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Submitted via email to: ConsumerPolicy@aer.gov.au

Draft Better Bills Guideline (version 2) – Tango Energy submission

Tango Energy thanks the Australian Energy Regulator (AER) for the opportunity to comment on version 2 of the Draft Better Bills Guideline (the Guideline).

Tango Energy is the wholly owned subsidiary retail arm of Pacific Hydro Australia (PHA). PHA was founded in 1992, and is a leading owner, operator and developer of renewable energy assets. It operates a high quality, diversified portfolio of wind, hydro and solar assets with an installed capacity of 665 MW; it also has a development pipeline of substantial projects totaling over 1100 MW of potential capacity, as well as over 300 MW of energy storage solutions.

We are a relatively new and growing retailer with approximately 150,000 small and large customers as of February 2022. While our customer base is predominantly in Victoria, Tango Energy also recently started selling to small customers in New South Wales, Queensland, and South Australia and expects to grow our presence in those jurisdictions.

Draft amendments

Tango Energy agrees with the AER's proposed amendments to the Guideline. Providing customers with clarification on their bills about how to access self-meter reads allows for further clarification and understanding from customers and meets the overall objective of the Guideline. The clarification of the best offer calculation and messaging also allows retailers to have a harmonised best offer framework across the Victorian and NECF jurisdictions and will reduce costs in terms of developing both of these for the Guideline.

Although we do not share any objections with the recent changes proposed, we wish to highlight some areas the AER should take into consideration to allow for a smooth implementation of the Guideline and look at clarifying to allow customers to further understand their bills.

Tier 1 Information

Under the Guideline the AER has identified that it applies to bills for both Electricity and Gas customers, and makes mention that retailers should use 'National Metering

Identifier (NMI)' before stating the relevant customers NMI.¹ The AER has made no reference to how this will apply for gas customers MIRN's and we request that the AER clarify whether retailers have the discretion to use MIRN or will be required to include 'Meter Identification Reference Number (MIRN)' in their bills for gas customers.

We also ask the AER to clarify the interpretation of the term "retailer identifying information"² in the Guideline and whether this term also stretches to meaning the contact information of retailers. Currently under the Guideline the only contact information retailers are permitted to be providing customers is a telephone number to make account enquiries and complaints or to contact their relevant ombudsman.³ By not providing other details in Tier 1 information for the customer to contact the retailer, such as an email address or a web address with a chat function, this has the potential to restrict customers who are unable to use a telephone to contact their retailer and further burdening them by not providing alternative communications. This has further implications to affect vulnerable customers who are unable to use verbal communication and rely significantly on electronic methods to communicate. One of the objectives of the Guideline is to provide information that will allow customers to easily understand how to dispute or raise query in relation to their bill,⁴ and by not providing alternative communication methods to those who may be unable to contact verbally restricts that objective from being achieved.

Furthermore we ask the AER to take into consideration the ability for retailers to include specific invoice numbers on bills. Retailers require this to be included on a bill for accounting purposes, and it allows the bill itself to have an easily identifiable reference number that a customer can use when discussing their bill with their specific retailer.

Tier 2 Information

In the "understand your bill" table retailers are required to provide customers with a breakdown of how the amount they are being charged for was calculated, including specifics as to that breakdown to make it easier for customers. However this section does not include other information that is key to giving customers a further understanding of their due amount, for instance meter numbers where the customer has multiple meters or multipliers where applicable. Providing this information would be consistent with the objective of the Guideline as it gives customers an easier understanding as to how exactly the bill was calculated as well as its consistency with their retail contract,⁵ and we ask the AER to provide further clarification on these inclusions into the understand your bill table as well as other terms that may give customers further understanding and clarity.

We also request the AER clarify to retailers the process where customers have received a plan change within their billing period as to whether the customer will require two separate plan

¹ Better Bills Guideline Section 40(f).

² Better Bills Guideline Section 40(i).

³ Better Bills Guideline Section 40(j).

⁴ NERR Rule 25A(3)(d).

⁵ NERR Rule 25A(3)(b).

summaries. Given that bills are going to need significant development to ensure they are compliant with the Guideline, retailers need to understand whether they will need to develop a separate bill for this specific scenario to ensure that they can meet these requirements.

If you would like to discuss this submission in detail, please contact me at the details provided with the submission.

Yours sincerely,

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