Consultation paper:

Delivering more protections for energy consumers: changes to retail energy contracts

stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

**To submit this form,** [**follow this link**](https://www.aemc.gov.au/contact-us/lodge-submission)**, and select the project reference code RRC0058.**

SUBMITTER DETAILS

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| **ORGANISATION:** |       |
| **CONTACT NAME:** |       |
| **EMAIL:** |       |
| **PHONE:** |       |
| **DATE** |       |

project DETAILS

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| **NAME OF RULE CHANGE:** | ECMC Consumer rule change requests x 4* Ensuring energy plan benefits last the length of the contract (RRC0061)
* Removing unreasonable conditional discounts (RRC0065)
* Preventing price increases for a fixed period under market retail (RRC0058)
* Removing fees and charges (RRC0059)
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| **PROJECT CODE:** | RRC0058 |
| **PROPONENT:** | The Hon Chris Bowen MP, Minister for Climate Change and Energy, as Chair of the Energy and Climate Change Ministerial Council |
| **SUBMISSION DUE DATE:** | January 16, 2025 |

**CHAPTER 1** – Context for these rule changes

**Question 1: What are the interactions between the four rule change requests that we should consider?**

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| What are the interactions between the four rule change requests that we should consider? |       |

**CHAPTER 2** – MAKING OUR DECISION

**Question 2: Assessment framework**

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| * Do you agree with the proposed assessment criteria?
* Are there additional criteria that the Commission should consider or criteria included here that are not relevant?
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**CHAPTER 3** –Ensuring energy plan benefits last the length of the

contract

**Question 3: Ensuring energy plan benefits last the length of the contract**

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| 1. How material do you consider the proposed issue to be?
* Do you have any information you can provide us on how many consumers are on contracts with expired or expiring benefit periods?
* How many of these consumers are vulnerable or receiving concessions?
* Are there differences in the extent or nature of the problem between retail electricity and gas contracts?
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| 1. Will the proposed solution address the issue raised in the rule change request?
* Does the proposed solution address issues of consent by including a standard term for end of contract arrangements?
* Is there an alternative solution that would better address the underlying issues?
* What transitional provisions would help retailers implement this rule at least cost?
* Are there any other considerations we should assess in the rule change
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| 1. Would this proposed rule change impact the variety of tariff structures available in the retail market?
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| 1. Is there any information we should consider based on the experience of the similar rule in Victoria?
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**CHAPTER 4** – Removing unreasonable conditional discounts

**Question 4: Removing unreasonable conditional discounts**

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| 1. What is the materiality of the problem raised in the rule change request?
* Do you have any information you can provide about the impact of large conditional fees and discounts on vulnerable customers?
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| 1. Will the proposed solution address the issue raised in the rule change request?
* Is there any information we should consider based on the application of the current rules relating to conditional discounting?
* Are there alternative options we should consider to best achieve the long-term interests of energy consumers.?
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| 1. What would be the cost of the proposed solution, if implemented, to both consumers and retailers?
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| 1. Are there any issues with implementation we need to consider?
* What transitional provisions could address those issues?
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**CHAPTER 5** – Preventing price increases for a fixed period under

market retail contracts

**Question 5: Preventing price increases for a fixed period**

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| 1. What is the materiality of the problem raised in the rule change request?
* Do you have any data on how often retail energy prices change per year?
* Do electricity and gas consumers experience the same issues?
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| 1. Which of the proposed solutions would best address the issue raised in the rule change request? Are there other options we should consider?
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| 1. What are the costs and benefits of each approach?
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| 1. What are your views on the appropriate fixed period for prices (if any)?
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| 1. Are there any implementation issues we need to consider?
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**CHAPTER 6** – Removing fees and charges

**Question 6: Removing fees and charges**

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| 1. What is the materiality of the problem in this rule change request?
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| 1. Will the proposed solution address the issues raised in the rule change request?
* Are there any alternative solutions we should consider?
* Is a rule change the best approach to solving this problem? If not, what approach would be better?
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| 1. What fees and charges should be prohibited in the NERR, if any?
* What are the benefits of removing these fees and charges?
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| 1. Will a change to the NERR (in lieu of jurisdictional derogations) help provide consistency for retailers?
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| 1. Besides existing jurisdictional derogations, are there any other implementation issues we should consider (eg, timing, costs)?
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**OTHER COMMENTS**

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| 1. Information on additional issues
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