

November 2025

Retail guidelines review

Consultation paper summary

We are reviewing the Benefit Change Notice Guidelines, Better Bills Guideline, Customer Hardship Policy Guideline and Retail Pricing Information Guidelines. On 12 November 2025, we published a consultation paper 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 written and verbal feedback until close of business on 23 December 2025. Contact consumers@aer.gov.au or book a consultation meeting here.

Approach to combining the guidelines

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.

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?

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.

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

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.

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

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.

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

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.

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

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.

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

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.

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

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.

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

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.

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

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.

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?

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.

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?

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.

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?

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.

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

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.

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