



23 December 2025

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

Email: consumers@aer.gov.au

Dear Mr Day,

AER Retail Guidelines Review – Consultation Paper

Origin Energy (Origin) appreciates the opportunity to provide comments on the Australian Energy Regulator (AER) Retail Guidelines Review Consultation Paper.

We support the objective for regulators and retailers to simplify energy communications to ensure customers are receiving clear, useful, and timely information and support. Consolidating the current retail guidelines and removing overlap and inconsistency will assist in meeting this objective and will also reduce administrative complexity.

This review also provides an opportunity to refine several existing obligations that are not delivering the customer outcomes originally intended.

We support the continued use of design principles for customer communication materials in place of highly prescriptive, tiered information requirements. Principles based guidance allows retailers the flexibility to design communications that reflect customers' individual circumstances, preferences and levels of engagement, while still meeting regulatory objectives. This approach is better suited to evolving technologies and communication channels.

In undertaking this review it is also vital that the AER align its timeframes with the implementation dates set out in the AEMC's 'Improving consumer confidence in retail energy plans Rule'. Retailers need certainty regarding what obligations they need to implement and by what date. Adequate lead times are necessary to make system and operational changes. Therefore, any changes to the Guidelines to reflect the AEMC's decision must provide retailers with sufficient time to implement these.

Origin's views on matters raised in the Consultation Paper are set in Attachment A.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on [REDACTED]

Yours sincerely

[REDACTED]
Sean Greenup
Group Manager Regulatory Policy

Combining the Guidelines

We agree that a single guideline should be underpinned by single set of consistent defined terms. When integrating the existing four guidelines into one document. We also agree that the AER will need to:

- Identify and remove overlaps.
- Remove unnecessary duplication.
- Alignment across the guidelines.
- Remove obligations that are no longer relevant.

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Better Bills Guideline

We consider the *Better Bills Guidelines* restricts retailers' ability to group and present information on customer bills in a way that is intuitive for customers. A less prescriptive approach would allow retailers to adapt bill design in response to customer feedback and the products and services they offer—an increasingly important consideration as product offerings continue to expand. Set out below are proposed improvements to the *Better Bills Guidelines* aimed at enhancing bill readability and reducing customer confusion.

Energy Ombudsman contact details

The AER notes that the inclusion of the Ombudsman contact details on page one has resulted in an increase in customers contacting their Ombudsman in error, rather than contacting their retailer. This is a poor customer experience. To avoid this continuing, we support Ombudsman contact details and information being included with Tier 3 information.

Account Balance

The customer's amount due is included on the front page of the bill as shown in diagram 1. This is tier 1 information. However, this amount does not take into account any credit that are on the account. The credit on the account is considered tier 2 information. An example of how this is presented on the customer's bill is provided in diagram 2.

Diagram 1: Page 1 / Tier 1 showing Amount Due as \$0.00 but no indication that the bill is in credit



Diagram 2: Page 2 / Tier 2 showing the Account Balance with the credit amount at the bottom of the page



This separation of information has resulted in increased calls to Origin because customers expect the first page of their bill to communicate the overall status of their account. Presenting charges on the first page without the overall account balance leads some customers to believe that amounts are owing when their account may in fact be in credit.

Origin would like account balances to be included as Tier 1 information. Displaying the overall balance on the first page, alongside the amount owing, would reduce customer confusion and ensure customers have the information they need.

Next scheduled read date

Next scheduled read date is currently tier 3 information, whereas metering details are included as tier 2 information. As a result, the next scheduled read date is not displayed on the bill where it is most relevant to the customer.

This has contributed to increased calls to Origin because customers rely on the next scheduled read date to ensure clear and safe access to the meter i.e. dogs are secured and gates are unlocked. Origin has an obligation under the National Energy Retail rules (NERR) to use its best endeavours to obtain actual meter readings. We believe that prominently communicating the date of the next scheduled read date is a significant step to gain actual readings.

Allowing retailers to include the next scheduled read date in Tier 2 information will reduce customer confusion and assist with ensuring actual meter reads are completed. Previously, Origin displayed it alongside the meter details with an estimated timeframe. See the example diagram 3 below.

Diagram 3: Meter read details

Meter details

Meter	Read date	Read type	Start read	End read	Volume	Correction factor	Heating value	Usage (units)
	29 Dec 2023	Actual	1457.0	1553.0	96.000	1.0126	36.80	3577.0
Unit conversion +								3.6
Total units								993.6

Your next meter read date is 28 Mar 2024 (+/- 2 business days). Please ensure clear access to your meter on the day.

Meter read date

The Meter Read date is not displayed on the bill. This is a driver of calls because customers are confused and want to know the date of the read when reconciling their pattern of usage against charges on the bill. Additionally, it is difficult for customers to follow the bill and understand which reading is aligned to the relevant charges.

Diagram 4 provides an example of a bill where pricing changes occur partway through the billing period (for example, over 1 July). The same meter numbers are shown with different start and end readings, but the bill does not reference the dates of those meter reads. This makes it very difficult for customers to understand what each set of readings relates to or how the charges have been calculated.

Diagram 4: Meter read dates

Meter details				
Meter	Read type	Start read	End read	Usage (kWh)
LG12E016101	Actual			0.000
LG162255292	Actual	6636.302	6709.414	73.112
LG162255292	Actual	4781.404	4799.909	18.505
LG12E016101	Actual			0.000
LG162255292	Actual	6709.414	7832.747	1123.300

Origin supports allowing the meter read date being included as part of Tier 2 information. Previously, the read date was in in the same table, and it was easier for the customer to follow.

Retailer email address

Origin is currently unable to include its’ email address on the front page of the bill. Email is a popular and convenient contact method for customers, and we consider it should be an optional Tier 1 contact method.

What concession and rebate information should be included on energy bills

The AEMC has recommended that the AER should consider amending the *Better Bills Guideline* to determine whether retailers should be required to include information on a first and final bill informing the customer that concessions do not automatically transfer when they move retailers.¹

Origin questions the likely effectiveness of this measure, particularly in light of the AEMC’s recent rule change requiring ‘best offer’ messages to be included in additional communication to the bill. The AEMC identified that a key barrier to switching is that customers do not open their electricity bill to read additional messages given the customer could be on direct debit, they only want to see the due amount, or they find the bill difficult to understand. It is important that the AER demonstrate how the inclusion of this information will materially improve concession uptake.

As we have previously stated, the most effective time to identify and confirm a customer’s eligibility for a concession is at the first point of contact with the customer. This is when the customer calls to establish a new agreement or signs up online. We are not convinced that additional bill changes will significantly improve concession rates.

We also note that the scope for further changes to the *Better Bills Guidelines* is limited under the current framework. The AER has mandated strict Tier 1 and Tier 2 information requirements for bills. Space on the front page is already constrained, particularly with the recent inclusion of the ‘best offer’ message for same plan names. Tier 2 and Tier 3 information is then dispersed across the following two to four pages, which further dilutes message visibility and effectiveness.

Benefit Change Notice Guidelines

The *Benefit Change Notice Guideline* will need to be updated to reflect changes from the AEMC’s *Improving Consumer Confidence in Retail Energy Plans* Rule Determination. Under the amended Rule 48B(2) of the NERR, the Guideline must now specify the information retailers are required to

¹ AEMC, *Improving the application of concessions to bills*, 25 September 2025, p. 27.

provide so that small customers can understand the tariffs and charges payable once a benefit period ends. This new requirement will take effect from 1 July 2026. We note this issue has not been raised as part of the Consultation Paper and we seek confirmation as to how and when this issue will be addressed.²

Simplify the notice

The benefit change notice could be simplified by removing redundant information from the section “*Details to help you use Energy Made Easy.*” With upgrades to Energy Made Easy (EME), the only information a customer needs to compare plans is their NMI. With the inclusion of the NMI, EME can automatically pull the required information to allow for a comparison.

Calculation of non-energy benefits

When calculating the value of a non-energy benefit, the value may change between the time the plan is taken up and when the plan ends. The consumed value is less relevant at the benefit end compared to the commencement or during the plan’s duration. Therefore, we recommend continuing to include a statement that the benefit is ending, but to exclude placing a monetary value on any add-on or bonus in the benefit change notice.

Customer Hardship Policy Guideline

Hardship Policies

Origin supports a principles-based approach where the AER provides an example standardised template across retailers that allows for flexibility. A guidance template would make it easier for customers and financial counsellors to understand what assistance is available and how to access it. It would also reduce the risk that poor wording inadvertently excludes people and ensures stronger regulatory compliance. At the same time, flexibility should remain in areas such as how each retailer delivers its support and the brand or tone it uses, so that communication remains authentic and tailored to each organisation.

Standardised Statements

To make standardised statements in hardship policies more accessible and supportive for consumers, retailers should focus on simplifying the language and tone. Using plain, conversational language helps customers understand what to expect. For example, instead of saying, “*We will assess your capacity to pay based on information you provide.*” a friendlier approach is, “*We will talk with you about what you can afford and work with you to find a plan that fits your situation.*” Replacing passive or formal wording with active, supportive phrasing also makes a difference; rather than “*Assistance may be offered if eligibility criteria are met.*” a more helpful statement is, “*If you’re having trouble paying, we will look at what support we can offer and explain your options clearly.*”

Providing customers with clear, simple steps can reduce uncertainty and make it easier for them to seek help. A short, structured flow such as:

- Contact us,
- Tell us what’s going on,
- We will discuss your options, and
- We will agree on a plan together, gives people a concrete sense of what the process will involve.

It is also important to remove judgemental or compliance heavy wording, so customers do not feel blamed or discouraged from reaching out. Being specific about the types of support available helps build confidence and clarity. For instance, naming options such as payment plans (smaller, manageable payments over time), payment extensions (extra time to pay a bill), concessions and rebates (government discounts a customer may be eligible for) and tailored solutions (like energy-

² AEMC, Improving Consumer Confidence in Retail Energy Plans – Rule Determination, 19 June 2025, pp. 20-22.

saving advice, energy audits, or potential debt relief) makes it easier for people to recognise what might help them.

Finally, explicitly showing empathy can be important. Normalising statements like “*Many people experience financial stress*” or “*We understand circumstances can change quickly*” helps customers feel understood and less alone in seeking support. Together, these changes can make hardship policies more approachable, transparent, and genuinely customer centred.

Retail Pricing Information Guidelines

Restricted offer definition

The *Retail Pricing Guidelines* outline the requirements for restricted plans, which are specifically targeted at an individual or exclusive group and tailored to the particular circumstances and needs of that customer.³

We support expanding clause 78 to include target campaigns where there is a membership requirement. Customers get frustrated when an offer is marketed to them as being a ‘best offer’ but the customer can only obtain the benefit through a membership.

Other Issues

Secondary settlement points

Secondary settlement points are optional additional metering points that enable customers to be billed separately for different portions of their energy usage starting December 2026. This feature could be incorporated into EME as a tick-box option for relevant households. Retailers supporting secondary settlement points would then be required to upload the corresponding rates.

Same plan name

We do not support restricting retailers from using the same name for different plans. To improve clarity in the best offer message, we could amend the text to include the date the plan became available—for example: “*The current Origin Go Variable plan, available from 10 December 2025.*”

We do not support the proposal take on prescriptive naming conventions, such as tiered classifications (i.e. gold, silver, bronze). Applying standardised labels across products with different benefit structures and tariff types would be challenging and could give rise to misleading or deceptive conduct risks. For example, it is unclear how a plan would be classified as “gold” when some benefits are financial and others are non-financial and a customer’s ability to realise those benefits may depend on individual circumstances, such as owning solar panels, a battery, or other behind-the-meter assets. More broadly, plans are designed to suit different household profiles based on consumption patterns, export behaviour, and available assets. A tiered approach does not adequately reflect this diversity.

We further do not support the proposal to develop unique plan identifiers for use wherever plan information is presented. Developing and managing identifiers for the large number of products and tariff combinations would be highly complex. Products also change regularly, with plans being removed from EME and retailer websites once they are no longer available to new customers. Identifying products by their name, rather than by an ID number, is simpler, clearer, and avoids unnecessary confusion and complexity.

Complex plans

It may be necessary to assess whether certain costs associated with complex plans should be included in annual cost estimates. For example, subscription fees for some of the complex plans appear to be excluded as they are disclosed separately in the fees table. However, some of these

³ Clause 77, Retail Pricing Guidelines.

subscription fees can be significant and may materially affect customer decision-making as they are compulsory for taking up the product.

Demand charges are also excluded from annual calculations which may result in tariffs or plans with demand charges appearing cheaper than they are in practice. Including these costs in annual estimates would provide customers with a more accurate and comparable indication of total plan costs.

Deemed better offer messaging

Rule 62 of the NERR refers to messaging requirements around negative deemed better offers. Specifically, Rule 62(d) states that if a deemed better offer is subject to conditions, the retailer may indicate that conditions apply and describe the nature of those conditions.

We support expanding the Guidelines to clarify that this messaging can also address the conditions and benefits associated with the customer's current plan, rather than focusing solely on the deemed better offer. As currently drafted, the provision appears to contemplate disclosure of conditions applying only to the new best offer, whereas additional clarity is needed to allow retailers to explain relevant conditions and benefits of the existing plan.

Specifically, the messaging displayed should highlight the benefits the customer currently receives and the potential loss of those benefits if the customer switches plans. This is particularly important for bundled arrangements, which may include non-energy services such as internet. In these circumstances, customers should be clearly informed that moving to another energy plan may result in the loss of associated benefits, such as internet credits or other bundled discounts.

We do not support including the 'best offer' message on additional communications due to the increased complexity with the timing of calculation of the best offer. Retailers have established formulas and systems built to calculate the best offer at certain times of year based on certain factors. To require this calculation to be carried outside these established parameters will add complexity and costs.

Specifically, we do not recommend including the 'best offer' message on benefit change notices, given the above concerns (benefit change notices do not always align with best offer calculation). Current guidelines advise directing customers to EME to compare the full market, rather than just alternatives from their existing retailer. Including a 'best offer' message may reduce engagement with EME and, in turn, impact market competitiveness.

Best offer obligations exclude paid membership or affiliation

Best offer obligations should exclude offers that require customers to hold a paid membership or affiliation with an entity unrelated to the retailer. This would address current issues, especially given the growing number of energy retailers offering internet and other services.

For example, customers on Origin Basic receive combined savings when they bundle energy with internet services, with the larger discounts applying to the internet component. Advising customers to switch electricity plans without acknowledging these associated benefits may result in them being worse off overall. The AER should also consider the need for exclusions as new products, such as battery plans, are introduced.

Increasing the best offer threshold

We support the proposal to increase the minimum potential savings for a negative best offer check from \$22 to \$50 per year. This aligns with the approach taken in Victoria.

Embedded networks

Customers within embedded networks are generally afforded similar levels of protection as on-market customers. They receive pricing information, are subject to billing provisions, and have access to applicable concessions. A key distinction, however, is that pricing for embedded network

customers is site-specific. Prices are typically negotiated by the embedded network owner or manager based on factors such as connection type and building configuration.

As a result, this information cannot be readily incorporated into standard plan information or used for meaningful comparison with market offers. For many customers, moving to an on-market NMI would also result in receiving multiple bills from different providers, separating network charges from energy usage charges. This would increase both complexity and overall costs. We are not convinced that the relevant information could be obtained in a way that is accurate or useful for customers, and customers may find it difficult to assess whether switching would be beneficial. Clarification of the intent behind such communications would therefore be helpful.