Consultation paper:

Improving the ability to switch to a better offer

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 RRC0062.**

SUBMITTER DETAILS

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

project DETAILS

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| **NAME OF RULE CHANGE:** | Improving the ability to switch to a better offer |
| **PROJECT CODE:** | RRC0062 |
| **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:** | 6 March 2025 |

**CHAPTER 2** – The problem raised in the rule change request

**Question 1: Do stakeholders agree that transaction costs area barrier to customer switching?**

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| * Are transaction costs a key barrier to customers switching to a better offer?
* What other factors do stakeholders consider influence customer switching?
* Have stakeholders observed higher rates of switching since the implementation of the Better Bills Guideline?
* How material is the issue identified in the proposal?
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**CHAPTER 3** – The proposed solution and implementation

**Question 2: Do stakeholders agree with the potential benefits identified in the proposal?**

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| * Do stakeholders have any feedback on the potential magnitude of any benefits this could manifest?
* Do you expect this will result in consumers facing lower bills?
* Are there other potential benefits that we have not considered?
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**Question 3: What are the costs associated with providing a streamlined switching process?**

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| * What are the upfront implementation costs?
* What do you consider the magnitude of the costs imposed on retailers will be?
* Do you consider there will be any ongoing costs associated with this rule change?
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**Question 4:What are stakeholders’ views on the best way to implement an improved approach to switching?**

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| * Should specific processes be prescribed or a principles-based approach taken?
* What could a principles-based approach look like?
* What opportunities for streamlining have you identified?
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**Question 5: Do stakeholders consider there is merit to the proposed alternative?**

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| * Would providing streamlined “like-for-like” switching result in greater improvements to switching rates?
* How material are the additional costs this would impose on retailers?
* If there is merit to this, do stakeholders have views on how this additional mechanism could work?
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**CHAPTER 4** –Making our decision

**Question 6: 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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