

# Notice of Instrument: Better Bills Guideline

Version 2

30 January 2023

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Director, Corporate Communications  
Australian Competition and Consumer Commission  
GPO Box 3131, Canberra ACT 2601

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Inquiries about this publication should be addressed to:

Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601

Tel: 1300 585 165

Email: [AERInquiry@aer.gov.au](mailto:AERInquiry@aer.gov.au)

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# 1 Executive summary

The Australian Energy Regulator (AER) published the Better Bills Guideline (Version 1) on 31 March 2022. The Better Bills Guideline (Version 1) set out how energy retailers must prepare and issue bills to small customers.

Following publication of the Better Bills Guideline (Version 1), a number of potential drafting ambiguities and concerns were identified by industry stakeholders and raised with the AER. Primarily these concerns related to the calculation and publication of the better offer message on a customer's bill.

Separately, since the Better Bills Guideline (Version 1) was published, a rule change was made to change the implementation date of the Better Bills Guideline (Version 1).<sup>1</sup>

The Australian Energy Council (AEC) submitted a rule change request on 30 June 2022 to delay the implementation date of the Better Bills Guideline (Version 1) by six months from 31 March 2023 ('Delaying implementation of the AER Billing guideline' (Reference: RRC0046)). The Australian Energy Market Commission (AEMC) published its final determination<sup>2</sup> on 13 October 2022 to amend the *National Energy Retail Rules*<sup>3</sup> (Retail Rules) to change the date by which all new provisions in the billing guideline must commence (from 31 March 2023 to 30 September 2023).

Part 2 of this Notice of Instrument details the amendments proposed in the draft Better Bills Guideline (Version 2) in response to the ambiguities and concerns identified by stakeholders. These include:

- clarifying that the requirement relating to customer read estimates is a statement on how to access the relevant information and not a requirement to include that detailed information in the bill
- including 'exports' within the definition of 'annual usage history' to ensure an accurate better offer calculation
- aligning the requirement to perform a better offer check and the requirement to include a better offer message on a bill
- amending the commencement provisions following a rule change<sup>4</sup> that has changed the date by which all new provisions in the billing guideline must commence (from 31 March 2023 to 30 September 2023).

Without these drafting amendments, consumers may have been impacted by an inaccurate better offer message or an overly complex and detailed bill where the bill was based on an estimated read.

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<sup>1</sup> AEMC, [Delaying implementation of the AER Billing guideline](#), Final Determination, 13 October 2022.

<sup>2</sup> AEMC, [Delaying implementation of the AER Billing guideline](#), Final Determination, 13 October 2022.

<sup>3</sup> Part 16, Schedule 3, subrule 1(2).

<sup>4</sup> AEMC, [Delaying implementation of the AER Billing guideline](#), Final Determination, 13 October 2022.

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Part 3 of this Notice of Instrument outlines further feedback and recommendations we received from stakeholders during consultation. In response to stakeholder feedback, we have made the following additional minor amendments to the Guideline:

- including a requirement for the exact words 'Meter Installation Registration Number (MIRN)' followed by the relevant MIRN (if applicable) within Tier 1 information (in equivalence to the requirement to include 'National Metering Identifier (NMI)' followed by the NMI)
- including a requirement for the exact words 'Delivery Point Identifier (DPI)' followed by the relevant DPI (if applicable) within Tier 1 information (in equivalence to the requirement to include 'National Metering Identifier (NMI)' followed by the NMI)
- including invoice numbers in Tier 1 information (if applicable)
- including a requirement for a final bill message using the exact words 'final bill' within Tier 1 information on a customer's final bill
- adding an exemption from including a better offer message on a customer's final bill
- including whether the dollar amount of the deemed better offer check result within a better offer message is GST inclusive or exclusive (as applicable)
- adding an exemption for the plan summary requirement for customers that receive a single bill in respect of the sale and supply of energy at two or more premises.

We are grateful for the ongoing engagement of our stakeholders and will continue to engage in relevant discussions following publication of the Guideline.

This Notice of Instrument (Version 2) ('Notice') accompanies the Guideline.<sup>5</sup> It explains how and why the AER has arrived at the amendments outlined in the Guideline. We have made our recommendations in line with the bill objective as contemplated by the AEMC<sup>6</sup> and the National Energy Retail Objective.<sup>7</sup>

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<sup>5</sup> The Guideline can be accessed at the AER website.

<sup>6</sup> *National Energy Retail Rules*, subrule 25A(3).

<sup>7</sup> *National Energy Retail Law*, section 13.

## 2 Amendments to address ambiguities and provide clarification

The AER consulted on the amendments detailed below, with stakeholders broadly supporting the proposed approaches to achieve clarity and alignment with policy intent.

### 2.1 Self-read information requirement

In the draft Better Bills Guideline (Version 2), we consulted on amendments to clarify that the requirement relating to customer read estimates is a statement on how to access the relevant information, rather than a requirement to include fulsome details on how to conduct a customer read estimate as prescribed by rule 21(3C) of the Retail Rules.

Stakeholders were supportive of our clarification<sup>8</sup> that retailers can include a concise statement on how to access self-read guidance and information where applicable, rather than the comprehensive guidance/information/instructions as contemplated by rule 21(3C) of the Retail Rules within a bill made under the Guideline.

### 2.2 Better offer

#### 2.2.1 Including exports in the definition of annual usage history

In calculating the better offer, retailers are required to consider the customer's annual usage history. The current definition is limited to the consumption of gas and electricity by a small customer. In the draft Better Bills Guideline (Version 2), we consulted on expanding the definition of annual usage history to include a small customer's exports.

Omitting 'exports' from the definition of annual usage history creates a distinction from the Victorian best offer requirements. Without regard to exports, the better offer check may not reflect an accurate calculation of the most suitable plan for a customer. This particularly impacts customers who are eligible for solar export credits.

The Essential Services Commission (ESC) considered the inclusion of 'exports' in its definition of annual usage history.<sup>9</sup> It highlighted that the data used to calculate the better offer should include both consumption and export data, to ensure that the better offer accounts for both the cost of energy consumed and 'any credit received from the feed-in tariffs associated with the offers being compared'.<sup>10</sup>

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<sup>8</sup> Ausgrid, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 31 October 2022 ('Ausgrid draft Guideline (Version 2) submission'); Simply Energy, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 31 October 2022 ('Simply draft Guideline (Version 2) submission'); Energy Global Co, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 27 October 2022 ('Energy Global Co draft Guideline (Version 2) submission').

<sup>9</sup> Essential Services Commission, [Building trust through new customer entitlements in the retail energy market](#), Final Decision, 30 October 2018.

<sup>10</sup> Essential Services Commission, [Building trust through new customer entitlements in the retail energy market](#), Final Decision, 30 October 2018, p 38.

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In making the Better Bills Guideline (Version 1), the AER intended that the practical application of the better offer calculation would be the same as that used in Victoria (even if it was not identically drafted).

We received strong support for including exports in the definition of annual usage history in consultation on the draft Guideline (Version 2).<sup>11</sup>

Therefore, to ensure retailers can accurately calculate the better offer check that is most suitable for the customer, we have amended the guideline to include 'exports' in the definition of annual usage history.

### 2.2.2 Aligning the frequency of better offer check and message

The AER consulted on amending the Guideline to address a potential misalignment between the requirement to conduct a better offer check and the required frequency of a better offer message.

There were concerns that where a customer receives a bill more often than once every 100 days, a retailer would be required to conduct a better offer check for each bill prepared even when they were not required to present the better offer message on the bill.

Respondents to the draft Better Bills Guideline (Version 2) supported our proposed amendment as it would alleviate ambiguity and reduce unnecessary costs.<sup>12</sup>

The Guideline now clarifies that retailers need only perform a better offer check when the better offer message is required on a bill, in line with the policy intention.

## 2.3 Flexibility for a change to the implementation date

On 13 October 2022, the AEMC published its final determination changing the implementation date for new billing provisions from 31 March 2023 to 30 September 2023.<sup>13</sup> To ensure consistency between the Guideline and the Retail Rules, the Guideline has been amended to reference 'the date specified in the Retail Rules'.

Stakeholders supported this clarification in line with the rule change.<sup>14</sup> Momentum<sup>15</sup> expressed appreciation for the letter of support that the AER submitted to the AEMC.<sup>16</sup>

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<sup>11</sup> Ausgrid draft Guideline (Version 2) submission; Simply draft Guideline (Version 2) submission; Energy Global Co draft Guideline (Version 2) submission; AGL, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 31 October 2022 ('AGL draft Guideline (Version 2) submission'); Tango, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 27 October 2022 ('Tango draft Guideline (Version 2) submission'); Momentum, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 26 October 2022 ('Momentum draft Guideline (Version 2) submission'); Red/Lumo, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 3 November 2022 ('Red/Lumo draft Guideline (Version 2) submission').

<sup>12</sup> Ausgrid draft Guideline (Version 2) submission; Simply draft Guideline (Version 2) submission; Energy Global Co draft Guideline (Version 2) submission; AGL draft Guideline (Version 2) submission; Tango draft Guideline (Version 2) submission; Momentum draft Guideline (Version 2) submission; Red/Lumo draft Guideline (Version 2) submission.

<sup>13</sup> AEMC, [Delaying implementation of the AER Billing guideline](#), Final Determination, 13 October 2022.

<sup>14</sup> AGL draft Guideline (Version 2) submission; Tango draft Guideline (Version 2) submission; Tango draft Guideline (Version 2) submission.

<sup>15</sup> Momentum draft Guideline (Version 2) submission.

<sup>16</sup> AER, [Letter of support for Delaying implementation of the AER Billing guideline](#), AEMC website, 4 August 2022.

## 3 Further amendments proposed by stakeholders during consultation

Stakeholders suggested further changes to the Guideline during consultation. These proposed changes and the AER's responses are outlined below.

### 3.1 Recommendations relating to Tier 1 requirements

#### 3.1.1 Better offer

##### 3.1.1.1 *Better offer message for VPP customers*

Energy Locals raised concerns that customers on a virtual power plant (VPP) plan may receive an inaccurate better offer calculation when comparing VPP plan usage to non-VPP plan usage due to the differences in usage profiles.<sup>17</sup>

VPP software optimises battery usage throughout the day, meaning the consumption profile would not be representative of the customer's consumption if they were on a non-VPP plan.

Energy Locals requested guidance on calculating the better offer in these circumstances. The AER is committed to assisting retailers in engaging with the requirements of the Guideline and intends to work with Energy Locals on this issue.

##### 3.1.1.2 *Most appropriate retail contract check under NSW Social Code and the better offer check under the Guideline*

AGL indicated in its submission to the draft Better Bills Guideline (Version 1),<sup>18</sup> as well as to this consultation process,<sup>19</sup> that New South Wales concession card holders are entitled to a check of the appropriateness of their retail contract under the NSW Social Programs for Energy Code (NSW Social Code) and a better offer check under the Guideline.

AGL has previously raised that there is a difference in logic between the NSW assessment of plan suitability and the Victorian best offer (which the better offer check in the Guideline is closely aligned with).<sup>20</sup> They indicated that the timing of a planned review of the NSW Social Code may leave retailers with insufficient time to make necessary amendments to their systems and processes prior to the full commencement date of the Guideline.

The AEMC's rule change to extend the implementation date for the Guideline<sup>21</sup> ensures that retailers have more time to manage system changes and associated costs.<sup>22</sup> The AER supported this extension to the implementation date, noting that 'the rule change provides

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<sup>17</sup> Energy Locals, [Submission to the draft Better Bills Guideline \(Version 2\) consultation](#), AER website, 31 October 2022 ('Energy Locals draft Guideline (Version 2) submission').

<sup>18</sup> AGL, [Submission to the draft Better Bills Guideline \(Version 1\) consultation](#), AER website, 31 January 2022 ('AGL draft Guideline (Version 1) submission').

<sup>19</sup> AGL draft Guideline (Version 2) submission.

<sup>20</sup> AGL draft Guideline (Version 1) submission.

<sup>21</sup> *National Energy Retail Rules*, subrule 1(2), Part 16, Schedule 2.

<sup>22</sup> AEMC, [Final Determination: Delaying implementation of the AER Billing guideline](#), AEMC website, 13 October 2022.



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greater flexibility to retailers around implementation of the Guideline and is likely to drive greater compliance'.<sup>23</sup>

We encourage retailers to utilise the implementation delay to manage and balance different jurisdictional requirements as applicable.

### ***3.1.1.3 Inclusion of statement regarding whether the better offer amount is inclusive or exclusive of GST***

Amendments to the Guideline mean that the dollar amount of the better offer check result included in a negative deemed better offer message will now state whether the dollar amount is inclusive or exclusive of GST, as applicable. For clarity, a negative deemed better offer message is the better offer message that a customer will receive if a better offer is available with their retailer.

Although no formal submission on this issue was made, the AER considers it an important clarification. This will assist consumers in understanding the conditions of their negative deemed better offer message, ensuring they are able to better comprehend their potential saving through switching to a different plan with their retailer. This decision upholds the AEMC's bill objective by enabling small customers to compare their plan with other offers.<sup>24</sup>

### **3.1.2 Requirement to specify the MIRN/DPI for gas customers**

In consultation on the draft Better Bills Guideline (Version 2), Tango Energy sought clarification on the equivalent requirement for a gas customer's MIRN with respect to the requirement to present a customer's NMI using the exact words 'National Metering Identifier (NMI)' followed by the NMI.<sup>25</sup>

To ensure that both gas and electricity bills remain clear for small customers in respect of meter identifiers, an amendment has been made to the Guideline to require:

- the inclusion of the exact words 'Meter Installation Registration Number (MIRN)' followed by the MIRN (if applicable) within Tier 1 information requirements.
- the inclusion of the exact words 'Delivery Point Identifier (DPI)' followed by the DPI (if applicable) within Tier 1 information requirements.

These additions are equivalent to the existing requirement to include an electricity customer's NMI using the exact words 'National Metering Identifier (NMI)' followed by the NMI.

### **3.1.3 Retailer identifying information**

Tango Energy sought clarification on the interpretation of 'retailer identifying information', suggesting an extension of the definition to include 'an email address or a web address with a chat function'.<sup>26</sup>

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<sup>23</sup> AER, [Letter of support for Delaying implementation of the AER Billing guideline](#), AEMC website, 4 August 2022.

<sup>24</sup> *National Energy Retail Rules*, subrule 25A(3)(c)(ii).

<sup>25</sup> Tango draft Guideline (Version 2) submission.

<sup>26</sup> Tango draft Guideline (Version 2) submission.

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The Guideline provides that 'retailer identifying information means a retailer's trading name, logo and website'. As a website can be used as a touchpoint to direct customers to other digital communication channels (including email addresses, contact forms and chatbots), the AER considers that the ability for retailers to include a website within Tier 1 is sufficient to assist customers who prefer digital communication channels in accessing their preferred means of communication. Therefore, the Guideline does not permit the inclusion of an email address within Tier 1 or Tier 2 information.

### 3.1.4 Invoice numbers

Tango Energy suggested that retailers should have the ability to include specific invoice numbers on bills for accounting purposes, which would allow the bill itself to have an easily identifiable reference number that customers can also use when discussing their bill with their retailer.<sup>27</sup>

While the AER notes the importance of retaining simplicity of Tier 1 information, for some small customers a tax invoice number would be important information for the payment and management of bills. For example, the research informing the Guideline found that invoice numbers are helpful additions for small business owners.<sup>28</sup>

Amendment to section 40 of the Guideline allows for inclusion of an invoice number in Tier 1 information if applicable, subject to compliance with the design principles. This amendment upholds the bill objective<sup>29</sup> by assisting small customers with paying and querying their bill. Section 8 also provides a broad definition for invoice number to facilitate interpretation.

### 3.1.5 Final bill message

Red and Lumo, AEC, AGL, EnergyAustralia and Momentum previously raised in their submissions to the draft Better Bills Guideline (Version 1)<sup>30</sup> that displaying the final bill message in a non-prominent location on the bill risks customers not knowing that their bill has been finalised. Red and Lumo submitted to this draft Guideline consultation that not including a final bill message could lead to customer confusion, resulting in increased retailer enquiries.<sup>31</sup> In addition, it was suggested that better offer messages should not be required when a customer finalises their account with their retailer.<sup>32</sup>

To ensure that customers can easily interpret that their bill is final, AER has provided for a final bill message (using the exact words 'final bill') in Tier 1 information.

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<sup>27</sup> Tango draft Guideline (Version 2) submission.

<sup>28</sup> Hall & Partners, [Small to Medium Business Owners Better Bills Guideline Research Report](#), AER website, December 2021.

<sup>29</sup> *National Energy Retail Rules*, subrule 25A.

<sup>30</sup> Red and Lumo, [Submission to the draft Better Bills Guideline \(Version 1\) consultation](#), AER website, 31 January 2022 ('Red/Lumo draft Guideline (Version 1) submission'); AEC, [Submission to the draft Better Bills Guideline \(Version 1\) consultation](#), AER website, 31 January 2022 ('AEC draft Guideline (Version 1) submission'); AGL, [Submission to the draft Better Bills Guideline \(Version 1\) consultation](#), AER website, 31 January 2022 ('AGL draft Guideline (Version 1) submission'); EnergyAustralia, [Submission to the draft Better Bills Guideline \(Version 1\) consultation](#), AER website, 31 January 2022 ('EnergyAustralia draft Guideline (Version 1) submission'); Momentum, [Submission to the draft Better Bills Guideline \(Version 1\) consultation](#), AER website, 31 January 2022 ('Momentum draft Guideline (Version 1) submission').

<sup>31</sup> Red/Lumo draft Guideline (Version 2) submission.

<sup>32</sup> Red/Lumo draft Guideline (Version 2) submission.

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Further, the AER considers that including a better offer message on a final bill is unlikely to benefit a consumer and is likely to create confusion. Section 58 excludes final bills from the requirement to include a better offer message to mitigate this concern. To ensure that Tier 1 remains uncluttered and easy to understand, the final bill message can be included in lieu of the better offer message, retaining simplicity. This amendment is in alignment with the bill objective<sup>33</sup> and ensures that small customers can easily understand their bill.

### 3.1.6 Timeframe to assess exemption applications

AGL advocated for imposing a timeframe of 4–6 weeks for the AER to assess exemption applications under sections 33 and 34 of the Guideline.<sup>34</sup> Section 33 applications, which must contain information set out in section 34, allow for retailers to seek approval for the inclusion of information not provided for by the Guideline among Tier 1 information. AGL stated that introducing a timeframe would ensure the process is not too protracted and allows for timely improvement in response to changing consumer needs.

The AER will endeavour to consider sections 33 and 34 applications within a reasonable timeframe to support market engagement.

## 3.2 Recommendations relating to Tier 2 requirements

### 3.2.1 Plan summary

#### 3.2.1.1 *Multisite customers*

AGL submitted that an exemption for the plan summary requirement is appropriate for multisite collective billing customers (customers within an arrangement where multiple individual small market customers/sites ('child entities') are billed to the same contracting customer (the 'parent entity') under a single invoice), similar to the exemption to the better offer requirement at section 57.<sup>35</sup>

AGL submitted that the utility of the plan summary as a tool to improve comprehension for small customers would not translate to collective invoice arrangements.<sup>36</sup> This is due to the bespoke nature of the arrangement and that the bill is issued to the parent entity rather than the child entity (the small customer), who will often never see the bill.<sup>37</sup> Additionally, AGL noted that retailers may manage multisite collective billing arrangements through dedicated teams, ensuring that these customers receive tailored information about their plans.<sup>38</sup>

Further, AGL suggested that providing a plan summary for each individual customer under a collective agreement would increase costs associated with back-end design, development and build requirements as well as performance upgrades to IT systems.<sup>39</sup>

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<sup>33</sup> *National Energy Retail Rules*, subrule 25A.

<sup>34</sup> AGL draft Guideline (Version 2) submission.

<sup>35</sup> AGL draft Guideline (Version 2) submission.

<sup>36</sup> AGL draft Guideline (Version 2) submission.

<sup>37</sup> AGL draft Guideline (Version 2) submission.

<sup>38</sup> AGL draft Guideline (Version 2) submission

<sup>39</sup> AGL draft Guideline (Version 2) submission.

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Through consultation on the draft Better Bills Guideline (Version 1), we received feedback that the plan summary was a higher cost component of the Guideline.<sup>40</sup> The AER maintains that the plan summary is an important tool for small customers in understanding and comparing their plan.

However, in circumstances of multisite collective billing where the plan summary is not being utilised by child entities for its intended purpose (comparison and comprehension), an exemption from the plan summary requirement would avoid unnecessary expenditure for retailers (which may result in additional costs being passed on to consumers).

Therefore, the Guideline has been amended to omit the requirement for a plan summary on a small customer's bill where the customer receives a single bill in respect of the sale and supply of energy at two or more premises.

We consider that this limited exemption is proportionate to maintaining the need for consumer protections while considering the cost of compliance and the potential resulting costs for small customers.<sup>41</sup>

### **3.2.1.2 Plan change during billing period**

Tango Energy requested clarification in their submission to the draft Better Bills Guideline (Version 1) and to this draft Guideline consultation process as to whether a customer's bill requires multiple separate plan summaries in instances where a customer has changed plans within their billing period.<sup>42</sup>

As explained in the Notice of Instrument (Version 1), the purpose of the plan summary is to make it easier for consumers to understand their plan and to compare their plan to others on the market. Therefore, a small customer's bill only needs to include one plan summary for the customer's current plan at the time the bill is issued. This aligns with the bill objective to facilitate customer comprehension of how their bills conform to their retail contracts.<sup>43</sup>

### **3.2.2 Billing period upgraded to Tier 1**

AGL submitted that customers may find it difficult to identify the billing period of a bill if it is not displayed on the first page.<sup>44</sup> AGL suggested that the AER provide that the 'billing period (date to date) and number of days' can be included in either Tier 1 or Tier 2 information.

An element of the AEMC's bill objective<sup>45</sup> is to enable small customers to easily understand how their bill is calculated. The billing period as a part of the 'Understand your bill' table is logically grouped in accordance with the design principles to achieve this purpose. Therefore, to retain the simplicity of Tier 1 information and support better consumer comprehension through logical grouping, the AER has maintained the billing period within Tier 2 information.

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<sup>40</sup> Seed Advisory, Better Bills Guideline – retailer cost analysis: report for Australian Energy Council ('Retailer cost analysis'), Australian Energy Council website, February 2022

<sup>41</sup> *National Energy Retail Rules*, subrule 25A(4).

<sup>42</sup> Tango draft Guideline (Version 2) submission.

<sup>43</sup> *National Energy Retail Rules*, subrule 25A(3)(b).

<sup>44</sup> AGL draft Guideline (Version 2) submission.

<sup>45</sup> *National Energy Retail Rules*, subrule 25A.

### 3.2.3 Meter information included in ‘Understand your bill’ table

Red and Lumo submitted that the ‘Understand your bill’ table does not allow for billing scenarios where there are multiple meters.<sup>46</sup> Red and Lumo advocated for the inclusion of meter numbers in Tier 2 to ‘help customers to understand their energy usage’.<sup>47</sup>

Bills tested by the Behavioural Economics Team of the Australian Government (BETA)<sup>48</sup> and the Behavioural Insights Team (BIT)<sup>49</sup> did not include meter numbers and performed well on comprehension. Complexity negatively impacts consumer comprehension<sup>50</sup> and adding meter numbers may cause confusion.

We reiterate the position taken in the Notice of Instrument (Version 1) that ‘detailed meter information can be included in additional information sections, after Tier 1 and Tier 2 information’.<sup>51</sup>

### 3.2.4 Next scheduled meter read date

Red and Lumo submitted that the estimated date of next scheduled meter read should be included as Tier 2 information.<sup>52</sup>

Tier 2 information is intended to assist customers’ understanding of their energy usage, energy plan and how their bill was calculated, as well as to help them compare their plan. Further, as the uptake of smart meters increases, informing customers of their scheduled meter reads will become less relevant.

Therefore, to ensure that information prescribed within the tiers remains prioritised, the estimated date of next scheduled meter read remains additional information. Retailers are permitted to include this date after Tier 1 and Tier 2 information (and in compliance with the design principles), upholding the priorities described in the bill objective.<sup>53</sup>

### 3.2.5 Jurisdictional scheme costs

Ausgrid advocated for jurisdictional scheme costs to be included in the ‘Understand your bill’ section within Tier 2.<sup>54</sup>

It is not the intention of the Guideline that jurisdictional Roadmap costs and other environmental schemes are separately itemised within the bill, nor is it a requirement. However, retailers could feasibly choose to do so, under the requirements of the ‘Understand your bill section’ to provide a breakdown of how the amount due was calculated.

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<sup>46</sup> Red/Lumo draft Guideline (Version 2) submission.

<sup>47</sup> Red/Lumo draft Guideline (Version 2) submission.

<sup>48</sup> BETA, [Improving energy bills: final report](#), Department of the Prime Minister and Cabinet website, October 2021.

<sup>49</sup> BIT, [Testing the better offer notice on energy bills](#), AER website, March 2022.

<sup>50</sup> BETA, [Energy bill contents and bill requirements: literature review](#), Department of the Prime Minister and Cabinet website, October 2021, p 3.

<sup>51</sup> AER, [Notice of Instrument \(Version 1\)](#), AER website, 31 March 2022.

<sup>52</sup> Red/Lumo draft Guideline (Version 2) submission.

<sup>53</sup> *National Energy Retail Rules*, subrule 25A(3).

<sup>54</sup> Ausgrid draft Guideline (Version 2) submission.

### 3.2.6 Smart meter information

Ausgrid submitted that bills should include details of the potential customer benefits of requesting a smart meter from a customer's retailer.<sup>55</sup>

Whilst the AER agrees that providing information on the benefits of smart meters is important to consumers, it is not information that would assist a customer in understanding or paying their bill. Further, while obtaining a smart meter could ultimately assist a customer with understanding their energy usage, comparing their energy plan and using energy efficiently, this would not be the effect of providing general information on the benefits of smart meters.

As such, we consider that information in respect of the benefits of smart meters does not meet the bill objective as contemplated by the AEMC.<sup>56</sup> It is therefore additional information.

### 3.2.7 Network tariff codes

Ausgrid submitted that the best network tariff for a customer's consumption profile should be included on bills. Again, while this is potentially useful information, it does not fulfill the purpose of the AEMC's bill objective.<sup>57</sup> Tariff information of this type is therefore able to be included as additional information.

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<sup>55</sup> Ausgrid draft Guideline (Version 2) submission.

<sup>56</sup> *National Energy Retail Rules*, subrule 25A(3).

<sup>57</sup> *National Energy Retail Rules*, subrule 25A(3).