

14 August 2025

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

Dear Mr Rutledge,

**Improving the application of concessions to bills – Draft Rule Change**

Origin Energy (Origin) appreciates the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) draft rule change regarding the improvement of concession applications to energy bills.

We strongly support the AEMC's recommendations to harmonise concession and rebate frameworks across jurisdictions. A consistent national approach to eligibility rules and application processes is essential to maximising consumer access to support measures, reducing regulatory complexity and eliminating duplication. Current inconsistencies in application requirements create barriers for customers and impose costs on retailers.

We further endorse the AEMC's recommendation to remove the onus on customers to apply for concessions and rebates. Implementing an automated system that identifies eligible customers through Services Australia's database would transform the administration of energy rebate schemes. Such a system would enable faster application processing, reduce administrative overheads and ensure that eligible customers receive their concession entitlements.

We also support the AEMC's draft rule requiring retailers to ask customers at sign up whether they may be eligible for applicable rebates or concession schemes. Increasing awareness of the availability and eligibility for concessions is critical to ensuring customers can access the support to which they are entitled.

However, we do not support any proposal for retailers to list all relevant jurisdictional rebates and concessions during customer contacts. The significant variation in scheme names, eligibility criteria and administration across jurisdictions would result in extended call times, increased operational costs and may overwhelm customers with information that may be irrelevant to their individual circumstances.

A more effective approach would be to confirm potential eligibility during the call and then direct customers to relevant and up-to-date resources, such as government websites or targeted follow-up communications, where they can access accurate and relevant information for their location. This would achieve the objective of increasing awareness while avoiding inefficiencies and maintaining a positive customer experience.

Origin's views on each of the draft rules and recommendations raised in the Draft Determination are set out further in Attachment A.

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

Yours sincerely



Sean Greenup  
Group Manager Regulatory Policy

## Responses to Draft Rules

**Draft Rule 1:** Retailers must ask consumers about their eligibility at sign-up.

We support the proposal to require retailers to ask customers at the time of sign-up whether they may be eligible for a rebate, concession or relief scheme.

Origin has robust processes in place to seek concession eligibility at the first point of contact. When a customer calls to sign a new contract, we will confirm and validate concessions while the customer is on the phone. In addition, when a customer signs up through our online portal, the customer can confirm their eligibility.

**Draft Rule 2:** Retailers must provide jurisdiction-specific on rebates and concessions at sign-up.

The Draft Rule proposes amending current requirements to ensure that information about concessions and rebates is specific to those offered within the customer's jurisdiction.

While we support the principle of providing jurisdictional specific rebate information, we are concerned about requiring retailers to deliver detailed information at the first point of contact, whether by phone or online. The number and variety of rebates are extensive and continually evolving (for example, Energy Bill Relief Payments, Cost of Living support, and hardship trial payments in NSW). Keeping call centre staff up to date with these constantly changing requirements and presenting this information during calls is likely to prolong call times and increase customer frustration.

A more effective approach would be to direct customers to clear, up-to-date resources, such as government or retailer website, within follow-up communications. This would achieve the intended outcome of informing customers while maintaining operational efficiency and a positive customer experience.

In terms of online sign-up forms, these forms are generally standardised to ensure consistent and relevant information collection, enabling customers to transfer to their preferred products. We provide links to information on relevant jurisdiction-specific rebates and concessions but it would require system enhancements if we were to individualise forms for each state, thereby increasing complexity and cost.

Finally, we note the Draft Rule 19(1)(c) includes a requirement to provide information about "*all applicable government funded energy charge rebate, concession or relief schemes*". We request the words "*all applicable*" be removed as it could be interpreted that a retailer needs to outline every rebate and concession, regardless of purpose of the rebate. We believe that it would be inappropriate to raise emergency assistance payment options proactively during initial customer interactions. This may encourage the customer to not pay their bills.

## Additional Recommendations

**Draft recommendation 1:** Primary recommendation: DCCEE should facilitate next steps across governments to automate concessions.

We believe one of the most effective way to ensure customers receive the rebates and concessions they are entitled to is through automating the assessment and payment process.

Under the current process, retailers establish a customer's eligibility directly with the customer, then validate this via API with Services Australia. If eligibility is confirmed, the payment is applied to the customer's

account. While this is generally a quick and effective process, it relies entirely on the customer initiating the application with their retailer.

The key barrier to full automation is the lack of a mechanism to match eligibility data with retailer account information. Services Australia holds the eligibility data, but no customer retailer account details. Retailers hold account details, but no eligibility data.

To address this, consideration should be given to whether existing portals could be leveraged, whether an alternative platform would be more effective, the measures needed to protect customer information and the resources and costs involved. Implementing automation will deliver significant efficiencies and increase the number of customers receiving concessions.

**Draft recommendation 2:** Jurisdictions should harmonise concession schemes

We believe harmonising eligibility rules and application processes for concession schemes is vital to maximising consumer access to the support they are entitled to. Currently, inconsistencies in application requirements, including documentation, eligibility criteria, and verification processes create confusion for customers and impose unnecessary costs on retailers. Harmonisation would reduce delays, duplication and confusion surrounding eligible rebates and concessions.

We are concerned that, even with a recommendation to establish cross jurisdictional working group, this recommendation may not be progressed in a timely manner. We therefore urge the AEMC to assume an active leadership role in driving these reforms. In particular, we encourage the AEMC to work closely with the Department of Climate Change, Energy, the Environment and Water (DCCEEW) and coordinate with jurisdictional bodies to ensure harmonising concession schemes remains a top policy priority.

**Draft recommendation 3:** The AER should develop guidance, amend the Better Bills Guideline and consider updating the Exempt Selling Guideline

*Develop Guidance for improving the way retailers communicate with customers*

We note the AEMC's recommendation that the AER develop guidance on how retailers can best communicate with customers at the time of sign up to ensure customers understand both what concessions or rebates are available to them and how to provide their eligibility information.

Retailers are dealing and interacting with a magnitude of customers every day. We develop scripting and communication material for customers based on those interactions and from our experience of what resonates and does not resonate with customers.

If the AEMC is aware of specific examples of retailers not asking the right questions, we would keen to work with the AEMC to further understand the magnitude of the problem and whether guidance is needed. The Draft Determination includes one example of a question<sup>1</sup> which does not demonstrate to Origin that there is market failure in this area.

*Better Bills Guidelines*

We note the proposed requirement for the AER to amend the *Better Bills Guideline* to mandate that retailers include clear information on both the first and final bills, explicitly stating that concessions will not automatically transfer.

Origin questions the likely effectiveness of this measure, particularly in light of the AEMC's recent draft rule change requiring 'best offer' messages to be included in additional communication to the bill. The AEMC identified a key barrier to switching is that customers do not open their electricity bill to read additional

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<sup>1</sup> AEMC, Improving the application of Concessions – Draft Determination, 3 July 2025, p18.

messages given the customer could be on direct debit, they only want to see the due amount or they find the bill difficult to understand<sup>2</sup>. We therefore seek that the AEMC demonstrate how the inclusion of this information will materially improve concession uptake.

As we have previously stated, the most effective time to identify and confirm a customer's eligibility for a concession is at the first point of contact with the customer. This is when the customer calls to establish a new agreement or signs up online. We are not convinced that additional bill changes will significantly improve concession rates.

We also note that the scope for further changes to the *Better Bills Guidelines* is limited under the current framework. The AER has mandated strict Tier 1 and Tier 2 information requirements for bills. The front page is already constrained, particularly with the recent inclusion of the 'best offer' message. Tier 2 and Tier 3 information is then dispersed across the following two to four pages, which further dilutes message visibility and effectiveness.

### *Exempt Sellers*

In principle, we do not have concerns with extending concessions requirements to relevant exempt sellers. However, further consultation is required to address the complexities of embedded network account configurations and to determine how concession obligations could be effectively applied in these contexts.

For example, how the framework would apply to a multi-tenanted premises where the primary facility to a commercial facility but there are separate living units. Without careful consideration, there is a risk of creating compliance uncertainty.

**Draft recommendation 4:** Services Australia should provide more detailed information on rebates and concessions

We support the AEMC's recommendation that Services Australia directly notify consumers of the rebates they are entitled to when they receive new or renewed concession cards. This measure would be highly effective in alerting customers to available energy concessions and in providing clearer guidance on eligibility requirements.

**Draft recommendation 5:** Jurisdictions should increase information provision

Jurisdictions should work with agencies that communicate directly with eligible consumers to determine the most effective ways to raise awareness of concession eligibility. This will be particularly important if there are changes to the eligibility or application of rebates. We would encourage Governments to become more involved as direct communication from government sources is likely to increase both awareness and consumer trust in the information provided.

**Draft recommendation 6:** Jurisdictions, Services Australia and retailers should establish a cross-agency forum

Origin supports all relevant concession and rebate stakeholders collaborating to address current barriers to the application and payment of rebates and concessions. For Origin, some priority issues include harmonisation of schemes, automation of payments, address verification, the expiry of temporary cards and the ongoing verification of permanent concessions.

We support the Commonwealth taking a facilitation role to bring together jurisdictions and service providers, including Services Australia, to progress this work. We agree with the AEMC that the ETEWG consumer protections sub-working group could provide an effective forum to support and coordinate these efforts.

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

<b>Draft recommendation 7:</b> Retailers should make it easy for customers to add concessions details
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Customers have multiple channels to provide concession details at any point during their contract term, including via their online account (eg Origin MyAccount) or by contacting our call centre. We consider these options to be sufficient and do not present barriers to customers in adding or updating their eligibility details.

<b>Draft recommendation 8:</b> Resolving household eligibility challenges
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We note the AEMC is seeking feedback on whether eligibility for concessions can be extended from the primary account holder to any person living at the address.

This proposal is complex and requires careful consideration given current energy account structures, systems and processes. Consideration needs to be given to the following issues:

- Under the current energy framework, each account is held by a primary account holder who is financially responsible for the account. The primary account holder, the person with financial responsibility, can provide consent for validation by Services Australia. Existing systems do not support multiple account holders. Any extension to the framework would need to consider whether, and how, additional members could be linked to an account without being assigned financial responsibility.
- If rebates are extended to anyone living at the address, system changes are required to 1) capture the additional persons details and 2) validate the concession details. It could require that we validate 2-3 concession cards, for different members of the household and then consolidate the amounts and validations to appear on the one bill for the customer. This is not a current functionality. These changes will be considerable as we can currently only validate against the authorised account holder.
- The retailer would need the explicit informed consent from the additional household member to verify their concession details with Services Australia. Without this consent, Retailers are unable to validate the concession details provided for eligibility.
- Allowing additional card holders has flow on impacts for the bill (ie if the card holder does not have financial responsibility for the account, how would it be presented on bills). This is particularly important for share houses where customers assume that if there are multiple persons listed on the account, they are all financially responsible.
- Privacy implications need to be considered. This includes the controls that would need to be put into place to ensure the that the primary account holder do not receive private information about additional holders' concession entitlements.
- Inconsistencies with this decision with other Government policies. For example, Centrepay obligations only allow for the financially responsible customer to use the services of Centrepay.

In this context, we believe the AEMC should undertake more in-depth consultation with both retailers and service providers to fully scope and understand the issues that would need to be addressed before making any further recommendations in this regard. The proposal is complex and we anticipate substantial system and process changes.