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Australian Energy Regulator - Markets Branch
GPO Box 520
Melbourne VIC 3001

Dear Sir/Madam

RE: Australian Energy Regulator's Retail Price Comparator Website Issues Paper

TRUenergy welcomes the opportunity to provide the following comments in relation to the Australian Energy Regulator's (AER) Retail Price Comparator Website Issues Paper.

TRUenergy supports the development of a single national pricing comparator website by the AER to replace the existing sites administered by the respective jurisdictional regulators. Currently, the different approaches taken by the various jurisdictions to managing the data on these websites mean that retailers find that the submission and verification of data to be resource intensive, and time consuming.

A national comparator website will be complicated to build due to the volume of data required to generate the prices consumers see and the administration associated with the preparation and uploading of the tariffs. TRUenergy, therefore, endorses the AER ensuring the website is initially kept as simple as possible both to minimise customer misunderstanding and the work required on retailers at a time when they are preparing for the NECF. Over time as customers become more familiar with the site and retailers have bedded down their systems for the NECF, the AER could investigate expanding the functions on the website.

In building the comparator, TRUenergy is of the view that the site must not restrict any retailer in the way they structure their products. Currently, some of the existing jurisdictional comparator sites do not allow retailers to offer GreenPower as an additional option to each of their products, despite this being consistent with the way the products are offered in the market.

With regard to discounts, TRUenergy believes these must be displayed consistently such that customers can make an informed decision. To minimise customer confusion and promote confidence in the website, TRUenergy believes all discounts should be included in the tariffs displayed to the customer so that they can accurately rank the offers available to them. Retailers should, however, clearly state how their discounts have been applied, and what the customer must do to receive such discounts.

TRUenergy also notes that there is likely to be some overlap with the commencement of the AER's website and the phasing out of the existing sites. Consideration should be given as to when the site is launched so as not to interfere with the system build for the NECF and the annual price setting processes in QLD, the ACT and NSW. TRUenergy believes delaying the start of the website until September would be preferable, as it would reduce the pressure on retailers and would enable the AER to undertake additional testing.

TRUenergy notes that the AER is seeking feedback on the disclaimer that will be displayed to customers when entering the comparator page. While TRUenergy understands the need for an upfront disclaimer, it nevertheless is of the view that the AER may be able to reduce the length of the disclaimer by incorporating 'guide' into the title for the website. This would make it more evident that the information on the comparator is only advisory and the site cannot definitively determine the best offer for their individual circumstances.

Finally, TRUenergy would urge the AER to ensure the website only includes generally available offers. The inclusion of all offers would not only require additional work by retailers to prepare the necessary pricing information for the site, but may also confuse customers about which offers are available to them.

Should you have any questions in relation to this submission please call me on (03) 8628 1185.

Yours sincerely

Alastair Phillips
Regulatory Manager
TRUenergy