer, the better offer message tells a customer how to compare plans from other retailers on Energy Made Easy.

The Better Bills Guideline sets out how retailers check whether a better offer is available. The check requires retailers to subtract the annual total cost of potential alternative plans from the annual total cost of a customer's current plan, based on their usage and other relevant information. If the result of the calculation is that a customer could save more than \$22 on a different plan, retailers must include a message with the name of the different plan and how much the customer could save in a prominent place on the bill. If the calculation finds that a customer would save \$22 or less, retailers must instead provide a prominent message telling the customer how to compare plans from other retailers on Energy Made Easy.

Evidence from BETA's impact report shows that the new requirements in the Better Bills Guideline have encouraged more customers to switch plans. Since the guideline was implemented, triple the amount of people visited Energy Made Easy because of the information on their bill and more than half of these people had never switched retailers before. Consumer experts also rated the Better Bills Guideline as particularly effective in making it easy for customers to determine how competitive their plan is, because of the better offer message.⁷

However, better offer messages can sometimes be confusing for customers. The Australian Competition and Consumer Commission's December 2024 Inquiry into the National Electricity Market report found that 24 per cent of customers received a better offer message that referred to a plan with the same name as their current plan but with different prices.⁸ Consumer advocates CHOICE have estimated that plans with the same name could cost customers around \$65 million a year in missed opportunities to save.⁹

In May 2025, the AER [made a decision](#) under the Better Bills Guideline requiring retailers who re-use plan names to include additional clarifying information in better offer messages on bills. However, there may be opportunities to further clarify better offer messages and reduce the potential for confusion due to plans with the same name.

CHOICE have also suggested that customers may be misled by better offer messages that refer to a plan the customer isn't eligible for (such as plans only available to new customers). They highlight that this creates unnecessary barriers to switching by leading customers to believe the information in better offer messages is inaccurate or irrelevant to them.¹⁰

⁷ BETA, [Better bills impact report](#), Department of the Prime Minister and Cabinet, August 2025, pp 4–5.

⁸ ACCC, [Inquiry into the National Electricity Market: December 2024 report](#), 3 December 2024, p 12.

⁹ CHOICE, [The power of confusion: Choice designated 'super' complaint on energy plans](#), May 2025, p 3.

¹⁰ CHOICE, [The power of confusion: Choice designated 'super' complaint on energy plans](#), May 2025, p 21.

Updating the better offer message to only include plans the customer is likely to be eligible for would ensure better offer messages are clear and relevant for customers. This may improve consumer trust in comparison information provided by retailers, which would encourage more people to act on this information to access a better plan.

Question 8. How could we ensure better offer messages are clear, relevant and trusted?

3.3.2 Providing better offer messages in more places

New rules require that retailers include comparative information (such as a better offer message) on communications relating to and sent at the same time as a bill (such as a covering email).¹¹

Many customers don't read every bill. This might be because they have a direct debit arrangement that means their bill is paid automatically or because retailers send enough information for the customer to pay the bill in accompanying communications. For example, retailers often send customers their bill as an email attachment or link. Sometimes those emails summarise the bill, including the amount and due date. The new rules require comparison information, like a better offer message, to be included in accompanying communications like covering emails.

Retailers also use other types of communications, like text messages or app notifications, to alert customers that their bill has been issued. These communications are typically much shorter and contain much less information. They have limited space and may have a strict character limit. Customers are also likely to interact with these types of communications very differently from a bill or covering email. Our guidelines need to specify the type of communications that must include comparison information, which must be provided in the manner and form required by the guidelines.

Our guidelines could also require the better offer message to appear on benefit change notices. Currently, notices must include a 'do nothing' amount, which is intended to help customers compare how much they will pay for energy if they do nothing following a benefit change with other offers available. Replacing the 'do nothing' amount with a better offer message would ensure customers receive clear, consistent messaging about how their plan compares with others available, which has already been proven effective in encouraging customers to compare their plan. It would also simplify obligations for retailers by reducing the number of different types of calculations they are required to do to provide customers with comparison information.

Question 9. Where should customers receive better offer messages and how could we ensure the messages are clear and appropriate for different kinds of communications?

¹¹ AEMC, [National Energy Retail Amendment \(Improving the ability to switch to a better offer\) Rule](#), Final determination, 11 September 2025, p 10.

3.3.3 Defining the deemed better offer

New protections mean that, from 30 December 2026, hardship customers must be offered a better offer if available.¹² Whenever they are not on a better offer, they must receive a financial benefit equivalent to the amount they would have saved if they were on the deemed better offer.

To enable this, we must define the term ‘deemed better offer’ in our guidelines. When defining the term, we must take into account the lowest cost energy offer available to the customer, the customer’s energy usage history and any non-financial benefits of energy plans.

In defining the deemed better offer, there are opportunities to simplify the regulatory framework for retailers while retaining the benefits of the better offer message for customers. The better offer message aligns with a similar requirement in Victoria. The Essential Services Commission of Victoria has recently announced changes to their best offer obligations, with the savings threshold increasing from \$22 to \$50 from 1 October 2026.¹³

To simplify requirements for retailers and ensure customers are receiving more relevant better offer messages, we could update the savings threshold in the Better Bills Guideline to align with this change. In addition to ensuring more consistent better offer and best offer obligations, this would better align with customer expectations in terms of the amount of money they expect to save to go to the effort of switching plans.

The Essential Services Commission of Victoria’s behavioural testing in 2018 revealed up to 90% of customers would need to save at least \$50 to switch.¹⁴ In 2024, we conducted our own consumer research to assess the benefits of the Better Bills Guideline (including the better offer message) for customers. This research similarly found that while customers see the better offer message as a positive addition to their bill, some customers may be unlikely to take action if the potential savings are too low (for example, less than \$40), especially if they are observing significant overall increases to their bill.

Increasing the savings threshold to \$50 to align with the change in Victoria could ensure better offer messages are more relevant for customers. There are also other minor changes we could make to improve consistency between the better offer and best offer obligations, such as excluding offers that require the customer to have a paid membership or affiliation with an entity that is unrelated to the retailer.

Question 10. What should we consider in defining the term ‘deemed better offer’, including in relation to how better offers are identified and how much a customer would need to save?

¹² AEMC, [National Energy Retail Amendment \(Assisting hardship customers\) Rule 2025](#), Final determination, 19 June 2025.

¹³ Essential Services Commission, [Energy consumer reforms: Final decision paper](#), September 2025.

¹⁴ Behavioural Insights Team, [Testing the impact of behaviourally informed energy bills and best offers](#), 2018, p 37.

3.4 Improving price transparency

3.4.1 Making fees and charges easier to understand

New rules aim to give customers more certainty about the fees and charges they will pay on their energy plan. They prohibit fees and charges for certain customers and require fees and charges to be set at reasonable levels for all other customers.¹⁵

Fees and charges are often communicated to customers through plan information documents on Energy Made Easy. The AEMC has recommended that we update our guidelines to require retailers to provide additional information about fees and charges in plan information documents and on Energy Made Easy. This includes a description of key fees and charges and the circumstances in which they will be charged.

The AEMC has also recommended that we consider if some fees and charges could be made more prominent for people using Energy Made Easy to understand and compare plans.

Energy plan information is often difficult for many customers to understand. It would be important to provide any additional information about fees and charges in a way that does not increase complexity for customers.

Question 11. How could we improve transparency of fees and charges in plan information and on Energy Made Easy without making plan information too complex for customers?

3.4.2 Increasing transparency for embedded network customers

Some customers get their energy through an embedded network, such as people in apartment buildings, caravan parks and shopping centres. Our [review of embedded networks](#) found customers in these networks don't enjoy the same price transparency as other customers, as well as having less choice over their energy plan.

In our recent [update of the Retail Exempt Selling Guideline](#), we were able to improve transparency for customers of exempt sellers in embedded networks by requiring exempt sellers to publish price information. However, the same requirements don't currently extend to embedded network customers of authorised retailers. In updating our guidelines, we could consider opportunities to bridge this gap and ensure more consistent price transparency protections for all energy customers, even if they don't have the same amount of choice over their energy plan.

Question 12. What information would be useful for customers in embedded networks to understand their energy plan and how it compares with others in the market?

¹⁵ AEMC, [National Energy Retail Amendment \(Improving consumer confidence in retail energy plans\) Rule 2025](#), Final determination, 19 June 2025.

3.5 Improving payment assistance information

3.5.1 Making hardship policies more consumer friendly

Many customers experience payment difficulty. In the 12 months to March 2025, the proportion of residential customers with an energy debt over 90 days old (not including customers on hardship programs) increased to 3.1% and the average energy debt grew by nearly 30 per cent to around \$1,400.¹⁶ Unfortunately, our data also shows that many customers in energy debt aren't receiving assistance from their retailer.

Our recent [Review of payment difficulty protections in the National Energy Customer Framework](#) identified barriers that can prevent customers from accessing this assistance. Some of these barriers relate to customer hardship policies, which sometimes use language that is seen to exclude customers or discourages them from seeking assistance (for example, because they don't identify with the terminology of 'hardship', which can be stigmatising). Hardship policies can also be inconsistent in the processes they set out for when and how retailers will provide assistance.

Some of the issues we identified in our payment difficulty review could be addressed through updates to the standardised statements that retailers are required to include in their hardship policies. Others could be addressed through changes to more general requirements about what retailer hardship policies must include.

Broader reforms are needed to close the assistance gap and ensure customers experiencing payment difficulty consistently receive proactive, effective and tailored assistance. However, this review could reduce some barriers to accessing assistance by making hardship policies more consistent and consumer friendly.

Question 13. What specific changes could we make to the standardised statements in hardship policies to make them more consumer friendly?

3.5.2 Helping customers access concessions and rebates

Research suggests that up to 60 per cent of energy customers are not receiving the concessions they're entitled to.¹⁷ We are advocating for automated concessions to close this gap.¹⁸ In its recent [Improving the application of concessions to bills](#) rule change process, the AEMC also determined that an automated concessions system would be the most effective long-term solution.¹⁹

In the meantime, our guidelines could help customers better understand the assistance available. Currently, customers receive a message on their energy bills that tells them

¹⁶ AER, [State of the energy market 2025](#), 26 August 2025, p 246.

¹⁷ F Botha and K Prakash, [Insights into energy concession awareness and energy-related behaviours among concession card holders in Australia](#), Melbourne Institute, June 2024.

¹⁸ AER, [Submission to Better Energy Customer Experiences consultation paper](#), 6 June 2025, p 4.

¹⁹ AEMC, [National Energy Retail Amendment \(Improving the application of concessions to bills\) Rule 2025](#), Final determination, 25 September 2025, p ii.

government is supporting customers to reduce bills, asks them to check the understand your bill section of their bill to see if they have received a rebate or concession, and directs them to energy.gov.au for more information.²⁰

This message was originally introduced following a request from government when new bill relief programs were being rolled out. It contains information that is generally helpful for energy customers in understanding energy options, rebates and concessions. However, a more tailored message may be more helpful for customers. For example, the AEMC have recommended that first and final bills notify customers that they will need to reapply for their concession with their new retailer.²¹

Question 14. What concession and rebate information should be included on energy bills?

²⁰ AER, [Better Bills Guideline energy bill relief message](#), Letter to retailers, 1 July 2024.

²¹ AEMC, [National Energy Retail Amendment \(Improving the application of concessions to bills\) Rule 2025](#), Final determination, 25 September 2025, p ii.