

Our Ref: EWOQ/18/0045

12 March 2018

Ms Sarah Proudfoot
General Manager
Retail Markets Branch
Australian Energy Regulator
AERInquiry@aer.gov.au

Dear Ms Proudfoot,

Re: Draft AER Retail Pricing Information Guidelines

Thank you for the opportunity to make a submission on the Australian Energy Regulator's (AER) Draft Retail Pricing Information Guidelines (Guidelines).

In our previous submission to the AER's Customer Price Information Issues paper, we provided responses based on our experience as an industry external dispute resolution scheme and dealing with residential and small business customer complaints in Queensland.

After reviewing the current document, we welcome the AER's proposed new guidelines to replace the current Energy Price Fact Sheet with two separate planning documents, a Basic Plan Information (BPI) and a Contract Summary (CS). The provision of consistent, simplified and transparent information will assist customers in better engaging with the market and understanding and comparing plans best suited for their circumstances. We are also very supportive of including ombudsman contact details for each jurisdiction in the CS.

Energy plan documents

We agree in principle to the amendment for all documents to be generated through Energy Made Easy (EME) with links to the relevant retailer. This will assist customers to access the key details of any plan in a consistent format and across a range of search pathways. It also means that BPIs will feature early and prominently as a major tool to help customers compare and contrast offers.

We also welcome the provision of information to customers on conditional benefit periods as well as on price changes however we would be very supportive of both documents including more detailed information on notification timelines for price changes before they occur.

The amendments will strengthen consistency in how energy information is presented to customers and thereby reduce the complexity customers' face when comparing offers through the inclusion of the comparison pricing table and support the AER's aim to make these changes with minimal impact to retailers.

Reducing barriers to customer engagement

The issue of reducing barriers to customer engagement has been a recurring key theme throughout this review process. We acknowledge the proposed improvements to the display of plan information on

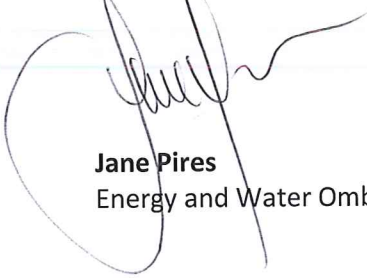
websites, in advertising and marketing material and for marketers, third party sales and customer service agents to have access to the EME plan ID number.

The use of clearer and simpler language, graphics and images will reduce the complexity customers face when comparing offers and agree with the need for the AER to monitor the use of the often confusing term 'benefit period' as part of the proposed comprehensive language review.

It would also be beneficial to make services more accessible to Culturally and Linguistically Diverse customers, the Aboriginal and Torres Strait Islander Community, older Australians, people with a disability and those who are not digitally engaged. Accessibility to services could be enhanced through the use of social media, engagement with local councils/community organisations in remote areas, a free phone service, the development of a contact-centre to enhance the EME website, resources offered in languages other than English and services for those with a vision or hearing impairment.

Thank you for the opportunity to contribute to this review. If you require any further information regarding this matter please contact Ms Ilona Cenefels, General Manager – Reporting, Policy and Research on 07 3087 9455 or Ilona.cenefels@ewoq.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jane Pires', with a large circular flourish on the left side.

Jane Pires
Energy and Water Ombudsman