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Australian Energy Regulator

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M2 Energy Pty Ltd Submission to the AER Retail Guidelines 2026

1. Executive Summary

M2 Energy Pty Ltd (trading as Dodo Power & Gas) (M2 Energy) welcomes the opportunity to provide feedback on the Australian Energy Regulator's (AER) Draft Retail Guidelines. We support the AER's objective of consolidating the existing retail guidelines into a single framework that provides greater clarity and consistency for both retailers and consumers.

Overall, M2 Energy considers the draft Retail Guidelines provide a practical foundation for simplifying the existing guidance and improving the consistency of customer-facing obligations. Our feedback is focused primarily on implementation rather than policy intent. While many of the proposed changes are reasonable, the cumulative effort required to implement new or amended obligations—including updates to systems, customer communications, business processes, governance frameworks, and staff training—should not be underestimated.

Implementing the consolidated Retail Guidelines will require more than simply updating customer-facing communications. Retailers will need to assess and implement changes across multiple business functions to ensure the Guidelines are embedded consistently into operational processes and compliance frameworks. When considered alongside the volume of concurrent regulatory reforms across the energy sector, these implementation activities require careful planning, resourcing, and prioritisation.

M2 Energy encourages the AER to provide adequate implementation time, practical guidance, and clear transitional arrangements to support consistent implementation across

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the industry. This will assist retailers in embedding the new requirements efficiently while maintaining business continuity and continuing to deliver positive customer outcomes.

2. Introduction

M2 Energy appreciates the opportunity to comment on the Draft Retail Guidelines.

The consolidation of multiple retail guidelines into a single document is a positive initiative that has the potential to simplify the existing guidance, improve consistency and provide retailers with greater clarity on the AER's regulatory expectations.

From M2 Energy's perspective, clear and practical guidance is valuable. It provides greater certainty when interpreting regulatory obligations, supports consistent implementation across the business and reduces the risk of differing interpretations across the industry. Our submission therefore focuses on the practical considerations associated with implementing the proposed Guidelines. While we generally support the direction of the review, we encourage the AER to ensure the final Guidelines are practical to implement, supported by appropriate implementation timeframes and guidance, and capable of being consistently applied across the retail sector.

3. General Comments

M2 Energy supports the overall structure of the Draft Retail Guidelines and the consolidation of multiple retail guidelines into a single framework. Over the longer term, a consolidated framework should improve regulatory clarity by providing retailers with a single source of truth for their obligations. This will reduce duplication, minimise interpretation risk and simplify the implementation of future regulatory changes.

However, achieving that end state will require a significant one-off implementation effort. Retailers will need to undertake a comprehensive review of existing compliance obligations, internal procedures, customer communications, system configurations, governance documentation, and supporting processes to ensure they align with the final Guidelines. While this represents a considerable investment for both the AER and retailers, M2 Energy considers the review to be worthwhile if it results in a clearer, more consistent, and more practical set of Retail Guidelines. For example, the Guidelines should provide retailers with greater certainty about the AER's regulatory expectations and promote a consistent interpretation of the underlying obligations across the industry. This assists retailers to

design compliant customer processes with greater confidence, reduces the risk of inconsistent implementation, and supports more predictable regulatory outcomes. For example, where the draft Guidelines include expectations around the use of plain language and effective customer communication, practical examples of compliant bill messages, hardship communications or best offer notifications would help retailers apply these principles consistently without prescribing a single format.

At the same time, the Guidelines should remain appropriately principles-based. Their role should be to explain how the AER interprets and intends to administer the existing regulatory framework—not to prescribe a single method of compliance or inadvertently expand the obligations contained within the *National Energy Retail Law* or *National Energy Retail Rules*. Retaining this balance provides retailers with the flexibility to tailor their operational processes and customer communications while remaining accountable for delivering the intended consumer outcomes.

4. Implementation Considerations

The consultation paper seeks feedback on implementation costs. From M2 Energy's perspective, the implementation effort associated with the Draft Retail Guidelines extends well beyond updating customer communications. The draft Guidelines affect multiple aspects of retailer operations, and we must assess impacts across multiple areas including, but not limited to, customer communications, product governance, staff training, Energy Made Easy data management, billing processes, digital channels, compliance monitoring and controls and operational procedures – to ensure obligations are implemented consistently.

Implementation also requires coordination across a number of business functions, including Regulatory Change, Compliance, Legal, Technology, Digital, Product, Customer Communications, Customer Operations, Customer Experience and Sales/Marketing. Once changes have been designed, retailers must complete governance approvals, update business documentation, revise customer journeys, undertake system and regression testing, and train frontline teams before changes can be deployed.

Although individual amendments may appear relatively straightforward, the cumulative effort required to implement the consolidated Guidelines across interconnected systems and business processes is significant. This implementation effort is further compounded by the volume of concurrent regulatory reforms being delivered across similar timeframes using shared technology, operational and subject matter expert resources.

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Retailers have only recently implemented several significant regulatory changes that commenced on 1 July 2026 and continue to progress additional reforms with implementation dates of 1 September 2026, 1 October 2026, and December 2026. Collectively, these reforms require substantial changes across customer processes, compliance frameworks, system configurations, testing, training, communications, and governance activities.

While each individual reform may be manageable in isolation, the cumulative impact of multiple overlapping regulatory obligations places considerable pressure on implementation capacity and increases delivery risk. M2 Energy therefore encourages the AER to ensure that implementation timeframes reflect the practical effort required to transition to the consolidated framework. Appropriate transition periods will enable retailers to implement the changes in a controlled manner, maintain compliance, minimise operational risk, and reduce the likelihood of unintended implementation issues arising from competing regulatory priorities. Given the volume of concurrent reforms, M2 Energy considers a minimum implementation period of 12 months, or alternatively a phased implementation approach, would provide retailers with sufficient time to design, build, test and deploy changes in a controlled manner.

5. Practical Guidance

M2 Energy considers that practical implementation guidance will be an important complement to the final Guidelines. While the draft Guidelines provide clear regulatory requirements, additional implementation guidance, worked examples, and frequently asked questions would assist retailers in applying the Guidelines consistently across different communication channels and emerging retail products. This would also reduce the likelihood of different interpretations across the market and minimise the need for retailers to seek clarification after the Guidelines commence. For example, worked examples demonstrating how the AER expects the Guidelines to apply to digital communications, SMS, web content and emerging products would promote greater consistency across the industry.

6. Future Retail Market

M2 Energy acknowledges the AER's recognition that the retail energy market continues to evolve, with customers increasingly engaging with products and services beyond traditional electricity and gas retail offers. Time-of-use tariffs, subscription-style products, virtual power plants, battery and electric vehicle offerings, and other distributed energy services are

changing both the nature of retail products and the way retailers communicate with customers.

The consolidation of the Retail Guidelines provides an opportunity to establish a framework that remains relevant as these products continue to emerge. Rather than prescribing communication requirements that are tailored to today's retail products, the Guidelines should focus on the underlying consumer outcomes they are intended to achieve—namely that customers receive information that is clear, timely and sufficient to make informed decisions.

M2 Energy considers that the final Retail Guidelines should be sufficiently flexible to accommodate changes in retail products, customer engagement channels and market practices, while maintaining clear expectations regarding the customer outcomes the AER is seeking to achieve. The purpose of the Guidelines should be to provide clarity on the application of existing obligations, rather than prescribe detailed processes that may become outdated as the market evolves. This approach would provide retailers with greater certainty in designing compliant customer processes while reducing the risk that further regulatory amendments are required solely because the way customers interact with energy products and services has changed.

M2 Energy also encourages the AER to continue engaging with retailers, consumer representatives and other market participants as new products mature. Ongoing engagement will help ensure the Guidelines remain practical to implement, reflect operational realities, and continue to support positive consumer outcomes without creating unnecessary regulatory complex.

7. Recommendations

Topic	M2 Energy’s Feedback	Recommendation
Consolidation of the Guidelines	Supports consolidating multiple guideline documents into a single framework that provides greater regulatory clarity.	Proceed with the consolidated approach.
Implementation Timeframes	Implementation will require changes across systems, operational processes, governance	Provide sufficient implementation periods to allow retailers to complete required changes.

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Topic	M2 Energy's Feedback	Recommendation
	documentation and customer interactions.	
Implementation Guidance	Supporting guidance will assist retailers to interpret and apply new requirements consistently.	Publish implementation guidance, worked examples and FAQs before commencement.
Industry engagement	Ongoing engagement supports consistent implementation and identifies practical issues early.	Continue engaging with retailers throughout implementation and future reviews of the Guidelines.
Future market developments	Retail products will continue to evolve over time.	Continue reviewing the Guidelines periodically to ensure they remain relevant as new products emerge.

8. Conclusion

M2 Energy supports the development of a single, consolidated Retail Guidelines framework. We encourage the AER to accompany the final Guidelines with practical implementation guidance and an implementation timeframe that reflects the scale of business change required. These measures will support consistent implementation across the retail sector while continuing to deliver positive consumer outcomes.

M2 Energy encourages the AER to recognise this implementation effort by providing sufficient transition periods, practical implementation guidance and continued engagement with industry throughout implementation. We consider these measures will support more consistent implementation across the retail sector while ultimately delivering better outcomes for consumers.

M2 Energy appreciates the opportunity to provide feedback and looks forward to continuing to engage with the AER as the Guidelines are finalised.

If you have any queries about this submission, please contact me on [REDACTED] or [REDACTED].

Yours sincerely,

[REDACTED]

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