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National Customer Code Energy Comparators & Energy Moving Services

The Public Interest Advocacy Centre (PIAC) welcomes the opportunity to respond to the National Customer Code Energy Comparators and Energy Moving Services (the Draft Code).

PIAC supports energy comparators and moving services meeting consistent standards to improve consumer protection and consumer outcomes. Accordingly, comparator and moving services should be subject to a mandatory code as outlined in recommendation 34 of the Australian Competition and Consumer Commission (ACCC) Retail Electricity Pricing Inquiry Final Report.

The Draft Code is a welcome recognition that comparator and moving services should be provided according to principles and standards equivalent to those governing the provision of energy services themselves. The Draft Code is a positive step towards an effective mandatory code as recommended by the ACCC.

PIAC supports the Draft Code reflecting the principles, structure, and intent of the Energy Comparator Code of Conduct 2015 (ECCC). The ECCC was developed collaboratively with industry and key consumer stakeholders and was robust, clear, and concise.

PIAC broadly supports customer centricity, accountability, transparency and disclosure, and fairness and consistency as the appropriate focus for the Draft Code. However, we note that these are not stated as clearly as in the ECCC. The structure of the ECCC provided a simpler statement of commitments relevant to better consumer outcomes. It also provided a clearer connection between these commitments and practical aspects understandable to consumers and the community. This clarity is an important foundation for effective monitoring and auditing.

Further refinement of the Draft Code should seek to simplify the commitments, format, and language to improve clarity for consumers, and make it easier to monitor compliance by signatories. These changes will ensure the Draft Code is more aligned with the requirements of an effective mandatory code.

PIAC welcomes the opportunity to discuss these matters further with the Energy Charter signatories and other stakeholders.

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