

30 July 2025

Mr Max Bonic
Project Leader
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000
Online via: www.aemc.gov.au

Dear Mr Bonic

RRC0062 – Improving the Ability to Switch to a Better Offer – Draft determination

Thank you for the opportunity to comment on the draft determination.

The comments contained in this submission reflect the feedback of the Energy & Water Ombudsman NSW (EWON), Energy & Water Ombudsman South Australia (EWOSA), and Energy and Water Ombudsman Queensland (EWOQ). We are the industry-based external dispute resolution schemes for the energy and water industries in New South Wales, South Australia, and Queensland.

We have collectively reviewed the draft determination, and we have only commented on two issues that align with issues customers raise, or with each respective organisation's operations as they relate to the draft determination:

- Amending the Better Bills Guideline
- The scope of the rule change

The Better Bills Guideline

We support the intent of the rule change to contribute to improved awareness of lower-priced plans by:

- extending the scope of the Better Bills Guideline to communications documents related to billing, such as bill cover letters and emails with bills attached
- requiring the Better Bills Guideline be updated by 20 September 2026, so that comparative information must be included in communications documents related to billing.

This is a common-sense change, supported by the behavioural research explored in the draft determination. Our main concern is that it will not assist customers experiencing vulnerability who have difficulty opening emails or written correspondence from their retailer at all. We recognise that this is a very challenging scenario to address.

The scope of the rule change proposal

It is surprising and disappointing that the scope of the draft determination has narrowed so significantly compared to the consultation paper, which was broader and more ambitious.

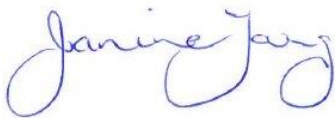
We acknowledge the Commission's reasoning for focusing on a targeted change, given stakeholder feedback to the consultation paper and changes expected from other concurrent rule changes and reviews. However, the insights about switching complexity and the consumer experience gained through this review are valuable.

We strongly encourage the Commission to draw on these insights and continue to look for opportunities to address switching complexity, given that:

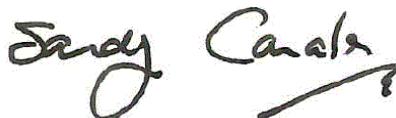
- the scope of the Better Energy Consumer Experiences review is still being explored and any outcomes will not be implemented for some time
- other reviews, such as the Assisting hardship customers rule change, address specific customer cohorts and/or issues which are related to switching, rather than looking holistically at switching itself.

If you require any further information regarding our submission, please contact Dr Rory Campbell, Manager Policy & Systemic Issues (EWON) on 02 8218 5266, Mr Antony Clarke, Policy and Governance Lead (EWOSA) on 08 8216 1861, or Mr Jeremy Inglis, Manager Policy and Research (EWOQ) on 07 3212 0630.

Yours sincerely



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