



15 December 2025

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

Re: Retail Guidelines Review – Consultation Paper (November 2025)

Dear AER Team,

Please find attached Altogether Group's submission to the Retail Guidelines Review – Consultation Paper (November 2025). As an authorised retailer serving embedded networks, we welcome the opportunity to contribute to the review, particularly regarding better-offer requirements, fee and charge transparency, and the information needs of embedded network customers.

Our responses focus on Questions 8 and 12. We would be pleased to engage further or provide any clarification you may require.

Kind Regards,
Candice Suttor
Head of Strategic Projects
Altogether Group

Altogether Group Pty Ltd Submission
Retail Guidelines Review – Consultation Paper (Nov 2025)
Responses to Questions 8, and 12

Q8 — How could we ensure better offer messages are clear, relevant and trusted?

Altogether Group are a sustainable, multi-service provider that operates within embedded networks. Embedded networks typically offer only one electricity plan for the entire building; this makes traditional better-offer messages immaterial and potentially confusing.

Altogether also provides consolidated billing across electricity, hot water, thermal energy/air conditioning, and EV charging. This model reduces customer burden and avoids multiple bills. However, the Better Bills Guideline requires Tier 1 information to reflect electricity only, meaning customers must move to later pages to find their true total payable. This creates confusion in multi-service billing environments.

Recommendations:

- Introduce an embedded-network-specific better-offer rule.
- Require an alternative message confirming that only one plan exists.
- Allow flexibility so the true total payable (multi-service) can be clearly shown on page 1.

Q12. What information would be useful for customers in embedded networks to understand their energy plan and how it compares with others in the market?

Although embedded-network authorised retailers must submit pricing data to EME, these plans are not published, leaving Embedded Network (EN) customers without visibility or a market comparison of their own plan details.

Recommendations:

- Publish all embedded-network authorised-retailer plans on the Energy Made Easy Portal (EME).
- Add an “Embedded Network” filter on EME.
- Include a clear statement on power of choice and the role of an Embedded Network Manager (ENM)
- Clearly explain that multi-service billing components may be applicable

- clearly explain that tariffs in embedded networks may include recovery for infrastructure investments in hot water systems, air conditioning, smart metering, electric vehicle charging, solar or batteries.

Information that should not be provided:

- Better-offer messages implying multiple plan options

Although recent regulatory changes now require embedded networks to publish their pricing information, Energy Made Easy, in our opinion, remains the most trusted and centralised government-run source of retail energy plan information. Publishing embedded-network authorised-retailer plans on EME would therefore provide customers, body corporates, developers and other stakeholders with a single, reliable point of truth rather than relying on multiple individual retailer websites.

Furthermore, making EN plans visible on EME would also introduce genuine competitive pressure, to the benefit of consumers. With greater transparency, stakeholders can more easily assess whether pricing, fees and charges are reasonable compared with other authorised embedded-network providers. This visibility would help drive better pricing behaviour across the sector while still avoiding unnecessary bill complexity for customers. It will also ensure better-informed customers can make educated choices for their energy supply.

Altogether Group appreciates the opportunity to contribute to this important and informed review process. As an authorised retailer serving embedded networks, we strongly support reforms that enhance transparency, improve customer understanding, and uplift protections for all energy consumers. Our aim in providing this submission is to offer practical, evidence-based insights that help ensure that regulatory settings genuinely support better outcomes for customers—particularly those in embedded networks who have historically faced information gaps and limited market access. We value the AER's leadership and look forward to continuing to work collaboratively to deliver a more consistent, transparent and consumer-centred energy market.