

February 2026

# Retail guidelines review

## Verbal submissions summary

### Background

Australian Energy Regulator (AER) Consumers staff met with stakeholders who provided verbal submissions to the [Retail guidelines review](#) consultation paper. In these meetings, we discussed their insights and feedback on the issues we are considering. This summary of verbal submissions reflects the views of stakeholders shared with the AER during the consultation process.

Stakeholders who provided verbal submissions summarised in this document included:

- Care Inc.
- Amber Electric
- Perpetual Energy
- Shell Energy & Powershop
- Guide Dogs Queensland
- Momentum Energy

This summary was prepared by AER staff and reviewed by stakeholders before publication.

### Care Inc

#### Friday 28 November 2025

- Customers who receive benefit change notices are often unsure what they mean or how to act to save money. Some customers even feel as though there is a possibility that their supply might be cut off if they don't respond to the notice. Benefit change notices could be improved through plain-language information and fewer, simpler sentences.
- Hardship policies should contain clearer information around writing down debt and debt waivers for customers receiving payment assistance. Customers experiencing payment difficulty often have accumulated debt and need clear and simple answers around what will happen to their debt, when it needs to be paid and who can help them paying it. Easy English and simple sentences are always encouraged for standardised statements in the Customer Hardship Policy Guideline.
- Many customers are aware of energy bill relief messaging. However, when concessions expire or eligibility needs updating, customers may not act to provide updated information to their retailer. Messages like 'We noticed your concession expired on [date]' and 'you have missed an amount of [x dollars]' because of it which could make a difference.

## Amber Electric

**Monday 8 December 2025**

- Energy Made Easy could be improved with more flexible options for retailers to input price information for some plans, such as those that are linked to the wholesale market. Currently, Energy Made Easy only allows set rates to be input by retailers when they're providing plan information or for traditional 'block' time-of-use plans, uses an imputed demand curve based on AEMO data (rather than the retailer's own customer demand curve or CDR data). For wholesale-market linked or other type of dynamic price plan, this can be a barrier to presenting information in a way that best describes the nature of the offer. There are also a number of 'set' text fields used by EME which can be confusing for customers viewing dynamic plan offers and require greater flexibility.
- A shift in requirements for the deemed better offer check and associated comparison information could better accommodate dynamic price plans. For example, Amber has only one market offer plan, the value of which is determined by customer behaviour and their technical setup. Forecasting usage for the next 12 months, as required by the deemed better offer check, is difficult due to fluctuations in the wholesale price. Updated requirements could allow retailers to consider alternative better offer requirements for dynamic offers, such as comparing the customer's current rates to better underlying network tariffs, if available.
- There are some requirements in the AER's billing guideline that could be updated to better enable new types of plans. For example, the requirements to display certain figures in dollars can be confusing for customers on dynamic price plans. Amber suggested that this information could be displayed as c/kWh instead of \$/kWh. In addition, with wholesale-linked usage rates changing regularly throughout a billing period, the requirement to include all usage rates on bills results in too much information for customers. Overall, the design principles or bill content requirements should provide greater flexibility for retailers to present information in line with the guideline and communication objective.

## Perpetual Energy

**Tuesday 16 December 2025**

- Perpetual Energy offers gas plans for large and small business customers with rates linked to the wholesale market. Each Perpetual Energy customer is on an individually negotiated plan, which means they are always on the best plan available to them. There is no alternative plan to compare or move to unless they choose to renegotiate a new contract, which complicates the better offer message obligations for this retailer.
- Some Perpetual Energy customers consume large quantities of gas that would be better expressed in gigajoules (GJ) as opposed to megajoules (MJ) as required by the Better Bills Guideline. For example, Perpetual Energy currently passes through the AEMO market fee at a rate of \$0.000025/MJ and network tariffs that include pricing steps like \$0.006053/MJ. Perpetual Energy would benefit from the flexibility to present these as \$0.025/GJ and \$6.053/GJ respectively for a much more customer-friendly experience.
- The requirement to include a plan summary need to better fit the scenario where customers are on individually negotiated market retail contracts without generic plan names or labels that are not publicly available.

## Shell Energy and Powershop

**Tuesday 16 December 2025**

- The review should consider multi-site customers, including how to present multiple national metering identifiers (NMI) and how specific information like usage and rates relates to different NMIs. This would improve efficiency and avoid duplication, as well as support compliance with payment assistance requirements for different types of small customers.
- The guidelines should update information requirements for complex plans, including plan names. However, plan names often contain important descriptors which attracting new customers and help existing customers understand key features of their plan. Retailers should maintain discretion to name their plans.

## Guide Dogs Queensland

**Wednesday 17 December 2025**

- Inaccessible energy information on bills, retailer websites and mobile applications is a barrier to certain customers engaging with the energy market. Some customers have opted out of engagement with the energy market entirely because information is not presented in a way that meets their needs. For example, these customers find smart meter data on energy usage intervals overwhelming and difficult to understand, and small font sizes in notices, letters and guidelines illegible. A gradual transition to applying internationally recognised accessibility standards, like the Web Content Accessibility Guidelines (WCAG) is recommended.
- Feedback from energy customers with specific needs highlights their concern around PDF bills and other notices that are not compatible with assistive technologies like screen-readers.
- Consumers with accessibility needs are unable to fully engage with the energy market because they cannot effectively utilise the information they are provided. This has caused some customers to adopt a “set and forget” direct debit approach that risks them being unable to check accuracy of billing and missing opportunities to save money by accessing a better offer.

## Momentum Energy

**Tuesday 13 January 2026**

- In relation to clarifying the better offer message, Momentum Energy suggested that either maintaining the AER’s October 2025 decision or removing plan name from the bill message and adding it to communications that accompany the bill. Momentum also proposed an updated header for the better offer message. Although these options would not solve the underlying issue of same name plans, they could help simplify the messaging, reduce consumer confusion, and enable customers to compare their actual retail contract with alternative energy offers.
- Momentum Energy supports a principles-led approach to this review and recommended that we publish a customer-friendly one-pager to support the guideline. Other suggestions included using more inclusive language than “hardship” (e.g. customers experiencing payment difficulty), providing a clearer definition of a “participating” customer, and reordering sections so that customer support statements, such as “ways we (retailer) can help”, are more visible upfront.