

PIAC oral submission to the AER – 31 October 2017

Staff present:

PIAC – Craig Memery; Tim Harrison

AER – Elisha Kelly; Pablo Albornoz; Natasha Kociski

PIAC staff requested a meeting with AER staff to provide input to the AER's consultation on its Customer Price Information Issues Paper.

PIAC provided the AER with a copy of its current consumer cohorts, which is a framework guiding their advocacy work to assist consumers towards sustainable and affordable energy.

With regard to the specific questions posed in the issues paper, PIAC commented that:

1. **Energy Price Fact Sheet (EPFS) content and format** – need to make EPFS as simple as possible for disengaged customers. Often for more engaged customers the priority will be that the information is accurate. There is often a difficult trade-off between simplicity and accuracy.
2. **Comparison rates and reference prices** – hard to decide what a comparison rate will look like now, when we're looking at a new energy world. Asking the customer to identify with a high, medium or low profile could be difficult if they are not sure where they fit. If a comparison rate is the chosen model, the design should be based on how customers can best use it. Need to take disadvantaged customers into account and consider different causes of disadvantage. Time of use load profile assumptions can also be applied to demand tariffs.
3. **Technological options to facilitate offer comparison** - QR codes – might assist a small number of customers who are already advantaged and engaged, but are they the best way to assist the disadvantaged cohort?
4. **Customers who are not digitally engaged** – If CALD consumers the Ethnic Communities Council has a good publication about engaging with CALD communities.
5. **General comments** - Need to consider other types of disadvantage – i.e. if it's not a technological advantage, customers may face other disadvantages or disabilities that make it harder for them to engage. For customers that are disadvantaged and not engaged, it is important to offer access to an energy offer that does not require them to engage. Any offer made to them should not be higher than the cost of supplying them energy. These customers should not be subsidising those that are paying on time. Best way to identify disadvantaged customers – concession card holder/health care benefits/unemployment benefits.