

December 2025

# Retail guidelines review

## Stakeholder workshop summary

- **What:** Workshop entitled *Making energy plan information more effective*.
- **When:** Thursday, 11 December 2025, 10:30 am – 12:00 pm AEDT.
- **Where:** Online (Microsoft Teams).
- **Who:** 26 representatives from 16 energy retailers and 9 consumer advocacy and support organisations, 3 facilitators from the Australian Energy Regulator (AER) and 3 observers from the AER. The AER invited authorised retailers and a wide range of consumer organisations to register to participate in the workshop.
- **How:** Guided discussion facilitated and scribed by AER staff, with additional input provided directly via the Microsoft Teams chat and poll features.
- **Why:** The purpose of the workshop was to gain practical insights from stakeholders on how to help customers easily understand and compare energy plans to choose the best plan for them.

## Background

- This workshop was part of initial consultation for the AER's [Retail guidelines review](#), which is reviewing the [Benefit Change Notice Guidelines](#), [Better Bills Guideline](#), [Customer Hardship Policy Guideline](#) and [Retail Pricing Information Guidelines](#).
- In the workshop, we sought feedback and insights on the best way to communicate energy plan information to customers, with a particular focus on how to make information about complex energy plans (such as virtual power plant and dynamic price plans) more effective.
- We explored this by discussing what information should be provided in different contexts, based on the idea that customers need different kinds of energy plan information in different contexts, depending on where they are at in their purchase journey. For example:
  - When looking at energy plan advertisements or reading a cover email with their bill attached, customers need simple **comparison information** that provides just enough information to prompt them to consider comparing their plan.
  - When trying to understand their plan and compare their plan with others on the market, customers need **plan summaries** that clearly communicate key features of their plan.
  - When making a decision to purchase a plan, customers need **plan information documents** that provide all the important details needed to choose the best plan for them.
- Ideas were then assessed and prioritised in 3 breakout room discussions.
- This consultation summary reflects the views of stakeholders which were shared with the AER during the session. The summary was prepared by the AER based on feedback recorded in a poll, facilitated whiteboard discussions and breakout rooms during the session.

## Discussion 1 – Pain points and opportunities

### Discussion structure

This whole-group discussion sought feedback on how to make energy plan more effective in 3 contexts:

- **Comparison information** that aims to prompt customers to consider comparing their plan
- **Plan summaries** that aim to help customers understand and compare key plan features
- **Plan information documents** that aim to help customers understand important details to choose the best plan for them

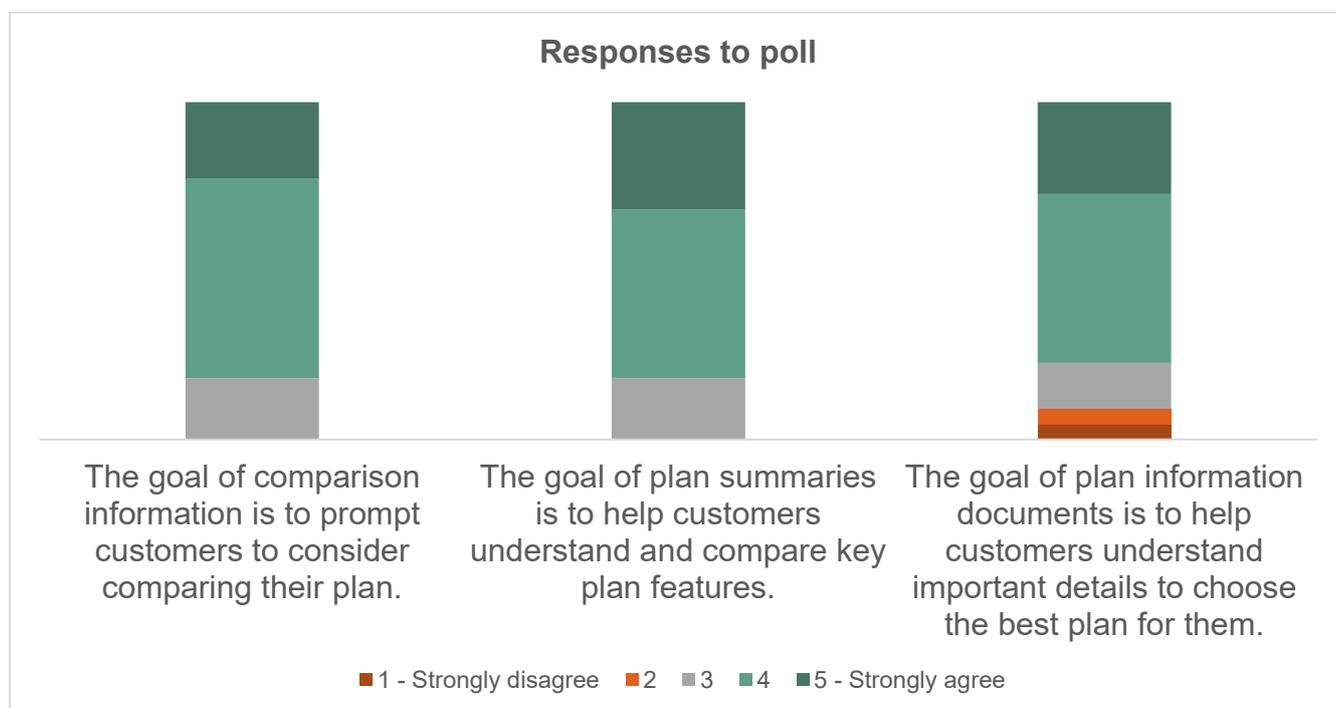
### Discussion questions

- Have we appropriately captured the aim of energy plan information in this context?
- What makes energy plan information ineffective at achieving that aim in this context?
- What could we do to make energy plan information more effective in this context?

### Aim of energy plan information

- 22 of 26 (85%) of participants responded to an in-session poll seeking feedback on whether we had appropriately captured the aim of energy plan information in each context.
- Responses indicated that participants generally agreed with the aims we proposed, with an average agreement of 3.9 to 4.1 out of 5.

**Figure 1: Response to in-session poll seeking feedback on aim of energy plan information**



## Comparison information should be clear and actionable

- Stakeholders agreed that the ‘do nothing’ amount on benefit change notices is not clear comparison information for customers. Consumer representatives highlighted the importance of consistency in describing plan availability and eligibility criteria.
- Consumer representatives outlined experiences where customers misunderstand comparison information which refers to plans that require behaviour change to realise their benefits. Stakeholders agreed that comparison information should be relevant to a customer’s circumstances, as best as they can be understood.

## Plan summaries should be relevant to customers

- Overall, stakeholders agreed some customers are likely to benefit from more and better information about new types of energy plans and how they can access better offers. Retailers told us they strive to provide clear and relevant information to customers, and our guidelines could help by providing flexibility to tailor communications where appropriate. Stakeholders suggested the AER aim to strike an appropriate balance between prescriptive requirements and principles-based obligations that protect customers on traditional plans while enabling new types of plans to develop.
- Consumer representatives highlighted that energy plan names do not always reflect important differences between various plans. This creates confusion and missed opportunities to save money. For example, plan names do not always clarify what the name means, why the plan is priced the way it is, or what risks are associated with certain types of plans. While retailers agreed that plan names can cause confusion, they cautioned that mandating ‘versioning’ for plans would create additional complexity for customers. Retailers noted that that plan names are usually developed based on the feature of the plan rather than the pricing but acknowledged that this is not always the case.
- Customers with specific needs, like people with low vision or blindness, find that energy information is often inaccessible, which limits their ability to engage with it. This causes these customers to take a passive approach to managing their energy needs, which can result in a disproportionate number of these customers paying higher prices than necessary.
- Consumer representatives recommended application of internationally recognised web content accessibility guidelines for digital communications and also customer facing information to improve accessibility issues. Consumer representatives encouraged the AER to consider re-introducing the ‘daily cost’ measure to bills. Excluding the ‘daily cost’ has made it harder for customers to understand and manage the cost of their energy usage.
- Retailers and consumer representatives encouraged the AER to revisit the framework for generally available plans. The framework for displaying plans on EME and conducting the deemed better offer check involves determining whether a plan is ‘generally available’ according to criteria set out in our guidelines. With the emergence of new types of energy plans, such as wholesale market-linked plans, fewer plans will be available to all customers or more will depend on the customer’s technical setup, meaning fewer plans would be included in these circumstances. If the framework were to be adjusted, it should consider the need for tailored information that is relevant to individual customers to help them choose the best plan for their needs.

## Plan information documents could be made simpler

- Retailers suggested simplifying Basic Plan Information Documents (BPID) and Detailed Plan Information Documents (DPID) and reviewing if this information could be provided through different delivery channels such as mobile apps. Consumer representatives noted that technical data in plan documents requires high energy literacy and suggested these documents should focus on simple information while shifting from prescribing more information to clearly identifying who a plan is for, making it easier for customers to determine if a plan meets their specific needs. Stakeholders agreed customers in embedded networks face challenges comparing electricity prices on the Energy Made Easy (EME) price comparator website. Our guidelines could help by requiring retailers to indicate whether a plan is specific to embedded networks when submitting information to EME.
- Plan information documents should include the most important information on the first page, and other information on subsequent pages.

## Discussion 2 – Assessing ideas

### Discussion structure

This breakout room discussion sought feedback on ideas proposed by participants in discussion 1. Each breakout room focused on energy plan information in a different context, as follows:

1. **Comparison information** that aims to prompt customers to consider comparing their plan
2. **Plan summaries** that aim to help customers understand and compare key plan features
3. **Plan information documents** that aim to help customers understand important details to choose the best plan for them

Participants were pre-allocated to breakout rooms to ensure a range of perspectives in each group.

### Discussion questions

- How effective is each idea for achieving the aim of energy plan information in this context?
- How flexible is each idea in achieving the aim of energy plan information in this context?
- What are the risks associated with each idea (for example, high implementation costs or potential for unintended consequences)?

### Group 1 – Information that prompts customers to compare their plan

- Consumer representatives outlined how comparison information that prompts customers to switch to a plan with the same name as their current plan confuses customers and creates a barrier to switching.
- Retailers said they should keep discretion over plan names because they help customers understand and compare plan features.
- Retailers suggested the requirement to include the name of the deemed better offer in comparison information could be removed. Instead, where the deemed better offer is a plan with the same name as the customer's current plan, they could be prompted by the potential saving expressed in dollars and to contact the retailer to switch. Stakeholders discussed that a frictionless switching process would be required to prevent unintended consequences.

- Stakeholders agreed that comparison information should be relevant to the customer's circumstances and broadly supported options to describe complex plans according to what type of customer they would suit. This could also address 'information overload' for customers by prioritising information according to both the customers' circumstances and plan complexity.
- Retailers cautioned that changes to existing arrangements for preparing and issuing bills, including comparison information such as better offer messages, would be impractical and costly relative to potential benefits.

## **Group 2 – Information that helps customers understand and compare key plan features**

- Retailers highlighted that customers often choose products and services based on non-price features they value, such as service quality.
- Consumer representatives noted that sometimes customers may choose more expensive plans not because of perceived value but because of confusion, inertia or lack of confidence.
- Stakeholders agreed that plan information should enable disadvantaged customers to quickly and easily navigate plans and pricing while giving other customers the ability to engage more deeply with additional information when desired.
- Stakeholders agreed that plan summaries should focus comparisons on core plan features (for example, price and tariff structure) to help customers compare value on a clear, consistent and transparent basis.
- Stakeholders agreed that this approach would be flexible over time, especially if retailers were able to communicate other elements of their plan alongside these core features based on specific value offerings (for example, to highlight additional benefits or service quality metrics).
- Stakeholders agreed that these additional plan elements could be communicated within a 'bounded flexibility' approach, with principles-based requirements to ensure that additional plan information does not reduce the clarity of core plan information.
- Stakeholders agreed that this would be a low-risk approach.
- Retailers suggested that regulations should avoid putting too many constraints on how price is communicated (for example, by prescribing specific terminology and formats).

## **Group 3 – Information that helps customers understand details to choose the best plan for them**

- Stakeholders agreed that plan information documents should include the most important information on the first page, with less important or other information detailed on subsequent pages.
- Retailers suggested that although the most important information should be first on plan information documents, prescribing this through requirements similar to tiering on bills in the Better Bills Guideline, would not be preferable.
- Stakeholders agreed that consumers would benefit from plan information that was more personalised.
- Retailers noted that although consumers would benefit from this, it may be difficult and there may be significant implementation and ongoing costs of personalisation, that could outweigh the benefits.