

Appendix C Format for submissions

Submitter	Toast Electric – Sustainability Trust
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All questions are optional. Please answer as many or as few as you wish. Thank you.

Questions	Comments
Proposal A – Standardise billing information	
Q1. Should minimum billing standards be compulsory or voluntary??	We think they should be compulsory to ensure all participants are competing on an even playing field.
Q2. Would the Authority providing a model bill and guidelines reduce your implementation costs and the time needed to implement these changes?	Yes, would like to see a model bill to determine scale of upgrades and data requirements needed.
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?	Yes. We support a 2-tiered approach. Again this supports standardisation and ease of comparison.
Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?	We fully support all the proposed requirements. In addition any incentives that have been offered and their value (such as free TV's etc and/or bundling discounts) should be listed on Tier 2. This enables customers to equate say higher elec costs with value provided in other areas.
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?	We estimate up to 6 months for Toast and our billing software provider to implement any changes.

Q6. Future-proofing – What mechanisms would best ensure these standards to evolve with new technologies, plans and AI-enabled billing in future?	
Proposal B – Introduce better plan	
Q7. Do you agree with the proposed better plan review mechanism?	<p>We are broadly supportive of the proposal, but raise some considerations:</p> <ul style="list-style-type: none"> - Low User/Standard User plans (whether required by regulation or offered voluntarily by a retailer) are usually calculated based on a 12-month usage estimate. We would want to reserve the right to only switch between low and standard user once/year. - The implementation and ongoing costs to analyse and present quantitative and qualitative data to enable a robust recommendation, as well as increased plan churn costs may be substantial. As a small retailer our ability to absorb these costs is limited and may present a barrier to our competitiveness if we need to raise prices across a smaller customer base to retain margins.
Q8. Is six months the right frequency for a better plan review?	Yes – noting that information from six months of usage over a summer season may not enable forecasting of customer’s winter heating habits.
Q9. Is three months an appropriate time frame for time-of-use trials? If not, what period would you suggest?	Yes. However, we’re unclear on how this proposal differs from the 6-month review and proposal to allow customers to change price plans for no cost. Existing customers may proactively change to a ToU (e.g. after 4 months with Toast) and then receive a 6-month review recommendation that will use their last 6 months’ data to confirm/recommend a change, to their current plan. We are concerned that fulfilling both proposals may result in multiple and possibly conflicting recommendations (esp if the differences between flat and ToU plans are small).
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, we support this provision
Q12. For retailers, what costs do you anticipate in implementing this change and what implementation support would reduce such costs?	Toast does not have any termination fees currently so do not expect any impact from this proposal.
Q13. Do you agree with our proposed transitional arrangements? If not, how would you change them?	
Proposal C – Encourage consumers to compare plans across all retailers and switch where it will save them money	
Q14. Do you agree with the proposed wording of the prompt?	<p>We partially agree. The wording “on another plan/compare plans..” effectively means “with another retailer/compare retailers” as the 3/6 month comms with a retailers existing customers will highlight if there is a better <u>plan</u> with their current retailer.</p> <p>We’d rather see straight-up wording that reflects the intent of the proposal.</p>
Q15. For retailers, what lead-in period would you need to implement this prompt across all channels?	Six months
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?	Yes
Q17. For retailers, do you already have a catalogue in which you show your current and any	Yes, we have all available tariffs shown on our website. The actual meter setup at a customer’s ICP will govern the immediately available plan (e.g. we

prospective customers your generally available plans and tariffs? If not, why not?	offer a Day/Night tariff, but the meter would need to be either currently on that setting or able to toggled to a Day/Night) In addition the customer would need to be willing to pay the costs of the tariff change – in some cases a technician visit would be required for non-communicating meters which would incur a charge of around \$150. So we would want to include any conditions/barriers to switching to those tariffs.
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?	Yes
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?	Yes, we think that's a reasonable expectation, as long as we have the tools and capacity to efficiently compare say flat rate and ToU options. Doing this on the fly, will require some IT upgrades to enable timely,real-time advice to be provided.
Proposal D – Limit back-billing to protect residential and small business consumers from bill shock	
Q20. Do you agree with this proposal to limit back-billing with justifiable exceptions?	Yes
Q21. Is a six-month cap reasonable?	Yes
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?	Yes or possibly a longer 12-month period depending on the ability of the customer to cover the back bill and ongoing elec costs.
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	Yes

transition period sufficient to implement these obligations?	
Next steps and proposed implementation	
Q25. Are these the right outcome measures to track success?	
Q26. Do you agree with these implementation principles?	Yes
Q27. How could we best support smaller retailers during the transition?	As a small retailer with a smaller customer base, the staff and IT costs associated with the changes are proportionally high compared to larger retailers. With much of our focus on providing lower cost power and wrap around services to our more vulnerable customers, any higher costs impact our services. We would appreciate a discussion on financial or in-kind support to enable us to remain compliant and maintain our levels of support for our lower-income customers.
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?	
Regulatory statement for the proposed amendment	
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.	
Proposed Code amendment	
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?	