



30 January 2022

SUBMISSION ON AER DRAFT BETTER BILLS GUIDELINE- DECEMBER 2021

BACKGROUND

The Queensland Consumers' Association (the Association) is a non-profit organisation established over 40 years ago and which exists to advance the interests of Queensland consumers. The Association's members work in a voluntary capacity and specialise in particular policy areas.

The Association is a member of the Consumers' Federation of Australia, the peak body for Australian consumer groups, and works closely with many other consumer and community groups.

The Association has been especially active for many years on energy issues in Queensland and nationally and has participated in, and made numerous submissions to inquiries etc. on energy issues conducted at national level, in Queensland, and in other states.

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COMMENTS

Guideline 12 should make it clearer that information must be presented in a way that is also easy to understand by small customers with disability. For example by replacing the present words with:

2. The information in a bill for a small customer (including a customer with disability) must be presented in a way that is easy to understand.

Guideline 13 should mention the importance of font colour on print legibility and prominence (and therefore on comprehension).

Currently colour is only mentioned in relation to the logical grouping of related bill information, etc., **not** in relation to fonts.

This could be easily done by changing the second dot point to:

- *accessible font sizes, font colours and font styles;*

And, to assist retailers to achieve the Guideline 13's objective, consider mentioning other relevant standards or guidelines, for example:

- The German standard DIN 1450:2013-04 Lettering – Legibility which is now published in English and can be bought here: <https://www.beuth.de/en/standard/din-1450/170093157>
- The Web Content Accessibility Guidelines (an internationally recognised standard created by the World Wide Web Consortium).

Printed and electronic bills

The Guideline should indicate clearly that the design principles apply to bills sent to customers via email, or accessed by customers online, as well as to printed bills sent to customers. It should also recognise that customers need to be able to easily understand bills sent by email or accessed online that are only viewed

on a screen, not printed then read. Also, that many customers will be unable, or choose not, to not print e bills in colour.

Alternative bill formats

The Guideline should require that, when requested by customers with special needs, retailers provide alternative bill formats such as audio, large print, and plain English versions

Future review of the Guideline

It is important that, in addition to the ongoing monitoring, of the Guideline's impact (mentioned in Section 9 of the Notice of Draft Instrument) a formal, transparent public review be undertaken a few years (for example three) after the full commencement date of 31 March 2023. This requirement should be added to the Guideline.