

31 July 2025

RRC0062 - Improving the ability to switch to a better offer rule change
Australian Energy Market Commission (AEMC)
Submission made online at www.aemc.gov.au

Dear Sir/Madam

Subject: RRC0062 Draft Rule Determination – *National Energy Retail Amendment (Improving the ability to switch to a better offer) Rule 2025* – Submission by SA Power Networks.

SA Power Networks (SAPN) welcomes the opportunity to provide feedback on the AEMC's Draft Determination for the *Improving the ability to switch to a better offer* rule change.

As South Australia's regulated energy distributor, serving 1.7 million South Australians, we play a critical role in the well-being of our community. SAPN believes all customers deserve affordable and equitable energy supply and is committed to advocating and supporting improvements that provide safeguards for all customers, and particularly those customers experiencing vulnerability.

SAPN acknowledges the challenging cost-of-living environment for customers and supports the AEMC's rule change to help customers switch to a better retail offer and provide some relief to the cost-of-living pressure. SAPN welcomes the opportunity to provide feedback on the proposed changes outlined in the *Draft Determination – National Energy Retail Amendment (Improving the ability to switch to a better offer) Rule 2025*.

This submission responds specifically to the proposed changes:

1. Increased visibility of a Better Offer through increasing scope of the Australian Energy Regulator's (AER) *billing guideline*
2. Introduction of a subrule which requires the *billing guideline* to include instructions on providing comparison information in retailers communications to small customers.

SAPN believes the proposed changes are a positive step towards increasing visibility of better retail offers for customers and is supportive of the changes outlined, specifically the requirement for the better offer to be included in the main email or letter communication to customers, separate to the bill. We encourage the use of simple, easy-to-understand language in the Better Offer communication to ensure all customers, including those with low literacy skills or from culturally and linguistically diverse backgrounds, can understand the better offer message.

SAPN understands from customers that difficulty in comparing retail offers due to the lack of standardisation between retailers and plans, is a key barrier to switching to a better offer. We are pleased this issue is being addressed as part of the AEMC's *Pricing Review*.

We value the opportunity to make a submission to the AEMC's Draft Rule Determination – *National Energy Retail Amendment (Improving the ability to switch to a better offer) Rule 2025* and support improving customer and community outcomes. Should you wish to discuss this submission, please contact SAPN's Policy and Advocacy Lead, Rebecca Carter at rebecca.carter@sapowernetworks.com.au or on 0417 480 984.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'C. Schutz', with a stylized flourish at the end.

Cecilia Schutz
External Affairs Manager