

30 April 2010

Mr Tom Leuner  
General Manager  
Markets Branch  
Australian Energy Regulator  
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positive energy

Dear Mr Leuner

**Re: Issues Paper: Retail Pricing Information Guideline**

ENERGEX Limited (ENERGEX) welcomes the opportunity to respond to the AER's *Issues Paper – AER Retail Pricing Information Guidelines* (Issues Paper) released as part of the AER's preliminary consultation process in the lead up to the introduction of the National Energy Customer Framework (NECF).

ENERGEX's notes that electricity retail pricing is likely to become more complicated as the sophistication of retail competition develops and dual/multi-rate domestic retail tariffs are introduced more widely. As such, presentation of standardised prices will become more difficult and subject to an increasing number of assumptions about the characteristics of the 'average' consumer. ENERGEX considers that development of standardised pricing comparators should not undermine price signals disseminated by network businesses. Network pricing signals should be transparent and passed through to the customer so that they can make informed decisions about their energy usage. ENERGEX is conscious of the need to ensure clear integration and coordination of the network and retail components of electricity prices.

ENERGEX also considers that:

- Standardised pricing will only be successful to the extent that non-price incentives offered by retailers (e.g. free magazine subscriptions) can be valued and incorporated into comparisons; and
- A retail price comparison 'calculator' might be a useful complementary tool for electricity customers seeking to compare bills for their particular circumstances at a "one-stop-shop". This would empower customers facing sophisticated retail pricing structures into the future. Such a feature might be maintained on the AER's website and referred to on retail businesses' pricing webpages.

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ENERGEX looks forward to further participating in future consultations around the development of the AER's Retail Pricing Information Guideline, however, in the meantime should you have any questions regarding this submission, please do not hesitate to contact Mick Ryan Regulation Manager, Operations on (07) 3223 1788.

Yours sincerely

A handwritten signature in blue ink that reads "Kevin Kehl". The signature is written in a cursive style with a blue color.

Kevin Kehl  
Executive General Manager Strategy & Regulation