

Executive Director  
DMO and Consumers  
Australian Energy Regulator  
Via email: [consumers@aer.gov.au](mailto:consumers@aer.gov.au)

Dear Executive Director

## **Retail guidelines review**

### *Introduction*

The Council of Small Business Organisations Australia (**COSBOA**) is the national peak body representing the interests of small businesses across Australia. With a diverse membership spanning across a variety of industries, COSBOA advocates for policy and regulatory frameworks that support small business sustainability and growth. Smaller businesses navigate complex regulatory environments with limited staff and resources. COSBOA's Small Business Perspectives Report 2025, found that 31% of respondents rate energy and utility costs as one of the top impacts on their current financial position.

COSBOA supports the Australian Energy Regulator's (**AER**) initiative to combine the four retail guidelines into a single, streamlined document. However, we emphasise that simplification must not come at the expense of practical implementation or create new burdens for small business energy consumers. Our responses to some of the consultation questions are answered below in general themes.

### *Accessibility of communications (Questions 1 to 4)*

Guidelines should be easy to understand for time-poor small business owners. This also includes ensuring obligations are clear, who must comply with them, and who benefits from protections they offer. When adapting the design principles to different forms of communications, focussing on what matters most and standardising forms across different retailers will result in more effective communication to small businesses. Additionally, including 'next step' instructions for consumers will make the process easier.

### *Managing increased complexity (Questions 6 and 7)*

For complex energy plan information, a combination of visual and written information is essential. Using diagrams to showcase time of use and demand can make the information easier to understand. To reduce confusion regarding energy plan names, we recommend establishing naming conventions to prevent misleading terminology, and standardised descriptors to be used for key features of a plan.

### *Improving price transparency (Question 11 and 12)*

Small businesses need to understand the total cost of ownership, not just usage rates. However, there are many small businesses who are part of embedded networks, and therefore never see a standard electricity bill or tariff in their own name. This makes reviewing the true prices and fees they pay hard to see and compare. We recommend ensuring embedded network customers receive comparable transparency where possible.

### *Payment assistance (Questions 13 and 14)*

We recommend an empathy first approach to the standardised statements in hardship policies. Given that this is often the first touchpoint for customers seeking help, the statement should be re-written to be customer focused and in plain language. While it is still a legal process and document, clearly stating what the customer is entitled to and what they can ask for will give them the assurance and comfort to contact a retailer.

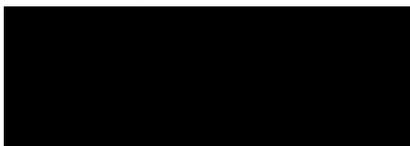
Concession and rebate information should be identifiable and or clearly stated that they are eligible for available programs. Many small business owners blur personal and business finances. When a business struggles with energy bills, the owner's personal financial hardship often follows. Payment difficulty support should recognize this reality.

### *Conclusion*

COSBOA supports the AER in undertaking this review. The consolidation and modernisation of retail guidelines align with the overarching goal to reduce red-tape and remove complexity for small business. Any simplification that occurs without improving accessibility will not succeed. The retail guidelines should enable small businesses to access fair, transparent energy services without adding to their substantial regulatory burden.

We welcome any further consultation you may have on the points raised in our submission.

Kind regards,



**Matthew Addison**  
Chair, COSBOA