

27th May 2015

Ms Sarah Proudfoot
General Manager, Retail Markets
Australian Energy Regulator
GPO Box 520 MELBOURNE VIC 3001

By email to: AERInquiry@aer.gov.au

Dear Ms Proudfoot

Retail pricing information guideline – April 2015

Blue NRG welcomes the opportunity to provide comment on the notice of draft instrument (notice) and amended Retail Pricing Guideline (Guideline) released for consultation in April 2015 by the Australian Energy Regulator (AER). Blue NRG is a small business retailer active in the New South Wales and Victorian electricity retail markets.

Blue NRG is broadly comfortable with the proposed changes to the guideline and supports any additional measures which promote greater transparency in product offerings across energy retailers and which promote further consistency in pricing information presented to consumers.

Blue NRG also supports any additional measures to provide further clarity on retailers' obligations under the Guideline which will continue to promote compliance with the Guideline.

Blue NRG has provided responses several specific amendments to the Guideline as proposed by AER in appendix A below.

If you have any questions relating to this submission, please feel free to contact me on 03 8888 3305.

Yours sincerely



Naomi Feast

Manager, Regulatory and Compliance

APPENDIX A

Section 2.2 of the Guideline: Language requirements

Blue NRG supports the use of the standardised terminology for product offers, however, suggests that the proposed terminology of 'no contract term' or 'ongoing contract' may be confusing to consumers. Blue NRG's experience is that business customers seeking contracts of this nature identify with the terminology 'no fixed term' or 'no lock in', and that these terms may be more meaningful to customers than 'ongoing contract'. Blue NRG would also recommend that where standardised terminology is mandated, retailers are still permitted to use any standardised terms in conjunction with their existing product names.

Section 3.4 of the Guideline: Mass and social media

Although Blue NRG supports requirements to reference Energy Price Fact Sheets through in mass marketing, Blue NRG considers that the proposed wording set out in the guideline is unworkable for social media platforms such as twitter which have size limitations on text / characters (for example, the AER's proposed wording would use up to 65 characters when including a reference to the retailer's website). Further, although consumers may use Energy Price Fact Sheets in making switching decisions, the terminology may not be familiar to customers. Therefore, as an alternative, Blue NRG suggests more generic wording, for example 'pricing information available at [insert retailer website].'

Section 5.2 - Displaying unit prices with respect to GST

Blue NRG notes that the AER has sought specific comment on the application of GST to prices presented on Energy Price Fact Sheets. As highlighted in the Notice, small business customers may prefer to view prices on a GST exclusive basis. Blue NRG supports this assertion, and agrees that either price should continue to be presented either on a GST inclusive and exclusive basis, or alternatively, that Energy Price Fact Sheets for small business offers are permitted to show prices in GST exclusive terms only.