

31 July 2025



Geoffrey Rutledge  
Chief Executive Officer  
Australian Energy Market Commission  
Level 15, 60 Castlereagh Street  
Sydney NSW 2000

Dear Mr Rutledge,

**Improving the ability to switch to a better offer Rule change – Draft Determination**

Origin Energy (Origin) appreciates the opportunity to provide comment on the Australian Energy Market Commission's (AEMC) Improving the ability to switch to a better offer rule change consultation paper.

We agree with the AEMC's finding that customers can generally switch to better offers with their existing retailers easily and with minimal effort<sup>1</sup>. Origin provides customers multiple channels to switch including via our website, over the phone, hyperlinks in energy bills and through the customers' online account with the retailer.

The AEMC has identified that a barrier to switching is low customer engagement with energy bills. A potential reason for this low engagement is that customers do not open their energy bill to see the bill saving message. The AEMC noted this could be because customers are on direct debit, they only see the due amount, or they find the bill difficult to understand<sup>2</sup>.

The AEMC has now identified the need to improve customer engagement by expanding the provisions of the *Better Bills Guidelines* (Guidelines) to require retailers to include a message in additional communication with customers. Under the draft rule, the AEMC will request that the Australian Energy Regulator (AER) review and broaden the scope of the Guidelines.

If this approach is progressed, we encourage the AEMC to provide clear policy guidance to the AER on the proposed changes to the Guidelines. In particular, a more precise definition of 'written communication' should be included in the final rule so that this is limited to emails or letters accompanying energy bills and does not extend to other forms of customer communication. Furthermore, we understand that the intention is to limit the comparison information to the best offer message currently found on energy bills. Clear policy instructions will provide greater certainty and ensure the intent of the draft rule is appropriately reflected in the AER's implementation.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on (07) 3867 0863 or [caroline.brumby@originenergy.com.au](mailto:caroline.brumby@originenergy.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "Sean Greenup", written over a light blue circular stamp.

Sean Greenup  
Group Manager Regulatory Policy

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<sup>1</sup> AEMC, Switching to a better offer – Draft Determination, 19 June 2025, pi.

<sup>2</sup> AEMC, Switching to a better offer – Draft Determination, 19 June 2025, pi.