

Hi AER Consumer team,

My name is Jess, I am a co-founder of [Plain Language Matters](#). We help organisations communicate clearly and offer writing, editing and training services.

I've reviewed [the draft AER Retail Guidelines](#). I think plain language principles can greatly improve this document.

Plain language writing centres the reader. This aligns with the AER's values to put consumers at the heart of everything you do. A plain language edit of the document would mean retailers can easily find, understand and use these guidelines in their business.

I've summarised my general feedback below but would love to meet for a video call to discuss the edits further. I've also attached:

- an example of a plain language edit of pages 10-11
- a quote to edit the document using plain language.

General recommended edits:

- Replace multi-level numbered and lettered lists with bullet points. They are confusing to follow. International plain language guidelines recommend using numbered lists only when items must be followed chronologically.
- Remove legal jargon as much as possible. This includes terms like 'prohibits' and 'prescribed information'.
- Replace the passive voice with the active voice. It strengthens comprehension.
- Offer relevant definitions at the start of each section. This means retailers can skip ahead to check specific obligations. The glossary is currently very long, and retailers would need to keep referring back to it for each section

Please let me know if we can set up a time for a video call. We'd love the opportunity to work with the AER team to improve the document.

Warm regards

Jess Mathew
Co-founder

Plain Language Matters



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Response to AER draft retail guidelines

Example plain language edit (page 10-11)

Part 4. Preparing and presenting comparative information

Comparative information shows a customer other plans that may save them money. It can help them decide which plan is best for their needs.

There are guidelines for preparing and presenting comparative information. This includes messages about better offers available.

How to present comparative information

When you present comparative information, you must:

- use accessible design principles (page 8 and 9)
- provide clear information about the plan/s (page 12 -15)
- follow customer bill guidelines (page 18-22)

How to present better offers

You must provide a better offer message on a bill to a customer at least once every billing cycle. This is typically every 100 days.

If you and the customer have agreed to a billing cycle longer than 100 days, you can follow that cycle instead.

The better offer message must include these exact words:

Could you save money on another plan?

Based on your past usage, our [name of better offer with month and year] could save you up to [projected saving in \$ terms] less per year than your current plan.

The Australian Energy Regulator requires us to include this information.

If no better offer is available, your message must include these exact words:

Could you save money on another plan?

Based on your past usage, you are on the best plan we can offer you.

The Australian Energy Regulator requires us to include this information.

Either message can also include:

- conditions or eligibility criteria that applies
- clear and simple instructions for how a customer can switch to this offer.

A better offer message must be next to the amount due on the bill. It must not be less prominent, so a customer can't see it.

How to assess a better offer

When you assess if a better offer is available to your customer, you must:

- compare the **annual total cost** of the customer's current plan with other available plans
- consider the customer's annual use since joining.

You cannot consider:

- non-financial benefits they receive
- discounts that apply only because the customer uses another good or service.

When you don't need to include a better offer message

You don't need to include a better offer message if the customer:

- would no longer qualify for a plan with your business due to their level of energy use
- receives a single energy bill for two or more premises
- receives energy under Ergon Energy's standing offer. This is in section 22A of the National Energy Retail Law in Queensland.
- is receiving their final bill.