

## Appendix C Format for submissions

<b>Submitter</b>	Peter Crosland
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*All questions are optional. Please answer as many or as few as you wish. Thank you.*

Questions	Comments
<b>Proposal A – Standardise billing information</b>	
Q1. Should minimum billing standards be compulsory or voluntary??	Compulsory
Q2. Would the Authority providing a model bill and guidelines reduce your implementation costs and the time needed to implement these changes?	
Q3. Tiered layout – Do you support adopting a two-tiered approach to information on bills? If not, how should critical and important information be distinguished?	
Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?	YES I support this
Q5. Implementation – For retailers, how much time would be needed for your organisation to incorporate this content across all billing channels? What challenges or dependencies (e.g. data collection, data standards, IT systems or staff training) need to be factored into timing?	YES I support this
Q6. Future-proofing – What mechanisms would best ensure these standards to evolve with	YES I support this

new technologies, plans and AI-enabled billing in future?	
<b>Proposal B – Introduce better plan</b>	
Q7. Do you agree with the proposed better plan review mechanism?	YES I support this
Q8. Is six months the right frequency for a better plan review?	YES I support this
Q9. Is three months an appropriate time frame for time-of-use trials? If not, what period would you suggest?	YES I support this
Q10. Do you have any feedback on the risk-free time of use proposal, requirement to inform customers whether they are saving on a time-of-use plan and type of guidance given on how to shift consumption?	
Q11. Do you support prohibiting termination fees when switching between plans with the same retailer?	YES I support this
Q12. For retailers, what costs do you anticipate in implementing this change and what implementation support would reduce such costs?	
Q13. Do you agree with our proposed transitional arrangements? If not, how would you change them?	
<b>Proposal C – Encourage consumers to compare plans across all retailers and switch where it will save them money</b>	

Q14. Do you agree with the proposed wording of the prompt?	
Q15. For retailers, what lead-in period would you need to implement this prompt across all channels?	
Q16. Do you agree that each retailer should be required to maintain a catalogue to allow customers to compare their full range of plans and costs?	
Q17. For retailers, do you already have a catalogue in which you show your current and any prospective customers your generally available plans and tariffs? If not, why not?	
Q18. Do you agree that the annual check-in should also include telling customers about the retailer's channels for comparing and accessing better plans?	
Q19. Do you agree that retailers should offer information about better plans whenever a customer contacts them about their bill or plan, not only when the customer explicitly asks to change plans?	
<b>Proposal D – Limit back-billing to protect residential and small business consumers from bill shock</b>	
Q20. Do you agree with this proposal to limit back-billing with justifiable exceptions?	
Q21. Is a six-month cap reasonable?	
Q22. Do you agree that customer	

should be allowed to pay back bills in instalments matching the period of the back bills? If not, what alternative do you propose?	
Q23. What additional proactive measures (beyond those listed) would best prevent back bills from accruing?	
Q24. For retailers, taking into account any operational requirements, is the proposed transition period sufficient to implement these obligations?	
<b>Next steps and proposed implementation</b>	
Q25. Are these the right outcome measures to track success?	
Q26. Do you agree with these implementation principles?	
Q27. How could we best support smaller retailers during the transition?	
Q28. Are there other interdependencies we should factor into the timetable?	
Q29. Do you agree with our preferred timing?	
Q30. If you prefer option 3, which elements should be delayed to 2027?	
Q31. How much lead time do you need to implement these proposals, should they proceed?	
<b>Regulatory statement for the proposed amendment</b>	
Q32. Do you agree with the objectives of the proposed	

amendment?	
Q33. Do you agree that the benefits of the proposed Code amendment outweigh its costs?	
Q34. Do you have any feedback on these criteria for weighing options?	
Q35. Do you agree with our assessment of the four options presented?	
Q36. Do you agree with our proposal to introduce mandatory billing improvements, rather than voluntary guidelines?	
Q37. Which elements of standardisation (if any) could remain voluntary without undermining consumer outcomes?	
Q38. Do you agree with our proposed approach regarding small businesses?	
Q39. Do you agree with our assessment on alternatives to proposal B?	
Q40. Do you agree with our assessment on alternatives to proposal C?	
Q41. Do you agree with our assessment on alternatives to proposal D?	
Q42. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity	

Industry Act 2010.	
Q43. Do you agree the proposals are overall better than the alternative considered? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	
<b>Proposed Code amendment</b>	
Q44. Do you have any comments on the drafting of the proposed amendment?	
Q45. Do you have any comments on the transitional provisions?	
Q46. Do you have any other feedback on this consultation paper or proposed Code amendment?	