



Ms Sarah Proudfoot  
General Manager – Retail Markets Branch  
Australian Energy Regulator  
GPO BOX 520  
Melbourne VIC 3001

**RE: Comments in relation to AER Retail Pricing Information Guidelines – Version 5**

Thank you for providing Pooled Energy with the opportunity to respond to the changes made to Version 5 of the AER Retail Pricing Information Guidelines. We note the amendments within the Guidelines is aimed to provide more clarity to customers to meaningfully understand and compare different plans.

There are a number of significant changes to Version 5, however the key concerns we have around these changes can be summarised in the following two amendments:

- Replacing the requirement for retailers to provide an Energy Price Fact Sheet with a requirement that each energy plan have two separate documents – the Basic Plan Information document and the Contract Summary; and
- Making all documents in a format, and include information determined by the AER, which will be automatically generated through the Energy Made Easy website. Retailers will no longer be permitted to develop their own documents.

As you are aware, Pooled Energy is a “bundle offer only” energy retailer. This means that we sell exclusively to swimming pool owners and operators, providing them with an integrated solution of advanced pool automation services and electricity. We are a company which is 100% Australian owned, based and operated and our solution to provide energy efficiencies to our customers has significant global potential.

With the new plan documents, Pooled Energy is unable to provide relevant information to the customer given that a majority of our key pricing structure is bundled across both our electricity and pool services together. Whilst the intent of the Guidelines was to provide more clarity of information to the customer, this cannot be achieved and does in fact do the opposite and limits the customer to making an inform decision about Pooled Energy’s energy retail services compared to another energy retailer. This in turn counteracts transparency to the customer which is the fundamental reason why we have the Energy Made Easy website and the AER Retail Pricing Guidelines in the first instance.

Whilst the intent of Version 5 was to make it easier for customers to understand and compare key features of an energy plan, we believe that the Guidelines constricts innovative energy retailers such as Pooled Energy who have differentiated our energy retail services to the customer who may not be able to be compared “like for like” with a traditional energy retailer.

A key driver of why Pooled Energy was established is to provide permanent energy efficiencies to Australian swimming pool owners as well as significant controllable consumption options to the grid. Houses with swimming pools represent a substantial proportion of residential electrical energy consumption. We are reliant on an energy grid under significant stress and we believe in the



government needs to provide appropriate provisions and pathways in place for more companies such as Pooled Energy to enter and remain competitive in the energy retail market whilst promoting energy efficiency and consumption flexibility as well as other energy related services in Australia.

In tabular format, please see Pooled Energy response to each of the core proposed requirements that you have made in Version 5 of the AER Retail Pricing Guidelines.

### Pooled Energy response to the key changes

Proposed Requirement	PE Response
<p>Replacement of the Energy Pricing Fact Sheet (EPFS) with a requirement that retailers provide two separate documents:</p> <p><b>1. Basic Plan Information (BPI) document:</b> <i>A single page document that includes key plan information most relevant to a customer's assessing a plan's suitability.</i></p> <p><b>2. A Contract Summary:</b> <i>Include more detailed information about fees, prices, contract details and eligibility criteria for an energy plan</i></p>	<p>Pooled Energy offers a bundle offer only (we only sell electricity to swimming pool owners). The Energy Made Easy (EME) <b><i>Retailer site offer fields and validation criteria</i></b> document currently does not have a clear provision on where we can adequately capture information so as both the BPI document and the CS reflect our product offering accurately.</p>
<p>The draft guidelines will propose information a BPI must contain, including a comparison pricing estimate, key facts and features about the plan and tariff information</p>	<p>The draft guidelines restricts energy retailers such as Pooled Energy whereby our product offerings may be different given we only offer bundle only plans.</p> <p>Given that a number of our fees and charges are pegged to our pool services and not as Pooled Energy being an energy retailer, we need clear provision and guidance on the appropriate amount of information reflected within the EME and the BPI document/CS to ensure that customers have an appropriate amount of information to make an informed decision to choose us as their energy retailer. At the moment the draft guidelines have no provision/guidance for this.</p> <p>Pooled Energy has met with the AER in during a 1:1 stakeholder meeting in February 2018 in regards to changes in the AER Retail Pricing Guidelines. It was agreed during the meeting that AER will provide a response to Pooled Energy in relation to the above concerns.</p>

Proposed Requirement	PE Response
<p>Inclusion of a "comparison pricing table" for each individual plan with the BPI document.</p> <p>Comparison pricing table includes:</p> <ul style="list-style-type: none"> <li>• Estimated average household consumption based on the number of people within a household</li> <li>• Two basis estimates for estimate quarterly bill (Base Price / With all discounts)</li> </ul>	<p>Is the comparison pricing table aligned to the new recently amended Bill benchmarking guidelines? Does it include the ability to include tailored benchmarking? (I.e. benchmarking of average household consumption patterns based on having a pool, underfloor heating, etc.). Otherwise our customer bills and our BPID will reflect different comparison pricing tables.</p> <p>Given that Pooled Energy does not offer discounts (rather we offer a permanent reduction of energy consumption for our customers), we are not sure how the &lt;Estimated Quarterly Bill columns&gt; will look like.</p>
<p>Inclusion of key facts, features and GST inclusive pricing information</p>	<p>How is this information captured given that different energy retailers would have different information to be input into these fields?</p>
<p>Contract Summary information</p>	<p>How is the information held within the contract summary captured? Is this manually inputted on the EME secured end of the website?</p> <p>Whilst the current EPFS captured our electricity pricing information, we also include our bundle service offering on the EPFS. Given that the CS is now automatically generated from the EME, we are unable to provide the appropriate amount of information required on our contract summary so as the customer can make an informed decision to choose us given a substantial portion of our fees and charges are pegged to our pool services and not purely the electricity side.</p>
<p>Standing Offers - Proposed change to the draft guidelines is to categorised standing offer plans that are published solely to meet a retailer's obligation as the FRMP as a restricted plan</p>	<p>Pooled Energy does not offer any generally available plans, rather we only offer restricted plans to those customers who own swimming pools. Can you please provide clarity as to whether or not we are required to publish standing offers onto the EME to meet our obligations as the FRMP given that we do not have any generally available plans?</p>



We fully support the direction of the AER in maximising transparency for consumers but feel strongly that the proposed approach is perhaps inadvertently structured to favour energy retailers who offer a commodity product with discounts and will significantly disadvantage innovative energy retailers and discourage new energy market entrants with innovative solutions. We hope that you will consider our concerns and look at alternative approaches which will satisfy your goals.

Should you have any questions about our comments above or would like to discuss our concerns further, please contact me or our Head of Electricity Retailing Peter Meywes or Christina Barlow who leads our Regulatory team.

Peters' email address is [petermeywes@pooledenergy.com](mailto:petermeywes@pooledenergy.com)

Christina's email address is [christinabarlow@pooledenergy.com](mailto:christinabarlow@pooledenergy.com).

Kind Regards

A handwritten signature in black ink, appearing to read 'Greg Irving', written over the 'Kind Regards' text.

**Greg Irving**  
Vice Chairman & CoFounder Pooled Energy



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