



# DMO 7 Draft Determination

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## About the Justice and Equity Centre

The Justice and Equity Centre is a leading, independent law and policy centre. Established in 1982 as the Public Interest Advocacy Centre (PIAC), we work with people and communities who are marginalised and facing disadvantage.

The Centre tackles injustice and inequality through:

- legal advice and representation, specialising in test cases and strategic casework;
- research, analysis and policy development; and
- advocacy for systems change to deliver social justice.

## Energy and Water Justice

Our Energy and Water Justice work improves regulation and policy so all people can access the sustainable, dependable and affordable energy and water they need. We ensure consumer protections improve equity and limit disadvantage and support communities to play a meaningful role in decision-making. We help to accelerate a transition away from fossil fuels that also improves outcomes for people. We work collaboratively with community and consumer groups across the country, and our work receives input from a community-based reference group whose members include:

- Affiliated Residential Park Residents Association NSW;
- Anglicare;
- Combined Pensioners and Superannuants Association of NSW;
- Energy and Water Ombudsman NSW;
- Ethnic Communities Council NSW;
- Financial Counsellors Association of NSW;
- NSW Council of Social Service;
- Physical Disability Council of NSW;
- St Vincent de Paul Society of NSW;
- Salvation Army;
- Tenants Union NSW; and
- The Sydney Alliance.

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The Justice and Equity Centre office is located on the land of the Gadigal of the Eora Nation.

## **Australian Council of Social Service**

The Australian Council of Social Service is a national advocate supporting people affected by poverty, disadvantage and inequality, and the peak council for community services nationally.

## **Queensland Council of Social Service**

QCOSS is Queensland's peak body for the social service sector. Our vision is to achieve equality, opportunity, and wellbeing for all Queenslanders.

## **South Australia Council of Social Service**

The South Australian Council of Social Service is the peak representative body for the non-government community, social and health sectors.

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# Recommendations

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## **Recommendation 1**

*That the AER scrutinise wholesale costs for DMO 7, including the impact of gentailer wholesale practices on reported wholesale costs, and consider where there are further opportunities to reduce wholesale costs included in the DMO*

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## **Recommendation 2**

*That the AER exclude solar exports and a solar export hedging adjustment from calculations of DMO 7.*

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## **Recommendation 3**

*That the AER remove costs to acquire and retain customers (CARC) as an explicit additional cost allowance, meeting its requirements by allowing for CARC through the existing retail margin.*

*If the current approach to CARC is maintained the AER should examine these costs in greater detail and consider specific measures to curtail them or introduce an efficiency driver to them, to ensure consumers are not exposed to imprudent or unreasonable costs.*

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## **Recommendation 4**

*That the AER undertake a more granular assessment of 'bad and doubtful debt' costs to determine the actual unmitigated costs to retailers and only incorporate actual costs which are unmitigated, and impact retailers cost to serve.*

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## **Recommendation 5**

*That the AER not include smart meter costs in retail cost calculations without greater transparency on how retailers are incurring and recovering these costs relative to the costs of legacy metering.*

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## **Recommendation 6**

*That the AER make removal of explicit 'competition allowance' permanent and continue to prioritise energy affordability in the calculation of DMO 7 through setting a fair retail margin grounded in efficiency.*

# 1. Introduction

The JEC, ACOSS, SACOSS and QCOSS welcome the opportunity to respond to the *Default market offer prices 2025-26 Draft Determination* (the Draft). We strongly support effective default price protections and their important role in shaping a retail market that works better for all consumers. We continue to encourage the AER to take every available opportunity to ensure Default Market Offer (DMO) 7 more meaningfully supports and protects consumers especially during this time of high energy costs and ongoing cost-of-living pressure for households.

Forthcoming retail rule changes<sup>1</sup> are likely to result in more consumers being on ‘standing offers’ in the coming years. These changes will help ensure consumers are not left on the escalating, obsolete ‘market offers’ highlighted in recent ACCC reporting<sup>2</sup>. In this context, ensuring that the DMO achieves its core objective of protecting customers from unreasonably high prices will be more important than ever.

Our organisations have welcomed the evolving approach of the AER over the course of successive determinations and the increasing attention to optimising affordability for consumers. We note the recent Energy and Climate Ministerial Council’s communique reiterating Ministerial encouragement for the AER to

*“Further interrogate retailer revenues and margins, broader cost pressures across the sector, and to further consider ongoing cost of living pressures in settling the final DMO.”<sup>3</sup>*

While the AER may consider there to be limited scope for further changes to reduce costs in this process, our organisations echo the encouragement of Ministers and highlight areas where we consider consumer outcomes can be improved in DMO 7 and through further reforms.

In our submission to the issues paper<sup>4</sup> we raised several concerns. These concerns were acknowledged by the AER in the draft paper but have not yet been substantively addressed. We are concerned that the methodology for calculating retail costs does not reflect the efficient costs of a prudent retailer and does not account for or incentivise fundamental efficiencies. We are particularly concerned with the continued explicit inclusion of costs to acquire and retain customers (CARC) as a stand-alone item in the cost stack, rather than being assumed as part of the retail margin.

Our submission predominantly identifies areas of the DMO 7 cost stack where our organisations contend further opportunities exist to improve outcomes for consumers. We also link this to our ongoing recommendation for a holistic review and reform of the DMO to assess its appropriate purpose, form and implementation.

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<sup>1</sup> See the [package of seven retail rule change requests](#) proposed by the Energy and Climate Change Ministerial Council to the AEMC in 2024.

<sup>2</sup> ACCC, 2023, [Inquiry into the National Energy Market: December 2023](#),

<sup>3</sup> Energy and Climate Ministerial Council, 2025, [March 2025 Communique](#)

<sup>4</sup> Justice and Equity Centre, ACOSS & SACOSS, 2024, [Submission to the AER Default Market Offer 25-26 Issues Paper \(DMO 7\)](#)

## 2. Response to DMO 7 Draft Determination

As proposed, the draft determination for DMO 7 will see significant increases in energy costs for NSW, QLD<sup>5</sup> and SA households, adding further burden to essential household budgets during an ongoing cost of living crisis. We strongly encourage the AER to re-examine key areas of the determination and approach, with a view to optimising the impact on improved household energy affordability.

### 2.1 Wholesale costs

Consumer and community advocates do not have visibility of the data used to calculate wholesale costs, impeding our scope to meaningfully comment on the validity of the DMO wholesale methodology. However, on materiality of their contribution to the cost-stack alone, wholesale costs should be exposed to further scrutiny. This should include assessing wholesale costs in relation to other aspects of retail costs, and how they interact. This assessment should also include the impact of gentailer wholesale practices on reported wholesale costs. The intent should be to ascertain the range of means retailers have to mitigate, manage and defray wholesale costs, as well as determine the factors impacting wholesale costs themselves. That is, the intent should be to determine how likely it is that retailers are fully exposed to headline changes in wholesale costs and the degree to which they are engaging in prudent activities to minimize this impact.

In this context we support the draft decision to exclude solar exports from the DMO 7 calculation, but do not agree with the provision of a hedging adjustment. As raised in our response to the issues paper, the question of whether to include solar PV exports and hedging costs is a good example of the risk of granularly considering costs in the DMO without consideration of how this interacts with other practices. We also note the example of solar exports as an area where allowing for specific practices now risks entrenching particular practices that may not be prudent or efficient, and in any case are not a given or required 'cost of business'.

Retailers face a reduced incentive (or requirement) to efficiently manage risks themselves if the AER makes explicit provision for all potential costs in DMO calculations. Including all possible costs risks fully compensating retailers for costs (and risks) which they have not actually faced, or which they have (or should have) mitigated or offset elsewhere. That is, costs cannot be considered in isolation from any other factors which may mean those costs are not actually faced or faced in full. The primary function of the retailer in the energy market is to manage risk – the AER should consider the degree to which the DMO (in its current form) should fully compensate all 'headline' costs for retailers.

As we have also noted previously, the DMO need not encompass the costs of all parts of a given retailers' business. The DMO does not apply to all consumers, or all retail services and specific market offer types are able to directly recover costs associated with more bespoke retail services and practices.

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<sup>5</sup> While the DMO only covers customers in SE QLD, it is used as a reference price for notified prices for regional QLD as part of the QLD government's Uniform Tariff Policy.

### **Recommendation 1**

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*That the AER scrutinise wholesale costs for DMO 7, including the impact of gentailer wholesale practices on reported wholesale costs, and consider where there are further opportunities to reduce wholesale costs included in the DMO*

### **Recommendation 2**

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*That the AER exclude solar exports and a solar export hedging adjustment from calculations of DMO 7.*

## **2.2 Retail costs**

In our submission to the DMO 7 Issues Paper, our organisations supported the AER collecting data from a greater range of retailers in order to better understand the range of retail practices and potential costs. However, we recommended that the AER

*“Adopt a transparent methodology which draws on the costs of the 25 retailers to determine an indication of the efficient costs for prudent retailers, to be used in the DMO calculation.”*

We highlighted the risk of the AER incorporating all retailers costs in the DMO 7 methodology and calculations, as not all costs borne by retailers are prudent, efficient (reasonable) or should fairly be passed through to consumers.

The employment of a weighted average to retail costs has not assuaged our concerns, particularly as this has seen an increase in the retail cost component of the DMO. Our understanding of the weighted average methodology is that it incorporates all costs presented by retailers and accepts them at face value, before weighting and averaging. We understand there is no interrogation of the prudence of costs related to a particular retailers behaviour or assessment as to efficiency and fairness. This is critical as it treats costs associated with all practices the same (legitimate), and as such a fundamental cost of doing business. This is not the case, and we strongly encourage further work to introduce more rigor to the assessment of retail costs and ensure a stronger incentive for retailers to reform inefficient practices and innovate to efficiently reduce their cost of business.

Our organisations do not support a weighted average of all retailer costs as the most appropriate approach to setting the retailer costs to serve component of the DMO.

### **2.2.1 Costs to acquire and retain customers**

We strongly disagree with the explicit inclusion of additional allowance for costs to acquire and retain customers (CARC). We refer to our detailed response to the Issues Paper and previous DMO processes<sup>6</sup>. While the AER is required to allow for the cost of acquisition and retention in its DMO determination, there is no requirement for this allowance to come in the form of a specific,

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<sup>6</sup> See the Appendix at the end of this submission.



additional cost component. CARC has no benefit to consumers and is not subject to any productivity or efficiency incentive within the DMO process as proposed.

As we have noted, CARC is already accounted for in the allowed retail margin. That is - like any other competitive business - retail businesses can choose to return profit (margin) to shareholders or reinvest in the business by investing some or all in business growth or augmentation activities. Critically, this includes acquiring new customers.

In the Draft, the AER highlighted CARC as one of two areas of considerable growth in retail costs for DMO 7. This is particularly unacceptable at a time of ongoing energy affordability concern.

We recommend the AER reconsider its approach to CARC. If the existing approach is retained the AER should examine these costs in greater detail and consider specific measures to curtail them or introduce an efficiency driver.

### ***Recommendation 3***

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*That the AER remove costs to acquire and retain customers (CARC) as an explicit additional cost allowance, meeting its requirements by allowing for CARC through the existing retail margin.*

*If the current approach to CARC is maintained the AER should examine these costs in greater detail and consider specific measures to curtail them or introduce an efficiency driver to them, to ensure consumers are not exposed to imprudent or unreasonable costs.*

### **2.2.2 Bad and doubtful debt**

Bad and doubtful debt was also identified as an area of retail cost growth in the Draft. The AER acknowledged concerns raised in our response to the Issues Paper regarding the actual impact of 'bad and doubtful debt' costs on retailers. However, there were no apparent changes made to the methodology.

Given the increase in costs attributable to bad and doubtful debt in the Draft, we consider it necessary to examine these costs with greater granularity, and assess the actual cost impacts experienced by retailers, particularly where 'headline' costs of bad and doubtful debt may not reflect the actual unrecoverable costs faced by retailers, or may be mitigated or otherwise impacted by:

- How bad and doubtful debt numbers are calculated – to what extent are they related to the actual unrecoverable costs experienced by retailers, associated with debts accumulated through the provision of energy services to customers (rather than notional 'gross debt' amounts calculated according to the terms of retail deals the consumers were on).
- How any unrecoverable cost interacts with provisions made by retailers, or other measures to mitigate or offset the impact of debt, including sales to debt recovery.

The objective should be to ensure that costs included as impacting the 'cost to serve' are the genuinely unmitigated costs a prudent retailer may actually face

#### **Recommendation 4**

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*That the AER undertake a more granular assessment of ‘bad and doubtful debt’ costs to determine the actual unmitigated costs to retailers and only incorporate actual costs which are unmitigated, and impact retailers cost to serve.*

#### **2.2.3 Metering costs**

We reiterate our position that smart meter costs should not be explicitly included in retail cost calculations, particularly without greater transparency of how retailers are incurring and recovering those costs. If retailers are recovering smart meter costs directly from the customer, recovering some costs from all customers, offsetting costs through sale of data or other services to metering providers, or engaging in any other activity that may alter the impact of the metering costs on the retailer, this must be assessed fully. Our organisations see merit in a regulated schedule of costs for smart meter installation and operation, including guidelines regarding how costs may be recovered from both individual consumers, and the wider customer base.

#### **Recommendation 5**

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*That the AER not include smart meter costs in retail cost calculations without greater transparency on how retailers are incurring and recovering these costs relative to the costs of legacy metering.*

### **2.3 Retail margin & competition allowance**

Our organisations strongly supported the AER embracing prioritisation of energy affordability in the calculation of DMO 6, including the separation of retail margin and competition allowance and the separation of processes for their respective calculation. This support was predicated on the robust transparency this decision enabled, not support for the concept of a competition allowance as an appropriate part of the DMO calculation.

We support the AER’s draft decision to maintain this separation for DMO 7 and strongly support the draft decision to disallow competition allowance. Our organisations recommend permanent removal of an of explicit ‘competition allowance’ on similar grounds to those presented in relation to CARC. Our joint submission to the DMO 6 Issues Paper<sup>7</sup> included detailed discussion on the unreasonableness and unfairness of including competition allowance in the DMO and we refer the AER to this work.

Our organisations support setting an efficient retail margin. The residential retail margin of 6% for DMO 6 was towards the higher end of ranges outlined in the draft determination analysis. In our submission to the DMO 7 Issues Paper, we argued that should the 6% margin be retained for DMO 7, it should be considered in relation to the setting of other cost allowance calculations. For example, if 6% continues to be at the higher end of the range, it should be counted against any further retail claims for additional cost allowance elsewhere in the decision and should give

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<sup>7</sup> Public Interest Advocacy Centre, ACOSS & SACOSS, 2023, [Submission to default market offer prices 24-25 Issues Paper](#)

confidence that CARC can be removed and explicit competition allowance permanently excluded.

We recommend, given the scope of increase in retail costs being claimed by retailers and provided for in the Draft, that a more efficient retail margin be applied in the final determination for DMO 7. We note that the Draft Determination for the VDO has set an efficient retail margin of 5 percent<sup>8</sup> and that setting a margin towards the lower end of 'reasonable' does not preclude retailers actually recovering greater margins on other products and services not covered by the DMO.

### ***Recommendation 6***

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*That the AER make removal of explicit 'competition allowance' permanent and continue to prioritise energy affordability in the calculation of DMO 7 through setting a fair retail margin grounded in efficiency.*

## **2.4 Network & environmental costs**

Our organisations recognise that the network and environmental cost components of the DMO and the mechanisms to lower these costs functionally sit outside of the DMO process.

However, these costs have a considerable impact on the AER achieving the objectives of the DMO, particularly the protection of customers from unreasonably high costs.

Our organisations recommend that the AER, in its capacity as regulator, support measures to reduce the burden of network and environmental costs on consumers by recommending the Energy and Climate Ministerial Council initiate:

- A review of cost recovery for environmental and efficiency schemes to implement more equitable cost recovery arrangements, including removing exemptions for large-users and transmission connected entities and/or removing some or all costs from bills, and recovering them from Government budgets; and
- A review of the cost recovery arrangements for large transmission investments and Renewable Energy Zone infrastructure and implementing more equitable cost-recovery shares ensuring all beneficiaries (including generators and large transmission-connected users) are contributing fairly to the associated costs.

## **3. Reform of the DMO**

Our organisations have consistently identified the need for more robust, widely applied and effective default pricing protections. Key to a more effective protection is a grounding in 'efficiency' and a robust link to the fundamental elements of the National Energy Objectives. This would help ensure retail market incentives are better aligned with consumer expectations and preferences. Much has changed since the DMO was initiated and experience of its application calls into question whether its initial purpose is still the right one to advance the consumer

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<sup>8</sup> Victorian Essential Services Commission, 2025, [Victorian Default Offer Price Review 2025-26](#)

interest. In our assessment the DMO is not fit-for-purpose and requires a more substantial re-examination than has been undertaken to date. Our assessment is based on an assessment that:

- Current circumstances in the energy market see consumers facing significant and sustained high retail energy bills in addition to wider cost of living pressures placing stress on households. It is in the consumer interest for default protections to ensure they pay no more than necessary for essential energy services, regardless of their capacity to navigate the market.
- People likely to be impacted by structural disadvantage including First Nations, women, young people, people with disabilities, people experiencing mental health issues, people experiencing family and domestic violence, people on low-incomes, and renters are also most likely to be consumers experiencing or at risk of energy debt and disconnection.<sup>9</sup> These cohorts represent a significant proportion of consumers who should not be intentionally disadvantaged due to poorly formulated or inconsistently applied pricing protections.
- Experience over recent years has demonstrated that the energy system transition will not be smooth. It is likely to involve significant shocks, particularly in the short-medium term, that impact energy costs for consumers. This includes the likelihood of including increasing network costs. More robust default price protections help mitigate the impact of shocks and ensure the retail energy market is delivering outcomes which are as efficient as possible.
- In a recent NSW survey of people on low incomes<sup>10</sup>, 50% of respondents reported they could not pay utility bills on time. 74% of respondents reported going without health and wellbeing essentials. For some people this included taking drastic measures like not eating dinner 4-5 nights a week, not having visitors or going out with friends, and going without food or medicine to afford their bills.

This sacrificing of health and wellbeing essentials was similarly reflected in The JEC's Powerless report.<sup>11</sup> These findings are also reflected in the QCOSS Living Affordability in QLD 2024 report<sup>12</sup> and ACOSS Heat in Homes Survey 2025.<sup>13</sup> This consistent evidence of consumer harm must be taken as context for what role retail market engagement can be assumed to play in delivering good outcomes for consumers. Crucially, consumers should not be condemned to higher energy costs simply because they cannot navigate the energy market amidst the other stresses they face. More efficient and widely applied defaults have a crucial role to play.

- Some people are turning to credit products such as Buy Now Pay Later and payday loans to pay for energy bills, further increasing their costs of energy.<sup>14</sup>

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<sup>9</sup> The Justice and Equity Centre, 2024, [Powerless: Debt and Disconnection](#).

<sup>10</sup> NSW Council of Social Service (NCOSS), 2024, [Impossible choices: Decisions NSW communities shouldn't have to make](#).

<sup>11</sup> The Justice and Equity Centre, 2024, [Powerless: Debt and Disconnection](#).

<sup>12</sup> QCOSS, 2024, [Report: Living Affordability in Queensland 2024](#)

<sup>13</sup> ACOSS, 2025, [Heat in Homes Survey Report 2025](#)

<sup>14</sup> See: The Justice and Equity Centre, 2024, [Powerless: Debt and Disconnection](#), pp. 49-50 and NSW Council of Social Service (NCOSS), 2024, [Impossible choices: Decisions NSW communities shouldn't have to make](#), pp.46-49

- While complaints to EWON have decreased for the first time in over a year, complaint numbers remain high with the majority of complaints being about high electricity bills.<sup>15</sup>
- The fundamental assumption underpinning the current DMO, that consumers can ‘shop around’ for more efficient, ‘fair’ retail offers is no longer reasonable advice (if it ever was). Increasingly market offers are priced at or above the level of a DMO which is itself, already intentionally set above the efficient cost to serve. There is also significant evidence that retail practices make identifying and accessing better offers difficult or even impossible for many consumers<sup>16</sup>.
- Through ‘Towards Energy Equity’, ‘Gamechanger’ and in the most recent State of the Market 2023 report, the AER has recognised that existing energy market arrangements fail to adequately support consumers experiencing disadvantage and are contributing to increased consumer vulnerability:

“For a range of reasons, many consumers face barriers to actively participate in the market and secure the best offer for their situation. This can exacerbate existing structural inequalities, whereby those who can least afford it are paying higher energy rates.”<sup>17</sup>

The ACCC has identified the need to review the DMO, flagging that,

“As the market continues to evolve, market bodies and state and federal governments should ensure that our regulatory framework remains effective in supporting meaningful consumer engagement and providing the necessary levels of consumer protection...”<sup>18</sup>

The ACCC suggested that the Review of the Retail Electricity Code that was previously scheduled to commence in November 2024 would be one appropriate avenue through which to review the DMO.<sup>19</sup> While our organisations would welcome the opportunity to be involved in the consultation for that Review, it necessary to ensure it is sufficiently broad in scope and able to consider what role default pricing should play as a fundamental consumer protection, as well as what objectives it should have and how it should best be formulated and applied. We encourage the AER to highlight the value and appropriateness of such a review to Energy Ministers concerned about the focus on affordability in the DMO.

We note the ongoing consultation on the package of retail Rule Change Proposals submitted to the AEMC by the Minister for Climate Change and Energy.<sup>20</sup> These reforms are complementary solutions to some of the issues we have highlighted, but they are not an alternative to review and reform of the DMO. Indeed, some changes (such as the proposal for customers to be no worse off than the standing offer after their ‘benefit’ periods end) rely upon a reformed DMO in order to deliver fully on their intent.

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<sup>15</sup> Energy and Water Ombudsman NSW, 2025, [EWON Insights Oct-Dec 2024](#)

<sup>16</sup> CHOICE, 2024, <https://www.choice.com.au/shopping/shopping-for-services/utilities/articles/confusing-energy-pricing-tactics>

<sup>17</sup> Australian Energy Regulator (AER), 2023, [State of the energy market 2023](#), p.248.

<sup>18</sup> ACCC, 2023, [Inquiry into the National Energy Market: December 2023](#), p. 72.

<sup>19</sup> Ibid, p.75.

<sup>20</sup> See the [package of seven retail rule change requests](#) proposed by the Energy and Climate Change Ministerial Council to the AEMC in 2024.

We recommend a re-evaluation of the DMO with the scope to consider a range of issues related to consumer protection and effective operation of the retail market, including:

- The role of robust, efficient default price protection in alleviating consumer vulnerability (both actual and potential) resulting from interaction with an essential service (energy).
- The circumstances where default price protection should apply to ensure consumers are protected by a fair/efficient default in all circumstances where they have not explicitly consented to retail offer conditions.
- How consumer preferences regarding 'postage stamp pricing' (consistently revealed in distribution network consumer engagement) can be reflected in the structure of default pricing protections. For instance, considering how daily charges and usage charges for similar consumers in similar conditions may also be regulated in conjunction with (or as an alternative to) a retail price cap.
- How environmental costs can be removed from the cost stack of bills and instead recovered through government revenue and taxation to ensure vulnerable consumers are not carrying a disproportionate cost burden of transition costs.
- The role of a reformed DMO as part of the introduction of an obligation on retailers to offer a flat-price option to consumers. That is, that a DMO could become the regulated flat-price offer required to be offered by retailers.
- The role of efficient, widely applied default pricing in incentivising retailers to understand consumer preferences and create genuine choice of alternative market products that are able to demonstrate value to consumers. That is, that a robust DMO could provide incentive for 'positive choice' and 'engagement' by consumers, rather than relying on consumer loss-aversion.
- The role of network tariff reform and cost-reflective network tariffs in enabling opportunities for retailers to offer a genuine range of product choice to consumers, rather than simply passing complex cost signals through to consumers.
- How our changing energy system is providing more meaningful opportunity for retail competition than retail allowance in the DMO. Retailers are increasingly able to innovate offers that meet consumer needs and preferences including opt-in time-of-use tariffs, solar-soakers, EV tariffs, bundling with renewable asset purchases and other green energy products.

While we understand these issues sit outside the remit of this process, we recommend the AER support the case for a review which encompasses consideration of them.

## **4. Continued engagement**

Our organisations would welcome the opportunity to further discuss these matters with the AER and other relevant stakeholders. Please contact [awest@jec.org.au](mailto:awest@jec.org.au) to arrange any follow-up.

## 5. Appendix

The JEC (previously the Public Interest Advocacy Centre), QCOSS, SACOSS and ACOSS have been consumer stakeholders in DMO engagement processes since its inception. The below list of resources provides further background into our long-held and evolving positions on the DMO as an enduring consumer advocate on DMO policy.

### DMO 7

- [JEC, ACOSS and SACOSS Joint Submission to DMO 7 Issues Paper](#)
- [SACOSS Submission to DMO 7 Issues Paper](#)

### DMO 6

- [JEC, ACOSS and SACOSS Joint Submission to DMO 6 Draft Determination](#)
- [JEC and SACOSS Joint Submission to DMO 6 Net System Load Profile Approach](#)
- [JEC, ACOSS and SACOSS Joint Submission to DMO 6 Issues Paper](#)

### DMO 5

- [JEC Submission to DMO 5 Draft Determination](#)
- [SACOSS Submission to DMO 5 Draft Determination](#)
- [JEC Submission to DMO 5 Issues Paper](#)
- [SACOSS Submission to DMO 5 Issues Paper](#)

### DMO 4

- [JEC Submission to AER Options Paper: Methodology for DMO 4](#)

### DMO 3

- [JEC Submission to AER Position Paper DMO 3](#)

### DMO 2

- [JEC Submission to DMO 2 Draft Determination](#)
- [QCOSS Submission to DMO 2 Draft Determination](#)
  - [QCOSS \(Etrog consulting\) DMO 2 Draft Determination](#)
- [JEC Submission to DMO 2 Position Paper on DMO 2 price setting](#)

### DMO 1

- [JEC Submission to DMO 1 Draft Determination](#)
- [JEC submission to AER Position Paper on developing a DMO for the electricity retail sector](#)
- [QCOSS submission to AER DMO Position Paper](#)
- [ACOSS Submission to AER on DMO](#)