

27 October 2022

General Manager
Strategic Policy and Energy Systems Innovation
Australian Energy Regulator
GPO Box 520
Melbourne, VIC 3001

Submitted electronically: consumerpolicy@aer.gov.au

Dear General Manager,

Better Bills Guidelines – Version 2

Thank you for the opportunity to provide our views on the Better Bills Guidelines – Version 2 (Guidelines). We believe the updated Guidelines will deliver better outcomes for retailers and customers by improving the clarity and intent of the Guidelines.

Established in March 2017, Energy Global Co (EGC) has been building and providing consulting services to retail energy businesses across the globe. Its extensive experience in retail energy market entry includes launching, building and scaling electricity and gas businesses in Australia, the USA and UK. The EGC team offers over 120 years of experience spanning across executive leadership, strategy, investment, business development and growth, operations, technology, project management, compliance and stakeholder engagement. EGC is unique in its extensive, hands-on experience navigating and resolving the different challenges faced when starting up, operating and growing an energy retail business.

EGC has previously corresponded with the AER on the Guidelines to discuss some potential ambiguities found in the initial drafting. We believe the amendments proposed in the current consultation draft addresses those ambiguities by providing greater clarity on the intent and operation of the self-read information and the frequency of the better offer requirement.

Further, the amendment to the implementation date and the inclusion of exports in the definition of annual usage history both serve to increase the clarity of the Guidelines.

We appreciate the AER taking the time to discuss and consider our earlier queries and for initiating this consultation to implement key drafting improvements in this important regulatory Guideline. Should you wish to discuss this submission, or any other questions, please contact me on the details below.

Kind regards,

Sam Morris

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