

Contact Officer: Georgiana Copeland
Contact Phone: [REDACTED]

Level 25, 32 Turbot Street
Brisbane QLD 4000
PO Box 12241
Brisbane QLD 4003
tel: (07) 3835 4666
www.aer.gov.au

4 January 2023

Stefanie Monaco
Manager – Regulatory Affairs
Red Energy Pty Ltd
Lumo Energy Pty Ltd

By email: [REDACTED]

Dear Stefanie

Application for exemption under section 35 of the Better Bills Guideline

I refer to your application of 6 September 2022 requesting approval to include several additional messages, which are not required by the Better Bills Guideline (**Guideline**), among Tier 1 information on your customer bills.

The AER has considered Red Energy Pty Ltd's (**Red Energy**) and Lumo Energy Pty Ltd's¹ (**Lumo Energy**) application and under section 35 of the Guideline has decided to not approve the certification logos and loyalty program tracking boxes.

The AER considers that both the placement of the logos and the tracking boxes within Tier 1 is inconsistent with Tier 1's purpose, namely to provide critical information to consumers.

The AER also considers that the additional messages may detract from the billing objective outlined in Rule 25A(3) of the National Energy Retail Rules, which states the objective of a bill is to provide billing information that enables small customers to easily understand:

- the payment amounts, dates and methods,
- how their bill is calculated and whether it conforms to their customer retail contract,
- their energy consumption and production, and related costs and revenue, to assist with:
 - using energy efficiently,
 - comparing their customer retail contract with other energy offers available to them,
 - considering options for energy supply other than through the distribution system,
- how to dispute or raise a query in relation to their bill,
- how to access interpreter services and seek financial assistance, and
- how to report a fault or emergency.

¹ Including Lumo Energy NSW Pty Ltd, Lumo Energy QLD Pty Ltd, and Lumo Energy SA Pty Ltd.

In particular:

- the logos' proximity to the retailer logo may lead to ambiguities on the origin of the invoice and is inconsistent with the intent of the Guidelines, and
- the tracking boxes do not provide essential information and may draw attention away from the adjacent, critical, better offer message.

Red Energy and Lumo Energy may wish to consider whether a number of the additional messages is better suited to the Tier 2 plan summary section, which includes space for 'plan benefit' details.

Should you wish to discuss any of the above, please contact Georgiana Copeland on ■■■■■

Yours sincerely



Justin Oliver
Board Member
Australian Energy Regulator