

31 October 2022

General Manager
Strategic Energy Policy and Energy Systems Innovation
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

Via email to consumerpolicy@aer.gov.au

Dear General Manager,

Re: Draft Better Bills Guideline (Version 2)

Simply Energy welcomes the opportunity to provide feedback on version two of the Australian Energy Regulator's (AER) Better Bills Guideline.

Simply Energy is a leading energy retailer with approximately 700,000 customer accounts across Victoria, New South Wales, South Australia, Queensland and Western Australia. Simply Energy is owned by the ENGIE Group, one of the largest independent power producers in the world and a global leader in the transition to a zero-carbon economy.

Simply Energy is supportive of the AER addressing unintended consequences and potential ambiguities in the original guideline drafting. We also support the scope of this consultation remaining limited to the issues identified in the draft instrument.

In this submission, we provide feedback on each of the proposed amendments to the guideline.

Clarifying the self-read information requirement

Simply Energy supports this proposed change and agree that it would not be a positive customer experience to require a bill to include comprehensive guidance, information and instructions to conduct a customer read estimate. We consider that the AER's proposed amendments to the guideline are appropriate and provide sufficient clarification.

Clarifying better offer – including exports in the definition of annual usage history

Simply Energy supports amendments to the better offer calculation to ensure alignment with the best offer calculation in Victoria. Retailers have already developed systems to calculate best offers in Victoria and any significant divergences from the Victorian methodology would significantly increase the cost of implementing the better offer. More broadly, we consider that including solar exports in the better offer calculation would enable a more accurate comparison of different offers and ensure that customers are shown the offer that is most suitable to their circumstances.

Clarifying better offer – aligning the frequency of better offer check and message

Simply Energy supports this proposed change and agrees that it is unnecessary for retailers to conduct a better offer check before issuing a bill that will not display a better offer message. We agree that the AER's proposed change would clarify the obligation and would align with our view of the intent and operation of the better offer check and message.

Flexibility for a change to the implementation date

Simply Energy supports changes to the guideline that enable it to come into effect on 30 September 2023, as recently determined by the Australian Energy Market Commission through its review into the implementation date. This would be a sensible and administrative change to the guideline to ensure that it aligns with the requirements set out in the National Energy Retail Rules.

Concluding remarks

Simply Energy welcomes further discussion in relation to this submission. To arrange a discussion or if you have any questions please contact Matthew Giampiccolo, Senior Regulatory Adviser, at [REDACTED] [@simplyenergy.com.au](mailto:[REDACTED]@simplyenergy.com.au).

Yours sincerely



James Barton
General Manager, Regulation
Simply Energy