

## Retail Guidelines Review Submission Objection

We are making this submission as long-suffering residential electricity consumers who fundamentally reject the premise that Australia's retail electricity crisis is primarily a "communications problem."

Electricity affordability, reliability and security have collapsed because regulatory frameworks have consistently prioritised network revenues, generator risk-transfer, and policy-driven market complexity over the interests of households.

Retail guidelines that merely "simplify communications" without exposing the true cost drivers will not protect consumers and will further entrench distrust.

**Below we respond directly to Questions 1–14 from a consumer-protection and regulatory-failure perspective.**

### **Question 1**

#### **How can the combined guidelines be easy for stakeholders to use?**

The guidelines must be easy for consumers, not just retailer compliance teams.

The combined guidelines should:

Be structured by consumer outcome (price, reliability, risk, exit rights), not by retailer process

Include mandatory consumer-facing summaries written in plain English

Explicitly separate energy costs from network charges, subsidies, and pass-through items

Require retailers to disclose what costs are outside their control versus what they profit from

If retailer staff find transparency "hard to implement," that is evidence of a market problem, not a justification to dilute consumer protections.

### **Question 2**

#### **How should design principles be adapted to different communications?**

Design principles must prioritise financial truth over behavioural nudging.

Bills, notices and plan documents should:

Always display a standardised cost breakdown, including:

Energy usage

NETWORK CHARGES (clearly separated and highlighted)

'Renewable' Policy and scheme costs

Prohibit visual design that buries fixed charges or emphasises discounts that expire

Use consistent placement for:

Total annualised cost

Upcoming price increases

Exit options

Formatting guidance is most needed where complexity currently hides cost escalation: plan summaries, benefit change notices, and hardship communications.

### **Question 3**

#### **How could communications be more accessible?**

Accessibility must include economic and cognitive accessibility, not just font size.

Communications should:

Avoid jargon such as "settlement points," "dynamic tariffs," and "flexible trading" without plain-language explanations

Provide one-page "What you will pay and why" summaries

Explicitly state when customers are paying for:

Network expansions

Interconnector costs

Battery Energy Storage Systems

Synchronous Condensers

'Renewable' Policy-mandated market changes customers are forced to endure

Directing confused customers to ombudsmen because bills are unclear is evidence of regulatory failure, not success.

### **Question 4**

#### **How could benefit change notices be improved?**

Benefit change notices currently normalise silent price rises.

They must:

Treat any increase to fixed or unavoidable charges as a major change

Show:

Old benefit value

New value

Net bill impact in dollars per year

Clearly state whether the customer's increased cost is driven by:

Retail pricing

Network charges

Battery Energy Storage Systems

Synchronous Condensers

Regulatory or policy costs

Non-financial "benefits" must never be used to distract from higher prices.

### **Question 5**

#### **How will secondary settlement points change energy plans?**

Secondary settlement points will:

Increase plan complexity

Shift risk from the system to households

Advantage tech-savvy and wealthier consumers while penalising others

Guidelines must:

Treat these plans as high-complexity products

Require explicit warnings that savings are conditional and variable

Prohibit bundling secondary settlement points into default or opt-out plans

**Consumers should never be defaulted into experimental pricing structures.**

### **Question 6**

**How could complex plan information be made easier to understand?**

The simplest solution is to limit complexity, not explain it away.

Guidelines should:

Require a "simple benchmark plan" comparison for every offer

Force retailers to disclose:

Worst-case annual cost

Best-case annual cost

Risk factors that drive volatility

If a plan cannot be explained on one page, it should not be marketed to households.

### **Question 7**

**How could plan name transparency be improved?**

Plan names must be strictly regulated.

Requirements should include:

Prohibiting terms like "Saver," "Value," or "Discount" unless objectively cheaper than the retailer's median offer

Banning reuse of plan names with different prices

Mandatory inclusion of the Energy Made Easy plan ID in all communications

Confusing plan names are not marketing creativity — they are consumer harm.

### **Question 8**

**How can better offer messages be trusted?**

Better offer messages must:

Only reference plans the customer is eligible for immediately

Include total bill impact, not just marginal savings

Clearly state when no meaningful saving exists

Messages that point to ineligible or near-identical plans destroy trust and should be prohibited.

### **Question 9**

**Where should better offer messages appear?**

They should appear:

On bills

On benefit change notices

On price increase notifications

They should not be forced into SMS or app alerts where context is lost.

Replacing “do nothing” amounts with better offer messages is only acceptable if the better offer reflects real, accessible savings.

### **Question 10**

#### **How should ‘deemed better offer’ be defined?**

The deemed better offer must:

Exclude conditional, membership-based or promotional offers

Be based on actual customer usage

Require a minimum \$50 annual saving, indexed to inflation

Hardship customers should never be told they are on a “better offer” while still facing unaffordable bills driven by fixed charges.

### **Question 11**

#### **How can fee and charge transparency be improved?**

Energy Made Easy must:

Visually separate:

Energy usage costs

NETWORK CHARGES

Battery Energy Storage System costs

Synchronous Condenser costs

Policy and scheme costs

Clearly state which charges are non-negotiable

Highlight charges that increase regardless of consumption

Without this, consumers are falsely led to believe switching retailers solves structural cost problems.

### **Question 12**

#### **What information do embedded network customers need?**

Embedded network customers require:

A comparison against the Default Market Offer

Clear disclosure of:

Exit restrictions

Network monopoly pricing

A statement of rights and limitations

Anything less entrenches captive pricing.

### **Question 13**

#### **How should hardship policies be improved?**

Hardship policies must:

Expose the Truth regarding Market Manipulating, ‘Renewable’ Prioritising Networks and

Generators - including their apologies to consumers & repentance for making them suffer so

unnecessarily.

Avoid stigmatising the ever increasing numbers of electricity consumers who are being unjustly forced to choose between heating and eating due to the 'renewable' rort

Guarantee:

No disconnection while engaged

Clear, predictable repayment options

Acknowledge that hardship is often caused by systemic, 'renewable' price escalation, not consumer behaviour

Assistance should be proactive, not application-based.

Genuinely cheap, reliable, secure, 24/7 Australian coal power must be prioritised in energy policy.

#### **Question 14**

**What concession and rebate information should be included on bills?**

Bills should:

Clearly state:

What concessions are applied

What the customer may still be entitled to

Include retailer responsibility to actively assist enrolment

Notify customers on final bills that concessions must be re-applied

Reliance on external websites shifts responsibility away from retailers and regulators.

#### **Conclusion**

This review risks becoming another exercise in regulatory self-congratulation unless it directly confronts the drivers of rising bills:

\*totally unnecessary grid upgrades and interconnector network cost escalation due to pathetic, ecocidal 'renewables,'

\*bankruptingly costly, market manipulating and incapable Battery Energy Storage Systems,

\*experimental, extremely costly and inferior Synchronous Condensers - totally unnecessary with freely available synchronous inertia provided effortlessly by far superior coal power,

\*pathetically intermittent 'renewable' policy-driven failure, and

\*the systematic transfer of risk to households.

Consumers do not need better-designed explanations of unaffordable power.

They need transparent costs, enforceable limits, a sovereign, Australian coal power based electricity service/system, and a genuinely independent regulator adhering to engineering facts, scientific rigour, integrity and ethics - willing to immediately prioritise the protection of Australian citizens/energy consumers with energy affordability, reliability and national security over dangerous, ideologically driven 'renewable' market experimentation.

Yours sincerely,

'Save Our Surroundings Riverina'