

2 May 2023

Mark Feather  
General Manager, Policy and Performance  
Australian Energy Regulator

Submitted via email: [REDACTED]

Dear Mark

### **Better Bills Guideline - Bill Relief Rebate**

Thank-you for the opportunity to provide a submission in response to your letter addressed to retailers on 18 April 2023 regarding the Better Bills Guideline – Bill Relief Message.

Momentum Energy Pty Ltd (Momentum) is an Australian operated energy retailer, owned by Hydro Tasmania, Australia's largest producer of renewable energy. We pride ourselves on providing competitive pricing, innovation and outstanding customer service to electricity consumers in Victoria, New South Wales, South Australia, Queensland, the ACT and on the Bass Strait Islands. We also retail natural gas to Victorian customers. We aim to offer competitive rates to both residential and business customers along with a range of innovative energy products and services.

We are very supportive of the Australian Government together with state and territory governments' intention to provide electricity price relief, to eligible residential and small business customers, via the Energy Price Relief Plan (EPRP). However, we do not support the Australian Energy Regulator's (AER's) proposal to include a bill message, as requested, by the Commonwealth Department of Climate Change, Energy and Water (DCCEEW) as tier 1 information.

#### **1. EPRP Process Design and Concession Validation**

Momentum has engaged with the Australian Energy Council (AEC) and DCCEEW to design and develop a least cost approach to the implementation of this short-term energy EPRP. This has been a good faith attempt by all parties to deliver the EPRP with reasonable validation of applicable Commonwealth Government concession recipients and to ensure consumers receive the energy bill payments in a timely manner. The inclusion of additional cohorts such as family tax benefit recipients, which retailers have no current knowledge of, has further complicated the implementation but with the aid of a new registration portal within the system of Services Australia we will be able to validate and ensure these consumers receive payments under the EPRP.

Momentum has been undertaking this activity while we are testing and finalising our complex system build to comply with the Better Bills Guideline effective 30 September 2023. It is somewhat disappointing that the AER has now requested that the EPRP messaging (as well as the dollar amount of the EPRP payment) are also required on energy bills from 1 July 2023 and as tier 1 information on the front page of energy bills provided under the Better Bills Guideline. This new requirement is extremely challenging due to the following:

- The dynamic nature of the dollar amounts of the payments that each customer receives as a result of the EPRP. These amounts may differ per customer depending on the billing cycle, relevant eligible concession and customer jurisdiction;
- EPRP payments may not be consistent on each bill subject to the billing cycle and the eligible concession; and
- Implementation of dollar amounts as tier one data would require a link to data held in the “understand your bill” section which is currently not being built into tier one data.

## **2. Better Bills Guideline Policy Intent**

It was our understanding that the Better Bills Guideline was established to provide consistent and simpler billing content by all retailers to electricity consumers. It was also determined that the front page of the bill (tier 1 data) should be limited to the most important information required by a customer to understand their electricity bill. Details of tariffs, products and applicable concessions were deemed subordinate information for inclusion in various sections such as “Understanding your bill” and “Account Summary” located subsequent to page 1. We do not consider that the EPRP message or dollar payments are relevant tier 1 billing information.

Therefore, we believe that the EPRP should not be included, at this late stage, as a Better Bills Guideline obligation and rather imposed under an alternative, contractual, or other short-term regulatory instrument. The current proposal has the prospect of seriously affecting our ability to comply with the Better Bills Guidelines by the set date and also creating additional costs that could be avoided.

## **3. Alternative Approach**

If the AER continues to pursue these obligations under the Better Bills Guideline we strongly suggest that the obligation to include the dollar value of the EPRP message be removed from the tier 1 front page and that the message be moved to the “Account Summary” on page 2 with a less wordy message such as:

“Government Energy Price Relief Payment in this Bill”

Alternatively, we would support the EPRP messaging to be delivered by other mediums such as paper bill inserts, a bill banner on the ebill or via mass media advertising. The dollar

details of the EPRP could still be provided on energy bills as a line item in the normal concession section of the bill.

Momentum hopes that the implementation of this important government concession can be delivered efficiently, with limited intrusions on existing regulatory obligations to ensure consumers receive the maximum benefit.

Should you require any further information regarding this submission, please don't hesitate to contact me on [REDACTED] or email [REDACTED]

Yours sincerely

[REDACTED]  
Randall Brown  
Head of Regulatory Affairs