

21 May 2018

Ms Sarah Proudfoot
General Manager - Retail Markets Branch
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Submitted by email: AERInquiry@aer.gov.au

AER Draft Benefit Change Notice Guidelines 2018

Thank you for the opportunity to provide a submission in response to the Draft Benefit Change Notice Guidelines.

Momentum Energy is a 100% Australian-owned and operated energy retailer. We pride ourselves on competitive pricing, innovation and outstanding customer service. We retail electricity in Victoria, New South Wales, South Australia, Queensland, the ACT, and on the Bass Strait Islands. We offer competitive rates to both residential and business customers along with a range of innovative energy products and services. We also retail natural gas to Victorian customers.

Momentum Energy is owned by Hydro Tasmania, Australia's largest producer of renewable energy.

Introduction

Momentum is committed to transparency and customer driven practices. Our efforts are focused on providing competitive rates and great service; we do not participate in discounting practices. We feel that our approach makes it easier for customers to engage in the market, and not be overwhelmed by complex offers. Momentum supports the effort the AER has taken to try and engage customers when there is a change to their benefit, and we have provided comments below for consideration.

Comments

The Guidelines require retailers to pre populate customer information for both the 'Table' and if sending notices via email. We appreciate the intention of this is to alleviate any confusion when customers look to compare offers, yet we feel the example goes too far, for example; providing a customer with their postcode and where it should be used. A customer is not confused by this type of information and it may appear insulting that a retailer assumes this level of assistance is required. We support the concept of making decision making as simple as possible however we are concerned that 'spoonfeeding' customers to this degree is unlikely to drive active engagement in the market.

Pre-populating the notices entails a considerable degree of operational complexity that is unlikely to result in a demonstrable benefit to customers is therefore not justified from a cost benefit perspective. We otherwise support the AER's moves to increase consumer engagement through targeted and informative information at key points in the customer lifecycle.

Additional information

If you require any further information with regard to these issues, please contact me on (03) 8651 3565 or email melissa.mcauliffe@momentum.com.au.

Yours sincerely

Melissa McAuliffe
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