

# **SEQ retail electricity market monitoring 2024-25**

**Report**

**December 2025**



We wish to acknowledge the contribution of the following staff to this report:

Thomas Höppli, Karan Bhogale, Adam Liddy, Mark Kelso and Tom Gardiner

The QCA may have utilised generative artificial intelligence tools to assist in the preparation of this report, including summarising material, processing data, drafting sections of text and identifying analytical themes. The QCA's use of these tools is subject to internal governance controls to ensure compliance with record-keeping, confidentiality and data integrity requirements. All AI-assisted outputs are reviewed, verified and, where necessary, amended by the QCA's officers. The QCA retains sole responsibility for the accuracy, reasoning and conclusions set out in this report.

**© Queensland Competition Authority 2025**

The Queensland Competition Authority supports and encourages the dissemination and exchange of information. However, copyright protects this document. The QCA has no objection to this material being reproduced, made available online or electronically, but only if the QCA is recognised as the owner of the copyright and this material remains unaltered.

# Contents

---

<b>EXECUTIVE SUMMARY</b>	<b>1</b>
<b>1 INTRODUCTION</b>	<b>3</b>
1.1 Market monitoring	3
1.2 Standing and market offers	3
1.3 Energy Made Easy	4
1.4 Retailers operating in SEQ	4
1.5 Scope of the report	5
1.6 Advice for customers	6
<b>2 ANNUAL BILLS</b>	<b>7</b>
2.1 QCA methodology	7
2.2 Residential flat rate offers	9
2.3 Residential flat rate offers with controlled load super economy	10
2.4 Residential flat rate offers with controlled load economy	12
2.5 Small business flat rate offers	14
2.6 Small business time-of-use offers	16
2.7 General observations	18
2.8 Key considerations for customers	19
<b>3 DISCOUNTS, SAVINGS AND INCENTIVES</b>	<b>21</b>
3.1 QCA methodology	21
3.2 Types of discounts, incentives and conditions	22
3.3 Regulation of discounting	23
3.4 Residential flat rate offers	24
3.5 Small business flat rate offers	32
3.6 Complexity due to discounts and incentives	37
3.7 Key considerations for customers	37
<b>4 FEES AND CHARGES</b>	<b>38</b>
4.1 QCA methodology	38
4.2 Restrictions on fees	39
4.3 Retail fees – residential flat rate offers	41
4.4 Retail fees – small business flat rate offers	45
4.5 Metering charges	49
4.6 Distribution non-network charges	51
4.7 Observations on fees and charges	54
4.8 Key considerations for customers	54
<b>5 BILLS WEIGHTED BY RETAILER MARKET SHARE</b>	<b>55</b>
5.1 QCA methodology	55
5.2 Trends in weighted average residential bills	56
5.3 Trends in weighted average small business bills	57
<b>6 CUSTOMERS RECEIVING ASSISTANCE WITH ELECTRICITY BILLS</b>	<b>58</b>

6.1	Assistance to customers	58
6.2	QCA methodology	59
6.3	AER hardship customer data	60
6.4	Number of assisted customers	61
6.5	Average annual bills of assisted customers	63
6.6	Key considerations for customers	68
<b>7</b>	<b>CUSTOMERS REMAINING ON LEGACY MARKET OFFERS</b>	<b>69</b>
7.1	Legacy market offers	69
7.2	QCA methodology	70
7.3	Customer numbers	71
7.4	Customer bills	73
7.5	Reasons customers remain on legacy offers	77
7.6	Price limitations for plans with expired benefits	78
<b>8</b>	<b>NEW RETAIL TARIFFS AND PLANS</b>	<b>79</b>
8.1	QCA methodology	79
8.2	New retail tariffs and plans in 2024-25	79
8.3	Continued retail tariffs and plans in 2024-25	80
8.4	Barriers to new and innovative offerings	80
8.5	Initiatives to support innovative offerings	82
<b>9</b>	<b>MARKET COMPETITIVENESS</b>	<b>84</b>
9.1	QCA methodology	84
9.2	Extent of market rivalry	85
9.3	Movement of prices and costs	92
9.4	Spread of prices in the market	94
9.5	Inactive or disengaged customers	95
9.6	Complexity of the market	97
	<b>GLOSSARY</b>	<b>99</b>
	<b>REFERENCES</b>	<b>101</b>

# Executive summary

---

## Introduction

We have been monitoring the south-east Queensland (SEQ) retail electricity market for residential and small business customers annually since 2016–17. Our market monitoring reports aim to support the Queensland Government's efforts to make sure customers can benefit from competition in the market. This report covers the period 1 July 2024 to 30 June 2025.

## Annual bills

SEQ customers can choose from a wide variety of retail electricity plans. Plans include supply and usage charges, and often also other charges, guaranteed or conditional discounts, financial incentives, fees and charges. Whether a plan is the cheapest for a customer depends on their consumption and the interaction between the various price components.

Few retailers had market offers in the June quarter of 2025 that were cheaper for the typical SEQ customer than their cheapest plan a year earlier. Residential customers' bills increased between the June quarters of 2024 and 2025 by between 5.6% and 6.2% for average lowest market offers and by between 3.6% and 5.0% for standing offers.<sup>1</sup> Small business flat rate customers' bills increased by 1.5% for lowest market offers and by 2.6% for standing offers. Small business time-of-use customers' bills decreased by 3.6% for lowest market offers and by 2.5% for standing offer. The lowest market offers for most tariffs and tariff combinations had a discount or financial incentive attached.

## Discounts, savings and incentives

As in previous years, discounts or incentives were more commonly offered to residential than to small business customers in 2024–25. Guaranteed discounts continued to be more common than conditional discounts. Sign-up and other credits were still the most common financial incentives, and similar non-financial incentives were offered as a year earlier. But we observed some new incentives, such as a prepaid public electric vehicle charging voucher. Various retailers again offered GreenPower, with options and prices similar to those in 2023–24.

## Fees and charges

Most retailers continued to attach retail fees to at least some of their market offers. The types of fees in 2024–25 were similar to those in previous years and included payment processing fees as well as fees for paper bills, dishonoured or late payments, membership and account establishment. By law, retailers may only charge 3 specific retail fees to standing offer customers in Queensland.

## Bills weighted by retailer market share

We compared and assessed trends in bills for residential and small business customers from 2015–16 to 2024–25, based on annual bills (in nominal dollars) weighted by retailer market share. Weighted average standing offer bills were always higher than weighted average market offer bills. Weighted average bills first increased (2015–16 and 2016–17), then gradually decreased (until 2021–22) and have increased substantially after that (since late 2021–22).

---

<sup>1</sup> We present standing offer and market offer bills for the most common tariffs and tariff combinations, based on the plans available on the price comparator website Energy Made Easy in 2024–25. These bills show what the typical SEQ customer with a median level of consumption would have paid if they had taken up the plans available in 2024–25.

## Customers receiving assistance with electricity bills

In the December quarter of 2024, nearly 393,000 SEQ customers received assistance with their electricity bills in the form of retailer hardship programs, the Queensland Government's electricity rebate and/or the Home Energy Emergency Assistance Scheme. The vast majority of these assisted customers (96.5%) only received the Queensland Government's electricity rebate.

Fewer assisted customers were on a standing offer than a year earlier, while most (93.0%) were on a market offer. But most assisted customers' market offers resulted in higher bills than the lowest market offer their retailer had available, and some were on market offers that resulted in higher bills than the most expensive market offer their retailer had available in the December quarter of 2024.

## Customers remaining on legacy market offers

In the December quarter of 2024, about one-third of residential and one-fifth of small business market offer customers were on a legacy offer.<sup>2</sup> There were close to 27,000 more residential legacy customers and close to 4,000 more small business legacy customers than a year earlier. The number of residential legacy customers on plans resulting in a bill above the default market offer (DMO) bill increased substantially, while the respective increase for small business customers was modest.

Considerably fewer legacy customers were on plans with conditional discounts. Fewer customers were thereby exposed to the risk of paying materially above the DMO when discounts were not realised. While some legacy offers may have attractive features, such as high solar feed-in tariffs, some legacy customers may lower their bills by switching to one of the new offers available.

## New retail tariffs and plans

A few retailers provided new offerings in 2024-25, such as plans with incentives to either use or export renewable energy during certain times. In addition, many retailers continued to provide innovative offerings introduced in previous years, such as plans that combine solar panels and battery storage, electric vehicle plans or plans for virtual power plants.

Some barriers may have continued to limit the development and take-up of new innovative offerings, including gaps in consumer protections, a general preference for simpler plans, a focus on price and costs and the fact that many innovative offerings required customers to have a smart meter, and in some instances also battery storage or an electric vehicle.

## Market competitiveness

The outcomes we observed in the SEQ retail electricity market in 2024-25 reflect the characteristics of a competitive market. We found that retailers continued to compete on price, including through discounts and/or financial incentives, customers switched more between retailers than a year earlier, and market concentration decreased in both the residential and small business markets.

However, some customers – including customers experiencing vulnerability – may find it difficult to navigate the market, compare plans and switch when a better plan becomes available. This suggests that competition might not be working as effectively as it should for all customers.

Active customers are likely to pay less than inactive or disengaged customers. We therefore encourage customers to regularly check whether they can find a better deal on [Energy Made Easy](#). Customers should also check the 'better offer' message on their bill. They can also contact their retailer directly to ask if a better deal is available.

---

<sup>2</sup> We defined legacy market offers (legacy offers) as plans that were not available to new customers in 2024-25 – that is, residential or small business plans that were closed to new customers before 1 July 2024.

# 1 Introduction

## 1.1 Market monitoring

Retail electricity prices for residential and small business customers have been deregulated in south-east Queensland (SEQ) since 1 July 2016. We have been monitoring the operation of the SEQ retail electricity market ever since. This assists the Queensland Government to ensure that electricity customers can benefit from competition in the market.

In June 2021, the then Minister responsible for Energy (the Minister) directed us to monitor and report on the operation of the SEQ retail electricity market for residential and small business customers for each financial year from 1 July 2020 to 30 June 2025.<sup>3</sup> This report covers the period from 1 July 2024 to 30 June 2025.

Electricity customers can be categorised as large or small customers, depending on their annual electricity consumption. Our report focuses on small customers – that is, residential or business customers who consume less than 100 megawatt hours (MWh) per year.<sup>4</sup>

## 1.2 Standing and market offers

Electricity retailers operating in SEQ are required to provide customer retail services to small customers under either:<sup>5</sup>

- standard retail contracts (standing offers) – basic offers with terms and conditions specified in the National Energy Retail Rules (NERR).<sup>6</sup> Since 1 July 2019, retailers have been required to set standing offer prices at or below the default market offer (DMO) prices set by the Australian Energy Regulator (AER) each year<sup>7</sup>
- market retail contracts (market offers) – offers with a minimum set of terms and conditions specified in the NERR that can include other terms and conditions agreed between the retailer and the customer.<sup>8</sup>

In our view, standing and market offers should not be compared solely based on bill estimates (or individual prices of the offers). Other factors may also be relevant. Standing offers typically provide additional benefits and more favourable terms and conditions than market offers. For example, standing offer customers receive access to paper bills at no extra cost, better payment terms (which can include bill smoothing) and ongoing certainty of terms – that is, retailers cannot change terms or impose restrictions as they can under market contracts.<sup>9</sup>

<sup>3</sup> The Minister's letter and direction notice are available on our website at [Market monitoring report 2024-25](#).

<sup>4</sup> National Energy Retail Law (NERL), s 5; National Energy Retail Regulations, s 7. In this report, references to the NERL are also references to the National Energy Retail Law (Queensland) ([NERLQ](#)), which includes Queensland-specific modifications to the NERL.

<sup>5</sup> NERL, s 20.

<sup>6</sup> NERR, rule 12 and sch 1. The NERR govern the sale and supply of energy (electricity and natural gas) from retailers and distributors to customers in New South Wales, Queensland, South Australia, Tasmania and the Australian Capital Territory, and are made by the Australian Energy Market Commission (AEMC) under the NERL.

<sup>7</sup> Competition and Consumer (Industry Code – Electricity Retail) Regulations 2019 (Cth) (Electricity Retail Regulations), s 10; AER, [Default market offer prices 2024-25](#) [final determination], 2024.

<sup>8</sup> NERR, rule 14.

<sup>9</sup> We acknowledge the difficulty of appropriately quantifying the value of these additional benefits. For more analysis on the value of the differences in the terms and conditions of standing and market offers, see QCA, [Regulated retail electricity prices for 2019-20](#) [final determination], 2019, pp 48-59, and QCA, [Regulated retail electricity prices for 2021-22](#) [final determination], 2021, pp 53-58. Similarly, the Australian Competition and Consumer Commission (ACCC) noted that



The term 'offers' is commonly used to refer to standing and market offers. However, electricity offers are also often referred to as 'plans' – for example on Energy Made Easy (a price comparator website), in the AER's retail pricing information guidelines, and in some other reports on retail electricity markets. In this report, we use the terms 'offers' and 'plans' interchangeably.

## 1.3 Energy Made Easy

The AER operates a free online price comparator called Energy Made Easy to assist small customers to compare plans.<sup>10</sup> Retailers have to provide information on each of their generally available electricity plans on Energy Made Easy in accordance with the AER's retail pricing information guidelines.<sup>11</sup> For our analysis this year and in previous years, we obtained data on all electricity plans available to SEQ customers directly from Energy Made Easy.

As Energy Made Easy is independent of commercial third parties and includes all generally available electricity plans, it is an important and reliable tool for customers who want to analyse, compare and choose plans. By contrast, commercial comparison sites often work on commissions-based arrangements and therefore typically do not cover all the retailers in the market. Nor do they always include in their comparison all the available plans of the retailers that are covered.

## 1.4 Retailers operating in SEQ

We identified 29 retailers on Energy Made Easy with plans for small customers in SEQ in 2024–25 (Table 1.1), which is the same number of retailers as in 2023–24. We observed that:

- 28 retailers had plans available in 2023–24 and 2024–25
- 1 retailer had plans available in 2024–25 but not in 2023–24 (Flow Power)
- 1 retailer published plans in 2023–24 under its previous and new name (Simply Energy / ENGIE).

Of the 29 retailers with plans for small customers in 2024–25, 26 provided plans for residential customers and 26 provided plans for small business customers (though not exactly the same retailers). Compared to 2023–24, 1 fewer retailer provided residential plans, and 3 more retailers provided small business plans.

Not all retailers offered plans in each quarter of 2024–25. Across residential and small business customers, 23 retailers had a standing offer and 25 retailers (though not exactly the same retailers who had a standing offer) had market offers available in the June quarter of 2025.

Some authorised retailers sell energy under different names or have retail 'brands' that sell energy or supply other providers.<sup>12</sup> We include these retail names or 'brands' in our analysis in the same way as we include authorised retailers, because each can have retail strategies that are different to those of the authorised retailer and are likely to have an impact on competition.

---

standing offer contracts have a guaranteed level of consumer protections that are higher than the required consumer protections in market offer contracts. Consumers may also take comfort from the government-set prices that apply to standing offers (ACCC, [Inquiry into the National Electricity Market](#), May 2022, p 29). Market offers are getting more protections too: In June 2025, the AEMC completed a rule change (in effect from 1 July 2026), allowing retailers to only increase the prices of existing and new market retail contracts once every 12 months (AEMC, [National Energy Retail Amendment \(Improving consumer confidence in retail energy plans\) Rule 2025](#) [rule determination], 2025, pp 30–35).

<sup>10</sup> NERL, s 62; [Energy Made Easy](#) website.

<sup>11</sup> AER, [AER Retail Pricing Information Guidelines](#) [version 5.0], 2018, p 8 (cl 23).

<sup>12</sup> For example, Powershop is the energy provider of Kogan Energy, and Tango Energy provides plans both under its former and its new name (Pacific Blue Retail).



**Table 1.1: Retailers with residential and/or small business plans in SEQ, 2024-25**

Retailer	Plans offered	
	Residential	Small business
1st Energy	✓	✓
AGL	✓	✓
Alinta Energy	✓	✓
Amber Electric	✓	✓
Ampol Energy	✓	✓
Blue NRG	—	✓
CovaU	✓	✓
Diamond Energy	✓	✓
Discover Energy	✓	✓
Dodo Power & Gas	✓	—
Energy Locals	✓	✓
EnergyAustralia	✓	✓
ENGIE	✓	✓
Flow Power	—	✓
Future X Power	✓	✓

Retailer (cont.)	Plans offered	
	Residential	Small business
GloBird Energy	✓	—
Kogan Energy	✓	—
Momentum Energy	✓	✓
Nectr	✓	✓
Next Business Energy	✓	✓
Origin Energy	✓	✓
Ovo Energy	✓	✓
Pacific Blue Retail	✓	✓
Powershop	✓	✓
ReAmped Energy	✓	✓
Red Energy	✓	✓
Shell Energy	—	✓
Sumo Power	✓	✓
Tango Energy	✓	✓

Source: Energy Made Easy; QCA analysis.

## 1.5 Scope of the report

Consistent with the Minister's requirements,<sup>13</sup> our report provides information on:

- the SEQ retail electricity market, including retailers that provided plans to small customers in 2024-25 (chapter 1)
- annual bills for a typical SEQ customer in the June quarter of 2025 and a year earlier (chapter 2); annual bills for each quarter of 2024-25, by retailer, are provided in appendix A
- discounts, savings and incentives (chapter 3)
- fees and charges (chapter 4)
- trends in weighted bills since 2015-16 (chapter 5)
- customers receiving assistance with electricity bills (chapter 6)
- customers remaining on legacy market offers (chapter 7)
- new types of retail tariffs and retail electricity plans (chapter 8)
- the competitiveness of the SEQ retail electricity market (chapter 9).

Appendices to this report (published separately) provide further details, including on the assumptions used to calculate annual bills, and additional information on customers receiving assistance with their bills. Three fact sheets summarise the insights of this report and can help customers to understand the key findings.<sup>14</sup>

<sup>13</sup> The Minister's direction notice and letters are available on our website at [Market monitoring report 2024-25](#).

<sup>14</sup> QCA, [Market monitoring report 2024-25](#), QCA website, 2025.

## 1.6 Advice for customers

Active customers are likely to pay less than inactive or disengaged customers. We encourage customers to regularly check Energy Made Easy to see whether they can find a better deal. In addition, customers should take notice of the 'better offer' message on their bill. They can also contact their retailer to ask if a better deal is available. The Queensland Government provides some general advice to customers (Box 1).

### Box 1: Queensland Government advice to customers



How to find the best deal:

- Use Energy Made Easy to compare and choose electricity deals by electricity retailers.
- Contact your current electricity retailer to ask for a better electricity deal.

Tips for choosing or switching electricity retailers:

- Check that the new electricity plan will save you money – compare the conditions, benefits and costs of your current plan against the plans you are considering.
- Read the conditions associated with any discount being offered.
- Check the payment terms for flexible options.
- Check exit fees.
- Use the cooling off period (10 days) to evaluate your new contract – you can change your mind.
- Check your electricity contract at least annually and reconsider your plan and alternative offers in the market.<sup>15</sup>

---

<sup>15</sup> Queensland Government, [Compare and choose electricity retailers](#), Queensland Government website, updated 1 August 2023, viewed 29 September 2025.

## 2 Annual bills

### Key findings

We analysed standing offer and market offer bills for the typical SEQ customer on the most common tariffs and tariff combinations, based on the plans available on Energy Made Easy, and found:

- For residential customers, standing offers increased by less than market offers in 2024-25. Between the June quarters of 2024 and 2025, average bills increased by 3.6% to 5.0% for standing offers and by 5.6% to 6.2% for lowest market offers.
- For small business customers, results were mixed – average bills:
  - increased for small business flat-rate customers (by 2.6% for standing offers and by 1.5% for lowest market offers)
  - decreased for small business time-of-use customers (by 2.5% for standing offers and by 3.6% for lowest market offers).
- Most retailers increased their lowest market offer from the year earlier. However, more than half of the retailers decreased their lowest market offer for small business time-of-use customers.
- The lowest market offers for most tariffs and tariff combinations we analysed had a discount or financial incentive attached in the June quarter of 2025.
- The number of retailers providing plans to residential customers decreased slightly in 2024-25, while the number of retailers providing plans to small business customers increased for one tariff and remained the same for the other tariff.
- Standing offer bills were generally higher than market offer bills in 2024-25, which was also the case in 2023-24.

### 2.1 QCA methodology

We calculated an annual bill for each plan retailers had available in 2024-25 for SEQ customers, using the same approach as in our previous reports<sup>16</sup> – that is, we:

- determined the most common residential and small business tariffs and tariff combinations
- used the median annual consumption to calculate annual bills for the ‘typical SEQ customer’
- included goods and services tax (GST) in the annual bills we present (in nominal dollars) but did not include rebates or payments provided by the Australian or Queensland governments.<sup>17</sup>

As data on the number of customers on specific plans (and the individual retail tariff that applies to them) is not generally available, we determined the most common tariffs and tariff combinations using network tariff data provided by Energex as a proxy.

<sup>16</sup> For more information on our methodology, see QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 8-10.

<sup>17</sup> For more information, see Appendix B.

Table 2.1 shows the median annual consumption levels of small customers in kilowatt hours (kWh) that we used to calculate annual bills for ‘the typical SEQ customer’ based on the information we obtained from Energy Made Easy on standing and generally available market offers.<sup>18</sup>

**Table 2.1: Median annual consumption – most common tariffs and tariff combinations**

Customer type	Tariff / tariff combination	Median consumption per year (kWh)
Residential	Flat rate (T8400)	4,100
	Flat rate (T8400) + controlled load super economy (T9000) <sup>a</sup>	5,252
	Flat rate (T8400) + controlled load economy (T9100) <sup>b</sup>	5,118
Small business	Flat rate (T8500)	4,184
	Time of use (T8800)	20,236

a Available for a minimum of 8 hours per day, during time periods set at the absolute discretion of Energex.

b Available for a minimum of 18 hours per day, during time periods set at the absolute discretion of Energex.

Sources: Energex, [Energex Network Tariff Guide, 01 July 2024 to 30 June 2025](#), 2024, p 24; Energex, unpublished median consumption data for 2023-24.

The amount of electricity small business customers use and the way they use it depend on the type of business they operate. Therefore, their usage varies more than that of residential customers.

When comparing the bills we present to those in the AER’s annual DMO determination, it should be kept in mind that the AER assumed a higher annual consumption than the consumption we use.<sup>19</sup>

For stakeholders seeking more detail or wishing to calculate bills based on different consumption levels (such as for small business tariffs), datasets with the plans we used in our analysis are available on request. Figure 2.1 shows how stakeholders can calculate annual bills.

**Figure 2.1: Calculation of annual bills**

Supply costs	+	Cost of electricity consumed	+	Recurring fees	-	Incentives and discounts	+	GST
daily supply charge × 365.25 days		usage charge × customer's annual consumption level		where applicable		where applicable		10%

Our analysis primarily focuses on market offers, which are offered in a competitive environment. Standing offer prices are capped by the DMO that the AER sets annually.<sup>20</sup>

<sup>18</sup> The annual bills we calculate do not reflect the actual electricity bills paid by customers in SEQ. Actual bills are based on individual customers’ actual consumption level. Individual customers may also still be on older plans (legacy offers published in previous financial years). We use the median consumption, because it is not influenced by individual ‘outliers’ (high or low values) and, for a customer on a particular tariff, assumes half of all customers use less electricity than the typical customer, and half use more. The bills we calculate do not include any rebates paid by the Australian or Queensland governments (Appendix B, sections B.1 to B.2 provides more details on the plans included in our analysis).

<sup>19</sup> AER, [Default market offer prices 2024-25](#) [revised final determination], 2024, pp 6, 9. The AER does not distinguish between economy and super economy controlled load tariffs, which are commonly used by SEQ customers. For more information, see Appendix B (section B.6). For 2024-25, the AER assumed the following annual consumption levels in the Energex distribution area: residential without controlled load – 4,600 kWh; residential with controlled load – 4,400 kWh (general usage) + 1,900 kWh (controlled load usage); and small business without controlled load – 10,000 kWh.

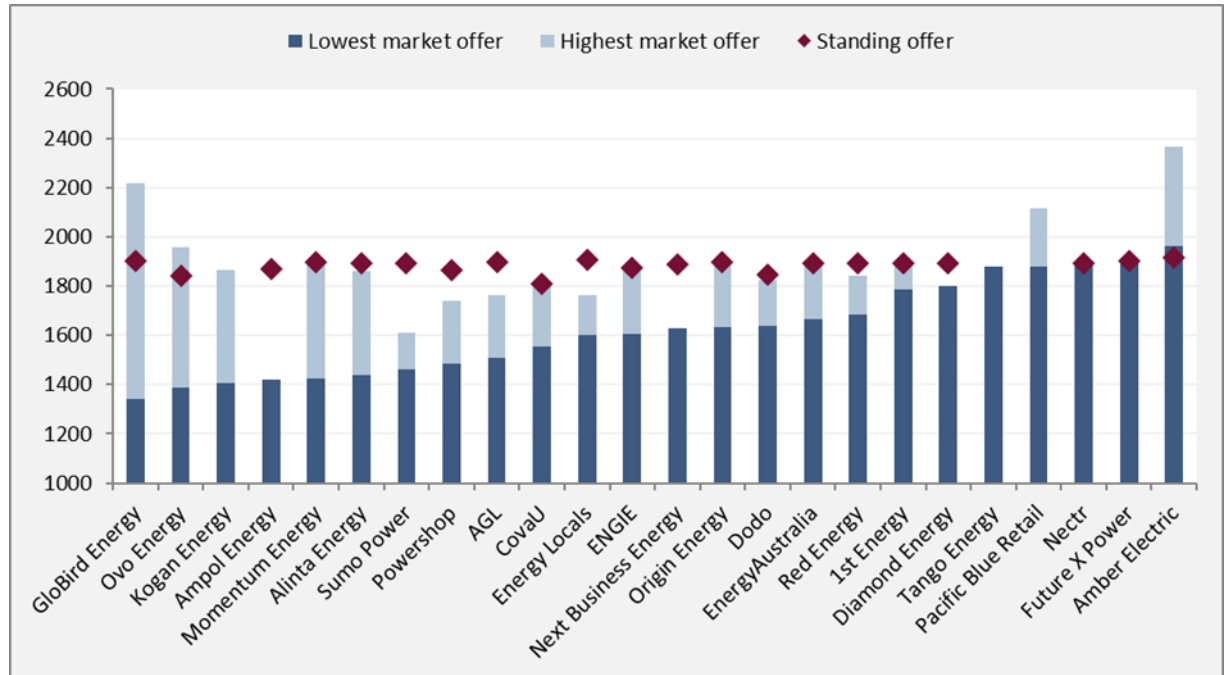
<sup>20</sup> The AER is not currently required to set a DMO for small business time-of-use plans. However, there is a proposal for wide-ranging changes to the DMO, including its overall objective and calculation, the matters that must be considered, the customers that the DMO would apply to, and the types of tariffs that the DMO covers – including a proposal for the AER to determine a cap for the small business time-of-use tariff (AER, [Default market offer 2026-27](#) [issues paper], 2025, pp 4-7). The ACCC monitors and enforces retailers’ compliance with the DMO (ACCC, [Electricity Retail Code compliance and enforcement checks](#), ACCC website, n.d., viewed 15 October 2025).

## 2.2 Residential flat rate offers

### 2.2.1 Bills in the June quarter of 2025

In the June quarter of 2025, 24 retailers had residential flat rate offers available – of these retailers, 21 had a standing offer and all 24 had at least one market offer. Figure 2.2 shows the bills, by retailer, for a typical SEQ customer.

**Figure 2.2: Annual bills for a typical SEQ residential flat rate customer, June quarter 2025**



Notes: Retailers are arranged according to their lowest market offer bill (in ascending order). Not every retailer had both standing and market offers. A table with detailed bills, by retailer, is included in Appendix A (section A.2.4). Sources: Energy Made Easy; QCA analysis.

Market offer bills were generally lower than standing offer bills. In the June quarter of 2025, for a typical SEQ customer on a residential flat rate tariff:

- standing offer bills ranged from \$1,810 (CovaU) to \$1,915 (Amber Electric)
- market offer bills ranged from \$1,342 (GloBird Energy) to \$2,366 (Amber Electric).

GloBird Energy's GloSave Residential (Flat Rate) Energex plan resulted in the lowest market offer bill. The plan had a 2% pay on time discount attached and an extra 1% pay on time via direct debit discount (both discounts were off the bill), effectively making it a 3% discount off the bill when both payment criteria were met by the customer.

### 2.2.2 Change between the June quarters of 2024 and 2025

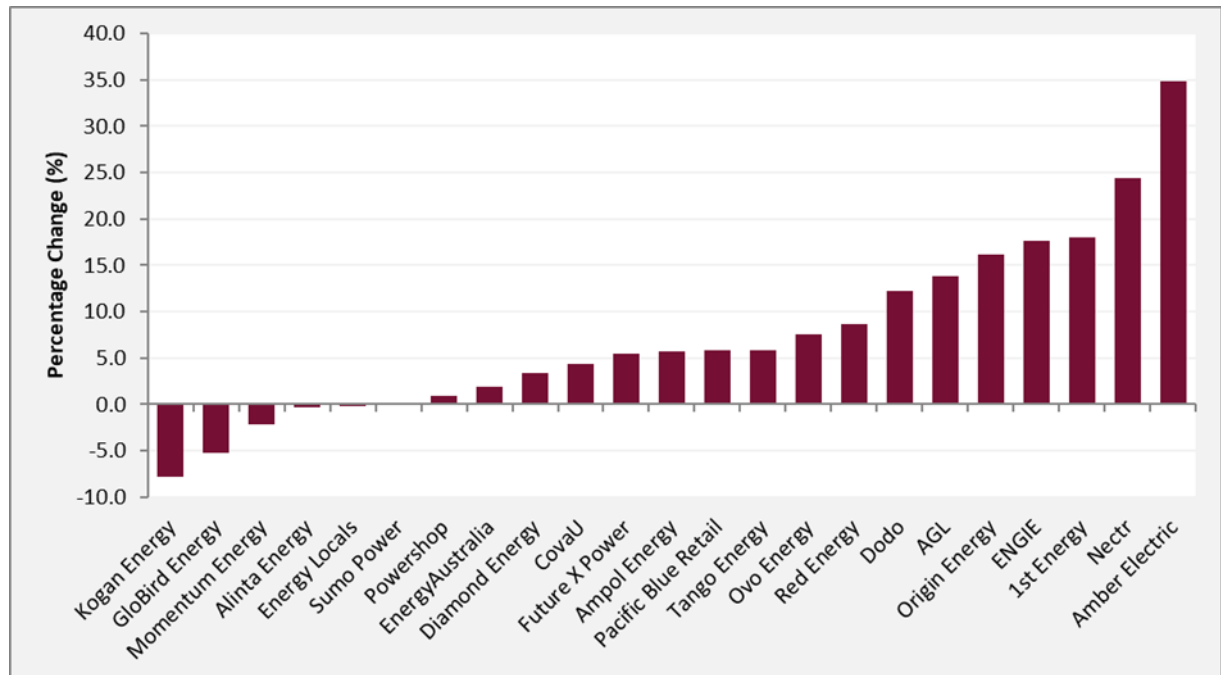
#### Number of retailers

The number of retailers offering residential flat rate plans decreased by one between the June quarters of 2024 and 2025 (from 25 to 24). In the June quarter of 2025, there was the same number of retailers with standing offers (21) but one fewer retailer with market offers (a decrease from 25 to 24).

## Lowest market offer bills

The average lowest market offer bill increased by 6.2% (or \$95) between the June quarters of 2024 and 2025 (from \$1,529 to \$1,624).<sup>21</sup> Not many retailers (5) had cheaper market offers available in the June quarter of 2025 than a year earlier. Most retailers increased their lowest market offer. Figure 2.3 shows the percentage change in each retailer's lowest market offer bill for customers on residential flat rate market offers from the June quarter of 2024 to the June quarter of 2025.

**Figure 2.3: Change in lowest market offer bill for a typical SEQ residential flat rate customer, by retailer, June quarter 2024 to June quarter 2025**



Note: Only retailers with market offers in both quarters are included.  
Sources: Energy Made Easy; QCA analysis.

## 2.3 Residential flat rate offers with controlled load super economy

### 2.3.1 Bills in the June quarter of 2025

In the June quarter of 2025, 24 retailers had plans available that combined a residential flat rate tariff with a controlled load super economy tariff – of these retailers, 19 had a standing offer and all 24 had at least one market offer. Figure 2.4 shows the bills, by retailer, for a typical SEQ customer.

<sup>21</sup> The comparison is based on the plans retailers had available for residential flat rate customers in those 2 quarters. We recalculated the bills from the previous year with the consumption level in Table 2.1 to allow a direct comparison. Changes in retailers' lowest market offer bills from quarter to quarter during 2024–25 are shown in Appendix A (section A.2.5).

**Figure 2.4: Annual bills for a typical SEQ residential flat rate with controlled load super economy customer, June quarter 2025**



Notes: Retailers are arranged according to their lowest market offer bill (in ascending order). Not every retailer had both standing and market offers. A table with detailed bills, by retailer, is included in Appendix A (section A.3.4). Sources: Energy Made Easy; QCA analysis.

Market offer bills were generally lower than standing offer bills. In the June quarter of 2025, for a typical SEQ customer on this tariff combination:

- standing offer bills ranged from \$2,000 (1st Energy) to \$2,501 (Future X Power)
- market offer bills ranged from \$1,553 (Kogan Energy) to \$2,650 (Amber Electric).

Kogan Energy's 'Kogan Energy for current First members' plan resulted in the lowest market offer bill. The plan had a \$100 sign-up credit attached for new Kogan Energy customers with an existing annual First membership.

## 2.3.2 Change between the June quarters of 2024 and 2025

### Number of retailers

The number of retailers offering residential flat rate plans with controlled load super economy decreased by one between the June quarters of 2024 and 2025 (from 25 to 24). In the June quarter of 2025, there was one fewer retailer with standing offers (a decrease from 20 to 19) and one fewer retailer with market offers (a decrease from 25 to 24).

### Lowest market offer bills

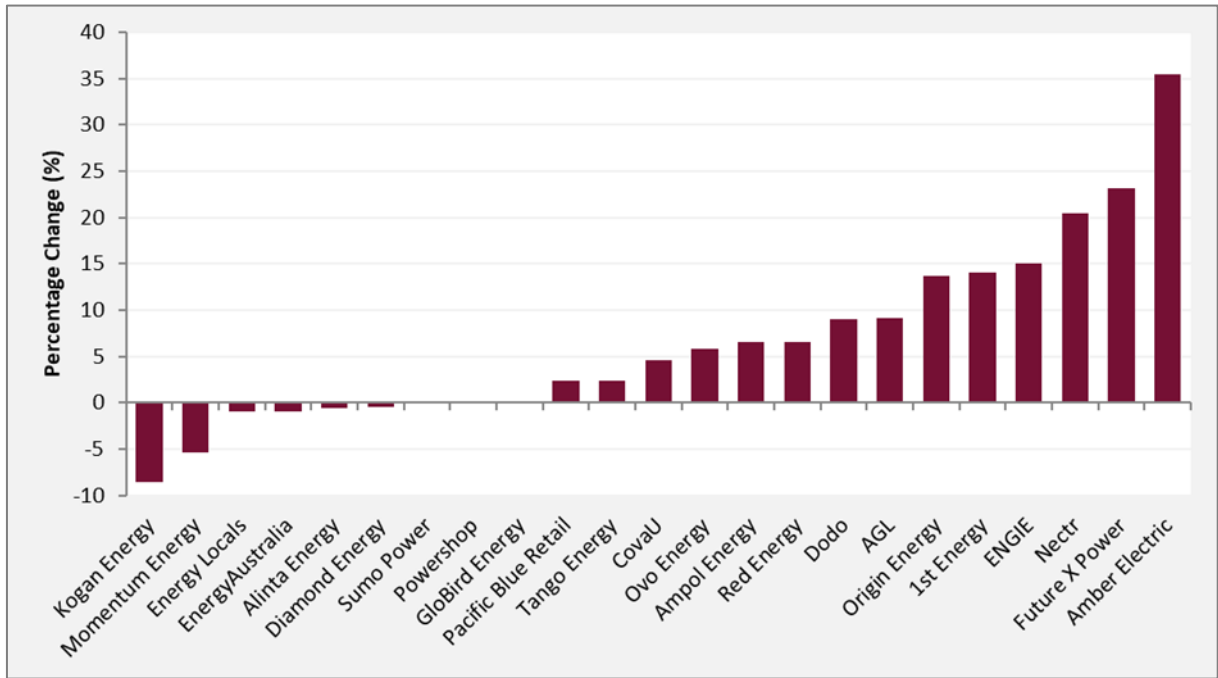
The average lowest market offer bill increased by 5.6% (or \$96) between the June quarters of 2024 and 2025 (from \$1,734 to \$1,830).<sup>22</sup> Not many retailers (6) had cheaper market offers available in the June quarter of 2025 than a year earlier. Most retailers increased their lowest market offer.

<sup>22</sup> The comparison is based on the plans retailers had available for residential flat rate with controlled load super economy customers in those 2 quarters. We recalculated the bills from the previous year with the consumption level in Table 2.1 to allow a direct comparison. Changes in retailers' lowest market offer bills from quarter to quarter during 2024-25 are shown in Appendix A (section A.3.5).



Figure 2.5 shows the percentage change in each retailer's lowest market offer bill for this tariff combination from the June quarter of 2024 to the June quarter of 2025.

**Figure 2.5: Change in lowest market offer bill for a typical SEQ residential flat rate with controlled load super economy customer, by retailer, June quarter 2024 to June quarter 2025**



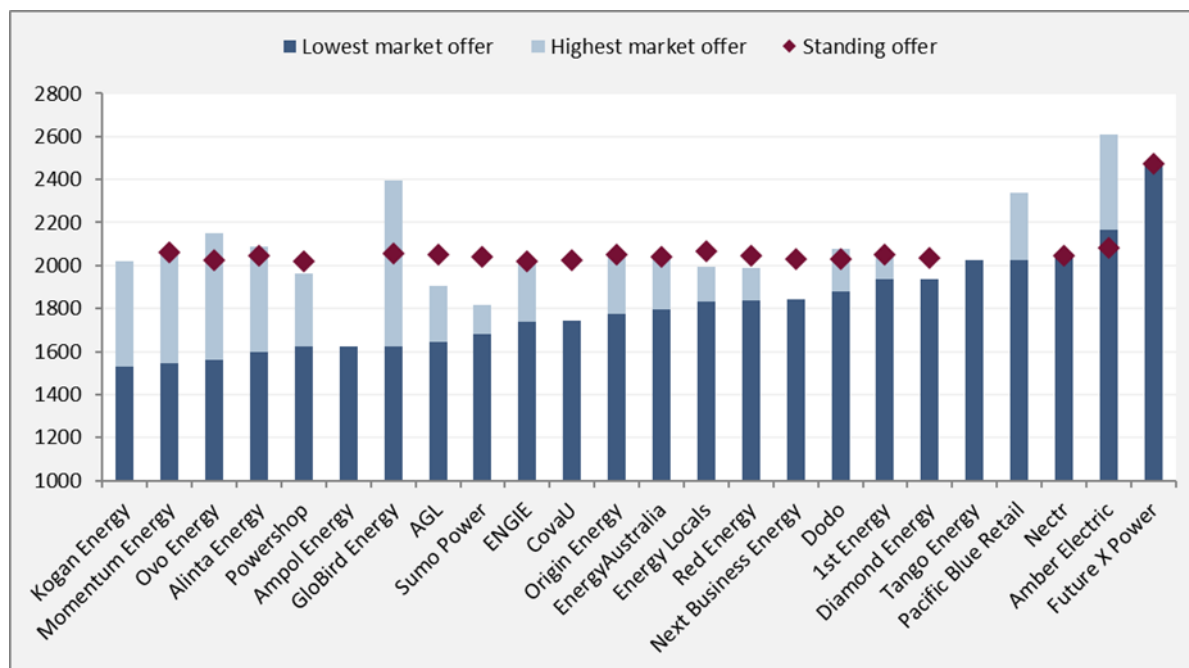
Note: Only retailers with market offers in both quarters are included.  
Sources: Energy Made Easy; QCA analysis.

## 2.4 Residential flat rate offers with controlled load economy

### 2.4.1 Bills in the June quarter of 2025

In the June quarter of 2025, 24 retailers had plans available that combined a residential flat rate tariff with a controlled load economy tariff – of these retailers, 20 had a standing offer and all 24 had at least one market offer. Figure 2.6 shows the bills, by retailer, for a typical SEQ customer.

**Figure 2.6: Annual bills for a typical SEQ residential flat rate with controlled load economy customer, June quarter 2025**



Notes: Retailers are arranged according to their lowest market offer bill (in ascending order). Not every retailer had both standing and market offers. A table with detailed bills, by retailer, is included in Appendix A (section A.4.4). Sources: Energy Made Easy; QCA analysis.

Market offer bills were generally lower than standing offer bills. In the June quarter of 2025, for a typical SEQ customer on this tariff combination:

- standing offer bills ranged from \$2,020 (Powershop) to \$2,472 (Future X Power)
- market offer bills ranged from \$1,530 (Kogan Energy) to \$2,610 (Amber Electric).

Kogan Energy's 'Kogan Energy for current First members' plan resulted in the lowest market offer bill. The plan had a \$100 sign-up credit attached for new Kogan Energy customers with an existing annual First membership.

## 2.4.2 Change between the June quarters of 2024 and 2025

### Number of retailers

The number of retailers offering residential flat rate plans with controlled load economy decreased by one between the June quarters of 2024 and 2025 (from 25 to 24). In the June quarter of 2025, there was the same number of retailers with standing offers (20) but one fewer retailer with market offers (a decrease from 25 to 24).

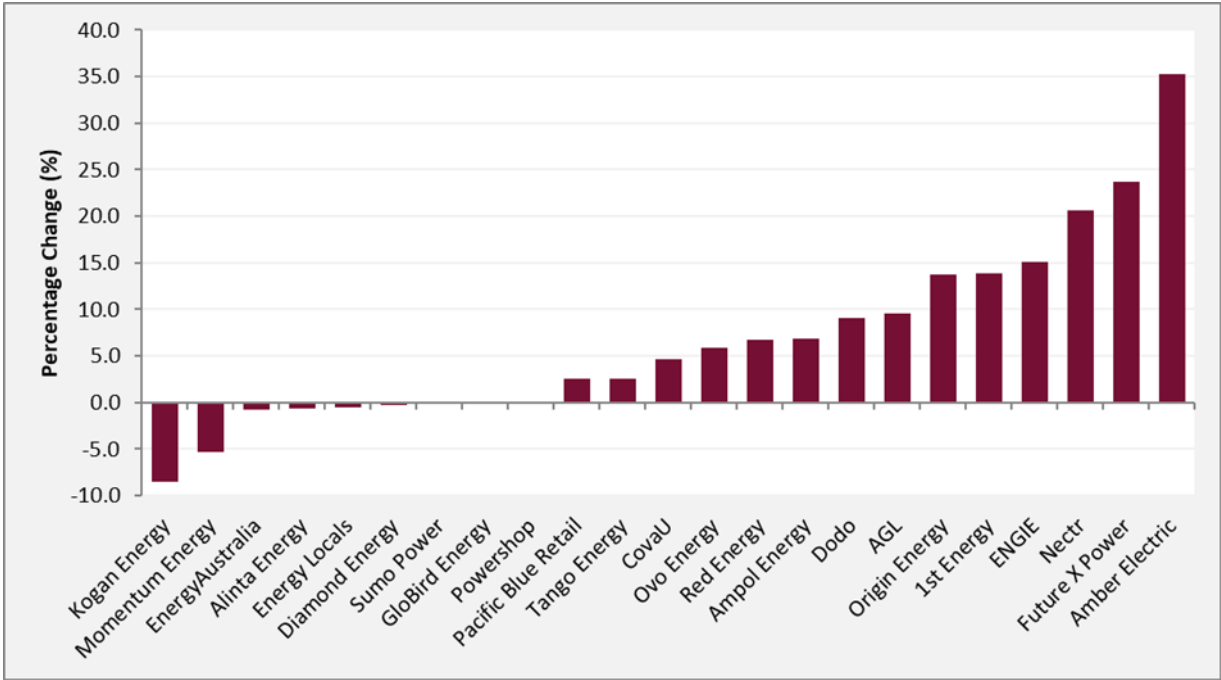
### Lowest market offer bills

The average lowest market offer bill increased by 5.7% (or \$98) between the June quarters of 2024 and 2025 (from \$1,714 to \$1,812).<sup>23</sup> Not many retailers (6) had cheaper market offers available in the June quarter of 2025 than a year earlier. Most retailers increased their lowest market offer.

<sup>23</sup> The comparison is based on the plans retailers had available for residential flat rate with controlled load economy customers in those 2 quarters. We recalculated the bills from the previous year with the consumption level in Table 2.1 to allow a direct comparison. Changes in retailers' lowest market offer bills from quarter to quarter during 2024-25 are shown in Appendix A (section A.4.5).

Figure 2.7 shows the percentage change in each retailer's lowest market offer bill for this tariff combination from the June quarter of 2024 to the June quarter of 2025.

**Figure 2.7: Change in lowest market offer bill for a typical SEQ residential flat rate with controlled load economy customer, by retailer, June quarter 2024 to June quarter 2025**



Note: Only retailers with market offers in both quarters are included.  
Sources: Energy Made Easy; QCA analysis.

## 2.5 Small business flat rate offers

### 2.5.1 Bills in the June quarter of 2025

In the June quarter of 2025, 24 retailers had small business flat rate offers available – of these retailers, 22 had a standing offer and 21 had at least one market offer. Figure 2.8 shows the bills, by retailer, for a typical SEQ customer.

**Figure 2.8: Annual bills for a typical SEQ small business flat rate customer, June quarter 2025**



Notes: Retailers are arranged according to their lowest market offer bill (in ascending order). Not every retailer had both standing and market offers. A table with detailed bills, by retailer, is included in Appendix A (section A.5.4). Sources: Energy Made Easy; QCA analysis.

Market offer bills were generally lower than standing offer bills. In the June quarter of 2025, for a typical SEQ customer on a small business flat rate tariff:

- standing offer bills ranged from \$1,904 (Shell Energy) to \$2,304 (Blue NRG)
- market offer bills ranged from \$1,486 (AGL) to \$2,494 (Amber Electric).

AGL's Business Smart Saver (3rd Party New To AGL) plan, which resulted in the lowest market offer bill, had a \$250 sign-up credit attached for new and moving customers.

## 2.5.2 Change between the June quarters of 2024 and 2025

### Number of retailers

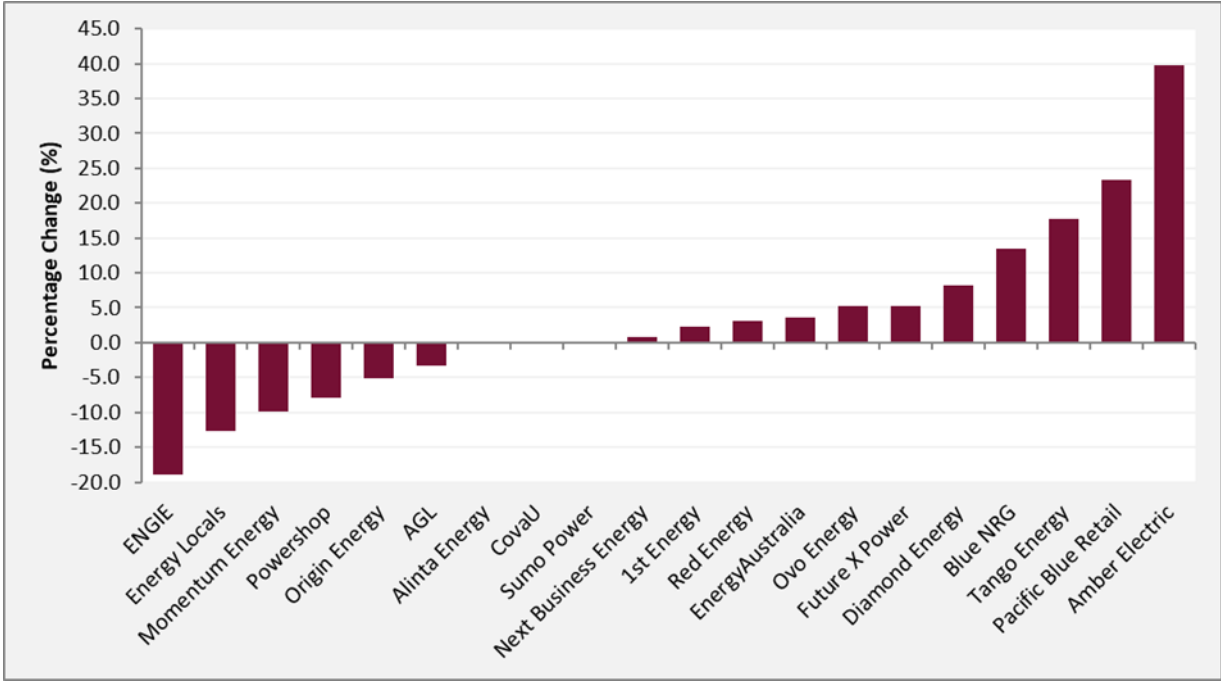
The number of retailers offering small business flat rate plans increased by 2 between the June quarters of 2024 and 2025 (from 22 to 24). In the June quarter of 2025, there were 4 more retailers with standing offers (an increase from 18 to 22) but one fewer retailer with market offers (a decrease from 22 to 21).

### Lowest market offer bills

The average lowest market offer bill increased by 1.5% (or \$27) between the June quarters of 2024 and 2025 (from \$1,824 to \$1,869).<sup>24</sup> Not many retailers (6) had cheaper market offers available in the June quarter of 2025 than a year earlier. Most retailers increased their lowest market offer. Figure 2.9 shows the percentage change in each retailer's lowest market offer bill for customers on small business flat rate offers from the June quarter of 2024 to the June quarter of 2025.

<sup>24</sup> The comparison is based on the plans retailers had available for small business flat rate customers in those 2 quarters. We recalculated the bills from the previous year with the consumption level in Table 2.1 to allow a direct comparison. Changes in retailers' lowest market offer bills from quarter to quarter during 2024–25 are shown in Appendix A (section A.5.5).

**Figure 2.9: Change in lowest market offer bill for a typical SEQ small business flat rate customer, by retailer, June quarter 2024 to June quarter 2025**



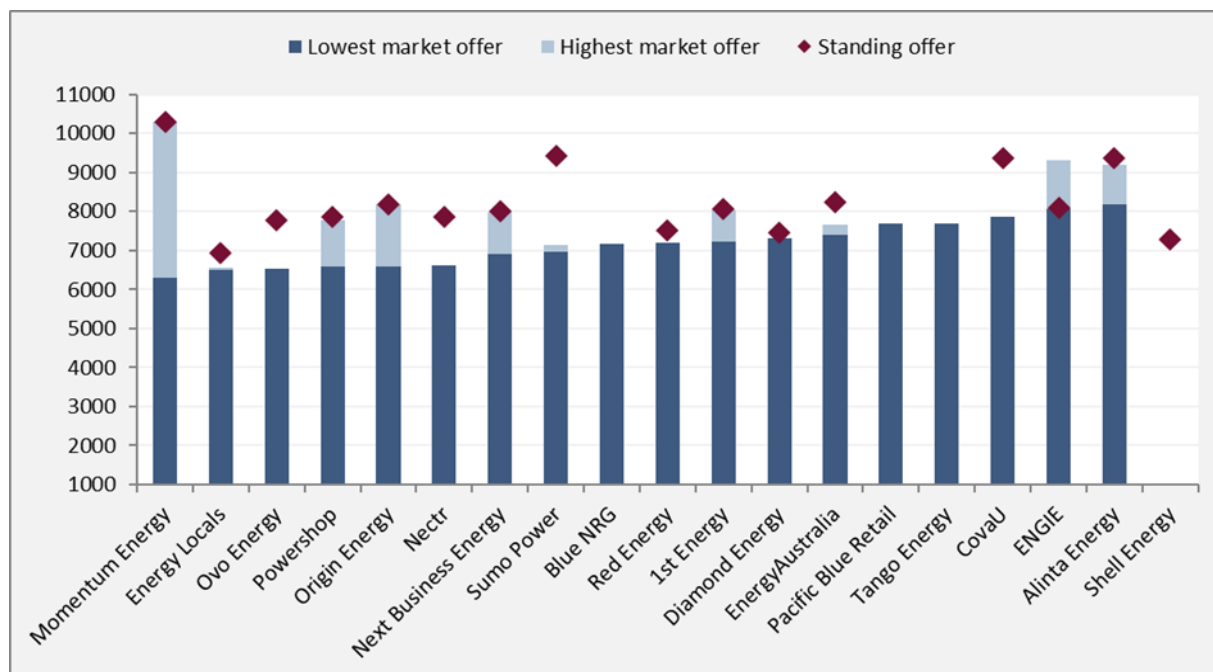
Note: Only retailers with market offers in both quarters are included.  
Sources: Energy Made Easy; QCA analysis.

## 2.6 Small business time-of-use offers

### 2.6.1 Bills in the June quarter of 2025

In the June quarter of 2025, 19 retailers had small business time-of-use offers available – of these retailers, 16 had a standing offer and 18 had at least one market offer. Figure 2.10 shows the bills, by retailer, for a typical SEQ customer.

**Figure 2.10: Annual bills for a typical SEQ small business time-of-use customer, June quarter 2025**



Notes: Retailers are arranged according to their lowest market offer bill (in ascending order). Not every retailer had both standing and market offers. A table with detailed bills, by retailer, is included in Appendix A (section A.6.4). Sources: Energy Made Easy; QCA analysis.

Market offer bills were generally lower than standing offer bills. In the June quarter of 2025, for a typical SEQ customer on a small business time-of-use tariff:

- standing offer bills ranged from \$6,931 (Energy Locals) to \$10,286 (Momentum Energy)
- market offer bills ranged from \$6,293 (Momentum Energy) to \$10,286 (Momentum Energy).

Momentum Energy's Thrifty Business plans, which resulted in the lowest market offer bill, did not have any discounts or incentives attached.

## 2.6.2 Change between the June quarters of 2024 and 2025

### Number of retailers

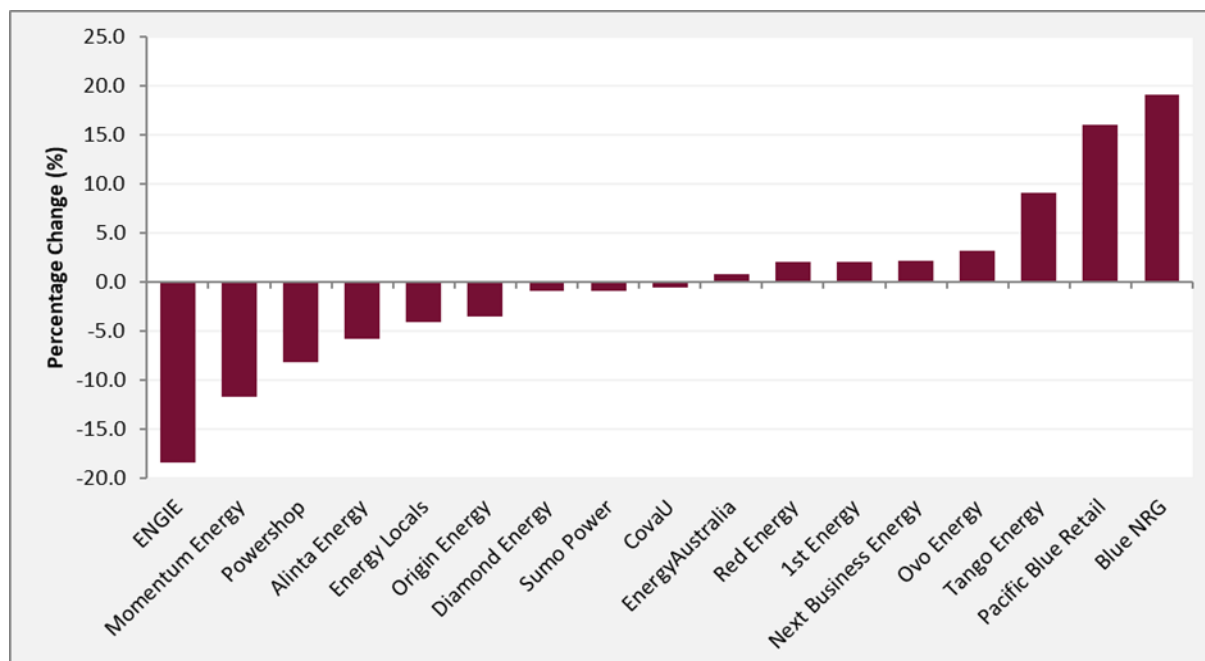
The number of retailers offering small business time-of-use plans was the same in the June quarters of 2024 and 2025 (19). In the June quarter of 2025, there was one more retailer with standing offers (an increase from 15 to 16) but one fewer retailer with market offers (a decrease from 19 to 18).

### Lowest market offer bills

The average lowest market offer bill decreased by 3.6% (or \$263) between the June quarters of 2024 and 2025 (from \$7,418 to \$7,154).<sup>25</sup> Just over half of the 17 retailers with plans in both quarters (9) had cheaper market offers available in the June quarter of 2025 than a year earlier, while 8 retailers' lowest market offers were more expensive. Figure 2.11 shows the percentage change in each retailer's lowest market offer bill for customers on small business time-of-use offers from the June quarter of 2024 to the June quarter of 2025.

<sup>25</sup> The comparison is based on the plans retailers had available for small business time-of-use customers in those 2 quarters. We recalculated the bills from the previous year with the consumption level in Table 2.1 to allow a direct comparison. Changes in retailers' lowest market offer bills from quarter to quarter during 2024–25 are shown in Appendix A (section A.6.5).

**Figure 2.11: Change in lowest market offer bill for a typical SEQ small business time-of-use customer, by retailer, June quarter 2024 to June quarter 2025**



Note: Only retailers with market offers in both quarters are included.  
Sources: Energy Made Easy; QCA analysis.

## 2.7 General observations

### Standing offer bills

- The DMO prices increased from 2023–24 to 2024–25 (in nominal dollars). In line with this, the average standing offer bill increased between the June quarters of 2024 and 2025 by 3.6% to 5.0% for the residential tariffs and tariff combinations we report on, and by 2.6% for the small business flat rate tariff. However, it decreased by 2.5% for the small business time-of-use tariff, which is not covered by the DMO.
- Standing offer prices (and bills) vary to some extent between retailers, even though the DMO prices set by the AER act as a cap on standing offer prices. The AER sets the DMO as an annual bill for a set consumption level and thereby gives retailers the ‘flexibility to translate the annual amount into different tariff structures’.<sup>26</sup>
- Most retailers set their standing offer prices at or just below the DMO reference bill, but some retailers offered standing offers well below the DMO cap.<sup>27</sup>
- Standing offer bills were generally higher than market offer bills in 2024–25.

### Market offer bills

- For each of the residential tariffs and tariff combinations we report on, average lowest market offer bills increased between the June quarters of 2024 and 2025 (between 5.6% and 6.2%). Results for small business customers were mixed – the average lowest market offer bill increased by 1.5% for small business flat rate customers, while it decreased by 3.6% small business time-of-use customers.

<sup>26</sup> AER, [Default Market Offer Prices 2019–20](#) [final determination], 2019, p 9. The AER sets the DMO as an annual bill for a set consumption level (which differs from the median consumption level in Table 2.1 that we use in our report).

<sup>27</sup> These observations do not apply to the small business time-of-use tariffs, which is not covered by the DMO.



- Most retailers increased their lowest market offer compared to a year earlier. The exception was offers for small business time-of-use customers – slightly more than half of retailers had a market offer that was cheaper than their lowest market offer a year earlier.
- There was still a substantial price dispersion between the highest- and the lowest-priced plans in 2024–25 for all tariffs and tariff combinations.<sup>28</sup> This means that there were opportunities for customers to save on energy bills if they effectively navigated the market and shopped around for the best plan for their circumstances, including their individual consumption.

## Higher costs are reflected in higher bills

- Retailers' prices are shaped by demand and the nature of competition, but they are also impacted by underlying costs, which include wholesale energy costs, network costs, environmental scheme costs and retail costs.<sup>29</sup>
- While wholesale energy costs had been a primary driver of price increases in recent years, wholesale costs have been easing off<sup>30</sup> since the record levels reached in 2022.<sup>31</sup> However, there have been increases in network costs<sup>32</sup> and retail costs, which include the costs of the smart meter rollout.<sup>33</sup>
- The AER increased the DMO prices for SEQ customers for 2024–25 by 4.9% for residential customers without controlled load, 2.2% for residential customers with controlled load and 1.4% for small business customers without controlled load.<sup>34</sup>

## 2.8 Key considerations for customers

Bills for the typical SEQ customer have increased in recent years. Customers should consider some key points when they compare different plans and determine which plan is best for them (Box 2).

### Box 2: Finding the best plan

- Individual customers' consumption is likely to differ from the consumption of the typical SEQ customer that the bills in our report are based on. As bills vary with consumption, the cheapest plan we present in our report will not be the cheapest plan for every SEQ customer.
- If customers are using [Energy Made Easy](#) to search for a new plan, they should enter their National Metering Identifier (a unique number for the electricity connection at their address that is included on the bill) to get personalised results that reflect their individual consumption level.
- Retailers regularly publish new plans. The cheapest plans we present in our report may not be available anymore, and other retailers may now have better plans available.
- Customers who have not signed a new electricity contract recently may face prices that differ substantially from the bills presented in this report. Active customers are likely to pay less than inactive or disengaged customers.
- Some retailers' standing offers were cheaper than their market offers in recent years. Retailers are not obliged to move customers onto their standing offer when they increase the price of

<sup>28</sup> We explore the spread of prices in more detail in section 9.4 of this report.

<sup>29</sup> Retail costs are costs retailers incur in providing retail and customer services. These include, for example, costs for billing systems, customer service, debt collection and the smart meter rollout.

<sup>30</sup> AER, [Default market offer prices 2024–25](#) [final determination, track-changed comparison], 2024, pp 1–2.

<sup>31</sup> AER, [Default market offer prices 2025–26](#) [final determination], 2025, pp 46–47; AER, [Default market offer prices 2024–25](#) [final determination, track-changed comparison], 2024, pp 39–40.

<sup>32</sup> AER, [Default market offer prices 2024–25](#) [final determination, track-changed comparison], 2024, p 106.

<sup>33</sup> AER, [Default market offer prices 2025–26](#) [final determination], 2025, p 115.

<sup>34</sup> AER, [Default market offer prices 2024–25](#) [revised final determination], 2024, p 6. Increases are in nominal dollars.

their existing market offer. If customers do not want to switch retailers, they can contact their retailer, as they have the right to receive the standing offer.

- Customers should compare market offers with the price of a standing offer. Retailers must indicate in their advertisements how the annual bill for each market offer differs (in per cent) from the DMO reference bill (standing offer bill), based on the annual electricity consumption the AER uses for its DMO determination.
- Standing offers typically provide more favourable terms and conditions than market offers. This can provide benefits to some customers.<sup>35</sup> However, market offers may have discounts or financial incentives attached that could reduce a customer's bill.
- Being on a market offer does not guarantee that a customer receives the lowest possible bill; there are significant differences between market offers, often even between different plans of the same retailer. Moreover, the supply and/or usage charges of a market offer may increase over time, and the initial discount period may expire. Therefore, even many customers who are on a market offer already have the potential to save by switching to a cheaper offer from their current retailer or by switching retailers.
- Customers should always check the 'better offer' message on their bill. The AER's Better Bills Guideline requires retailers to regularly provide such a message on the bill as well as information on Energy Made Easy to encourage consumers to switch to the best plan available.
- Before customers switch, they should carefully check the terms and conditions of the new plan to ensure that the plan suits their individual situation and preferences. For example, customers may need to factor in additional fees if they prefer to receive paper bills, or they may miss out on a discount or an incentive attached to the plan if they do not meet all the conditions. Chapters 3 and 4 provide more information on discounts, incentives, fees and charges.

---

<sup>35</sup> These additional benefits include access to paper bills at no extra cost, better payment terms (such as bill smoothing) and ongoing certainty of terms (i.e. retailers cannot change terms or impose restrictions as they can under market contracts).

# 3 Discounts, savings and incentives

## Key findings

We assessed the discounts, savings and incentives attached to residential and/or small business plans in the June quarter of 2025 and compared them to those in the June quarter of 2024. We found that in the June quarter of 2025:

- Discounts and financial and/or non-financial incentives were more common on plans for residential customers than for small business customers, as in the June quarter of 2024.
- For residential customers, discounts were available from a third of the retailers, while financial and/or non-financial incentives were offered by half of the retailers.
- For small business customers, nearly a quarter of the retailers offered discounts, financial and/or non-financial incentives.
- As in the June quarter of 2024:
  - guaranteed discounts were more common than conditional discounts
  - sign-up and other credits were the most common financial incentives (a new incentive in the June quarter of 2025 was a prepaid public EV charging voucher)
  - non-financial incentives were attached to various plans (there were several new incentives in the June quarter of 2025 for small business customers).
- GreenPower options for electricity from certified renewable energy sources were offered by various retailers.<sup>36</sup> The GreenPower options and their prices had not changed much compared to the June quarter of 2024. Several retailers also offered carbon offset options again.
- Various plans had conditions and/or eligibility criteria attached. Some customers may not have been able to take up those plans, or they may have forfeited the discounts or incentives if they did not meet the conditions or criteria, which could have resulted in a higher bill.
- Discounts, incentives and GreenPower options can provide value to customers but can also add complexity for customers when they review and compare plans.

## 3.1 QCA methodology

As in previous years, we compared and assessed the types of discounts, savings and incentives attached to retailers' generally available market offers using information from Energy Made Easy. Retailers can vary their market offers in several ways – for example, by:

<sup>36</sup> [GreenPower](#) is a scheme that enables households and businesses to displace all or part of their electricity usage with certified renewable energy, which is added to the electricity grid on their behalf. We consider GreenPower options a non-financial incentive. They do not reduce customers' bills but allow customers to reduce their carbon emissions.

- offering different supply and/or usage charges for different plans
- attaching guaranteed and/or conditional discounts of different types and levels
- attaching other financial or non-financial incentives
- attaching GreenPower options.

The focus of our analysis is on market offers because retailers generally attach discounts, savings and incentives to their market offers only.<sup>37</sup>

We present data for residential flat rate market offers (section 3.4) and small business flat rate market offers (section 3.5) in the June quarter. This is consistent with our approach in previous years, which showed that the June quarter data is broadly representative of the discounts, incentives and GreenPower options available over the course of the year for the different residential and small business tariffs.<sup>38</sup>

## 3.2 Types of discounts, incentives and conditions

### Guaranteed vs conditional discounts

There are 2 types of discounts:

- guaranteed discounts do not require a particular action or behaviour of the customer
- conditional discounts only apply if a customer satisfies certain requirements or conditions.<sup>39</sup>

If a discount is conditional, retailers must provide sufficiently clear information to describe the requirements or conditions that a customer must satisfy. Conditional discounts can include, but are not limited to:

- pay on time discounts
- bundling discounts (e.g. when a customer signs up to both electricity and gas with a retailer)
- direct debit discounts
- discounts based on customer type (e.g. new customer) or method of sign-up (e.g. online only)
- 'refer a friend' credits.<sup>40</sup>

### Financial vs non-financial incentives

Retailers can attach other benefits and/or savings ('incentives') to their plans. An incentive is defined as 'a benefit to the customer other than a discount' and can include non-price benefits, one-off price benefits or physical gifts that are provided to a customer when they enter a contract. Examples of non-price incentives are vouchers, subscriptions, cinema tickets or tickets to sporting events.<sup>41</sup>

Retailers do not categorise their incentives as either a financial or a non-financial incentive on Energy Made Easy. We generally classify an incentive as a financial incentive if it leads to a reduction of a customer's bill or has a direct cash equivalent, such as a gift card or prepaid credit card. If an incentive provides benefits and/or savings that do not directly reduce the bill value, we treat it as a non-financial incentive. Accordingly, we only include financial incentives in our bill calculations.

<sup>37</sup> No retailer attached any discounts to their flat rate standing offers in 2024-25, but some retailers continued to attach GreenPower options. EnergyAustralia again attached its 'PowerResponse program rebate' as an incentive to some standing offers, and Origin Energy attached a 'Origin Go Zero Electricity' incentive.

<sup>38</sup> As in previous years, the types and value (in dollar and percentage terms) of discounts, incentives and GreenPower options did not vary significantly between the 5 tariffs and tariff combinations that we cover and between the 4 quarters.

<sup>39</sup> AER, [AER Retail Pricing Information Guidelines](#) [version 5.0], 2018, pp 9-10, paras 35-36.

<sup>40</sup> AER, [Retail Pricing Information Guidelines obligations for retailers](#) [guidance note], 2021; ACCC, [Guide to the Electricity Retail Code](#) [version 3], 2021, pp iv, 17.

<sup>41</sup> AER, [AER Retail Pricing Information Guidelines](#) [version 5.0], 2018, p 10, paras 38-42.

## Eligibility criteria

In addition to discounts and incentives, some retailers attach eligibility restrictions/criteria to their plans. Eligibility criteria are specific conditions that a customer must meet to access a generally available plan – for example, being a member of a club/organisation, signing up to the plan through a comparison website, signing up to the plan online, being a concession card or Seniors Card holder, or being a new customer to the retailer.<sup>42</sup>

### 3.3 Regulation of discounting

In recent years, there have been significant changes to the regulation of discounting on retail electricity plans.<sup>43</sup>

- **Discounts on inflated prices:** Retailers are not allowed to attach discounts to a market offer where at least one price is above the equivalent price in a standing offer and no prices in the market offer are below the equivalent price in a standing offer. Retailers are thereby prevented from publishing plans where no customer could be better off under the undiscounted market offer than under the standing offer.<sup>44</sup>
- **Advertising of discounts:** Retailers must compare their prices in plans, advertisements and publications with a 'reference price' set by the AER. For each market offer, retailers must present an annual bill for a 'representative customer' – based on the model annual usage set by the AER – that includes all conditional discounts (if any). The difference between this bill and the reference price (annual DMO reference bill), must be expressed as a percentage of the reference price to provide a uniform basis for customers to compare market offers.<sup>45</sup>
- **Restriction of discount (and fee) amounts:** Conditional discounts and conditional fees are limited to the 'reasonable costs' a retailer is likely to incur when payment conditions are not met.<sup>46</sup> This restriction intends to improve plan comparability and protect consumers from excessive penalties in retail contracts with conditional discounts.<sup>47</sup>

These regulatory changes appear to have impacted customer and retailer behaviour. We observed in previous reports that there had been a general shift away from conditional towards guaranteed discounts and that the value of conditional discounts (where still available) had decreased. However, we also found that some plans now had eligibility criteria attached, which were similar in nature to a conditional discount. We share the ACCC's view that the use of eligibility criteria increases price certainty and transparency for customers when signing up to such a plan, which is a positive step.<sup>48</sup>

<sup>42</sup> AER, [AER Retail Pricing Information Guidelines](#) [version 5.0], 2018, pp 11-12, paras 48(k), 51.

<sup>43</sup> More information on the policy intent and impacts of these regulatory changes is available in section 3.3 of our market monitoring report for 2019-20 (QCA, [SEQ retail electricity market monitoring 2019-20](#), 2020, pp 34-36).

<sup>44</sup> Rule 46B of the National Energy Retail Rules (NERR), in effect since 1 July 2018; AEMC, [National Energy Retail Amendment \(Preventing discounts on inflated energy rates\) Rule 2018](#) [final determination], 2018, pp ii-iii; AEMC, [National Energy Retail Amendment \(Preventing discounts on inflated energy rates\) Rule 2018 No 2](#) [final rule], 2018, sch 1. We discussed some of the issues surrounding the introduction of the rule in our market monitoring report for 2017-18 (QCA, [SEQ retail electricity market monitoring: 2017-18](#) [updated report], 2019, p 63).

<sup>45</sup> Competition and Consumer (Industry Code – Electricity Retail) Regulations 2019 (Cth) (Electricity Retail Regulations), part 2 – Electricity Retail Code of Conduct (Electricity Retail Code), in force since 1 July 2019; ACCC, [Inquiry into the National Electricity Market](#), November 2019, pp 10, 22-23.

<sup>46</sup> AEMC, [National Energy Retail Amendment \(Regulating conditional discounting\) Rule 2020 No 1](#) [final rule], 2020, sch 1.

<sup>47</sup> Rules 46C and 52B of the NERR, in force since 1 July 2020; AEMC, [National Energy Retail Amendment \(Regulating conditional discounting\) Rule](#) [final determination], 2020, pp i-ii, 9-10. The final rule only applies to new contracts entered into after 1 July 2020 – that is, large conditional discounts attached to plans that existed before this date are not impacted by this rule. The ACCC noted that it was not concerned about conditional discounts that 'appropriately and efficiently allocate risk between consumers and retailers'. Conditional discounts that reflect reasonable costs to the retailer when the consumer fails to meet a payment condition can ensure these costs are not distributed across all customers (ACCC, [Inquiry into the National Electricity Market](#), December 2023, p 63).

<sup>48</sup> ACCC, [Inquiry into the National Electricity Market](#), December 2023, p 63.

The ACCC considered that the regulation of conditional discounting had been effective, but that the combination of customer disengagement and the exclusion of legacy contracts from regulation had allowed conditional discounts to persist.<sup>49</sup> The ACCC remained concerned about plans with large conditional discounts, given the significant impact on customers when the discount conditions are not met. Based on retailer pricing data, the ACCC found in December 2024 that failing to achieve conditional discounts increased an SEQ customer's annual bill on average by \$537, or 27%. It noted that the large conditional discounts it observed likely reflected those attached to legacy offers that existed before the AEMC introduced regulations to restrict the size of conditional discounts attached to new contracts entered into from 1 July 2020.<sup>50</sup>

In response to a rule change request, the AEMC made a final rule in June 2025 to strengthen and enhance consumer protections by, among other things, ensuring that:

- customers do not pay more than the standing offer price when their contract's benefit period changes or expires
- customers on grandfathered contracts with high conditional discounts receive their discount regardless of whether they meet their payment condition.

The AEMC also considered equity for certain consumers, including disengaged and vulnerable consumers, who will be provided extra protections. The final rule will take effect on 1 July 2026.<sup>51</sup>

## 3.4 Residential flat rate offers

### 3.4.1 Discounts

The discounts attached to residential flat rate market offers in the June quarter of 2025 (Table 3.1) were similar to those in the other quarters of 2024-25 and included:

- guaranteed discounts
- pay on time discounts
- pay on time discounts combined with a certain payment or billing method
- a discount that applied during a certain time only.

**Table 3.1: Discounts – residential flat rate market offers, June quarter 2025**

Retailer	Guaranteed	Pay on time	Pay on time and payment/billing method	Time of day
1st Energy	5% off bill <sup>a</sup>	–	–	–
CovaU	15% off usage <sup>b</sup>	–	–	–
Diamond Energy	–	–	2% off bill <sup>a,c</sup>	–
EnergyAustralia	3, 5, 10 or 12% off bill <sup>b,d</sup>	–	–	–
ENGIE	3, 4, 8 or 9% off bill <sup>b</sup>	–	–	–
GloBird Energy	–	2% off bill <sup>b,e</sup>	1% off bill <sup>b,f</sup>	–
Next Business Energy	8% off usage <sup>a</sup>	–	–	–
Ovo Energy	–	–	–	20% off usage <sup>b,g</sup>

<sup>49</sup> ACCC, *Inquiry into the National Electricity Market*, December 2023, p 65.

<sup>50</sup> ACCC, *Inquiry into the National Electricity Market*, December 2024, p 34. We calculated the percentage based on data published in ACCC, *Inquiry into the National Electricity Market [Appendix C – Supplementary spreadsheet with retail pricing data, cost stack data and charts]*, sheet 1. Residential (conditional), supplementary table figure C1.9, December 2024. We investigate the issue of customers on legacy market offers in more detail in Chapter 7 of this report.

<sup>51</sup> AEMC, *National Energy Retail Amendment (Improving consumer confidence in retail energy plans) Rule 2025* [rule determination], 2025, pp 3, 10-19, 23-27.

- a The discount was only attached to one plan (1st Energy, Diamond Energy and Next Business Energy).
- b The discount was only attached to some plans (CovaU, EnergyAustralia, ENGIE, GloBird Energy and Ovo Energy).
- c An ongoing discount applied to GST exclusive supply and usage charges with email invoicing and full payment received by due date.
- d Discounts applied to GST inclusive supply and usage charges.
- e Customers received a 2% discount off supply and usage charges when they paid their bill on time.
- f Customers received a 1% discount off supply and usage charges when they paid their bill on time by direct debit. The retailer referred to this discount as a direct debit discount.
- g The 'Free 3 Rate' discount amount stated was an estimate. The actual discount percentage amount varied depending on a customer's actual usage during the 'Free 3' period (11 am to 2 pm daily).

Notes: A dash (–) means the retailer did not attach the discount type to any of its residential flat rate market offers in this quarter. If a retailer had a discount attached, it did not necessarily attach the discount to each residential flat rate market offer or during the entire quarter.

Sources: Energy Made Easy; QCA analysis.

## Fewer retailers offered discounts than a year earlier

In the June quarter of 2025, 8 of the 24 retailers with residential flat rate market offers attached guaranteed and/or conditional discounts to at least one of their plans. This compares to 10 of the 25 retailers in the June quarter of 2024.<sup>52</sup> Of the 10 retailers that offered discounts in the June quarter of 2024, 7 retailers again offered discounts in the June quarter of 2025. One new retailer (Next Business Energy) offered discounts in the June quarter of 2025, while 3 retailers that offered discounts in the June quarter of 2024 did not do so anymore in the June quarter of 2025 (Alinta Energy, Simply Energy and Sumo Power).<sup>53</sup>

We also note that fewer retailers offered discounts than a few years ago. Changes to the regulation of discounting (discussed in section 3.3) may have influenced retailers' decision to attach discounts – in particular, very high conditional discounts that were common a few years ago. In addition, cost pressures may have negatively impacted some retailers' willingness and ability to offer discounts.

## Guaranteed discounts remained more common

In the June quarter of 2025, 5 of the 8 retailers with discounts offered only guaranteed discounts, while the remaining 3 retailers offered only conditional discounts. In the June quarter of 2024, 2 retailers offered both guaranteed and conditional discounts.

The size of the guaranteed discounts was generally lower in the June quarter of 2025 than in the June quarter of 2024, while the value of the conditional discounts remained largely unchanged.

## Some plans combined a pay on time discount with a payment/billing method

The same discount combinations and amounts were available as in the June quarter of 2024:

- Diamond Energy attached a 2% discount off the total bill if customers received bills by email and paid on time.
- GloBird Energy attached a 2% pay on time discount and an extra 1% pay on time via direct debit discount to most plans (both discounts off the bill), effectively making it a 3% discount off the bill when both payment criteria were met by the customer.

## Some plans had eligibility criteria attached

Some plans that had discounts attached also had restrictions attached – for example, the plans were only available to customers who:

<sup>52</sup> QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, pp 25–27. Simply Energy rebranded to ENGIE in April 2024. The retailer count in the June quarter of 2024 includes different plans of ENGIE and Simply Energy with discounts attached.

<sup>53</sup> Simply Energy rebranded to ENGIE in April 2024. It had plans published under both names in the June quarter of 2024.



- signed up through selected third-party channels
- were business customers<sup>54</sup>
- agreed to the National Roads and Motorists' Association (NRMA) terms and conditions and privacy policy and were not current My NRMA members
- moved house within 60 days.

### 3.4.2 Financial incentives

The financial incentives attached to residential flat rate market offers in the June quarter of 2025 (Table 3.2) were similar to those in the other quarters of 2024–25.

**Table 3.2: Financial incentives – residential flat rate market offers, June quarter 2025**

Retailer	Financial incentive
AGL <sup>a</sup>	<b>Sign-up credit</b> \$25 credit on the first bill \$25 credit on the next bill after 150 days (for existing customers only) \$100 credit on the next bill after 150 days (for new and moving customers only) \$125 credit on the next bill after 150 days (for new and moving customers only) <b>Bonus digital Mastercard</b> \$50 prepaid card if customers remained with AGL for at least 30 days from sign-up \$100 prepaid card if customers remained with AGL for at least 30 days from sign-up <b>Bonus prepaid Visa</b> \$100 prepaid card if customers remained with AGL for at least 30 days from sign-up
Amber Electric <sup>b</sup>	<b>Welcome credit</b> \$50 credit applied over 6 months (for new customers only) \$120 credit applied over 6 months (for new customers only) \$150 credit applied over 6 months (for new customers only) \$180 credit applied over 6 months (for new customers only)
CovaU <sup>c</sup>	<b>Refer a friend credit</b> \$50 credit applied to the existing and the new customer's accounts, if sign-up was completed using a 'Refer a Friend' link from an existing CovaU customer
EnergyAustralia <sup>d</sup>	<b>Credit</b> \$50 credit on the first or next bill (for 'move home customers by invitation only')
Energy Locals <sup>e</sup>	<b>Refer a friend credit</b> \$50 credit applied to the existing and the new customer's accounts, if sign-up was completed using a 'Refer a Friend' link from an existing Energy Locals customer <b>Special discount</b> \$100 credit applied to the account if customers stayed on the plan for 6 months
ENGIE <sup>f</sup>	<b>Welcome credit</b> \$100 credit on the first bill <b>EV Flex Charge</b> 150 kWh prepaid Chargefox public charging voucher to provide flexibility of charging when out or at home; from 12 am to 6 am AEST, ENGIE credited back 10 c/kWh of energy used at home.
Kogan Energy <sup>g</sup>	<b>Sign-up credit</b> \$100 credit (for new customers with an existing annual First membership)
Momentum Energy <sup>h</sup>	<b>Welcome credit</b> \$50 sign-up credit applied to the first bill
Origin Energy <sup>g</sup>	<b>Account credit</b> \$50 credit applied to the account after 25 June if the account was still active then \$150 credit applied to the account after 30 May if the account was still active then \$150 credit applied to the account after sign-up

<sup>54</sup> The retailer's Next Assured Res 8% GTD Energex Anytime plan was coded as a residential plan on Energy Made Easy.

Retailer	Financial incentive
Ovo Energy <sup>i</sup>	<b>Interest rewards</b> 3% interest on credit balances (after all monthly charges were considered), prorated for the number of days since the last bill <b>Electric vehicle off-peak</b> 8.0 c/kWh usage charge between 12 am and 6 am 8.4 c/kWh usage charge between 12 am and 6 am <b>Electric vehicle super off-peak</b> Free electricity between 11 am and 2 pm every day <b>'Free 3'</b> Free electricity between 11 am and 2 pm every day
Powershop <sup>g</sup>	<b>Sign-up credit</b> \$150 credit applied to the first bill \$200 credit applied to the first bill
Red Energy <sup>g</sup>	<b>Free electricity use period</b> Between 12 pm and 2 pm Saturday and Sunday, usage charges were waived

- a The different financial incentives were attached to different plans. Except for 2 plans, each plan had some eligibility restriction attached (e.g. the plan was only available to new AGL customers, Westpac customers or customers with a Seniors Card). Some plans had 2 incentives attached.
- b An incentive was attached all plans (except the Amber Plan offers) and listed as discounts on Energy Made Easy. The plans were available to new customers who had to be customers of CommBank (CBA) and link their CBA credit card or bank account as their payment method; customers were ineligible to receive any remaining credit months if they cancelled their Amber Electric account, switched their payment method to a non-CBA account, or their CBA card expired.
- c The incentive was attached to each plan.
- d The incentive was attached to 1 plan only.
- e The 'refer a friend' credit was attached to all market offers. The special discount credit was attached to 1 plan only and included as a discount on Energy Made Easy.
- f The welcome credit was attached to several plans, while the EV Flex Charge was only attached to 1 plan.
- g The incentive was attached to some plans only.
- h The eligibility restrictions included on Energy Made Easy stated the 2 plans with this incentive attached were only available to customers who signed up with a new supply address.
- i Each plan had at least 1 incentive attached; some plans had up to 3 incentives attached.

Notes: Retailers did not always offer financial incentives during the entire quarter. The same plan may have had different financial and/or non-financial incentives attached at different times, and a few plans had more than one incentive attached at the same time. Various plans had eligibility restrictions attached. Retailers generally reported incentives as including GST, or we assume them to include GST.

Sources: Energy Made Easy; QCA analysis.

In the June quarter of 2025, 12 of the 24 retailers with residential flat rate market offers attached financial incentives to at least one of their plans. This compares to 17 of the 25 retailers in the June quarter of 2024.<sup>55</sup>

The types of financial incentives attached to residential flat rate market offers were similar in both June quarters, with sign-up and other credits being the most common form of financial incentive. A new type of financial incentives offered in the June quarter of 2025 was ENGIE's EV Flex Charge, a prepaid public charging voucher.

Various plans with incentives attached also had eligibility criteria attached, which could preclude some customers from receiving the incentives. For example, some plans required customers to:

- have a Seniors Card
- own an electric vehicle (EV)
- have a solar photovoltaic (PV) system
- sign up online.

When customers compare plans and analyse the value of a financial incentive, they need to bear in mind that they may have to meet eligibility criteria and terms and conditions to access the incentive. Moreover, financial incentives are often one-off credits and will not reduce bills permanently.

<sup>55</sup> QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 27-29. Simply Energy rebranded to ENGIE in April 2024. The retailer count in the June quarter of 2024 includes different plans of ENGIE and Simply Energy with incentives attached.

### 3.4.3 Non-financial incentives

The non-financial incentives attached to residential flat rate market offers in the June quarter of 2025 (Table 3.3) were similar to those in the other quarters of 2024-25.

**Table 3.3: Non-financial incentives – residential flat rate market offers, June quarter 2025**

Retailer	Non-financial incentive
AGL <sup>a</sup>	<b>Velocity points</b> 3,000 Velocity points 10,000 sign-up Velocity points 20,000 sign-up Velocity points <b>Netflix</b> Netflix Standard with ads
Alinta Energy <sup>b</sup>	<b>Feed-in tariff</b> 10 c/kWh feed-in tariff for the first 10 kW exported (standard feed-in tariff thereafter)
Ampol Energy <sup>c</sup>	<b>Fuel discount</b> 10 c/L discount for regular and premium fuels when paying via the Ampol app, with a maximum of 1,500 L claimable annually
EnergyAustralia <sup>d</sup>	<b>PowerResponse program rebate</b> Customers may be eligible for EnergyAustralia's PowerResponse program, and by participating in events, they may be eligible for rebates, which may change over time
Energy Locals <sup>c</sup>	<b>Local Rewards</b> Free membership to Entertainment (valued at up to \$69.99), which provided access to a range of offers and discounts
ENGIE <sup>e</sup>	<b>Velocity points</b> 15,000 bonus Velocity points upfront and additional 3 or 6 Velocity points for every \$1 paid for electricity <b>GreenPower</b> 100% of usage matched with GreenPower, sourced from accredited, renewable electricity sources <b>Moving home guarantee</b> ENGIE promised to 'make moving easy' for existing and new customers; it guaranteed that 'electricity will be on in 3 business days' or customers would get \$500 credit back on their first bill <b>My NRMA membership</b> Complimentary membership of My NRMA, a National Roads and Motorists' Association (NRMA) program to 'explore new places and experiences, great deals on fuel, shopping, travel, entertainment and more along the way'
GloBird Energy <sup>e</sup>	<b>Carbon offset</b> 100% carbon offset <b>Renewable electricity</b> 100% renewable electricity accredited by GreenPower <b>Solar feed-in tariff</b> 10 c/kWh 'generous solar feed-in' credit for the first 8 kWh/day 11 c/kWh 'generous solar feed-in' credit for the first 8 kWh/day
Kogan Energy <sup>e</sup>	<b>Kogan First</b> Free Kogan First membership for 12 months for new customers
Momentum Energy <sup>c</sup>	<b>GreenPower</b> 10% of usage offset with renewable energy for free
Nectr <sup>c</sup>	<b>Carbon offset</b> 100% carbon neutral included

Retailer	Non-financial incentive
Origin Energy <sup>e</sup>	<p><b>Origin Go Zero Electricity</b> For \$1.50 per week, Origin Energy offset the greenhouse gas emissions from the customer's electricity or gas supply through Climate Active; with some plans, customers were also eligible to receive 2,000 Everyday Rewards points about 45 days after signing up if they opted in for Origin Go Zero Electricity</p> <p><b>Everyday Rewards points</b> Up to 5,000 Everyday Rewards points about 45 days after the acceptance date, and ongoing 1 Everyday Rewards point per \$1 on the bill Up to 20,000 Everyday Rewards points about 45 days after the acceptance date, and ongoing 1 Everyday Rewards point per \$1 on the bill</p> <p><b>AGA EHA Program membership</b> Customers received an Emergency Home Assistance (EHA) Program membership provided by Allianz Global Assistance (AGA) for the 12-month energy plan period</p>
Red Energy <sup>f</sup>	<p><b>Qantas points</b> 10,000 bonus Qantas points when paying the first bill in full, and additional 2 or 3 Qantas points per \$1 on every bill when paying on time</p> <p><b>Contributions to Taronga Conservation Society Australia</b> \$5 contribution for each calendar month from the date Red Energy became responsible for the electricity supply</p> <p><b>Contributions to Breast Cancer Network Australia</b> \$5 contribution for each calendar month from the date Red Energy became responsible for the electricity supply</p> <p><b>Contributions to Rotary International District 9815 Incorporated</b> \$5 contribution for each calendar month from the date Red Energy became responsible for the electricity supply</p> <p><b>Solar feed-in rates</b> 'A competitive solar feed-in rate'</p> <p><b>Renewable matching promise</b> Snowy Hydro Limited matched every unit of electricity a customer bought from Red Energy by generating one unit of electricity from a renewable source</p>

- a The incentives were only attached to some plans. Except for 2 plans, each plan had some eligibility restriction attached (e.g. the plan was only available to existing AGL customers who were Velocity members, or to customers with a Seniors Card). Some plans had 2 incentives attached.
- b The incentive (referred to as a 'stepped feed-in tariff') was only attached to one plan, which required customers to have a qualifying solar PV generator with a generating capacity of no more than 10 kW (or larger at the retailer's discretion). For any export after the 10 kW threshold, Alinta Energy's standard feed-in tariff applied.
- c The incentive was attached to one plan only (Ampol Energy and Nectr only had one market offer).
- d The incentive was attached to all plans.
- e The incentives were attached to some plans only. For the 2 plans that had the GreenPower incentive attached, ENGIE stated in the green charge description field on Energy Made Easy that a daily charge of 14.28 cents would be applied to the bill to participate in the GreenPower accredited program.
- f Each plan (except the Living Energy Saver plans) had at least one incentive attached; some plans had 2 incentives attached. Several plans had an 8 c/kWh (or 5.5 c/kWh from 15 May 2025) solar feed-in tariff attached, including those with the 'great solar feed-in rates' incentive attached.

Notes: Retailers did not always offer non-financial incentives during the entire quarter. The same plan may have had different financial and/or non-financial incentives attached at different times, and a few plans had more than one incentive attached at the same time. Various plans had eligibility restrictions attached.

Sources: Energy Made Easy; QCA analysis.

In the June quarter of 2025, 12 of the 24 retailers with residential flat rate market offers attached non-financial incentives to at least one of their plans. This compares to 12 of the 25 retailers in the June quarter of 2024.<sup>56</sup>

The types of non-financial incentives attached to residential flat rate market offers were similar in both June quarters. No new types incentives were offered in the June quarter of 2025.

Both the range of non-financial incentives and the number of retailers offering such incentives have increased substantially over time. For instance, about half of the retailers attached non-financial

<sup>56</sup> QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 29-32. Simply Energy rebranded to ENGIE in April 2024. The retailer count in the June quarter of 2024 includes different plans of ENGIE and Simply Energy with incentives attached.

incentives to their residential flat rate market offers in the June quarters of 2024 and 2025, compared to only 4 of the 34 retailers in the June quarter of 2021.<sup>57</sup>

Our observations on eligibility criteria attached to plans with discounts or financial incentives also apply to plans with non-financial incentives. For example, some plans with non-financial incentives attached were only available to customers who:

- signed up through selected third-party channels
- were existing Everyday Rewards members
- were a new customer
- were Qantas Frequent Flyer members or Qantas Red business customers who were nominated as a director or authorised person on a Qantas Red business plan who were also an account holder on a Qantas Red residential premises.

While non-financial incentives do not reduce a customer's bill, they can still be of value to the customer and influence the choice of a plan. However, retailers' use of incentives can add complexity for customers when they review and compare plans. As with financial incentives, customers need to bear in mind that eligibility criteria and terms and conditions may be attached to accessing a non-financial incentive, and that the incentive may be one-off only.

### 3.4.4 GreenPower

The GreenPower options attached to residential flat rate market offers in the June quarter of 2025 (Table 3.4) were similar to the options in the other quarters of 2024-25. Retailers generally allowed customers to select a proportion of their electricity usage to be supplied from GreenPower-accredited sources for a fixed price per week or per kilowatt hour on top of their normal bill.

**Table 3.4: GreenPower options – residential flat rate market offers, June quarter 2025**

Retailer	GreenPower options
AGL	20% GreenPower for \$1/week 100% GreenPower for 4.4 c/kWh
Amber Electric	100% GreenPower for 6.06 c/kWh
CovaU <sup>a</sup>	25% GreenPower for 1.1 c/kWh or 1.375 c/kWh 50% GreenPower for 2.2 c/kWh or 2.75 c/kWh 100% GreenPower for 4.4 c/kWh or 5.5 c/kWh
Diamond Energy	50% GreenPower for 2.75 c/kWh 100% GreenPower for 5.5 c/kWh
Dodo Power & Gas <sup>b</sup>	10% GreenPower for 0.99 c/kWh 100% GreenPower for 9.9 c/kWh
EnergyAustralia	10% PureEnergy for 4.95 c x 10% x total usage 20% PureEnergy for 4.95 c x 20% x total usage 100% PureEnergy for 4.95 c/kWh
Energy Locals	10% GreenPower for 0.485 c/kWh 50% GreenPower for 2.425 c/kWh 100% GreenPower for 4.85 c/kWh
ENGIE <sup>c</sup>	100% GreenPower for 14.28 c/day
GloBird Energy <sup>d</sup>	100% GreenPower included in usage charges (0 c/kWh)
Momentum Energy <sup>e</sup>	10, 20, 25, 50, 75 or 100% of usage for 4.95 c/kWh 10% GreenPower included in usage charges (0 c/kWh)

<sup>57</sup> QCA, [SEQ retail electricity market monitoring 2020-21](#), 2021, p 42. We reported that 5 retailers attached non-financial incentives in 2021 – this included Dodo Power & Gas. We no longer include the potential promotional offers of Dodo Power & Gas as a non-financial incentive.

Retailer	GreenPower options
Origin Energy	25% GreenPower for 1.13 c/kWh 50% GreenPower for 2.25 c/kWh 100% GreenPower for 4.5 c/kWh
Ovo Energy <sup>f</sup>	100% GreenPower for 4.95 c/kWh or 5.5 c/kWh
Pacific Blue Retail <sup>g</sup>	100% GreenPower included in usage charges (0 c/kWh)
Powershop	100% GreenPower for 5.5 c/kWh – customers could purchase as much or as little 100% GreenPower as they liked
Red Energy <sup>h</sup>	100% GreenPower for 3.3 c/kWh or 4.84 c/kWh

a The higher prices were attached to the 2 plans available from 1 August 2024 to 1 July 2025, while the lower prices were attached to the 2 plans available from 10 July 2024.

b As in previous years, the retailer stated in the description field on Energy Made Easy for the 10% GreenPower option '\$0.099 per kWh' but included a dollar value of '0.0099' in the green charge amount field.

c Only 2 plans had this GreenPower option attached. The retailer stated in the incentives field on Energy Made Easy that 100% of the electricity will be matched with GreenPower.

d Only 3 plans had this GreenPower option attached.

e These options were attached to all plans, except for one plan that had 10% free GreenPower attached as an incentive.

f The lower price was stated in the description field on Energy Made Easy for the plans that expired on 16 or 28 May 2025, but the dollar value was included in the green charge amount field as '0.055' for all the plans.

g Only one plan had this GreenPower option attached.

h The higher price was attached to plans that were available until 15 May 2025, while the lower price was attached to plans available from 15 May 2025 to 1 July 2025.

Note: Retailers reported GreenPower prices as being GST inclusive, except for EnergyAustralia, Energy Locals, Origin Energy and Red Energy, which did not indicate the GST status of their GreenPower options.

Sources: Energy Made Easy; QCA analysis.

In the June quarter of 2025, 15 of the 24 retailers had GreenPower options attached to at least one residential flat rate market offer. This is similar to the June quarter of 2024 (16 of the 25 retailers).<sup>58</sup> While 1 additional retailer offered GreenPower options in the June quarter of 2025 (GloBird Energy), 2 retailers that had GreenPower options available in the June quarter of 2024 (Simply Energy and ReAmped Energy) are no longer active in the market.<sup>59</sup>

Retailers that attached GreenPower options to their residential flat rate market offers often provided a choice of either 10%, 20%, 25%, 50% or 100% GreenPower. The price of GreenPower varied substantially between the retailers. Charges for 100% GreenPower, for example, ranged from 3.3 c/kWh (Red Energy) to 9.9 c/kWh (Dodo Power & Gas) in the June quarter of 2025. Some retailers included 100% GreenPower at no extra cost or charged a set amount per day.

In comparison to the June quarter of 2024, in the June quarter of 2025:

- 8 retailers had the same GreenPower options and prices (AGL, Diamond Energy, Dodo Power & Gas, EnergyAustralia, ENGIE, Momentum Energy, Pacific Blue Retail and Powershop)
- 3 retailers had the same options but higher prices (CovaU<sup>60</sup>, Origin Energy and Ovo Energy<sup>61</sup>)
- 2 retailers had the same options but lower prices (Amber Electric and Red Energy<sup>62</sup>)
- 1 retailer had the same options but now only had a single price (Energy Locals).

In addition, some retailers had carbon offsets attached to at least one of their residential flat rate market offers in the June quarter of 2025:

- Alinta Energy – offered a 'Carbon Balance Single Rate' plan, but provided no information on Energy Made Easy if it included carbon offsets or if additional charges were associated with it
- GloBird Energy – 100% carbon offset as an incentive (GloGreen (Flat Rate) Energex plans only)

<sup>58</sup> QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 32-33.

<sup>59</sup> Simply Energy has rebranded to ENGIE and ReAmped Energy has surrendered its electricity retailer authorisation. In the June quarter of 2024, different GreenPower options were attached to the plans published by ENGIE and Simply Energy.

<sup>60</sup> CovaU had 2 plans with higher prices and 2 plans with the same prices as in the June quarter of 2024.

<sup>61</sup> Ovo Energy still had plans with the lower prices available in the earlier part of the June quarter of 2025.

<sup>62</sup> Red Energy still had plans with the higher prices available in the earlier part of the June quarter of 2025.



- Nectr – 100% carbon neutral included as an incentive (Nectr Home Buzz plan)
- Origin Energy – various plans gave customers the option to pay \$1.50 per week to offset their greenhouse gas emissions through Climate Active included as an incentive
- Powershop – as part of the contract terms, all the carbon emissions associated with the customer’s energy usage were offset (Power Offset plans only).

## 3.5 Small business flat rate offers

### 3.5.1 Discounts

The discounts attached to small business flat rate market offers in the June quarter of 2025 (Table 3.5) were similar to those in the other quarters of 2024–25. Retailers attached either a guaranteed discount or a combination of a pay on time and billing method discount.

**Table 3.5: Discounts – small business flat rate market offers, June quarter 2025**

Retailer	Guaranteed	Pay on time and billing methods
1st Energy	10% off bill <sup>a</sup>	–
Diamond Energy	–	2% off bill <sup>b</sup>
EnergyAustralia	7 or 10% off bill <sup>c</sup>	–
ENGIE	3, 8 or 15% off bill <sup>d</sup>	–
Next Business Energy	8% off usage <sup>e</sup> 10% off bill <sup>e</sup>	–

a The discount was only attached to one of the retailer’s plans.

b An ongoing discount applied to GST exclusive supply and usage charges with email invoicing and full payment received by due date. The discount was attached to the retailer’s only plan.

c The discounts applied to GST exclusive supply and usage charges. Both of the retailer’s plans had a discount attached.

d Each of the retailer’s plans had a discount attached.

e Of the retailer’s 8 plans, 1 had the discount off usage charges attached and 4 had the discount off the bill was attached.

Notes: A dash (–) means the retailer did not attach the discount type to any of its small business flat rate market offers in this quarter. If a retailer had a discount attached, it did not necessarily attach the discount to each small business flat rate market offer or during the entire quarter.

Sources: Energy Made Easy; QCA analysis.

### More retailers offered discounts than a year earlier

In the June quarter of 2025, 5 of the 21 retailers with small business flat rate market offers attached discounts to at least one of their plans. This compares to 4 of the 22 retailers in the June quarter of 2024.<sup>63</sup> We found that 4 of the 5 retailers that offered discounts in the June quarter of 2025 also offered discounts in the June quarter of 2024. A new retailer that offered discounts in the June quarter of 2025 was ENGIE.

While one more retailer offered discounts than a year earlier, fewer retailers did so than a few years ago. Changes to the regulation of discounting (discussed in section 3.3) may have influenced retailers’ decision to attach discounts – in particular, very high conditional discounts that were common a few years ago. In addition, cost pressures may have negatively impacted some retailers’ willingness and ability to offer discounts.

<sup>63</sup> QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, pp 34–35.



## Guaranteed discounts remained more common

In the June quarter of 2025, 4 of the 5 retailers with discounts only offered guaranteed discounts – similar to the June quarter of 2024, when 3 of the 4 retailers only offered guaranteed discounts. The size of the guaranteed discounts was similar in the June quarters of 2024 and 2025.

## Only one retailer offered a conditional discount

As in each June quarter since 2020, Diamond Energy was the only retailer to attach a discount combination. A 2% discount off the total bill if customers received bills by email and paid on time was offered in the June quarters of 2023, 2024 and 2025. The discount value was lower than in the June quarter of 2022, when the discount was 7%.<sup>64</sup>

## Some plans had eligibility criteria attached

Some plans that had discounts attached also had restrictions attached – for example, the plans were only available to customers who:

- moved house within 60 days
- had linked Virgin Australia Business Flyer members accounts
- were new customers.

## 3.5.2 Financial incentives

The financial incentives attached to small business flat rate market offers in the June quarter of 2025 (Table 3.6) were similar to those in the other quarters of 2024–25.

**Table 3.6: Financial incentives – small business flat rate market offers, June quarter 2025**

Retailer	Financial incentive
AGL <sup>a</sup>	<b>Sign-up credit</b> \$250 credit on the next bill after 150 days (for new and moving customers only)
Energy Locals <sup>b</sup>	<b>Sign-up credit</b> \$175 credit after staying with the retailer for 6 months (for new customers only) <b>Refer a friend credit</b> \$50 credit applied to the existing and the new customer's accounts, if sign-up was completed using a 'Refer a Friend' link from an existing Energy Locals customer
ENGIE <sup>c</sup>	<b>Welcome credit</b> \$100 credit on the first bill
Origin Energy <sup>d</sup>	<b>Account credit</b> \$200 credit applied to the account after sign-up \$300 credit applied to the account after sign-up
Ovo Energy <sup>e</sup>	<b>Interest rewards</b> 3% interest on credit balances (after all monthly charges were considered), prorated for the number of days since the last bill

a The sign-up credit was attached to one plan only.

b The sign-up credit was attached to 2 plans only, while the 'refer a friend' credit was attached to all 4 plans.

c The welcome credit was attached to 2 plans only.

d The account credits were attached to some plans only.

e The interest rewards were attached to both plans.

Notes: Retailers did not always offer financial incentives during the entire quarter. The same plan may have had different financial and/or non-financial incentives attached at different times, and a few plans had more than one incentive attached at the same time. Various plans had eligibility restrictions attached. Retailers generally reported incentives as including GST, or we assume them to include GST.

Sources: Energy Made Easy; QCA analysis.

<sup>64</sup> QCA, [SEQ retail electricity market monitoring 2021–22](#), 2022, p 47.

In the June quarter of 2025, 5 of the 21 retailers with small business flat rate market offers attached financial incentives to at least one of their plans. This compares to 4 of the 22 retailers in the June quarter of 2024.<sup>65</sup>

The types of financial incentives attached to small business flat rate market offers were the same in both June quarters, with sign-up and other credits being the most common form of financial incentive. No new types of financial incentives were offered in the June quarter of 2025.

Various plans with incentives attached also had eligibility restrictions attached, which could preclude some customers from receiving the incentives. For example, some plans required customers to:

- sign up with an authorised representative of the retailer
- have core operating business hours between 8 am and 6 pm daily.

When customers compare plans and analyse the value of a financial incentive, they need to bear in mind that they may have to meet eligibility criteria and terms and conditions to access the incentive. Moreover, financial incentives are often one-off credits and will not reduce bills permanently.

### 3.5.3 Non-financial incentives

The non-financial incentives attached to small business flat rate market offers in the June quarter of 2025 (Table 3.7) were similar to those in the other quarters of 2024–25.

**Table 3.7: Non-financial incentives – small business flat rate market offers, June quarter 2025**

Retailer	Non-financial incentive
ENGIE <sup>a</sup>	<b>Velocity points</b> 15,000 bonus Velocity points upfront and additional 3 or 6 Velocity points for every \$1 paid for electricity <b>GreenPower</b> 100% of usage matched with GreenPower, sourced from accredited, renewable electricity sources <b>Moving home guarantee</b> ENGIE promised to ‘make moving easy’ for existing and new customers; it guaranteed that ‘electricity will be on in 3 business days’ or customers would get \$500 credit back on their first bill
Momentum Energy <sup>b</sup>	<b>GreenPower</b> 10% of usage offset with renewable energy for free
Nectr <sup>b</sup>	<b>Carbon offset</b> 100% carbon neutral included
Origin Energy <sup>c</sup>	<b>Origin Go Zero Electricity</b> For 1.5 c/kWh, Origin Energy offset the greenhouse gas emissions from the customer’s electricity or gas supply through Climate Active
Red Energy <sup>d</sup>	<b>Qantas points</b> 10,000 bonus Qantas points when paying the first bill in full, and additional 2 Qantas points per \$1 on every bill when paying on time 15,000 bonus Qantas points when paying the first bill in full, and additional 3 Qantas points per \$1 on every bill when paying on time <b>Solar feed-in rates</b> ‘A competitive solar feed-in rate’

a Velocity points were attached to 2 plans. GreenPower and the moving home guarantee were attached to one plan each.

b The incentive was attached to one plan only.

c The incentive was attached to each plan.

d Each plan (except the Red Business Saver plans) had at least one incentive attached; some plans had 2 incentives attached. The plans with the solar feed-in rates incentive had an 8 c/kWh feed-in tariff attached until 15 May 2025 and 5.5 c/kWh from 15 May 2025, which was higher than the feed-in tariff attached to some of the other plans, unlike for residential plans.

<sup>65</sup> QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, pp 35–36.

Notes: Retailers did not always offer non-financial incentives during the entire quarter. The same plan may have had different financial and/or non-financial incentives attached at different times, and a few plans had more than one incentive attached at the same time. Various plans had eligibility restrictions attached.

Sources: Energy Made Easy; QCA analysis.

In the June quarter of 2025, 5 of the 21 retailers attached non-financial incentives to at least one of their small business flat rate market offers. This compares to 6 of the 22 retailers in the June quarter of 2024.<sup>66</sup>

The types of non-financial incentives attached to small business flat rate market offers were similar in both June quarters. New types of incentives in the June quarter of 2025 included Velocity points, a moving home guarantee and carbon offsets.

Customers need to be mindful that eligibility criteria and terms and conditions may be attached to accessing a non-financial incentive. For example, some plans were only available to customers who:

- had a Qantas Business Rewards membership and had an Australian Business Number (ABN) on their account that matched the ABN registered to their Qantas Business Rewards membership
- had linked Virgin Australia Business Flyer members accounts
- were new customers.

While non-financial incentives do not reduce a customer's bill, they can still be of value to the customer and influence the choice of a plan. However, retailers' use of incentives can add complexity for customers when they review and compare plans. As with financial incentives, customers need to bear in mind that eligibility criteria and terms and conditions may be attached to accessing a non-financial incentive, and that the incentive may be one-off only.

### 3.5.4 GreenPower

The GreenPower options attached to small business flat rate market offers in the June quarter of 2025 (Table 3.8) were similar to the options in the other quarters of 2024-25. Retailers generally allowed customers to select a proportion of their electricity usage to be supplied from GreenPower-accredited sources for a fixed price per week or per kilowatt hour on top of their normal bill.

**Table 3.8: GreenPower options – small business flat rate market offers, June quarter 2025**

Retailer	GreenPower options
AGL	20% GreenPower for 0.88 c/kWh 100% GreenPower for 4.4 c/kWh
Amber Electric	100% GreenPower for 6.06 c/kWh
CovaU	25% GreenPower for 1.375 c/kWh 50% GreenPower for 2.75 c/kWh 100% GreenPower for 5.5 c/kWh
Diamond Energy	50% GreenPower for 2.75 c/kWh 100% GreenPower for 5.5 c/kWh
EnergyAustralia	10% PureEnergy for 4.95 c x 10% x total usage 25% PureEnergy for 4.95 c x 25% x total usage 100% PureEnergy for 4.95 c/kWh
Energy Locals	10% GreenPower for 0.485 c/kWh 50% GreenPower for 2.425 c/kWh 100% GreenPower for 4.85 c/kWh
ENGIE <sup>a</sup>	100% GreenPower for \$1.50/day

<sup>66</sup> QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 36-37. Simply Energy rebranded to ENGIE in April 2024. The retailer count in the June quarter of 2024 includes plans of ENGIE and Simply Energy with incentives attached.

Retailer	GreenPower options
Momentum Energy <sup>b</sup>	10, 20, 25, 50, 75 or 100% of usage for 4.95 c/kWh 10% GreenPower included in usage charges (0 c/kWh)
Origin Energy	25% GreenPower for 1.13 c/kWh 50% GreenPower for 2.25 c/kWh 100% GreenPower for 4.5 c/kWh
Ovo Energy <sup>c</sup>	100% GreenPower for 4.95 c/kWh or 5.5 c/kWh
Powershop	100% GreenPower for 5.5 c/kWh – customers could purchase as much or as little 100% GreenPower as they liked
Red Energy <sup>d</sup>	100% GreenPower for 3.3 c/kWh or 4.84 c/kWh

a Only one plan had this GreenPower option attached. ENGIE stated in the incentives field on Energy Made Easy that 100% of the electricity will be matched with GreenPower.

b A choice of options was attached to all plans, except for one plan that had 10% free GreenPower attached as an incentive.

c The lower price was stated in the description field on Energy Made Easy for the plan that expired on 28 May 2025, but the dollar value was included in the green charge amount field as '0.055' for both plans.

d The higher price was attached to plans that were available until 15 May 2025, while the lower price was attached to plans available from 15 May 2025 to 1 July 2025.

Note: Retailers reported GreenPower prices as being GST inclusive, except for EnergyAustralia, Energy Locals, Origin Energy and Red Energy, which did not indicate the GST status of their GreenPower options.

Sources: Energy Made Easy; QCA analysis.

In the June quarter of 2025, 12 of the 21 retailers had GreenPower options attached to at least one of their small business flat rate market offers. This is a slightly lower proportion than in the June quarter of 2024 (14 of the 22 retailers).<sup>67</sup> The 2 retailers that did not have GreenPower options available anymore in the June quarter of 2025 are no longer active in the market.<sup>68</sup>

Retailers that attached GreenPower options to their small business flat rate market offers often provided a choice of either 10%, 20%, 25%, 50% or 100% GreenPower. The price of GreenPower varied substantially between the retailers. Charges for 100% GreenPower, for example, ranged from 3.3 c/kWh (Red Energy) to 6.06 c/kWh (Amber Electric). ENGIE charged a set amount per day (\$1.50) for 100% GreenPower.

In comparison to the June quarter of 2024, in the June quarter of 2025:

- 6 retailers had the same GreenPower options and prices (AGL, Diamond Energy, EnergyAustralia, ENGIE, Momentum Energy and Powershop)
- 4 retailers had the same options but higher prices (CovaU, Energy Locals, Origin Energy and Ovo Energy<sup>69</sup>)
- 2 retailers had the same options but lower prices (Amber Electric and Red Energy<sup>70</sup>).

In addition, some retailers had carbon offsets attached to at least one of their small business flat rate market offers in the June quarter of 2025:

- Alinta Energy – offered a 'Carbon Balance Single Rate' plan, but provided no information on Energy Made Easy if it included carbon offsets or if additional charges were associated with it
- Origin Energy – gave customers the option with all plans to pay 1.50 c/kWh to offset their greenhouse gas emissions through Climate Active, which was included as an incentive
- Nectr – 100% carbon neutral included as an incentive (Nectr Business Buzz (8500) plan)
- Powershop – as part of the contract terms, all the carbon emissions associated with the customer's energy usage were offset (Power Offset plans only).

<sup>67</sup> QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 37-38. Simply Energy rebranded to ENGIE in April 2024.

The retailer count in the June quarter of 2024 includes plans of ENGIE and Simply Energy with GreenPower options attached.

<sup>68</sup> Simply Energy has rebranded to ENGIE and ReAmped Energy has surrendered its electricity retailer authorisation.

<sup>69</sup> Ovo Energy still had one plan with the lower prices available until 28 May 2025.

<sup>70</sup> Red Energy still had plans with the higher prices available until 15 May 2025.

### 3.6 Complexity due to discounts and incentives

The observations we made in previous years regarding the additional complexity that discounts and incentives can cause are still relevant. Customers should not only consider the potential discounts and incentives when they review and compare different plans, but they should also have regard to the underlying supply and usage charges of those plans. Customers need to keep in mind that:

- many financial incentives are only one-off
- non-financial incentives do not reduce the bill but may still add value
- some discounts are conditional on a particular action or behaviour
- some 'generally available' plans have eligibility restrictions attached that preclude some customers from accessing them.

Over the past few years, plans with discounts attached have become less prevalent. We have also seen a shift from conditional to guaranteed discounts. We are of the view that these developments make it easier for customers to compare plans. However, we have also observed that more retailers attach incentives to their plans, which customers need to evaluate when they compare plans.

### 3.7 Key considerations for customers

Discounts and financial incentives can lower customers' electricity bills. But customers should carefully consider if a plan with discounts or incentives attached is best suited to them (Box 3).

#### Box 3: Considering discounts and incentives

- Eligibility restrictions and/or terms and conditions may be attached to a discount or incentive, or the plan itself. It is therefore advisable to always carefully check the details of each plan. Customers could risk forfeiting the discount or incentive if they do not meet any of the conditions or criteria, or they may not even be eligible for the plan.
- Eligibility restrictions can be similar in nature to a conditional discount. However, a plan with eligibility restrictions may provide more certainty for customers that they will receive the financial benefits and pay what they expect than a plan with a conditional discount.
- Financial incentives are often one-off credits or bonuses and will therefore only reduce the bill once. Customers should therefore also carefully check the supply and usage charges of a plan. Over the longer term, a plan with a financial incentive could result in higher bills.
- Non-financial incentives do not reduce the bill value, but they may still be of value to the customer and are worth considering when selecting a new plan. As with financial incentives, customers need to bear in mind that eligibility restrictions and terms and conditions may be attached to a non-financial incentive and that the incentive may expire or be one-off.
- The changes to the regulation of discounting provide important consumer protections. However, customers need to keep in mind that the percentage indications in retailers' advertisements ('x% less than the reference price') are not discount percentages, but a comparison between the annual bill for that plan (based on the model annual usage set by the AER) and the DMO reference bill. A customer's actual savings will depend on their individual consumption and may therefore substantially differ from the value of savings suggested by the DMO reference bill comparison. This is particularly relevant for small business customers, whose consumption levels are more diverse than those of residential customers.
- A plan with discounts or incentives does not always result in a lower bill. Such a plan could have higher supply and/or usage charges than a plan with no discounts or incentives. Customers should keep in mind that the supply and usage charges generally differ from retailer to retailer, and often even between different plans of the same retailer.

# 4 Fees and charges

## Key findings

We assessed the fees and charges attached to residential and/or small business plans in the June quarter of 2025 and compared them to those a year earlier. We found:

- Most retailers attached retail fees to at least one of their market offers in the June quarters of 2024 and 2025. The types of retail fees and their range were similar in these two quarters. Retailers included fees for payment processing, paper bills, dishonoured or late payments, membership and account establishment. No retailer attached exit fees.
- Some retailers' standing offers published on Energy Made Easy had fees attached that are not allowed to be charged to standing offer customers in SEQ. This year, we identified one retailer that had charged prohibited fees to a small number of its standing offer customers. This breach has since been remediated.
- Not all retailers provided information on metering charges, and very few retailers disclosed how they treat or charge costs related to advanced digital metering.
- Retailers generally attached some distribution non-network charges to their plans, such as fees for reconnection and disconnection services.
- As in previous years, fee information on Energy Made Easy was not always clear, and some retailers:
  - only stated for some fees whether or not they included or excluded GST, while other retailers did not include any information about GST at all for their fees
  - noted that fees 'may' apply or included fees but indicated their values as zero
  - referred to the potential for fees and charges – other than those listed on Energy Made Easy – to be levied on customers.

These issues make it more challenging for customers to compare plans.

## 4.1 QCA methodology

Electricity plans can include various one-off or recurring fees, including payment processing fees, paper bill fees, dishonoured payment fees, membership fees, late payment fees, account establishment fees and exit fees.<sup>71</sup> Retailers may also pass through to customers certain fees or charges levied by distributors, such as metering charges, connection, disconnection and reconnection fees, special meter reading fees and meter inspection fees.<sup>72</sup>

<sup>71</sup> Section 2(d) of the direction refers to 'joining and early termination charges'. In this chapter, we describe these fees as 'account establishment fees' and 'exit fees' to align with the terminology used on Energy Made Easy.

<sup>72</sup> These fees are also referred to as distribution non-network charges (see section 4.6). Also see Electricity Regulation, s 226 and sch 8; Energex, [Energex Network Tariff Guide, 1 July 2024 to 30 June 2025](#), 2024.



We primarily rely on data published on Energy Made Easy. Retailers are required to provide the 'key fees' applicable to retail electricity plans on Energy Made Easy. A key fee is a fee that will be incurred by all or a significant portion of customers.<sup>73</sup>

Our analysis focuses on the types of fees and charges attached to residential and small business flat rate plans in the June quarter. This is consistent with our approach in previous years. Data on Energy Made Easy showed that – as in previous years – the types and value of fees and charges for each retailer did not vary substantially across all the quarters of 2024–25, between the 3 residential tariffs and tariff combinations, or between the 2 small business tariffs.

## 4.2 Restrictions on fees

### 4.2.1 Standing offer customers

When the National Energy Customer Framework (NECF) was introduced in Queensland on 1 July 2015, Queensland-specific 'derogations' were added to the framework, including a restriction on fee types that can be charged to standing offer customers. Under section 22A of the National Energy Retail Law (NERL), standing offer customers in Queensland can only be charged 3 fee types:

- historical billing data fee for data that is more than 2 years old, if requested by a customer
- retailer's administration fee for a dishonoured payment
- financial institution fee for a dishonoured payment.<sup>74</sup>

We have written to each retailer that is operating in the SEQ retail electricity market to inform them of their obligations under the NECF. In addition, we check on a quarterly basis if any standing offers published on Energy Made Easy have fees attached that retailers are not allowed to charge customers in Queensland. Whenever we identify published standing offers that have prohibited fees attached, we contact the respective retailer(s) to enquire if any standing offer customers have in fact been charged such fees. If that is the case, the retailer has breached section 22A of the NERL, and we take actions to ensure compliance and that the matter is rectified in the interests of consumers.<sup>75</sup>

### 4.2.2 Fee amounts

Conditional fees are restricted to the 'reasonable costs' a retailer is likely to incur when payment conditions are not met.<sup>76</sup> The AEMC considered that a guideline for reasonable cost levels was not required, as 'reasonable costs' was a 'widely used and understood concept'. The AEMC therefore adopted a principles-based approach that provides flexibility to the AER in enforcing the rule on a case-by-case basis, and to retailers in complying with the rule.<sup>77</sup>

In addition, the *Competition and Consumer Act 2010* (Cth) Part IVC prohibits retailers from levying excessive credit or debit card payment processing fees. The ACCC has clarified that a payment surcharge is excessive and in breach of the law if it exceeds the costs to the business of processing

<sup>73</sup> AER, [AER Retail Pricing Information Guidelines](#) [version 5.0], 2018, p 10, cls 43 and 47. Examples of key fees include account establishment fees, annual membership fees, late payment fees, payment processing fees and metering fees.

<sup>74</sup> Section 22A specifies that retailers' standing offer prices 'may comprise only fees and charges of types that were the subject of the notified prices for the financial year immediately preceding the day the price determination no longer applies'. These 3 fee types are the fees that were included in the QCA's price determination for 2015–16 (National Energy Retail Law, s 22A; Queensland Government, [Gazette: Extraordinary](#), vol 369, no 36, 19 June 2015, p 190).

<sup>75</sup> Our compliance and enforcement activities are described on our website at [Energy enforcement](#).

<sup>76</sup> Division 7A (Customer retail contracts – conditional fees) in the NERR contains the relevant rule 52B (AEMC, [National Energy Retail Amendment \(Regulating conditional discounting\) Rule 2020 No 1](#) [final rule], 2020, sch 1).

<sup>77</sup> AEMC, [National Energy Retail Amendment \(Regulating conditional discounting\) Rule](#) [final determination], 2020, pp ii, 36, 39.



the payment.<sup>78</sup> We note that the ACCC has issued several infringement notices for excessive payment surcharges in recent years.

### 4.2.3 Exit fees

Rule 49A of the NERL (Qld) Regulation limits the circumstances in which a retailer may impose an 'early termination charge' on a small customer who is on a market offer.<sup>79</sup> Under this provision, a retailer may charge no more than \$20 if a customer ends a fixed-term contract or a fixed benefit period early. Exit fees are prohibited in market retail contracts that are not fixed-term, except where the fee relates to the early termination of a fixed benefit period. Where an exit fee is permitted, the contract must clearly state either the amount of the fee or the method by which it will be calculated.

Exit fees are not common in the SEQ retail electricity market. No retailers have attached exit fees to their residential or small business flat rate market offers since the June quarter of 2019. As in previous years, some retailers explicitly stated in the June quarter of 2025 on Energy Made Easy for all or most of their plans that they did not charge any exit fees.<sup>80</sup>

### 4.2.4 Paper bills

The AER's Better Bills Guideline provides guidance to retailers on preparing and issuing bills.<sup>81</sup> When the guideline was developed, the issue of customers having access to paper bills free of charge was considered. Stakeholders noted that paper bills are the preferred – and sometimes the only – way to receive bills and to manage payments and energy usage for many people in the community, including people on low incomes, people in vulnerable situations and older people.<sup>82</sup>

While the AER was not given the power to require retailers to provide paper bills for all market offers, it encourages retailers – as a matter of best practice – to offer paper bills for all retail contracts, so that customers who cannot communicate through online channels, or choose not to, are not excluded from accessing competitively priced plans.<sup>83</sup>

We note that some retailers continued to attach specific eligibility criteria to their plans in 2024–25 – such as customers agreeing to receive bills by email – that effectively prevented certain customers from accessing those plans as they could not (or did not want to) receive bills electronically. We found that in the June quarter of 2025, 17 of 25 retailers offered the option of providing paper bills to residential or small business customers. Of those 17 retailers, 10 attached a paper bill fee.

### 4.2.5 Upcoming changes

In June 2025, the AEMC made a final rule determination on 4 rule change requests to improve consumer confidence in retail energy plans and reduce the risk of customers facing unexpected or unreasonable costs. These reforms form part of a broader package of measures designed to improve transparency, fairness and consumer protections in the retail energy market. The AEMC determined that retailers will no longer be able to impose certain categories of charges and that all

<sup>78</sup> ACCC, [Card surcharges](#), ACCC website, n.d., accessed 24 October 2025

<sup>79</sup> National Energy Retail Law (Queensland) Regulation 2014, [Sch 5, cl 10, rule 49A](#).

<sup>80</sup> These retailers were Amber Electric, Energy Locals, Kogan Energy, Pacific Blue Retail and Powershop.

<sup>81</sup> AER, [Better Bills Guideline](#), 2022; AER, [Notice of Instrument: Better Bills Guideline](#), 2022, p 48.

<sup>82</sup> Public Interest Advocacy Centre (PIAC), [submission to the AER, Draft Better Bills Guideline](#), 27 January 2022, p 5.

<sup>83</sup> AEMC, [Bill contents and billing requirements](#) [rule determination], 2021, pp 24–25; AER, [submission to the AEMC, National Energy Retail Amendment \(Bill contents and billing requirements\) Rule](#) [draft determination], 5 February 2021, pp 3–4.

remaining fees must be subject to stricter cost-reflectivity requirements. The AEMC made the following final rules on fees and charges:<sup>84</sup>

- **Prohibition of fees for vulnerable consumers:** Retailers will be prohibited from charging any fees to hardship customers, customers experiencing payment difficulty and customers affected by family violence. Retailers may continue to pass through network charges, which are fees for services typically customer-initiated or requested by the retailer on the customer's behalf.<sup>85</sup>
- **Fees must reflect reasonable cost estimates:** For consumers not experiencing vulnerability, fees will be limited to reasonable estimates of the costs retailers incur. This prevents retailers from using fees as a source of additional revenue unrelated to the provision of services.
- **Prohibition of account establishment and non-network metering fees:** Retailers will be prohibited from charging account establishment fees and special metering fees that are not network charges. These charges can act as a barrier to switching to a new retailer and add to the cost of moving, which disproportionately affect renters.
- **Requirement for a free payment method:** Retailers must offer their customers at least one free method of paying their bill that is commonly used and easily accessible. This will provide more certainty and accessibility, particularly for customers who may already be experiencing financial stress.

For retailers, these reforms will require adjustments to their billing systems, fee structures and compliance processes. While the changes may involve some administrative and system costs, the AEMC considered these costs to be proportionate to the consumer benefits delivered. Retailers were given 12 months to implement the changes, with compliance required from 1 July 2026.

## 4.3 Retail fees – residential flat rate offers

### 4.3.1 Market offers

Residential flat rate market offers available on Energy Made Easy in the June quarter of 2025 included the following retail fees, as shown in Table 4.1:

- credit and debit card payment processing fees
- processing fees for payments made by BPay or over the counter at Australia Post
- dishonoured cheque and direct debit payment fees ('dishonour payment fees')
- paper bill fees
- late payment fees
- membership fees
- account establishment fees
- metering fees.

<sup>84</sup> AEMC, [National Energy Retail Amendment \(Improving consumer confidence in retail energy plans\) Rule 2025](#) [rule determination], 2025, pp 42-55.

<sup>85</sup> Meter reconfigurations are an example of such charges. For the purposes of this final rule, the definition of vulnerable customers does not include concession-only customers.

**Table 4.1: Retail fees – residential flat rate market offers, June quarter 2025**

Retailer	Card payment processing fee			Other payment processing fee		Dishonour payment fee		Paper bill fee	Late payment fee	Membership fee (per year)	Account establishment fee	Metering fee
	Credit / debit card – general	Visa / Mastercard	Amex / Diners Club	BPay	Australia Post over the counter	Cheque	Direct debit					
1st Energy	–	–	–	–	–	\$15.00	\$7.50	–	–	–	–	–
AGL	–	0.14% / 0.30% <sup>a</sup> 0.65% / 0.77% <sup>b</sup>	–	–	0.49% / \$3.20 <sup>c</sup>	–	–	\$1.75	\$12	–	–	–
Amber Electric	1.00%	–	–	–	–	–	\$3.00	–	\$16	\$264.00	–	–
CovaU	0.73%	–	–	–	0.803% <sup>d</sup>	–	\$2.75	–	–	–	–	–
Diamond Energy	–	0.60% <sup>e</sup>	–	–	–	\$20.00	\$10.00	–	\$15	–	\$22	–
Dodo Power & Gas	–	–	2.89% <sup>f</sup>	\$2.50	\$2.20	–	\$9.50	\$2.20	–	–	–	–
EnergyAustralia	–	0.36% <sup>m</sup>	1.50% <sup>i</sup>	–	–	–	–	\$1.69	\$12	–	–	–
Energy Locals	–	0.46% / 0.81% <sup>g</sup>	0.81% <sup>g</sup>	–	–	–	\$10.00	\$2.00	\$16	\$197.88 / \$257.88	–	–
ENGIE	–	0.37% <sup>h</sup>	–	–	\$3.16	–	–	\$2.20	\$12	–	–	–
Future X Power	–	–	–	–	–	\$15.00	\$15.00	–	–	–	–	–
Momentum Energy	0.53%	–	–	–	–	–	–	–	–	–	–	–
Nectr	1.30%	–	–	\$0.88	–	–	–	–	–	–	–	–
Next Business Energy	–	0.77% <sup>e</sup>	1.95% <sup>i</sup>	–	–	–	–	–	–	–	–	\$77
Origin Energy	–	0.24% / 0.28% <sup>j</sup> 0.56% / 0.64% <sup>k</sup>	0.64% <sup>i</sup>	–	\$2.70 or 0.49% <sup>l</sup>	–	–	\$1.75	\$12	–	–	–
Pacific Blue Retail	–	0.60% <sup>h</sup>	0.75% <sup>i</sup>	–	–	\$7.50	\$7.50	\$3.30	–	–	–	–
Sumo Power	0.70% <sup>m</sup>	–	–	–	\$2.00	–	\$2.75 <sup>n</sup>	\$3.10	–	–	–	–
Tango Energy	–	0.60% <sup>h</sup>	0.75% <sup>h</sup>	–	–	\$7.50	\$7.50	\$3.30	–	–	–	–

a Visa debit card payment fee (0.14%), Mastercard debit card payment fee (0.30%).

b Visa credit card payment fee (0.65%), Mastercard credit card payment fee (0.77%).

c Fee for card payments made at Australia Post outlets (0.49%); an over-the-counter fee may apply for payments made in person at an Australia Post outlet (\$3.20).

d Applied to credit card payments via Australia Post.

e Applied to Mastercard and Visa credit card payments.

f Surcharge for Amex and Diners Club payments.

g Visa, Mastercard and Amex were accepted for payments via the secure Westpac payment portal; a credit card processing fee (0.81%) or a debit card processing fee (0.46%) applied. Processing fees for payments made via direct debit using a credit or debit card were waived.

h Processing fees for payments made by Visa or Mastercard (or Amex for Tango Energy), unless paying via direct debit.

i Applied to Amex payments.

j Visa debit card payment fee (0.24%), Mastercard debit card payment fee (0.28%).

k Visa credit card payment fee (0.56%), Mastercard credit card payment fee (0.64%).

l The higher of the 2 fees may have applied.

m The fee only applicable for payments made by credit cards

n The fee was included as an 'other fee'. The retailer did not indicate what type(s) of payments the dishonour payment fee applied to.

Notes: Amex stands for American Express. A dash (–) means the retailer did not attach the fee type to any of its residential flat rate market offers available on Energy Made Easy in the June quarter. Fees and charges listed did not necessarily apply to all plans published by the retailers.

Sources: Energy Made Easy; QCA analysis.

## General observations

In the June quarter of 2025, 17 of the 24 retailers with residential flat rate market offers attached retail fees to at least one of their plans. This compares to 18 of the 25 retailers in the June quarter of 2024.<sup>86</sup> Most of the retail fee types and levels were the same, or similar, in both June quarters.

Most of the retailers that did not attach retail fees in the June quarter of 2025 also did not attach retail fees a year earlier (Alinta Energy, GloBird Energy, Kogan Energy, Ovo Energy, Powershop, Red Energy).

All retailers either stated on Energy Made Easy that they reserved the right to charge or impose additional fees and charges, or provided links to their website and/or a phone number for more information on fees.

## Card payment processing fees

We identified 15 retailers that attached card payment processing fees to at least one of their residential flat rate market offers.

Payment processing fees on credit card payments ranged from 0.36% (Visa and Mastercard) to 2.89% (Amex and Diners Club) – the same range as in the June quarter of 2024 (0.36% to 2.89%).

Payment processing fees on debit card payments ranged from 0.14% (Visa) to 1.30% (any debit card) – a wider range than in the June quarter of 2024 (0.14% to 1.00%).

## Other payment processing fees

We identified 7 retailers that attached BPay and/or Australia Post payment processing fees to at least one of their residential flat rate market offers. The fees and their level were largely identical to those attached in the June quarter of 2024.<sup>87</sup> No cheque payment processing fees were attached in the June quarters of 2024 and 2025.

## Dishonour payment fees

We identified 10 retailers that attached dishonour payment fees to at least one of their residential flat rate market offers.

Fees for dishonoured cheque payments ranged from \$7.50 to \$20, and fees for dishonoured direct debit payments ranged from \$2.75 to \$15 – the same range of dishonoured cheque payment fees as in the June quarter of 2024 (\$7.50 to \$20), but a wider range of dishonoured direct debit payment fees than in the June quarter of 2024 (\$7.50 to \$15).

Pacific Blue Retail and Tango Energy stated that a fee would apply to not only dishonoured or reversed direct debit and cheque payments but also to dishonoured credit card payments. Sumo Power did not state which payment method its fee applied to.

<sup>86</sup> For more detail on the fees attached to residential flat rate market offers in the June quarter of 2024, see QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 43–44.

<sup>87</sup> As in the June quarter of 2024, Origin Energy stated on each plan that a payment processing fee may apply to payments at an Australia Post outlet of the higher of \$2.70 or 0.49%, but it did not indicate which payment methods the fee applied to. While the fee amount field on Energy Made Easy correctly stated the amount as \$2.70, the fee percentage was included as zero. EnergyAustralia stated in the additional fee information field on Energy Made Easy for all plans that payment processing fees could be avoided by paying from a bank account using direct debit or BPay, like it did for most plans in the June quarter of 2024.

## Paper bill fees

We identified 9 retailers that attached paper bill fees to at least one of their residential flat rate market offers, ranging from \$1.69 to \$3.30. The range of fees was similar in the June quarter of 2024 (\$1.65 to \$3.30).

## Late payment fees

We identified 7 retailers that attached late payment fees to at least one of their residential flat rate market offers, ranging from \$12 to \$16, with most retailers (4 out of 7) attaching a fee of \$12. The range of fees was identical in the June quarters of 2023 and 2024 (\$12 to \$16).

Diamond Energy again attached both a late payment fee and a pay on time discount. GloBird Energy did not attach a late payment fee but again attached a pay on time discount to most residential flat rate market offers, which provided an incentive to customers to pay on time.<sup>88</sup>

## Membership fees

The same 2 retailers attached membership fees in the June quarter of 2025 as a year earlier:

- Amber Electric attached a membership fee of \$264 (\$22/month) to each plan to access wholesale energy rates (up from \$228 (\$19/month) in the June quarter of 2024).
- Energy Locals attached a membership fee of \$198 (\$16.50/month; 2 market offers) or \$258 (\$21.50/month; 1 market offer) to access wholesale energy rates (up from \$168 (\$13.99/month; 2 market offers) or \$234 (\$19.49/month; 1 market offer) in the June quarter of 2024).

## Account establishment fees

Diamond Energy was again the only retailer with an account establishment fee. The fee (\$22, unchanged from the June quarter of 2024) was payable upon transfer from another retailer.

## Metering fees

Next Business Energy was the only retailer with a metering fee. The fee was described as 'COMMS3 / COMMS4 Metering Charge' or 'Other fee' (\$77).

### 4.3.2 Standing offers

In the June quarter of 2025, 9 of the 21 retailers with residential flat rate standing offers attached retail fees to at least one of their plans (Table 4.2). This is identical to our observation of fees in the June quarter of 2024.<sup>89</sup>

**Table 4.2: Retail fees – residential flat rate standing offers, June quarter 2025**

Retailer	Dishonour payment fee		Metering fee
	Cheque	Direct debit	
1st Energy	\$15.00	\$7.50	–
Amber Electric	–	\$3.00	–
CovaU	–	\$2.75	–
Diamond Energy	–	\$10.00	–

<sup>88</sup> Pay on time discounts in the June quarter of 2025 are outlined in chapter 3 (section 3.4.1).

<sup>89</sup> For more detail on the fees attached to residential flat rate standing offers in the June quarter of 2024, see QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, p 46.

Retailer	Dishonour payment fee		Metering fee
	Cheque	Direct debit	
Dodo Power & Gas	–	\$9.50	–
Energy Locals	–	\$10.00	–
Future X Power	\$15.00	\$15.00	–
Next Business Energy	–	–	\$77.00
Sumo Power	\$2.75 <sup>a</sup>		–

a Sumo Power did not specify whether this fee applied to cheque, debit or both payment types. As in the June quarters of 2023 and 2024, the fee was coded as an 'other fee' on Energy Made Easy, while other retailers generally coded their dishonour payment fees as either a fee for dishonoured cheque or dishonoured direct debit payments.

Note: Fees and charges listed did not necessarily apply to all plans published by the retailers.

Sources: Energy Made Easy; QCA analysis.

Of the 9 retailers with fees attached to at least one of their residential flat rate standing offers, 8 retailers attached dishonour payment fees of:

- \$15.00 for dishonoured cheque payments
- \$2.75 to \$15.00 for dishonoured direct debit payments.

In the June quarter of 2024, the range of fees was larger for dishonoured cheque payments (\$9.50 to \$15.00) but smaller for dishonoured direct debit payments (\$7.50 to \$15.00). We note that Sumo Power did not state which payment method its fee applied to in either of the 2 June quarters.

Next Business Energy attached a metering charge to its residential flat rate standing offer, which was described as 'COMMS3 / COMMS4 Metering Charge' or 'Other fee' (\$77.00). We checked with Next Business Energy if any customers had been charged this prohibited fee and were advised that no residential standing offer customer had been charged this fee.

Some retailers continued to state in the additional fee information on Energy Made Easy that:

- customers could avoid payment processing fees by paying from their bank account using direct debit or BPay (EnergyAustralia)
- they reserved the right to change or impose additional fees or charges; if that happened, they would notify customers (Alinta Energy and Ovo Energy).

These 3 retailers did not attach any retail fees to their standing offers on Energy Made Easy. However, we consider that this fee information could be confusing for customers, as it does not align with the restriction on the fee types that can be attached to standing offers in Queensland.

## 4.4 Retail fees – small business flat rate offers

### 4.4.1 Market offers

Small business flat rate market offers available on Energy Made Easy in the June quarter of 2025 included the following retail fees, as shown in Table 4.3:

- credit and debit card payment processing fees
- processing fees for payments made by BPay or over the counter at Australia Post
- dishonoured cheque and direct debit payment fees ('dishonour payment fees')
- paper bill fees
- late payment fees
- membership fees
- account establishment fees
- metering fees.

**Table 4.3: Retail fees – small business flat rate market offers, June quarter 2025**

Retailer	Card payment processing fee			Other payment processing fee		Dishonour payment fee		Paper bill fee	Late payment fee	Member-ship fee (per year)	Account establish-ment fee	Metering fee
	Credit / debit card – general	Visa / Mastercard	Amex	BPay	Australia Post over the counter	Cheque	Direct debit					
1st Energy	–	–	–	–	–	\$15.00	\$7.50	–	–	–	–	–
AGL	–	0.14% / 0.30% <sup>a</sup> 0.65% / 0.77% <sup>b</sup>	–	–	0.49% / \$3.20 <sup>c</sup>	–	–	\$1.75	\$12	–	–	–
Amber Electric	1.00%	–	–	–	–	–	\$3.00	–	\$16	\$264.00	–	–
Blue NRG	–	0.97%	1.39% <sup>l</sup>	–	–	–	\$11.979	\$5.50	–	–	–	\$0.66 to \$2.893
CovaU	0.73%	–	–	–	0.803% <sup>d</sup>	–	\$2.75	–	–	–	–	–
Diamond Energy	–	0.60%	–	–	–	\$20.00	\$10.00	–	\$15	–	\$22	–
Energy Locals	–	0.46% / 0.81% <sup>e</sup>	0.81% <sup>e</sup>	–	–	–	\$10.00	\$2.00	\$16	\$389.88	–	–
EnergyAustralia	–	0.36% <sup>j</sup>	1.50%	–	–	–	–	–	\$12	–	–	–
ENGIE	–	0.37% <sup>f</sup>	–	–	\$3.16	–	–	\$2.20	\$12	–	–	–
Future X Power	–	–	–	–	–	\$15.00	\$15.00	–	–	–	–	–
Momentum Energy	0.53%	–	–	–	–	–	–	–	–	–	–	–
Nectr	1.30%	–	–	\$0.88	–	–	–	–	–	–	–	–
Next Business Energy	–	0.77% <sup>j</sup>	1.95%	–	–	–	–	–	–	–	–	\$77
Origin Energy	–	0.24% / 0.28% <sup>g</sup> 0.56% / 0.64% <sup>h</sup>	0.64%	–	\$2.70 / 0.49% <sup>i</sup>	–	–	\$1.75	\$12	–	–	–
Pacific Blue Retail	–	0.60% <sup>f</sup>	0.75% <sup>f</sup>	–	–	\$7.50	\$7.50	\$3.30	–	–	–	–
Sumo Power	0.70% <sup>j</sup>	–	–	–	\$2.00	–	\$2.75 <sup>k</sup>	\$3.10	–	–	–	–
Tango Energy	–	0.60% <sup>f</sup>	0.75% <sup>f</sup>	–	–	\$7.50	\$7.50	\$3.30	–	–	–	–

a Visa debit card payment fee (0.14%), Mastercard debit card payment fee (0.30%).

b Visa credit card payment fee (0.65%), Mastercard credit card payment fee (0.77%).

c Fee for card payments made at Australia Post outlets (0.49%); an over-the-counter fee may apply for payments made in person at an Australia Post outlet (\$3.20)

d Applied to credit card payments via Australia Post.

e Visa, Mastercard and Amex were accepted for payments via the secure Westpac payment portal; a credit card processing fee (0.81%) or a debit card processing fee (0.46%) applied. Processing fees for payments made via direct debit using a credit or debit card were waived.

f Processing fees for payments made via direct debit using a credit or debit card were waived.

g Visa debit card payment fee (0.24%), Mastercard debit card payment fee (0.28%).

h Visa credit card payment fee (0.56%), Mastercard credit card payment fee (0.64%).

i The higher of the 2 fees may have applied.

j Only applicable to payments made by credit card.

k The fee was included as an 'other fee'. The retailer did not indicate what type(s) of payments the dishonour payment fee applied to.

l Fee for Amex and JCB.

Notes: Amex stands for American Express. A dash (–) means the retailer did not attach the fee type to any of its small business flat rate market offers available on Energy Made Easy in the June quarter.

Fees and charges listed did not necessarily apply to all plans published by the retailers.

Sources: Energy Made Easy; QCA analysis



## General observations

In the June quarter of 2025, 17 of the 21 retailers with small business flat rate market offers attached retail fees to at least one of their plans. This compares to 18 of the 22 retailers in the June quarter of 2024.<sup>90</sup> Most of the retail fee types and levels were the same, or similar, in both June quarters.

The 4 retailers that did not attach retail fees to any of their small business flat rate market offers in the June quarter of 2025 (Alinta Energy, Ovo Energy, Powershop and Red Energy) did not attach retail fees in the June quarter of 2024 either.

All retailers either stated on Energy Made Easy that they reserved the right to charge or impose additional fees and charges, or provided links to their website and/or a phone number for more information on fees.

## Card payment processing fees

We identified 15 retailers that attached card payment processing fees to at least one of their small business flat rate market offers.

Payment processing fees on credit card payments ranged from 0.36% (Visa and Mastercard) to 1.95% (Amex) – the same range as in the June quarter of 2024 (0.36% to 1.95%).

Payment processing fees on debit card payments ranged from 0.14% (Visa) to 1.30% (any debit card) – a wider range than in the June quarter of 2024 (0.14% to 1.00%).

## Other payment processing fees

We identified 6 retailers that attached BPay and/or Australia Post payment processing fees to at least one of their small business flat rate market offers. The fees and their level were largely identical to those attached in the June quarter of 2024.<sup>91</sup> However, no BPay fees were attached in the June quarter of 2024.

## Dishonour payment fees

We identified 10 retailers that attached dishonour payment fees to at least one of their small business flat rate market offers.

Fees for dishonoured cheque payments ranged from \$7.50 to \$20, and fees for dishonoured direct debit payments ranged from \$2.75 to \$15 – the same range of dishonoured cheque payment fees as in the June quarter of 2024 (\$7.50 to \$20), but a wider range of dishonoured direct debit payment fees than in the June quarter of 2024 (\$7.50 to \$15).

Pacific Blue Retail and Tango Energy stated that a fee would apply to not only dishonoured or reversed direct debit and cheque payments but also to dishonoured credit card payments. Sumo Power did not state which payment method its fee applied to.

---

<sup>90</sup> For more detail on the fees attached to small business flat rate market offers in the June quarter of 2024, see QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 48-49.

<sup>91</sup> As in the June quarter of 2024, Origin Energy stated on each plan that a payment processing fee may apply to payments at an Australia Post outlet of the higher of \$2.70 or 0.49%, but it did not indicate which payment methods the fee applied to. While the fee amount field on Energy Made Easy correctly stated the amount as \$2.70, the fee percentage was included as zero.

## Paper bill fees

We identified 8 retailers that attached paper bill fees to at least one of their small business flat rate market offers, ranging from \$1.75 to \$5.50. The range of fees was similar in the June quarter of 2024 (\$1.65 to \$5.50).

## Late payment fees

We identified 7 retailers that attached late payment fees to at least one of their small business flat rate market offers, ranging from \$12 to \$16, with most retailers (4 out of 7) attaching a fee of \$12. The range of fees was identical in the June quarters of 2023 and 2024 (\$12 to \$16).

Diamond Energy was again the only retailer that attached a late payment fee and a pay on time discount to its market offer.<sup>92</sup>

## Membership fees

The same 2 retailers attached membership fees in the June quarter of 2025 as a year earlier:

- Amber Electric attached a membership fee of \$264 (\$22/month) to each plan to access wholesale rates (up from \$228 (\$19/month) in the June quarter of 2024).
- Energy Locals attached a membership fee of \$390 (\$32.49/month) to both its plans to access wholesale energy rates (identical to the fee attached in the June quarter of 2024).

## Account establishment fees

Diamond Energy was again the only retailer with an account establishment fee. The fee (\$22, unchanged from the June quarter of 2024) was payable upon transfer from another retailer.

## Metering fees

Two retailers attached metering fees to each of their small business flat rate market offers:

- Blue NRG attached 2 daily metering charges of \$0.66 (minimum) and \$2.893 (maximum) – the fee amounts were identical to those in the June quarter of 2024.<sup>93</sup>
- Next Business Energy attached 2 'other fee' types, described as 'COMMS3 / COMMS4 Metering Charge' or 'Other fee' (\$77).

## 4.4.2 Standing offers

In the June quarter of 2025, 11 of the 22 retailers with small business flat rate standing offers attached retail fees to at least one of their plans (Table 4.4). This compares to 8 of the 18 retailers in the June quarter of 2024.<sup>94</sup>

**Table 4.4: Retail fees – small business flat rate standing offers, June quarter 2025**

Retailer	Dishonour payment fee		Payment processing fee	Metering fee
	Cheque	Direct debit		
1st Energy	\$15.00	\$7.50	–	–
Amber Electric	–	\$3.00	–	–

<sup>92</sup> Pay on time discounts in the June quarter of 2025 are outlined in chapter 3 (section 3.5.1).

<sup>93</sup> It was unclear how Blue NRG determined what price would be charged.

<sup>94</sup> For more detail on the fees attached to small business flat rate standing offers in the June quarter of 2024, see QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, p 51.

Retailer	Dishonour payment fee		Payment processing fee	Metering fee
	Cheque	Direct debit		
Blue NRG	–	\$11.979	–	–
CovaU	–	\$2.75	–	–
Diamond Energy	–	\$10.00	–	–
Energy Locals	–	\$10.00	–	–
Flow Power	–	–	0.66% <sup>a</sup>	–
Future X Power	\$15.00	\$15.00	–	–
Next Business Energy	–	–	–	\$77.00
Shell Energy	\$27.50	\$27.50	1.15%, 1.65%, 1.87% <sup>b</sup>	–
Sumo Power	\$2.75 <sup>c</sup>		–	–

a The retailer included the fee as a payment processing fee, without specifying which payment method(s) it applied to.

b The fees were coded as credit card payment processing fees – 1.15% applied to Visa and Mastercard payments, 1.65% to Diners Card payments and 1.87% to Amex payments.

c Sumo Power did not specify whether this fee applied to cheque, debit or both payment types. As in the June quarters of 2023 and 2024, the fee was coded as an ‘other fee’ on Energy Made Easy, while other retailers generally coded their dishonour payment fees as either a fee for dishonoured cheque or dishonoured direct debit payments.

Note: Fees and charges listed did not necessarily apply to all plans published by the retailers.

Sources: Energy Made Easy; QCA analysis.

Of the 11 retailers with fees attached to at least one of their small business flat rate standing offers, 9 retailers attached dishonour payment fees, which ranged from:

- \$15.00 to \$27.50 for dishonoured cheque payments
- \$2.75 to \$27.50 for dishonoured direct debit payments.

The range of fees was wider than in the June quarter of 2024 for both dishonoured cheque and dishonoured direct debit payments, when the fees ranged from \$9.50 to \$15.00 and from \$7.50 to \$15.00, respectively.

Next Business Energy attached a metering charge to its small business flat rate standing offer, which was described as ‘COMMS3 / COMMS4 Metering Charge’ or ‘Other fee’ (\$77.00). The standing offers of Flow Power and Shell Energy included payment processing fees. We checked with these 3 retailers if any standing offer customers had been charged these prohibited fees. Flow Power and Shell Energy advised that they had not charged any of these fees to standing offer customers. Next Business Energy advised that 3 ‘occupier’ accounts of unknown customers had been charged this fee.<sup>95</sup> All 3 accounts remained unpaid, and 2 accounts had been closed. The retailer removed the prohibited fees from the accounts and tried to notify the one still-active account about the error.

## 4.5 Metering charges

### 4.5.1 Meter read fees

Table 4.5 shows the meter read fees attached to retailers' standing and market offers. We focused on the fees attached to residential and small business flat rate plans in the June quarter of 2025. We observed that individual retailers' fees were mostly identical across the 5 tariffs and tariff combinations we cover in this report, and in all the quarters of the financial year, as in previous years.

<sup>95</sup> The accounts were established as usage was identified at the site, without a customer contacting Next Business Energy.

**Table 4.5: Meter read fees – residential and small business flat rate plans, June quarter 2025**

Retailer	Meter read fees	
	Residential flat rate plans	Small business flat rate plans
AGL	\$15.18	\$15.18
CovaU	\$15.18	\$15.18
EnergyAustralia	\$15.18	\$0
Energy Locals	\$53.37	\$53.37
ENGIE	\$15.18	\$15.18
Kogan Energy	\$0 / \$15.18 <sup>a</sup>	\$0 / \$15.18 <sup>a</sup>
Nectr	\$15.18	\$15.18
Powershop	\$0 / \$15.18 <sup>a</sup>	\$0 / \$15.18 <sup>a</sup>

a Both fees were classified as an 'other fee' and described as 'move in read fee' (\$0) or a 'move out read fee' (\$15.18).

Notes: A dash (–) means the retailer did not attach meter read fees to any of its plans or did not have any residential or small business flat rate plans available on Energy Made Easy in this quarter. Not every retailer attached meter read fees to its plans in this quarter. Where a retailer had fees attached, it did not necessarily attach those fees to all the plans. Fee amounts have been rounded to 2 decimal places.

Source: Energy Made Easy.

The meter read fee of \$15.18 listed by most of those retailers that provided information on their meter read fees is consistent with the GST inclusive 2024–25 price charged by Energex for a special meter reading (excluding final read).<sup>96</sup> However, many retailers stated that the fee amount may vary. Energy Locals attached a fee of \$53.37, which would be charged when the customer moves out, but stated the actual fee may vary.

We note that not all retailers provided information on meter read fees on Energy Made Easy. We consider that retailers should always provide clear fee information on Energy Made Easy, and at the very least a link to a page on their website where customers can access clear, SEQ-specific, additional information on applicable meter read fees.

## 4.5.2 Energex metering charges

Since 1 July 2015, Energex has been required to separate its metering charges to allow transparency of metering costs. Energex's daily metering service charge recovers the cost for the provision of metering services for 'type 6' basic (accumulation) meters, which includes meter provision, meter reading, meter maintenance and meter data services. Table 4.6 shows the applicable metering service charges in 2024–25.

**Table 4.6: Energex's metering service charges in 2024–25**

Tariff	Energex metering service charges	
	Daily charge	Annual charge
Primary tariff	\$0.12117	\$44.26
Load control	\$0.03532	\$12.90
Solar photovoltaic	\$0.08698	\$31.77

Note: The metering charges exclude GST.

Source: Energex, [2024–25 Network Price List](#), 2024.

Many retailers add these charges to the daily supply charges of their plans, while others include a separate metering charge. Energy Made Easy does not provide sufficient information to determine how each retailer bills customers for Energex's metering service charges.

As we stated in previous market monitoring and solar feed-in tariff monitoring reports, we consider that all retailers should clearly identify Energex's metering charges on Energy Made Easy, or state

<sup>96</sup> Energex, [2024–25 Network Price List](#), 2024.

that they do not levy these charges if that is the case. This would make information for customers clearer and make it easier for them to compare plans.

### 4.5.3 Advanced digital metering charges

Retailers are required to disclose metering arrangements and any associated costs on electricity plans published on Energy Made Easy. Metering fees are among the key fees that retailers must include on energy plans, where the fee will be incurred by all or a significant portion of customers.<sup>97</sup> Table 4.7 summarises retailers' information on advanced digital metering (ADM) charges in the June quarter of 2024 provided on Energy Made Easy. ADM charges apply to type 4 meters (smart meter) or type 4a meters (smart meter with remote communications disabled).

**Table 4.7: Retailers' information on advanced digital metering charges attached to residential and small business flat rate plans in SEQ, June quarter 2025**

Retailer	Advanced digital metering charge commentary
Amber Electric	Noted it would install a smart meter if the customer did not have one.
ENGIE	Required customers to have a smart meter with remote read capabilities for one plan.
GloBird Energy	Published some plans that were only available for customers <i>without</i> a smart meter.
Red Energy	Requested customers to contact Red Energy for specific metering charges.
Shell Energy	Published daily metering costs for various meter configurations.

Note: The remaining retailers did not provide any clear ADM information on Energy Made Easy.  
Source: Energy Made Easy.

Analysis of all retailers' residential and small business flat rate offers showed that as in previous years:

- most retailers did not provide any clear information on how they treated ADM charges
- some retailers had plans that were only available to customers with a smart meter, but no ADM charges were attached to the plans
- some retailers published separate solar and non-solar plans with different daily supply charges
- a few retailers had no plans that were available for basic (type 6) accumulation meters or described the meter type for their plans as 'type 0'.

Retailers are required to include recurring metering charges in the unconditional price of plans that the ACCC uses to check compliance of standing offers with the DMO and to calculate the comparison percentage for communicating price information to customers.<sup>98</sup> We consider that all retailers should therefore clearly identify ADM charges on Energy Made Easy or state that they do not levy these charges. This information would help customers compare plans more effectively.

## 4.6 Distribution non-network charges

As in previous years, retailers' plans available in 2024–25 generally included some distribution non-network charges. Reconnection and disconnection fees are key fees that retailers must specify on Energy Made Easy.<sup>99</sup> While distribution non-network charges are payable by customers, there is no 'typical' liability for these fees, which are only charged when reconnection and disconnection services are provided. As the fees are not charged on a regular basis – unlike supply and usage charges – they are not included in our bill calculations. However, we include them below to provide an overview of these charges.

<sup>97</sup> AER, [AER Retail Pricing Information Guidelines](#) [version 5.0], 2018, pp 10–11, cl 43, 47(j), 48(j).

<sup>98</sup> ACCC, [Guide to the Electricity Retail Code](#) [version 3], 2021, p 5.

<sup>99</sup> AER, [AER Retail Pricing Information Guidelines](#) [version 5.0], 2018, pp 10–11, cl 43–47.

## 4.6.1 Reconnection and disconnection fees

Table 4.8 shows the reconnection and disconnection fees attached to retailers' standing and market offers. We focus on residential and small business flat rate plans in the June quarter of 2025. We found that individual retailers' fees were similar – or even identical – across the 5 tariffs and tariff combinations we cover in our report, and in all the quarters of the financial year, as in previous years.

**Table 4.8: Reconnection and disconnection fees – residential and small business flat rate plans, June quarter 2025**

Retailer	Reconnection fees		Disconnection fees	
	Residential	Small business	Residential	Small business
1st Energy	–	–	\$15.18	\$15.18
AGL	\$15.18	\$15.18	\$15.18	\$15.18
Alinta Energy	0 / \$128.11 / \$134.59 / \$140.35	0 / \$134.59 / \$140.35	0	0
Amber Electric	–	–	0	0
Ampol Energy	\$15.18	\$15.18	\$15.18	\$15.18
Blue NRG	–	\$656.35	–	\$656.35
CovaU	0 / \$90.16	0	0	0
Diamond Energy	–	–	\$15.18	\$15.18
Dodo Power & Gas	\$50.15	–	\$19.00	–
Energy Locals	–	–	\$53.37	\$53.37
EnergyAustralia	0	0	\$15.18	0
ENGIE	–	–	\$15.18	\$15.18
Flow Power	–	0	–	0
Future X Power	–	–	\$12.00	\$12
GloBird Energy	–	–	\$15.00	–
Kogan Energy	–	–	0	–
Momentum Energy	\$110.85	\$110.85	0	0
Nectr	\$110.85	\$110.85	0 / \$90.16	0
Next Business Energy	0	0	0	0
Origin Energy	\$15.18	\$15.18	\$15.18	\$15.18
Ovo Energy	–	–	0	0
Pacific Blue Retail	0	0	0	0
Powershop	–	–	0	0
Red Energy	–	–	0	0
Tango Energy	0	0	0	0

Notes: A dash (–) means the retailer did not attach reconnection / disconnection fees to any of its plans or did not have any residential or small business flat rate plans available on Energy Made Easy in this quarter. Not every retailer attached reconnection / disconnection fees to its plans in this quarter. Where a retailer had fees attached, it did not necessarily attach those fees to all the plans. Fee amounts have been rounded to 2 decimal places.

Source: Energy Made Easy.

### Reconnection fees

In the June quarter of 2025, 12 of the 24 retailers with residential flat rate plans attached reconnection fees to at least one of their plans (compared to 13 of the 25 retailers in the June quarter of 2024), and 13 of the 24 retailers with small business flat rate plans attached reconnection fees to at least one of their plans (compared to 12 of the 22 retailers in the June quarter of 2024).<sup>100</sup>

The range of reconnection fees (\$0 to \$656.35) was larger than in the June quarter of 2024 (\$0 to \$624.75). In both June quarters, Blue NRG had the highest reconnection fees. The highest fee in the

<sup>100</sup> For more detail on the reconnection fees attached in the June quarter of 2024, see QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, pp 54–55.

June quarter of 2025 (\$656.35) was attached to each of Blue NRG's small business plans and was described as a reconnection fee (business hours), but the retailer noted that fees may vary. The highest fee for residential customers in the June quarter of 2025 (\$140.35) was attached to each of Alinta Energy's plans and was described as a fee for out-of-business-hours reconnection.

## Disconnection fees

In the June quarter of 2025, 23 of the 24 retailers with residential flat rate plans attached disconnection fees to at least one of their plans (compared to 24 of the 25 retailers in the June quarter of 2024), and 22 of the 24 retailers with small business flat rate plans attached disconnection fees to at least one of their plans (compared to 21 of the 22 retailers in the June quarter of 2024).<sup>101</sup>

The range of disconnection fees (\$0 to \$656.35) was higher than in the June quarter of 2024 (\$0 to \$624.75). In both June quarters, Blue NRG had the highest disconnection fee. A \$656.35 'move out' disconnection fee that 'may vary' was attached to each of its small business flat rate market offers in the June quarter of 2025. The highest disconnection fee for residential customers was attached to Nectr's standing offer (\$90.16). Nectr noted that the fee was an Energex network charge that is passed through and that the actual fee 'may vary'.

## Observations on reconnection and disconnection fees

Table 4.8 shows that the reconnection and disconnection fees attached to retailers' residential and small business flat rate plans in the June quarter of 2025 were generally identical. However, as we observed in previous years, the information on these fees was often inconsistent or unclear on Energy Made Easy. For example, some retailers:

- stated that a fee 'may apply' or 'may be charged' (usually without specifying under which circumstances the fee 'may apply' or 'may be charged')
- cautioned customers that the fee 'may vary'
- entered fees as GST inclusive, while others did not mention the GST status of their fees
- had different fee amounts attached to different plans (e.g. standing offers or market offers)
- advised customers to contact their retailer or referred them to their website to confirm the fee
- included a fee but stated the fee amount as zero
- did not include reconnection or disconnection fees but noted that fees imposed by the distributor would be 'passed through'
- referred customers to the 'additional fee information' on Energy Made Easy for more details, which, in turn, referred customers to the retailer's website
- used different descriptions for fees, and what the fees applied to
- attached fees that were described as a pass-through of network charges but did not necessarily match the fees for services levied by Energex.

We consider that these issues add complexity when customers compare plans.

## Other potential distribution non-network charges

As in previous years, some retailers included information with their plans on Energy Made Easy that referred to the potential for distribution non-network charges – other than those listed on Energy Made Easy – to be levied on customers. We consider that retailers should clearly identify on Energy Made Easy where customers can obtain information on distribution non-network charges that apply, or may apply, to their plans.

---

<sup>101</sup> For more detail on the disconnection fees attached in the June quarter of 2024, see QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, pp 56–57.



## 4.7 Observations on fees and charges

We identified similar issues with the information retailers provided on Energy Made Easy in 2024-25 as we did in our previous reports. We consider that the following issues add to the complexity that customers face when selecting the best plan for their circumstances:<sup>102</sup>

- Further fees could be charged. Some retailers referred to the potential for fees – other than those listed on Energy Made Easy – to be levied on customers.
- Some fees ‘may’ apply. Some retailers listed fees that ‘may’ apply, but they rarely explained on Energy Made Easy (or on their websites) the circumstances in which these fees ‘may’ apply.
- Some fees have a value of zero. Some retailers included fees on Energy Made Easy with a value of zero, stating that the fee may vary and/or advising to check their website for additional details.
- The treatment of GST is not always consistent. Although fees should be reported as including GST, the GST treatment within some fee types on Energy Made Easy was inconsistent or unclear between retailers.
- There can be problems with the quality of fee information provided. Retailers are responsible for the quality of data and information they publish on Energy Made Easy, and we have found some mistakes and inconsistencies.

## 4.8 Key considerations for customers

Fees and charges can increase customers’ electricity bills. Customers should be aware of how retailers can apply fees and charges (Box 4).

### Box 4: Understanding fees and charges

- Retailers can charge customers fees and charges in addition to supply and usage charges. This can lead to a higher-than-expected bill – for example, if a bill is not paid on time.
- Customers on a plan with conditional discounts attached should carefully consider the fees attached to the plan. If customers lose their conditional discounts, they may also have to pay additional fees (such as late payment fees), which can substantially increase their bill.
- Some fees may be included in each single bill (such as paper bill fees), or they are levied on top of the bill when it is paid (such as credit card payment processing fees).
- Some fees ‘may’ apply, or additional fees could be levied. Customers are advised to check with the retailer directly as to the circumstances when such fees apply, given that such information is rarely disclosed on Energy Made Easy.
- Retailers are only allowed to charge SEQ standing offer customers certain fee types. Fees for paper bills, card payments or late payments are prohibited. Customers should check their bills and contact their retailer if they believe they were incorrectly charged such prohibited fees. If a customer has been charged a prohibited fee, they may also notify the QCA.

<sup>102</sup> For more detail on these recurring issues, see QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 57-59.

# 5 Bills weighted by retailer market share

## Key findings

We compared and assessed trends in bills for residential and small business customers over the past 10 years, based on annual bills weighed by retailer market share. We found:

- Weighted average standing offer bills were always higher than weighted average market offer bills in each quarter from 2015–16 to 2024–25 (in nominal dollars).
- Over these 10 years, weighted average bills increased in the first 2 years (2015–16 and 2016–17) and then gradually decreased over the subsequent 5 years (until 2021–22). Since then (late 2021–22), they have increased substantially.

A number of assumptions were required to calculate bills weighted by retailer market share. Our results should therefore be interpreted and used with caution.

## 5.1 QCA methodology

We used the same approach as for our previous reports to compare and assess the trends in standing offer and generally available market offer bills weighted by retailer market share<sup>103</sup> – that is, we:

- calculated an annual bill (in nominal dollars) for each plan available on Energy Made Easy since 2015–16, using the latest median consumption of a typical SEQ customer (Table 2.1)
- weighted standing and market offer bills by retailer market shares, which we calculated based on data published by the AER.

We had to make a number of assumptions. These assumptions and some general caveats should be kept in mind when interpreting the bills in this chapter or using them for other purposes:

- Customer data – information on the number of customers by tariff type is not publicly available. We present a trend analysis for the 2 most common tariffs only, as total customer numbers would not provide a solid base to calculate market shares for all tariffs or tariff combinations.
- Reliability of data – the AER’s data on some retailers may be unreliable, in particular in the earlier years.<sup>104</sup>
- Influence of large retailers – some retailers have relatively high market shares, and their offers therefore have a strong influence on the weighted average bills. In some quarters, the weighted average bills almost exclusively reflect the plans of a very small number of retailers.

<sup>103</sup> For more information, see QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, pp 60–62.

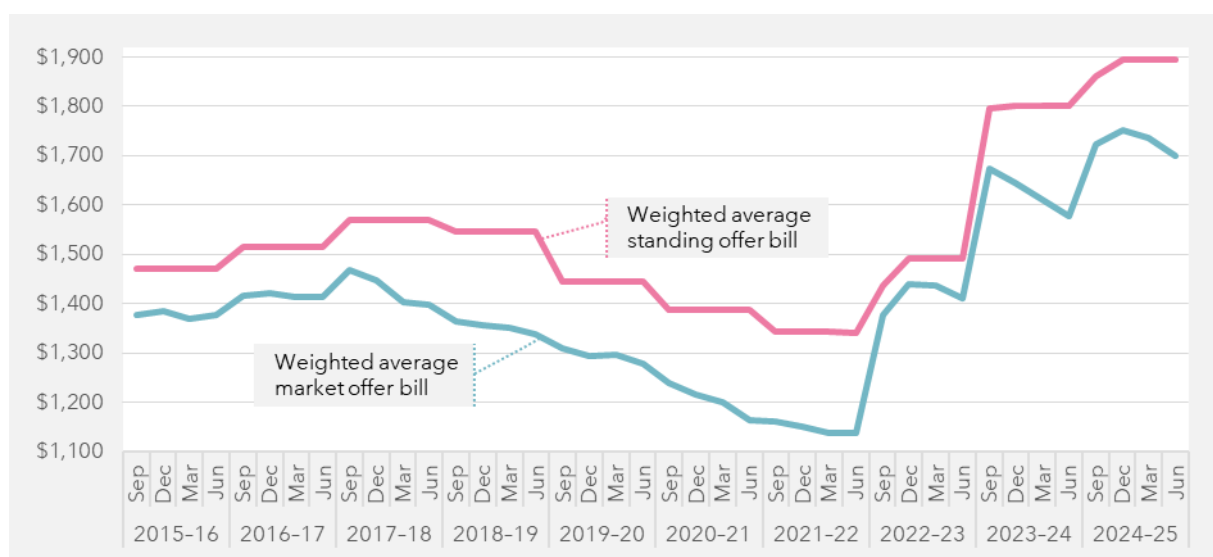
<sup>104</sup> The AER updated some data on its website in 2018 after discovering ‘significant errors’ and cautioned that previous years’ data may still be inaccurate (AER, [Retail energy market performance update for Quarter 1, 2017–18](#), 2018, viewed 8 October 2024; AER, [AER removes retail performance data from its website](#) [news release], 11 September 2018).

- Uptake vs market share – the weighting approach assumes that the uptake of a retailer’s plans is proportional to this retailer’s current market share. This may not always be the case, given that smaller retailers – including new market entrants – often have competitive offers.
- Retail brands – some retailers sell energy under their own name and also own retail 'brands' that sell energy, but customer numbers are not reported separately. As a proxy, we equally apportioned the customer numbers of the authorised parent company to each retailer/brand.

## 5.2 Trends in weighted average residential bills

Figure 5.1 shows the standing offer bills and generally available market offer bills (in nominal dollars), each weighted by retailer market share, for the typical residential flat rate customer since 2015–16.

**Figure 5.1: Weighted bills for a typical residential flat rate customer, 2015–16 to 2024–25**



Notes: Annual bills (in nominal dollars) for each quarter based on the median consumption of a typical SEQ residential flat rate customer (Table 2.1), weighted by retailer market share in that quarter.

Sources: Energy Made Easy; AER retail performance data; QCA analysis.

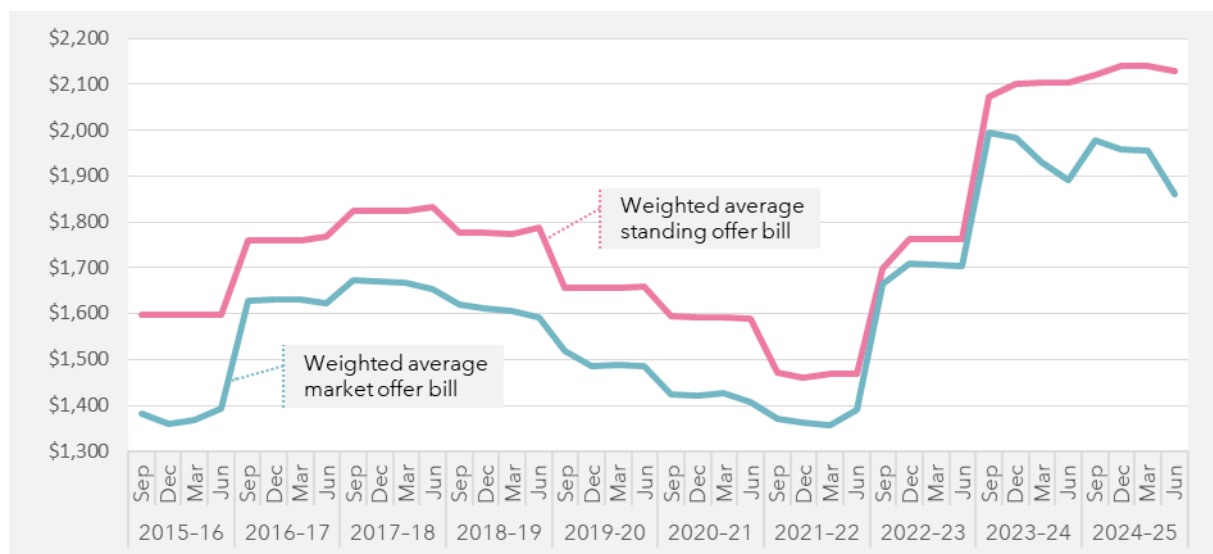
Our analysis of weighted average bills for a typical residential flat rate customer shows that:

- over the past 10 years (from the beginning of 2015–16 to the end of 2024–25):
  - the weighted average standing offer bill was always higher than the weighted average market offer bill
  - both the weighted average standing offer and market offer bill increased
- over the first 7 years (until the end of 2021–22), the weighted average standing offer and market offer bill decreased, although both increased slightly in the first 2 years.
- over the past 3 years (between the June quarters of 2022 and 2025), the weighted average standing offer and market offer bill increased substantially
- the largest increase in the weighted average market offer bill was in 2022–23 (between the June quarters of 2022 and 2023), whereas the largest increase in the weighted average standing offer bill was in 2023–24 (between the June quarters of 2023 and 2024)
- the difference between the weighted average standing offer and market offer bill remained largely the same in 2015–16 and 2016–17 but then grew substantially over the next few years. It decreased in 2022–23 and has since then increased again substantially.

## 5.3 Trends in weighted average small business bills

Figure 5.2 shows the standing offer bills and generally available market offer bills (in nominal dollars), each weighted by retailer market share, for the typical small business flat rate customer since 2015-16.

**Figure 5.2: Weighted bills for a typical small business flat rate customer, 2015-16 to 2024-25**



Notes: Annual bills (in nominal dollars) for each quarter based on the median consumption of a typical SEQ small business flat rate customer (Table 2.1), weighted by retailer market share in that quarter.

Sources: Energy Made Easy; AER retail performance data; QCA analysis.

Our analysis of weighted average bills for a typical small business flat rate customer shows that:

- over the past 10 years (from the beginning of 2015-16 to the end of 2024-25):
  - the weighted average standing offer bill was always higher than the weighted average market offer bill
  - both the weighted average standing offer and market offer bill increased
- over the first 7 years (until the end of 2021-22):
  - the weighted average standing offer bill decreased, although it increased in the first 3 years
  - the weighted average market offer bill increased marginally, although it gradually decreased from 2017-18 to 2021-22
- over the past 3 years (between the June quarters of 2022 and 2025), the weighted average standing offer and market offer bill increased substantially
- the largest increase in the weighted average market offer bill was in 2022-23 (between the June quarters of 2022 and 2023), whereas the largest increase in the weighted average standing offer bill was in 2023-24 (between the June quarters of 2023 and 2024)
- the difference between the weighted average standing offer and market offer bill did not vary much from 2016-17 to 2020-21. It decreased substantially in late 2021-22 and reached its lowest level in the September quarter of 2022. Since then, it has increased again substantially.

# 6 Customers receiving assistance with electricity bills

## Key findings

Customers in SEQ may receive assistance with their electricity bills in the form of retailer hardship programs, the Queensland Government's electricity rebate and/or the Home Energy Emergency Assistance Scheme.

We analysed, among other things, how many customers that received assistance were on standing offers and how many were on market offers. We also investigated the prices they paid. We found that:

- In the December quarter of 2024, 93.0% of the 392,885 SEQ customers that received assistance were on a market offer. The vast majority of assisted customers (96.5%) only received the Queensland Government's electricity rebate.
- The number of assisted customers who were on a standing offer decreased by about 10% between the December quarters of 2023 and 2024.
- Most assisted customers were on market offers that resulted in higher bills than the cheapest market offer their retailer had available, and some were on market offers that resulted in higher bills than the most expensive market offer their retailer had available in the December quarter of 2024.

It is important for assisted customers to regularly check the 'better offer' message on their bill and to engage with their retailer from time to time to ensure they are on the plan that best meets their needs. There may also be opportunities for retailers to proactively engage with their assisted customers to ensure they are on the best possible plan.

## 6.1 Assistance to customers

Our report provides information on residential customers that received assistance with their electricity bills in the form of retailer hardship programs, the Queensland Government's electricity rebate and/or the Home Energy Emergency Assistance Scheme (HEEAS). Other payments or rebates provided by the Australian or Queensland governments are not included in our analysis.

To refer to these customers, we sometimes use the terms 'customers receiving assistance with electricity bills' or 'assisted customers'.

## 6.2 QCA methodology

In early April 2025, we issued an information notice to all retailers with residential customers in SEQ in 2024–25 to collect information on customers participating in a hardship program, receiving the electricity rebate and/or support through HEEAS.<sup>105</sup>

### 6.2.1 Customers in hardship programs

To avoid inconsistencies between the data reported by the QCA and the AER, we based the data requirements about customers participating in a hardship program on hardship program data published by the AER – specifically, the AER's data for the December quarter of 2024.

We aligned our definition of hardship program customers with the AER's definition. Thereby, our measures of the number of customers in a hardship program, and of the number of hardship program customers receiving either the electricity rebate or HEEAS support or both, are a subset of retailers' hardship program data published by the AER.

We required retailers to disaggregate the number and contract type of hardship customers to show customers in a hardship program only, and customers in a hardship program who also received the electricity rebate and/or HEEAS support during the December quarter of 2024. Retailers were required to report the prices paid by customers in each of these hardship subcategories.

### 6.2.2 Customers receiving the electricity rebate and/or HEEAS support

We report on customers who received the electricity rebate and/or HEEAS support (but who were not in a hardship program) during the December quarter of 2024. Retailers were required to report on the number of customers, the type of contract these customers were on and the prices they paid.

### 6.2.3 Tariffs covered in our analysis

As in previous years, we asked retailers to provide information on residential customers on common residential tariffs and tariff combinations. Our analysis focuses on customers on a flat rate tariff, flat rate with controlled load super economy tariff, or flat rate with controlled load economy tariff. Some assisted customers may have moved (or been moved) from these tariffs and tariff combinations to other tariffs, which would reflect in a reduction in the number of assisted customers in our reporting. To monitor the total number of assisted customers in SEQ, we asked retailers to provide the total number of assisted customers again.

### 6.2.4 Data quality and availability

Most retailers responded to the information notice by the end July 2025. As in previous years, we identified a number of issues that we addressed with retailers before we started our analysis and investigated abnormalities that we found during the analysis.

The bills in this chapter are different to the bills we present in Chapter 2. This is because our assessment in this chapter relies on the data retailers submitted, whereas the analysis in Chapter 2 is based on the plans retailers had published on Energy Made Easy in 2024–25.

---

<sup>105</sup> The notices were issued under s 89C of the Electricity Act.

## 6.3 AER hardship customer data

The AER's retail market performance data shows that as at 31 December 2024, there were just over 1.5 million residential customers in SEQ.<sup>106</sup> Table 6.1 shows that 13,728 customers were in a hardship program at the end of 2024, accounting for 0.9% of residential customers in SEQ. This is a decrease of 5,770 hardship program customers from the 19,498 customers at the end of 2023,<sup>107</sup> which was 1.3% of residential customers in SEQ.

**Table 6.1: AER hardship customer data for SEQ, December quarter 2024**

Retailer	Customers on a hardship program			Percentage (of each retailer's customers)
	Standing offer customers <sup>a</sup>	Market offer customers	Total	
1st Energy	0	47	47	2.1%
AGL	28	2,761	2,789	0.7%
Alinta Energy	23	1,547	1,570	0.8%
Altogether Group	0	82	82	0.4%
Amber Electric	0	26	26	0.6%
Ampol Energy	0	26	26	0.2%
CovaU	0	17	17	1.7%
Diamond Energy	0	1	1	0.0%
Dodo Power & Gas	0	379	379	2.5%
Energy Locals	4	31	35	0.5%
EnergyAustralia	11	1,842	1,853	1.9%
Future X Power	0	1	1	2.4%
GloBird Energy	0	15	15	0.2%
Humenergy	0	1	1	0.0%
LocalVolts	0	1	1	1.1%
Metered Energy	9	0	9	0.1%
Momentum Energy	0	4	4	0.3%
Nectr	0	352	352	2.4%
OC Energy	0	1	1	0.5%
Origin Energy	97	5,690	5,787	1.0%
Ovo Energy	1	35	36	0.2%
Powershop	5	103	108	0.9%
Red Energy	0	343	343	0.5%
Simply Energy	2	176	178	1.4%
Sumo Power	0	59	59	0.5%
Tango Energy	0	6	6	0.8%
The Embedded Networks Company	0	1	1	0.5%
Winenergy	0	1	1	0.1%
<b>Total for SEQ</b>	<b>180</b>	<b>13,548</b>	<b>13,728</b>	<b>0.9%</b>

<sup>a</sup> The AER refers to these as standard retail customers.

Notes: We excluded retailers that the AER included with zero hardship customers (Amaysim Energy, Apex Energy, Discover Energy, Electricity in a Box, Elysian Energy, Locality Planning Energy, Mojo Power, People Energy, Powerclub, Powerdirect, PowerHub, QEnergy, Real Utilities, ReAmped Energy and Savant Energy).

Sources: AER, [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 2 and 4], 2024, viewed 1 May 2025; QCA analysis.

<sup>106</sup> AER, [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 2], 2025; QCA analysis.

<sup>107</sup> AER, [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 4], 2025; QCA analysis. Last year, we reported 19,563 hardship customers. The AER data now shows fewer customers for Altogether Group (by 4) and Simply Energy (by 61), resulting in 65 fewer customers in a hardship program being reported for the December quarter of 2023.



Some retailers made retrospective changes to customers' status and/or other adjustments to their hardship customer data following the publication of the AER's performance data for the December quarter of 2024. For this reason, some of the data in the following tables do not exactly match the data in Table 6.1.

## 6.4 Number of assisted customers

### 6.4.1 Total number of assisted customers by assistance category

Table 6.2 shows the total number of SEQ customers receiving assistance with electricity bills on standing offers and market offers for all residential tariffs or tariff combinations, and the share of assisted customers on market offers, for each assistance category in the December quarter of 2024.

**Table 6.2: Total number of assisted customers in SEQ by contract type and assistance category, December quarter 2024**

Assistance category	Number of customers on standing offers	Number of customers on market offers	Percentage of customers on market offers
1. Hardship program only	69	6,172	98.9%
2. Electricity rebate only	27,454	351,564	92.8%
3. HEEAS support only	14	80	85.1%
4. Hardship program and electricity rebate	34	6,846	99.5%
5. Hardship program and HEEAS support	1	158	99.4%
6. Electricity rebate and HEEAS support	1	193	99.5%
7. Hardship program, and electricity rebate and HEEAS support	1	298	99.7%
<b>Total for SEQ</b>	<b>27,574</b>	<b>365,311</b>	<b>93.0%</b>

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

The total number of assisted customers in SEQ decreased by 2,099 between the December quarters of 2023 and 2024 (from 394,984 to 392,885). In the December quarter of 2024, the percentage of assisted customers on a market offer (93.0%)<sup>108</sup> was slightly higher than the respective percentage among all SEQ residential customers (91.1%).<sup>109</sup>

Nearly all assisted customers on standing offers were electricity rebate only customers (99.6%), and nearly all customers receiving more than one form of assistance were on market offers (99.5%). Customers receiving the electricity rebate only made up most assisted customers (96.5%, up from some 95% in the December quarter of 2023).

### 6.4.2 Number of assisted customers by retailer

Table 6.3 shows the number of each retailer's SEQ customers on the 3 most common residential tariffs and tariff combinations that were receiving assistance with electricity bills. It shows the number of assisted customers who were on standing offers and market offers, as well as the share of customers who were on market offers, in the December quarter of 2024.

<sup>108</sup> The share of assisted customers on market offers ranged from 85.1% (for customers receiving HEEAS support only) to 99.7% (for customers in a hardship program, and receiving the electricity rebate and HEEAS support).

<sup>109</sup> AER, [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 2], 2025; QCA analysis. The AER data includes residential customers on all tariffs or tariff combinations.

**Table 6.3: Assisted customers in SEQ by contract type and by retailer, December quarter 2024**

Retailer	Number of customers on standing offers	Number of customers on market offers	Percentage of customers on market offers
1st Energy	2	687	99.7%
AGL	8,226	69,908	89.5%
Alinta Energy	0	17,314	100.0%
Altogether Group	0	3,174	100.0%
Amber Electric	0	112	100.0%
Ampol Energy	0	901	100.0%
CovaU	2	15	88.2%
Diamond Energy	41	918	95.7%
Discover Energy	2	0	0.0%
Dodo Power & Gas	22	2,685	99.2%
Energy Locals	0	30	100.0%
EnergyAustralia	242	19,331	98.8%
Future X Power	0	1	100.0%
GloBird Energy	0	887	100.0%
Humenergy	0	240	100.0%
Metered Energy	2,593	0	0.0%
Momentum Energy	0	2	100.0%
Nectr	0	4,323	100.0%
OC Energy	0	37	100.0%
Origin Energy	14,960	156,506	91.3%
Ovo Energy	10	1,570	99.4%
Powerhub	0	235	100.0%
Powershop	28	1,212	97.7%
Red Energy	18	12,777	99.9%
Simply Energy	3	1,764	99.8%
Sumo Power	1	1,607	99.9%
Tango Energy	1	66	98.5%
The Embedded Networks Company	0	27	100.0%
Winenergy	0	131	100.0%
<b>Total for SEQ</b>	<b>26,151</b>	<b>296,460</b>	<b>91.9%</b>

Notes: Retailers that were issued information notices and reported having no customers receiving assistance are not included in the table.

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

Table 6.3 shows that 29 retailers indicated they had customers who received at least one category of assistance with electricity bills in the December quarter of 2024. The share of assisted customers on market offers reported by the 29 retailers was 91.9%, and 14 retailers reported that 100% of their assisted customers were on market offers.

Whilst 15 retailers had at least one assisted customer on a standing offer, 98.6% of these standing offer customers were concentrated to 3 retailers (Origin Energy, AGL and Metered Energy).

### 6.4.3 Change in the number of assisted standing offer customers by retailer

Table 6.4 shows the change in each retailer's number of assisted customers on standing offers from the December quarter of 2023 to the December quarter of 2024, based on the 3 most common residential tariffs and tariff combinations.

**Table 6.4: Assisted customers in SEQ on standing offer by retailer, change from December quarter 2023 to December quarter 2024**

Retailer	December quarter 2023	December quarter 2024	Change	
			(number)	(%)
Origin Energy	17,401	14,960	-2,441	-14.0%
AGL	8,561	8,226	-335	-3.9%
Metered Energy	2,795	2,593	-202	-7.2%
Powershop	46	28	-18	-39.1%
Dodo Power & Gas	35	22	-13	-7.1%
Simply Energy	5	3	-2	-40.0%
Diamond Energy	42	41	-1	-2.4%
Sumo Power	1	1	0	0.0%
Discover Energy	1	2	1	100.0%
Red Energy	17	18	1	5.9%
Tango Energy	0	1	1	–
1st Energy	0	2	2	–
CovaU	0	2	2	–
Ovo Energy	0	10	10	–
EnergyAustralia	154	242	88	57.1%
<b>Total for SEQ</b>	<b>29,058</b>	<b>26,151</b>	<b>-2,907</b>	<b>-10.0%</b>

Notes: Retailers that did not report any assisted customers on standing offers for both December quarters are not included in this table. Retailers are ordered by the highest decrease in customer numbers.

Source: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

From the December quarter of 2023 to the December quarter of 2024, the number of assisted customers on standing offers decreased by 2,907 (-10.0%). The 3 retailers that made up 98.6% of the assisted customers on standing offers in the December quarter of 2024 (Origin Energy, AGL and Metered Energy) were the same retailers that contributed to the greatest reduction in the number of assisted customers on standing offers.

## 6.5 Average annual bills of assisted customers

This section sets out average bills for assisted customers in the December quarter of 2024 based on data provided by retailers in response to our information notice.<sup>110</sup> We compared these prices to the average prices of plans that were available on Energy Made Easy in the December quarter of 2024. This analysis allows us to draw conclusions about whether assisted customers were, on average, paying more or less than they would have with the plans that were available. We calculated bills for each plan by using the annual consumption level of the typical SEQ customer (Table 2.1).<sup>111</sup>

Electricity consumption of assisted customers can vary significantly. The ACCC found that hardship and payment plan customers used significantly more electricity than other customer groups, while concession customers had the lowest consumption.<sup>112</sup> We acknowledge that using the median consumption of the typical SEQ customer may overestimate bills for electricity rebate customers (who tend to have a lower usage) and underestimate bills for the other assistance categories. However, given the variability of electricity consumption of assisted customers and across the assistance categories, we continue to use the consumption level of the typical SEQ for all assistance categories. This also allows us to compare the prices paid by assisted customers to the prices of plans that were available in 2024-25.

<sup>110</sup> In Chapter 2 and Appendix A, we present average bills based on retailers' standing and market offers that were available on Energy Made Easy in 2024-25.

<sup>111</sup> An individual customer's usage during 2024-25 may have differed from the typical usage level.

<sup>112</sup> ACCC, *Inquiry into the National Electricity Market*, June 2024, pp 46-47.

The actual prices paid by customers may also vary significantly depending on whether they realise the conditional discounts attached to their plans. Plans with only guaranteed discounts (or no discounts) may result in lower bills than plans with conditional discounts (and possibly also guaranteed discounts). This may be because guaranteed discounts are higher or because plans with no discounts had lower prices. In this section, we present prices (annual bills) that include all guaranteed and conditional discounts attached to market offers.

The bill calculations for rebate customers do not include the value of the electricity rebate (\$372.20 in 2024-25) or other government payments to allow comparisons with the actual underlying prices.<sup>113</sup>

## 6.5.1 Bills by assistance category

Table 6.5 and Table 6.6 compare the average standing offer and market offer bills of assisted customers on the 3 most common residential tariffs and tariff combinations<sup>114</sup> with bills based on the plans available on Energy Made Easy in the December quarter of 2024 – these bills indicate what the typical SEQ customer would have paid if they had taken up the plans that were available during that quarter.<sup>115</sup> Instances where assisted customers' bills were higher than the respective average standing offer bill or average lowest market offer bill based on plans that were available during that quarter are underlined.

**Table 6.5: Standing offer – average annual bills of assisted customers and bills based on available plans, December quarter 2024**

Category	Flat rate (\$)	Flat rate with controlled load super economy (\$)	Flat rate with controlled load economy (\$)
1. Hardship program only	1,866	2,071 <sup>a</sup>	2,029 <sup>b</sup>
2. Electricity rebate only	1,839	<u>2,092</u>	2,050
3. HEEAS support only	1,633 <sup>b</sup>	n/a	2,050 <sup>a</sup>
4. Hardship program and electricity rebate	1,767 <sup>b</sup>	2,078 <sup>a</sup>	<u>2,132</u> <sup>b</sup>
5. Hardship program and HEEAS support	1,609 <sup>a</sup>	n/a	n/a
6. Electricity rebate and HEEAS support	n/a	n/a	2,050 <sup>a</sup>
7. Hardship program, and electricity rebate and HEEAS support	n/a	2,078 <sup>a</sup>	n/a
<b>Average standing offer</b>	<b>1,884</b>	<b>2,087</b>	<b>2,067</b>

a The number of customers in this category is 5 or less.

b The number of customers in this category is more than 5 but less than 20.

n/a: No retailer reported having any assisted customers in this category.

Note: Average bills of assisted customers that are higher than the respective bill based on available plans are underlined.

Sources: Retailers' responses to the QCA's information notice (unpublished); Energy Made Easy; QCA analysis (Appendix A, sections A.2.2, A.3.2 and A.4.2).

Comparing the average standing offer bills of assisted customers with the bills based on the plans that were available on Energy Made Easy in the December quarter of 2024 (Table 6.5) shows that the average standing offer bills of assisted customers were:

- lower for flat rate customers (\$18 to \$275 lower)
- lower for flat rate with controlled load super economy customers (\$9 to \$16 lower), except for customers in the electricity rebate only category (\$5 higher)
- lower for flat rate with controlled load economy customers (\$17 to \$38 lower), except for customers in the hardship and rebate category (\$65 higher).

<sup>113</sup> Queensland Government, [Electricity and gas rebates](#), Queensland Government website, updated 10 September 2024, viewed 2 May 2025.

<sup>114</sup> Appendix C (sections C.5 to C.11) shows the distribution of bills for customers in these assistance categories.

<sup>115</sup> Bills, by retailer, in the December quarter of 2024 are included in Appendix A (sections A.2.2, A.3.2 and A.4.2).

Our analysis shows that the average standing offer customer in nearly all assistance categories was on a cheaper plan than the average standing offer that was available in the December quarter of 2024. It may be that some retailers decided not to increase their standing offer prices for assisted customers when the DMO prices increased.

Table 6.2 shows that most assisted customers (93.0%) were on a market offer. In contrast to our analysis on standing offers, we found that the average market offer customer in most assistance categories paid higher prices than the average lowest market offer available in the December quarter of 2024 (Table 6.6). This suggests that many assisted customers could have saved money by switching to one of the cheaper plans that were available in the December quarter of 2024.

**Table 6.6: Market offer – average annual bills of assisted customers and bills based on available plans, December quarter 2024**

Category	Flat rate (\$)	Flat rate with controlled load super economy (\$)	Flat rate with controlled load economy (\$)
1. Hardship program only	<u>1,694</u>	<u>1,883</u>	<u>1,885</u>
2. Electricity rebate only	<u>1,811</u>	<u>2,044</u>	<u>2,001</u>
3. HEEAS support only	<u>1,643</u> <sup>a</sup>	<u>1,953</u> <sup>a</sup>	<u>1,916</u> <sup>a</sup>
4. Hardship program and electricity rebate	<u>1,652</u>	<u>1,826</u>	<u>1,822</u>
5. Hardship program and HEEAS support	<u>1,606</u> <sup>b</sup>	1,745 <sup>a</sup>	<u>1,806</u> <sup>b</sup>
6. Electricity rebate and HEEAS support	<u>1,794</u> <sup>b</sup>	<u>1,949</u> <sup>a</sup>	<u>1,929</u> <sup>b</sup>
7. Hardship program, and electricity rebate and HEEAS support	<u>1,578</u>	<u>1,799</u> <sup>b</sup>	1,750
<b>Average lowest market offer</b>	<b>1,576</b>	<b>1,789</b>	<b>1,771</b>

a The number of customers in this category is 25 or less.

b The number of customers in this category is more than 25 but less than 100.

n/a: No retailer reported having any assisted customers in this category.

Note: Average bills of assisted customers that are higher than the respective bill based on available plans are underlined.

Sources: Retailers' responses to the QCA's information notice (unpublished); Energy Made Easy; QCA analysis (Appendix A, sections A.2.2, A.3.2 and A.4.2).

Comparing the average market offer bills of assisted customers with the average lowest market offer bills based on the plans that were available on Energy Made Easy in the December quarter of 2024 (Table 6.6) shows that the average market offer bills of assisted customers were:

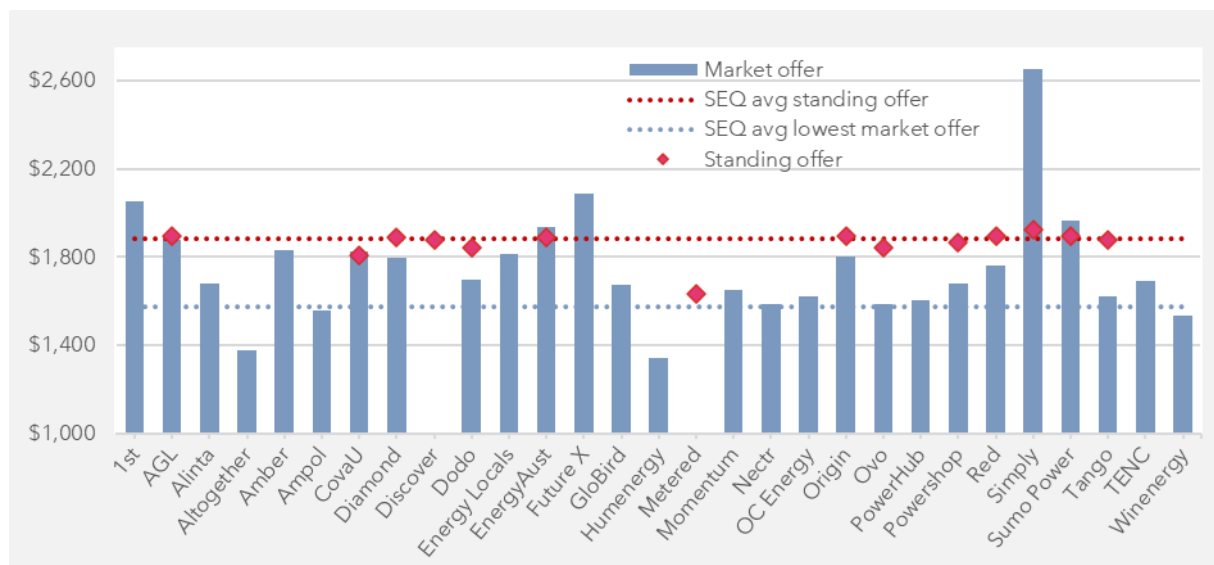
- lower for customers in 2 assistance categories (and on a specific tariff combination): hardship and HEEAS support customers on flat rate with controlled load super economy (\$44 lower), and hardship, electricity rebate and HEEAS support customers on flat rate with controlled load economy (\$21 lower)
- higher for customers in all other assistance categories (and tariffs/tariff combinations) (\$2 to \$255 higher).

## 6.5.2 Bills by retailer

Figure 6.1 shows, by retailer, average standing and market offer bills in the December quarter of 2024 across all assistance categories for assisted residential flat rate customers.<sup>116</sup>

<sup>116</sup> The bills, by retailer, for assisted customers on residential flat rate with controlled load super economy and residential flat rate with controlled load economy are included in Appendix C (section C.2).

**Figure 6.1: Average annual bills for assisted customers – residential flat rate by retailer, December quarter 2024**



Notes: Bills are based on the consumption of a typical SEQ customer (Table 2.1). Retailers that did not report any assisted customers are not included in this figure. TENC stands for The Embedded Networks Company.

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

When comparing bills for assisted customers on a residential flat rate tariff with the corresponding bills based on plans available to SEQ customers on Energy Made Easy, we observed that:

- of the 14 retailers with assisted customers on a standing offer, 7 retailers' plans resulted in a higher bill than the average standing offer bill (\$1,884) for a typical SEQ customer (with all bills ranging between \$1,633 and \$1,927)
- of the 27 retailers with assisted customers on a market offer, 23 retailers' plans resulted in a higher bill than the average market offer bill (\$1,576) for a typical SEQ customer (with all bills ranging between \$1,344 and \$2,651).<sup>117</sup>

Figure 6.2 compares the average market offer bills of assisted residential flat rate customers, by retailer, to the residential flat rate market offer(s) that their respective retailer had available in the December quarter of 2024.<sup>118</sup> Based on the consumption level of the typical SEQ customer, most assisted customers were on market offers that resulted in higher bills than the cheapest market offer their retailer had available, and some were on plans that resulted in higher bills than the most expensive market offer their retailer had available.

<sup>117</sup> A table with each retailer's average bills is provided in Appendix C (section C.2).

<sup>118</sup> A comparison for assisted customers on residential flat rate with controlled load super economy and residential flat rate with controlled load economy is included in Appendix C (section C.3).

**Figure 6.2: Average bills of assisted customers compared to available market offers – residential flat rate by retailer, December quarter 2024**



Notes: Bills are based on the consumption of a typical SEQ customer (Table 2.1). The figure does not include retailers that either did not report any assisted customers, or reported assisted customers but did not have market offers available on Energy Made Easy in the December quarter of 2024.

Sources: Retailers' responses to the QCA's information notice (unpublished); Energy Made Easy; QCA analysis.

### 6.5.3 Trends in average annual bills

Our trend analysis is based on the plans that assisted customers were contracted to each year. We calculated annual bills based on these plans, using the consumption of the typical SEQ customer (Table 2.1) to enable a direct comparison to the bills in Chapter 2 and Appendix A. Additionally, we recalculated the last 7 years of bill information consistent with the consumption of the typical SEQ customer to ensure that any changes in bills we observe over time reflect changes in prices only and are not distorted by changes in consumption over time.

Figure 6.3 shows average standing and market offer bills for assisted customers on residential flat rate plans between 2017-18 and 2024-25. It illustrates how prices paid, in nominal dollars, changed over time for each category of customers receiving assistance:<sup>119</sup>

- For standing offer customers, the average prices paid decreased from 2017-18 to 2021-22 for each assistance category.<sup>120</sup> Prices (annual bills) have since increased again. In 2024-25, they reached the highest level in the past 8 years for 2 of the 7 assistance categories and the second-highest level in the past 8 years for 3 assistance categories after their peak prices in 2023-24.<sup>121</sup>
- For market offer customers, similar observations apply. In 2024-25, the average prices paid increased to the highest level in the past 8 years for 4 of the 7 assistance categories, with the remaining 3 assistance categories having their second-highest bill over the 8-year period after reaching the highest level in 2023-24.

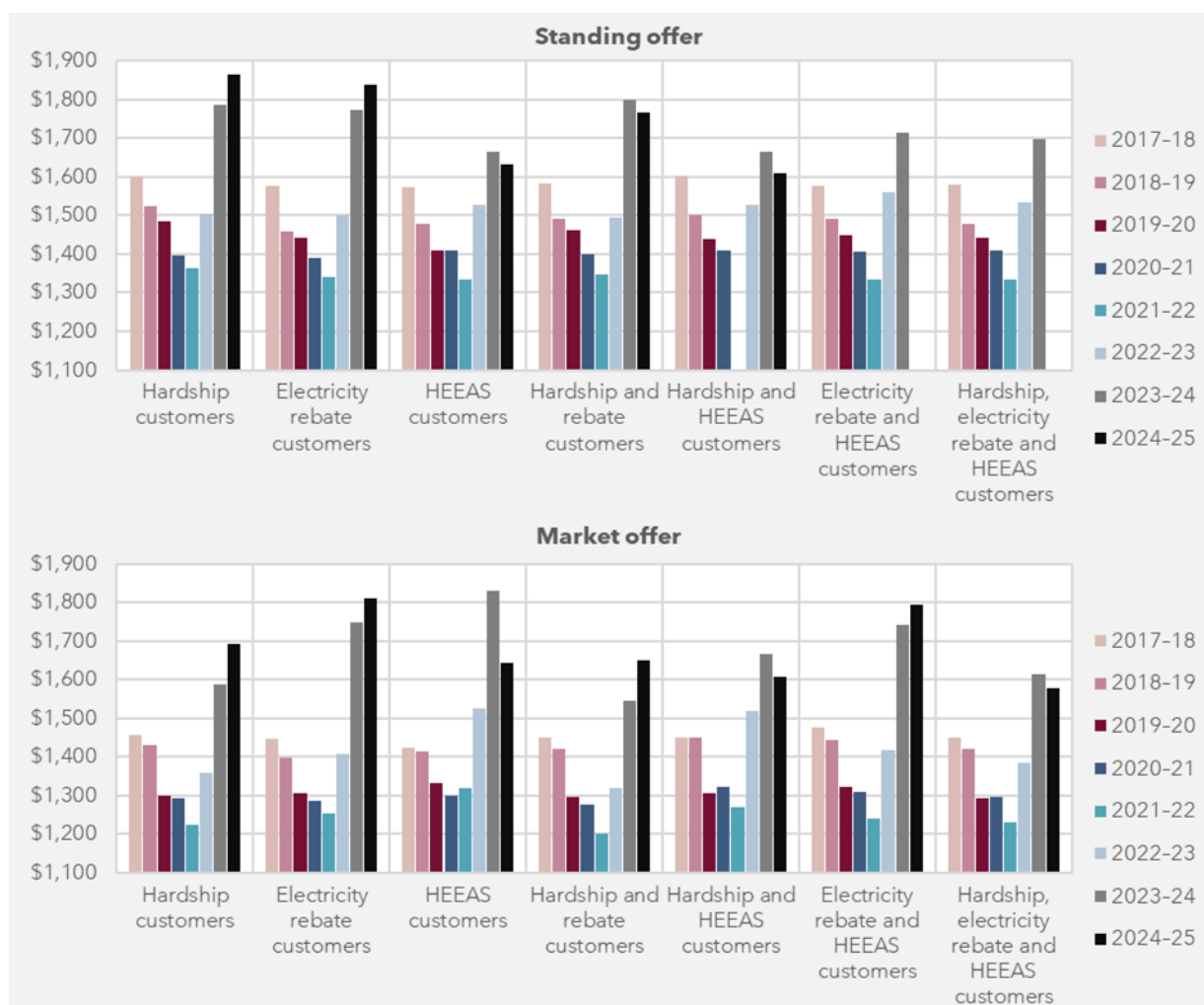
<sup>119</sup> It is important to keep in mind that the number of customers in some of the assistance categories is relatively low, which means that a few higher or lower offers can have a significant impact on the average bills. Bills are presented in nominal dollars. Trends in the average standing and market offer bills for assisted customers on residential flat rate with controlled load super economy and residential flat rate with controlled load economy plans are shown in Appendix C (section C.4).

<sup>120</sup> The largest decreases in the average standing offer prices paid occurred in 2018-19, before the DMO was introduced.

<sup>121</sup> The remaining 2 assistance categories had zero assisted customers in 2024-25.



**Figure 6.3: Average annual bills for assisted customers – residential flat rate, 2017-18 to 2024-25**



Notes: Bills are in nominal dollars. For 2019-20 to 2024-25, we included bills from the respective December quarters. Gaps indicate that no retailer reported having any assisted customers on that category of assistance.

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

## 6.6 Key considerations for customers

Customers who receive assistance with their bills may benefit from remaining active and engaged with the retail electricity market, even if they face some challenges doing so (Box 5).

### Box 5: Importance of customer engagement

- Customers should regularly check the 'better offer' message on their bill, which shows the best plan their retailer can offer them. There may also be opportunities for retailers to proactively engage with their assisted customers to ensure they are on the best possible plan.
- Customers may also check on Energy Made Easy if a better plan is available. For help with using Energy Made Easy, customers may call the AER Infoline on 1300 585 165.
- Assisted customers should consider if they are benefiting from conditional discounts attached to their plan. A plan without discounts may result in a lower bill, especially if customers cannot always meet the discount conditions.

# 7 Customers remaining on legacy market offers

## Key findings

Some SEQ customers do not switch plans regularly and remain on older plans that may be more expensive. We analysed how many SEQ customers were on legacy market offers<sup>122</sup> and how their bills compared to the default market offer (DMO). We found that:

- In the December quarter of 2024, there were 466,202 residential and 21,451 small business customers on a legacy market offer covered by the DMO. While the number of customers on legacy market offers increased between the December quarters of 2023 and 2024, the share remained largely the same (about one-third of residential and one-fifth of small business market offer customers).
- Most legacy customers were on market offers *without* conditional discounts in the December quarter of 2024 (88% of residential and 94% of small business customers).
  - The share of residential customers on plans without conditional discounts who were paying above the DMO increased substantially between the December quarters of 2023 and 2024 (up from 29% to 45%), while the share of small business customers remained relatively stable (up from 30% to 31%).
- There was a substantial decrease in the number and share of legacy customers on market offers *with* conditional discounts between the December quarters – from 20% to 12% for residential and from 13% to 6% for small business customers.
  - Some 45% of residential legacy customers who achieved a conditional discount had bill outcomes above the DMO, while most small business legacy customers who achieved a conditional discount had bill outcomes below the DMO. If the discount was not achieved, most legacy customers had bill outcomes above the DMO (93% of residential and 79% of small business customers).
- Some legacy offers have attributes that are attractive (such as a high solar feed-in tariff). However, there is scope for some legacy customers to lower their bills by switching to one of the new offers available in the market. Active customers are likely to pay less than inactive or disengaged customers.

## 7.1 Legacy market offers

For many customers, choosing an electricity retailer and plan is a ‘set and forget’ task. Our analysis shows that many SEQ customers do not regularly switch plans or retailers (sections 9.2.3 and 9.5). This may, in part, be due to inattention, lack of time, complexity of information and low levels of trust and confidence. The ACCC suggested that retailers compete when they acquire new customers but

<sup>122</sup> We defined legacy market offers (legacy offers) as plans that were not available to new customers in 2024–25 – that is, residential or small business plans that were closed to new customers before 1 July 2024.

are not incentivised to keep prices for existing customers competitive.<sup>123</sup> As a result, customers who do not regularly engage with the market pay higher prices, and some customers appear to incur potentially disproportionate penalties for not regularly switching. The ACCC found that, as at August 2024, 59% of customers on plans older than 2 years and 29% of customers on plans that were 1 to 2 years old, were paying bills equal to or higher than the DMO reference price. Notably, nearly all flat rate customers on plans priced more than 25% above the DMO were older than 2 years.<sup>124</sup>

In December 2023, the then Minister responsible for Energy requested that we ask retailers to provide the number of households and small businesses in SEQ remaining on legacy offers that are above the DMO, and that we include this information in future market monitoring reports. The Minister noted that there was a gap in information regarding disengaged customers who remain on legacy offers that have increased over time above the DMO.<sup>125</sup>

## 7.2 QCA methodology

We applied the same methodology as last year.<sup>126</sup> We defined legacy market offers (legacy offers) as plans that were not available to new customers in 2024–25 – that is, residential or small business plans that were closed to new customers before 1 July 2024. We selected this cut-off date as it allows us to compare the DMO prices in 2024–25, which applied from 1 July 2024, to the prices of plans that were available before 2024–25.<sup>127</sup>

It is important to note that some customers may be on higher-priced offers that were still available after 1 July 2024 and are therefore not categorised as legacy offers. Our analysis in Chapter 2 and Appendix A shows that retailers offered a range of market offers in 2024–25, including some plans that resulted in bills higher than the DMO.

Given information about plans and prices of SEQ customers is not publicly available, we asked retailers to calculate legacy market offer bills (legacy bills) for all tariffs and tariff combinations covered by the DMO.<sup>128</sup> In particular, we asked retailers to provide:

- the total number of customers on legacy offers (legacy customers) as at 31 December 2024
- the number of legacy customers whose bill (based on the DMO annual usage) was higher than the 2024–25 Energex DMO reference bill
- the average amount the bills exceeded the respective DMO reference price.

For plans *with* a conditional discount attached, we asked retailers to calculate an annual bill twice – once assuming the discount was achieved, and once assuming the discount was not achieved.

Table 7.1 shows the annual usage and DMO reference bill values the AER set for 2024–25 for the Energex distribution network, which we asked retailers to use in order to calculate bills and compare those bills to the DMO reference bill.<sup>129</sup>

<sup>123</sup> The ACCC considered that ‘retailers recoup their costs over a customer’s lifetime, by setting attractively low acquisition offers and making subsequent unilateral price increases for their existing customer base over time’ (ACCC, [Inquiry into the National Electricity Market](#), December 2023, pp 9, 68–73).

<sup>124</sup> ACCC, [Inquiry into the National Electricity Market](#), December 2024, p 49.

<sup>125</sup> The Minister’s letter is available on our website at [‘SEQ retail electricity market monitoring’](#).

<sup>126</sup> For more information on our methodology, see QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, pp 99–100.

<sup>127</sup> We note that the Minister did not define the term ‘legacy market offer’, and there is no formal definition for it in this context. The ACCC classified plans as ‘older’ (plans that existed from 1 August 2022 onwards, or as at 1 August 2023 and 2024) and ‘newer’ (plans that existed as at 1 August 2024) (ACCC, [Inquiry into the National Electricity Market](#), December 2024, p 48).

<sup>128</sup> The AER is only required to set DMO prices for residential customers on flat rate or time-of-use tariffs, residential customers with controlled load, and small business customers on flat rate tariffs.

<sup>129</sup> The bills in this chapter are based on DMO consumption levels, while the bills in Chapter 2 are based on median consumption levels.

**Table 7.1: Energex DMO – annual usage and reference bills for 2024-25**

	Residential tariffs			Small business tariffs
	Flat rate	Flat rate + controlled load	Time-of-use	Flat rate
Annual usage (general)	4,600 kWh	4,400 kWh	4,600 kWh	10,000 kWh
Annual usage (controlled load)	–	1,900 kWh	–	–
Annual reference bill (incl GST)	\$2,066	\$2,414	\$2,066	\$4,261

Source: AER, [2024-25 Default market offer prices](#) [revised final determination], 2024, p 6.

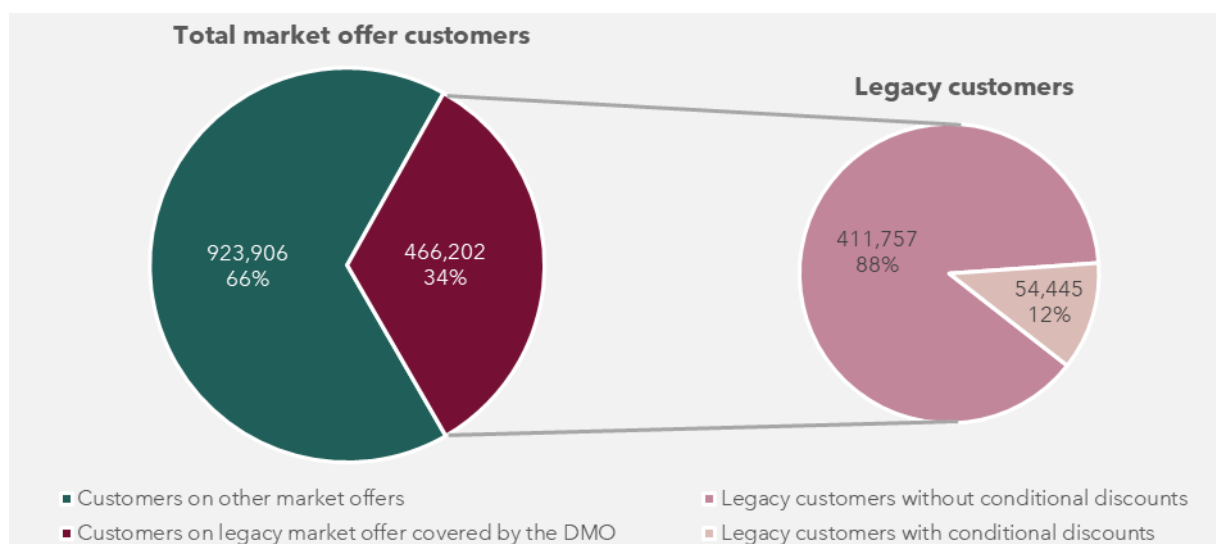
Legacy customers on other tariffs – such as tariffs with a demand charge, small business controlled load and time-of-use tariffs, and tariffs offered in embedded networks – are not included in our analysis as they are not covered by the DMO.<sup>130</sup>

## 7.3 Customer numbers

As at 31 December 2024, 36 retailers had at least one residential customer on a market offer in SEQ, and 35 retailers had at least one small business customer on a market offer in SEQ. In total, there were 1,390,108 residential customers and 96,650 small business customers in SEQ who were on a market offer in the December quarter of 2024.<sup>131</sup>

### 7.3.1 Residential customers

Seventeen of the 36 retailers with residential customers on a market offer in SEQ indicated that they had customers on a legacy offer covered by the DMO, and 12 of the 17 had at least one customer on a legacy offer higher than the 2024-25 DMO reference bill. Overall, about one-third of the market offer customers were on a legacy offer in the December quarter of 2024 (Figure 7.1). A vast majority of these customers were on a legacy offer without a conditional discount (88%), while legacy offers with a conditional discount were less common (12%).

**Figure 7.1: Residential customers on legacy market offers, December quarter 2024**

Note: Percentages rounded to whole numbers.

Sources: Retailers' responses to the QCA's information notice (unpublished); AER, [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 2], 2025, viewed 13 May 2025; QCA analysis.

<sup>130</sup> AER, [Default market offer prices 2024-25](#) [final determination], 2024, pp 9, 11-12.

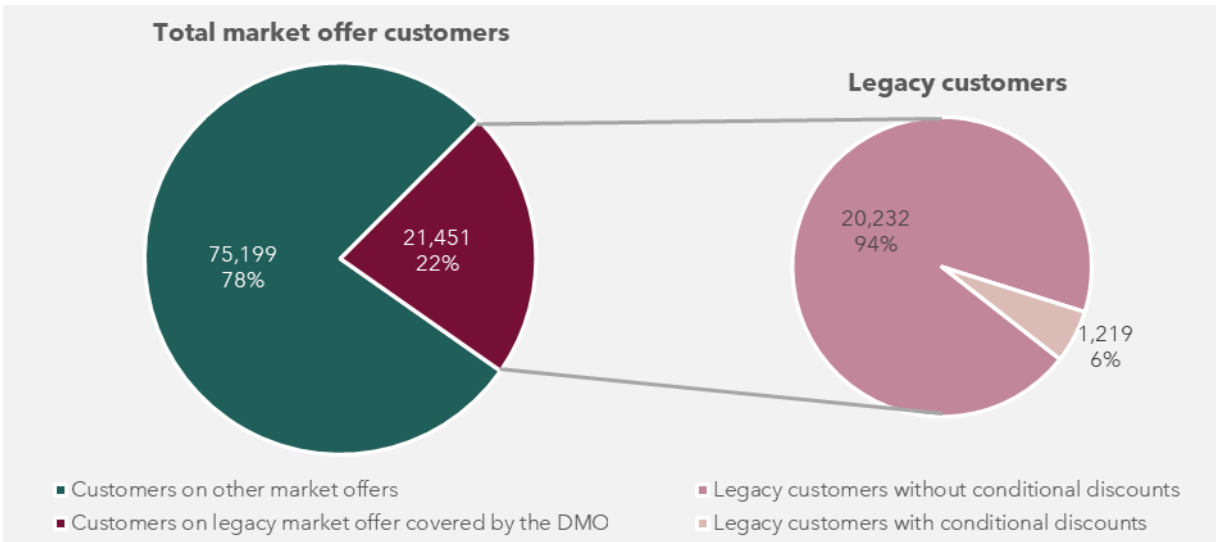
<sup>131</sup> AER, [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 2], 2025, viewed 13 May 2025.

Between the December quarters of 2023 and 2024, the number of residential customers on legacy market offers covered by the DMO increased by close to 27,000, while the share of market offer customers on legacy market offers only increased slightly (from 32% to 34%).<sup>132,133</sup> However, there was a change in the composition of legacy offers. The number of customers on legacy offers *without* conditional discounts increased by around 60,000, while the number of customers on legacy offers *with* conditional discounts decreased by almost 33,000.

### 7.3.2 Small business customers

Eighteen of the 35 retailers with small business customers on a market offer in SEQ indicated that they had customers on a legacy offer covered by the DMO, and 10 of the 18 had at least one customer on a legacy offer higher than the 2024-25 DMO reference bill. Overall, about one-fifth of the market offer customers were on a legacy offer in the December quarter of 2024 (Figure 7.2). A vast majority of these customers were on a legacy offer without a conditional discount (94%), while legacy offers with a conditional discount were less common (6%).

**Figure 7.2: Small business customers on legacy market offers, December quarter 2024**



Note: Percentages rounded to whole numbers.

Sources: Retailers' responses to the QCA's information notice (unpublished); AER, [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 2], 2025, viewed 13 May 2025; QCA analysis.

Between the December quarters of 2023 and 2024, the number of small business customers on legacy market offers covered by the DMO increased by close to 4,000, while the share of market offer customers on legacy market offers only increased slightly (from 19% to 22%).<sup>134,135</sup> However, within the legacy market offer group, there was a notable change in the composition of offers. The number of customers on legacy offers without conditional discounts increased by about 5,000, while the number of customers on legacy offers with conditional discounts decreased by about 1,000.

<sup>132</sup> QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 100-101. Similarly, the ACCC reported a NEM-wide average of customers on offers 1 to 2 years old of 33% and 43% on offers more than 2 years old (ACCC, [Inquiry into the National Electricity Market](#), December 2024, p 49).

<sup>133</sup> Part of this change is explained by an increased number of expired market offers during 2024-25.

<sup>134</sup> QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, p 101.

<sup>135</sup> Part of this change is explained by an increased number of expired market offers during 2024-25.

### 7.3.3 General observations

Between the December quarters of 2023 and 2024, we observed an increase in the number of residential and small business customers on legacy market offers covered by the DMO. This outcome highlights the limited switching activity in the legacy customer cohort and indicates that disengagement with the market persists, with many residential customers and small businesses remaining on legacy offers.

Over the same period, we observed a notable decrease in both the number and the share of customers on legacy offers with conditional discounts (the share decreased from 20% to 12% for residential customers and from 13% to 6% for small business customers).<sup>136</sup> This decrease may indicate that retailers were phasing out some of their old plans that had conditional discounts attached,<sup>137</sup> or that customers were actively moving away from them. As we note in Chapter 3, guaranteed discounts continue to be more common than conditional discounts among new plans published in recent years, reflecting a broader shift away from conditional discounting practices.

## 7.4 Customer bills

We asked retailers to calculate legacy market offer bills in the same manner as bills are calculated for price comparisons with the 2024–25 Energex DMO reference bills, and to provide the average amount that legacy market offer bills were above the equivalent DMO for each tariff or tariff combination. The data retailers provided to us suggests that more than half of legacy customers on plans without conditional discounts, or on plans where a conditional discount was achieved, would have had bills below the equivalent DMO. If a discount was attached to the plan, and it was not achieved, the bill for most customers was above the DMO.

### 7.4.1 Residential customers

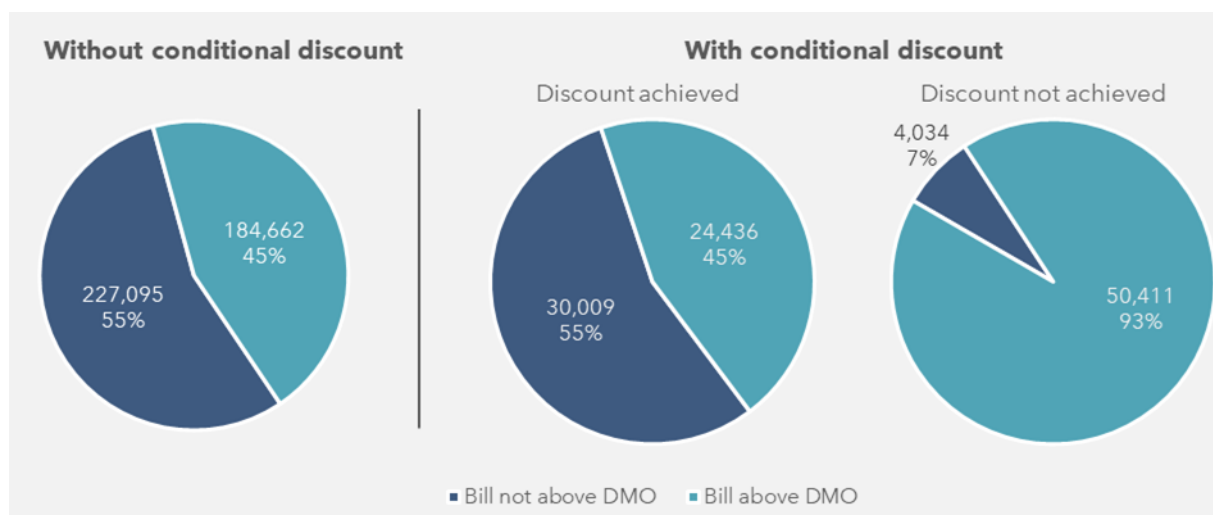
Figure 7.3 provides a breakdown of bill outcomes for residential legacy market offer customers, including the percentage of bills that were above the DMO.

---

<sup>136</sup> We note the age of these offers is not known – some offers may have been closed to new customers for several years.

<sup>137</sup> The AEMC received a rule change request in August 2024, which sought – among other things – to amend the NERR to remove the grandfathering arrangements that allow some legacy market offers to include ‘unreasonably large’ conditional discounts, and to ensure that conditional discounts are not higher than reasonable costs. While a final rule change was only made in June 2025 and will not come into effect until 1 July 2026 (AEMC, [National Energy Retail Amendment \(Improving consumer confidence in retail energy plans\) Rule 2025](#) [rule determination], 2025, pp 1–4, 23–28, 56), some retailers may have proactively started to respond to the upcoming changes.

**Figure 7.3: Legacy bills – residential customers, December quarter 2024**



Note: Percentages rounded to whole numbers.

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

Of the 411,757 residential legacy market offer customers on plans *without* conditional discounts, 45% were on plans that resulted in a bill above the DMO bill. Similarly, of the 54,445 residential legacy market offer customers on plans *with* conditional discounts, 45% were on plans that resulted in a bill above the DMO bill if the conditional discount was achieved. If the discount was not achieved, the bill for almost all customers (93%) was above the DMO.

Compared to the bill outcomes in the December quarter of 2023, the share of residential legacy market offer customers above the DMO in the December quarter of 2024 was:

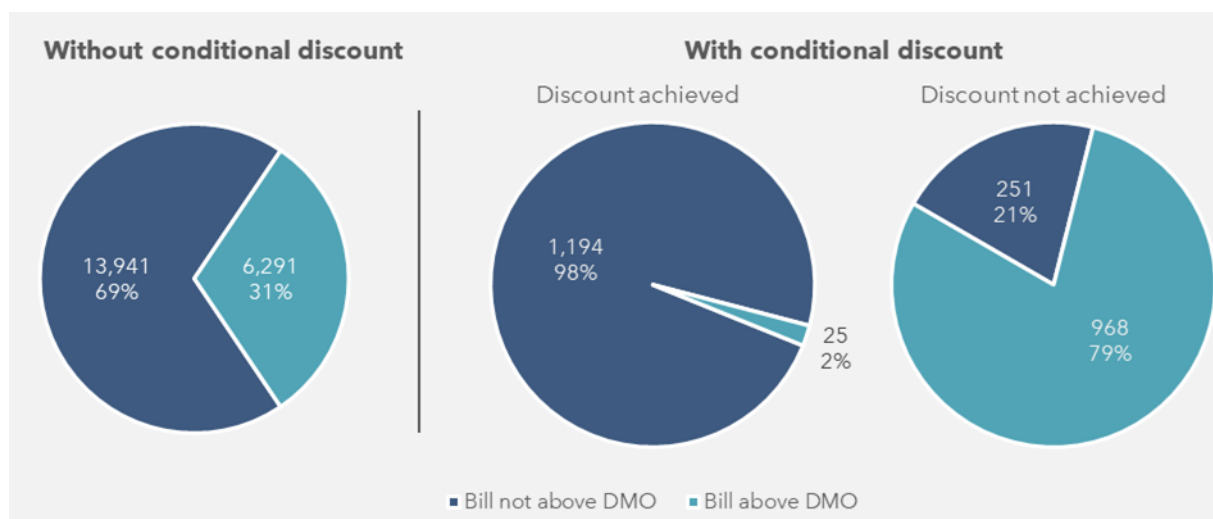
- substantially higher for customers on plans without conditional discounts (up from 29% to 45%)
- substantially higher for customers on plans with conditional discounts if the discount was achieved (up from 29% to 45%)
- slightly lower for customers on plans with conditional discounts if the discount was not achieved (down from 98% to 93%).

## 7.4.2 Small business customers

Figure 7.4 provides a breakdown of bill outcomes for small business legacy market offer customers, including the percentage of bills that were above the DMO.



**Figure 7.4: Legacy bills – small business customers, December quarter 2024**



Note: Percentages rounded to whole numbers.

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

Of the 20,232 small business legacy market offer customers on plans without conditional discounts, less than one-third (31%) were on plans that resulted in a bill above the DMO bill. Of the 1,219 small business legacy market offer customers on plans with conditional discounts, the vast majority (98%) were on plans that resulted in bills below the DMO if the conditional discount was achieved. If the discount was not achieved, the bill for most customers (79%) was above the DMO.

Compared to the bill outcomes in the December quarter of 2023, the share of small business legacy market offer customers above the DMO in the December quarter of 2024 was:

- similar for customers on plans without conditional discounts (up from 30% to 31%)
- lower for customers on plans with conditional discounts if the discount was achieved (down from 9% to 2%)
- substantially lower for customers on plans with conditional discounts if the discount was not achieved (down from 94% to 79%).

### 7.4.3 General observations

Between the December quarters of 2023 and 2024, we observed an increase in the number of legacy customers who were on plans that resulted in a bill above the DMO:<sup>138</sup>

- For residential customers, the number increased by 80,479 (conditional discounts achieved) or 46,153 (conditional discounts not achieved).
- For small business customers, the number increased by 1,568 (conditional discounts achieved) or 645 (conditional discounts not achieved).

We note that the increase in the number of legacy market offer customers was more substantial among residential customers. This suggests that residential customers were more likely than small business customers to remain on legacy market offers priced above the DMO in 2024-25. This may indicate that small business customers may have been more engaged with the market, as they typically face higher bills than residential customers.<sup>139</sup>

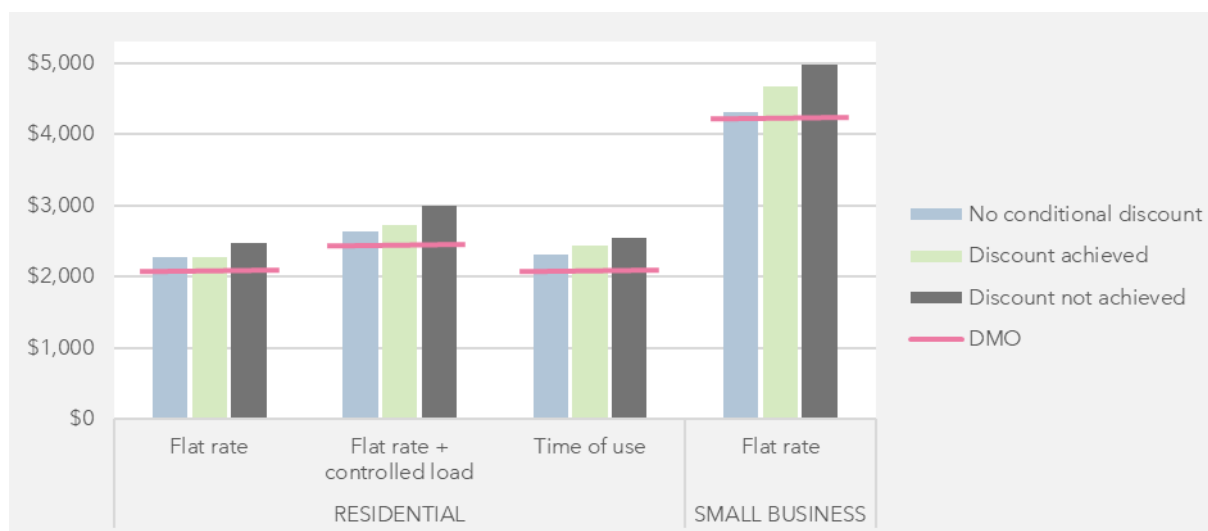
<sup>138</sup> Our analysis includes all legacy customers and assumes – for those customers who were on plans with conditional discounts attached – that either all or none of these customers achieved their discounts.

<sup>139</sup> Energy Consumers Australia found that concerns around affordability remained significantly elevated in 2024. Of the small businesses surveyed, 71% reported electricity costs as a substantial or even one of their biggest cost overheads and 50%

## 7.4.4 Comparing bills to the DMO

This section looks at the bill outcomes for legacy customers on offers that produced bill values above the equivalent DMO reference bill. Figure 7.5 shows the annual bill value for legacy offers above the DMO for each residential and small business tariff and tariff combination covered by the DMO as well as the respective DMO reference bill.

**Figure 7.5: Annual bill value of legacy offers above the DMO, December quarter 2024**



Notes: Bill values are based on the DMO annual usage and have been weighted by the number of legacy customers who were on those offers. Individual legacy customers' consumption may vary significantly. The bills do not include other components of the legacy offers, such as solar feed-in tariffs.

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

Customers on legacy offers above the DMO were paying less on plans that had no conditional discounts attached than on plans that had discounts attached, even if all the conditional discounts were achieved. When conditional discounts were not achieved, bills were substantially higher. The average amount above the DMO in the December quarter of 2024 ranged from:

- \$205 (no conditional discount) to \$414 (discount not achieved) – residential flat rate
- \$225 (no conditional discount) to \$575 (discount not achieved) – residential flat rate with controlled load
- \$252 (no conditional discount) to \$487 (discount not achieved) – residential time-of-use
- \$51 (no conditional discount) to \$724 (discount not achieved) – small business flat rate.

Our findings in the December quarter of 2024 are similar to those a year earlier: legacy customers on plans without conditional discounts had the smallest bill values above the DMO for tariffs covered by the DMO.<sup>140</sup> This indicates that legacy customers are generally better off on plans without conditional discounts attached.

Compared to the December quarter of 2023, the lower-bound bill outcomes increased for residential flat rate and time-of-use customers (by \$27 and \$68 respectively), while it decreased for residential flat rate with controlled load and small business flat rate customers (by \$34 and \$108 respectively).

expressed that they were more concerned about their ability to pay electricity bills than a year ago (compared to 17% of residential customers who were most concerned about paying electricity bills). In addition, 64% of small businesses reported looking for a better deal at least every 2 years, compared to 55% of residential customers (Energy Consumers Australia, [Energy Consumer Sentiment Survey](#) [Topline Data], 2024).

<sup>140</sup> The only exception in the December quarter of 2023 was for the residential time-of-use tariff, where the bill value was slightly lower when customers achieved the conditional discounts attached to their plan.

The largest decrease in the average amount above the DMO was for small business customers, which suggests that this customer segment was more actively moving away from higher-priced plans.

In both December quarters, the largest bill values above the DMO were for plans where conditional discounts were not achieved. This illustrates how legacy market offers with conditional discounts expose customers to the risk of paying materially above the DMO when discounts are not realised. Table 7.2 shows the bill impact of legacy customers failing to meet conditional discount conditions.

**Table 7.2: Estimated impact of conditional discounts on legacy market offer bills, December quarter 2024**

Tariff type		Bill value (\$)		Difference	
		Discount achieved	Discount not achieved	(\$)	(%)
Residential	Flat rate	2,274	2,480	206	9.1
	Flat rate + controlled load	2,726	2,989	263	9.7
	Time-of-use	2,431	2,553	122	5.0
Small business	Flat rate	4,668	4,985	317	6.8

Notes: Bill values are based on the DMO annual usage and have been weighted by the number of legacy customers who were on those offers. Individual legacy customers' consumption may vary significantly. The bills do not include other components of the legacy offers, such as solar feed-in tariffs.

Sources: Retailers' responses to the QCA's information notice (unpublished); QCA analysis.

## 7.5 Reasons customers remain on legacy offers

Our analysis suggests there is scope for some customers to reduce their bill by switching to their retailer's standing offer or by switching to a cheaper market offer.<sup>141</sup> However, there may be various reasons why customers remain on legacy offers – even if they are (or appear to be) more expensive than the DMO – for example:

- Customers' actual usage may vary significantly from the DMO consumption level that we used for our comparison. This means that while the plan is expensive for a customer with the DMO consumption level, it may be an ideal plan for a customer with a different consumption level.
- A legacy offer may have attributes attached that are advantageous for customers. For example, a low-usage customer with a solar PV system may prefer to remain on a more expensive legacy market offer because it has a high solar feed-in tariff attached.<sup>142</sup>
- High conditional discounts could prevent some customers from switching, as they do not want to lose their large discount. However, customers may potentially be unaware that the discount is off a higher underlying price and that they may be able to save money by switching to a plan with cheaper prices, even if the new plan has a smaller discount or no discount at all.
- Some of the reasons for customers not switching retailers or plans that we discuss in sections 9.2.3 and 9.5 – such as customers not being price-sensitive or feeling that the benefits of shopping around do not outweigh the costs – are likely to apply to legacy customers too.

Nonetheless, we consider that customers should regularly evaluate whether their current plan remains the best option for their circumstances and check if a better plan is available, either from their current retailer or from other retailers in the market.

<sup>141</sup> Our analysis shows that market offer bills were generally lower than standing offer bills, which are capped by the DMO (see Chapter 2 and Appendix A).

<sup>142</sup> In response to our data request for the 2023–24 analysis, one retailer told us that most customers on its legacy offers actively opted to remain on these plans because of the high solar feed-in tariff attached to these plans. As the usage of the average customer on these plans is very low – well below a representative customer and the DMO consumption level – and the feed-in tariff is high, the retailer stated these customers often received a bill of zero or were even in credit (QCA, [SEQ retail electricity market monitoring 2023–24](#), 2024, p 104).

## 7.6 Price limitations for plans with expired benefits

In June 2025, the AEMC made a final rule determination on 4 rule change requests to improve consumer confidence in retail energy plans and reduce the risk of customers facing unexpected costs or unreasonable conditional penalties. These reforms form part of a broader package of measures designed to improve transparency, fairness and consumer protections in the retail energy market. With respect to legacy offer customers, one of the rule changes requires retailers to restrict the prices that customers pay if they are on a contract where the benefits expire or change before the contract ends to the standing offer price (or less). This requirement will apply to both new and existing contracts with benefit periods, in the following way:<sup>143</sup>

- New contracts – Retailers must not charge customers more than the standing offer price when a benefit period ends, unless the contract specifies that benefits continue for the life of the contract.
- Existing contracts – Retailers must not charge customers more than the standing offer price from 1 July 2026 (if plan benefits end before 1 July 2026) or from the end of the current benefit period (if plan benefits end after 1 July 2026). No change is required for contracts where post-benefit prices are already lower than or equal to the standing offer price.

For legacy market offer customers in SEQ, this reform will provide a direct safeguard against paying materially higher rates once benefit periods expire, as post-benefit prices will be capped at the equivalent DMO level. This is expected to reduce the price gap between disengaged customers and those on more competitive market offers. While the rule will cap post-benefit prices, customers are still likely to benefit from engaging with the market, as standing offers are generally priced above the cheapest market offers available. Customers who remain disengaged may therefore continue to pay more than active customers, albeit with stronger protections against excessive charges. Retailers have been given 12 months to implement these changes, with compliance required from 1 July 2026.

---

<sup>143</sup> AEMC, [National Energy Retail Amendment \(Improving consumer confidence in retail energy plans\) Rule 2025](#) [rule determination], 2025, p 12.

# 8 New retail tariffs and plans

## Key findings

Based on our analysis of retail tariff structures and electricity plans in 2024-25, we found that:

- A few retailers provided new offerings, such as plans with incentives to either use or export renewable energy during certain times.
- Many retailers also continued to provide offerings that were introduced in previous years, including plans that combine solar panels and battery storage, or plans for electric vehicle (EV) and virtual power plant (VPP) customers.
- Some barriers may have continued to hold back the development and take-up of new and innovative offerings, including:
  - gaps in consumer protections
  - preference for simplicity
  - focus on price and costs
  - adoption of new technologies that are required for such offerings.
- There were some new initiatives to support innovative offerings, including discounts on batteries, a policy-led sandboxing approach and a forward-looking review of electricity pricing, products and services.

## 8.1 QCA methodology

To obtain information on the emergence of new types of retail tariff structures and retail electricity plans, we followed the same approach as for our previous annual market monitoring reports. We:

- collected and analysed retail tariff structure and electricity plan information from Energy Made Easy and other sources in each quarter of 2024-25
- invited retailers to provide information on any new retail tariffs and plans in their responses to the information notice we issued them in April 2025.<sup>144</sup>

## 8.2 New retail tariffs and plans in 2024-25

We identified some new offerings in 2024-25.

### Incentives to use renewable energy

Flow Power applied a 'price efficiency adjustment' to customers' monthly bill to incentivise the use of electricity when renewable generation is high and prices are low. Customers who shifted their usage to cheaper times – such as the middle of the day, when renewables are abundant – could

---

<sup>144</sup> The 'new retail tariffs and plans' section of the information notice was optional, as in previous years.

reduce their base usage charge. By contrast, consistent usage during expensive periods – typically when fossil-fuel generation is at its peak – would lead to an increase in the base usage charge.<sup>145</sup>

### Incentives to export during peak periods

AGL rewarded customers on its Battery Rewards Plan with a prepaid digital Visa gift card worth at least 25 c/kWh (up to \$600 per year) if they exported electricity to the grid between 5 pm and 9 pm. During that time period, customers could export as much or as little as they wanted, and AGL promised not to touch their battery, unless customers joined AGL's VPP.<sup>146</sup>

## 8.3 Continued retail tariffs and plans in 2024-25

We found that many retailers continued to provide innovative retail tariffs and plans in 2024-25 that were introduced in previous years, including:<sup>147</sup>

- plans that combine solar panels and battery storage
- EV plans
- VPP plans
- customer retention plans
- plans that offer incentives and other benefits through partnerships
- plans that offer rewards for responding to peaks in demand.

The ACCC described innovative new energy services as an emerging feature in the market more broadly and noted that these services were rapidly growing in size and importance. In its July 2025 report, it found that there had been significant increases in recent years in the number of customers on behavioural demand response programs, EV tariffs and VPPs, which were enabled by a substantial increase in installed battery storage capacity connected to the grid. But the ACCC found that:

- although the uptake of EV tariffs was increasing, it remained relatively low, given that other charging options were available and EVs could be charged with customers' existing retail tariff
- there was a significant gap between the number of customers with a battery installed and those who also participated in a VPP, even though VPP customers had substantially lower bills
- behavioural demand response programs delivered only modest financial rewards (median annual bill credits of \$5.86 that reduced annual bills by less than 1%), which raised the question whether such programs provide adequate incentives for customers to participate and effectively reduce the demand on the grid to stabilise the balance between demand and supply.<sup>148</sup>

## 8.4 Barriers to new and innovative offerings

Retailers and customers face several challenges with new types of retail tariffs and plans that may slow down the emergence and adoption of such offerings. We consider that the following barriers may have continued to hold back the development and take-up of new and innovative offerings.

<sup>145</sup> Flow Power, [Our variable pricing – Your Price Efficiency Adjustment explained](#), Flow Power website, n.d., viewed 9 October 2025. We note that these plans were not published on Energy Made Easy and are therefore not included in our analysis in Chapter 2 and Appendix A.

<sup>146</sup> AGL, [Have a home battery? Get up to \\$1,000 worth of rewards](#), AGL website, n.d., viewed 23 October 2025.

<sup>147</sup> For an overview of the new retail tariffs and plans in 2023-24 and in the years before, see QCA, [SEQ retail electricity market monitoring 2022-23](#), 2023, pp 84-88 and QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 76-78.

<sup>148</sup> ACCC, [Inquiry into the National Electricity Market](#), July 2025, pp 5-7, 47, 69.

## Gaps in consumer protections

Consumer protections provide a legal framework to ensure customers are treated fairly and have access to recourse if they are not. They also build confidence in new offerings, which are becoming increasingly common and important to support the energy transition. However, the AER and the Energy and Climate Change Ministerial Council identified gaps in the current regulatory framework.<sup>149</sup> The ACCC highlighted a number of challenges for consumer participation in new energy services. To maximise the level of participation in such energy markets, the ACCC recommended energy-specific consumer protections that oblige energy service providers to:

- ensure consumers are no worse off and are fairly rewarded for their participation in the market
- protect the investments made by consumers in energy assets
- set guardrails to protect consumers where external control is contemplated
- design and distribute energy offers in a consumer-centric way.<sup>150</sup>

The AEMC considered that aspects of retail market regulation – especially consumer protections – did not adequately cover newer energy services. It acknowledged stakeholder feedback that different retail regulations across states may limit innovation. The AEMC further cautioned that regulations that require comparisons between innovative tariff products and standard market offers may prevent the creation and uptake of new and differentiated products.<sup>151</sup> We also note that the DMO only applies to a small number of more traditional tariffs.<sup>152</sup>

## Preference for simplicity

We noted last year that it may often be challenging for customers to understand and compare new and innovative offers, and that retailers may be responding to this challenge by providing plans that are simple, clear and accessible. For example, some customers may find cost-reflective tariffs difficult to understand and engage with, such as demand tariffs – the default network tariff in the 2020-25 regulatory period for small customers in SEQ with a smart meter. As many customers prefer plans with a simpler pricing structure, many retailers continued to offer flat rate plans, even if those customers were assigned to a demand tariff at the network level.<sup>153</sup>

The AER has also changed the default network tariff from a demand tariff to a time-of-use tariff for small customers with a smart meter in the Energex distribution area from 1 July 2025. It considered that a time-of-use tariff provided price signals to customers about the times of abundance and scarcity on the network, which are easier to understand than those provided by a demand tariff.<sup>154</sup>

---

<sup>149</sup> AER, [Review of consumer protections for future energy services](#) [final advice], AER website, 23 November 2023, viewed 27 October 2025; Energy and Climate Change Ministerial Council, [Consultation paper – Better Energy Customer Experiences](#), 2025, pp 6-7.

<sup>150</sup> ACCC, [Inquiry into the National Electricity Market](#), July 2025, pp 10-11.

<sup>151</sup> AEMC, [The pricing review](#) [discussion paper], 2025, pp 7, 41.

<sup>152</sup> The AER is required to set a DMO price for residential customers on flat rate or time-of-use tariffs, residential customers with controlled load and small business customers on flat rate tariffs (AER, [Default market offer prices 2024-25](#) [final determination], 2024, pp 8-9).

<sup>153</sup> Retailer evidence supports that this practice continued in 2024-25. For example, one retailer noted in its response to our information notice that the number of customers on demand tariffs increased [at the network level] as smart meters were rolled out. However, the retailer had paused assigning new customers to demand tariffs [at the retail level], citing customer experience concerns and the challenges customers face in understanding and engaging with these tariffs (Retailer's response to QCA information notice for 2024-25 (unpublished)).

<sup>154</sup> AER, [Energex – Determination 2025-30](#) [final decision, attachment 19: Tariff structure statement – Ergon Energy and Energex – 2025-30 Distribution determination revenue proposal], 2025, pp 3, 9, 15, 18.



## Focus on price and costs

Broader economic conditions, including cost-of-living pressures, also influence customer behaviour. Energy Consumers Australia reported that across all income brackets (except those earning \$150,000+ per year), more than half of households were either under financial pressure or managing to afford bills but not much else. It concluded that most customers would be unlikely to afford major energy upgrades, including consumer energy resources (such as solar or batteries).<sup>155</sup> We consider that ongoing affordability challenges may prompt some customers to focus mainly on price, rather than innovation, unless new or innovative offerings promise some savings.

Retailers may have been responding to this focus on price and affordability by focusing on competitive rather than on innovative offerings. In addition, high and/or volatile wholesale energy costs may dampen retailers' willingness or capacity to invest in the development and launch of innovative offerings. We note that since the market volatility initially observed in 2022,<sup>156</sup> wholesale energy costs have remained elevated,<sup>157</sup> which may dampen innovation as retailers shift their focus on cost savings and the provision of competitively priced plans.<sup>158</sup>

## Adoption of new technologies

Many innovative offerings require customers to have a smart meter, and in some instances also battery storage or an EV. This precludes a large number of SEQ customers – including those who are still on an accumulation meter – from taking up innovative offerings. As long as a substantial portion of the customer base lack the necessary technology to take up innovative offerings, retailers' incentives to develop and market such offerings are likely to remain limited, which stifles innovation in the sector. As the rollout of smart meters progresses and more customers purchase batteries and/or EVs, more retailers may provide innovative offerings that most SEQ customers could take up.

# 8.5 Initiatives to support innovative offerings

Households and small businesses have access to an increasing range of energy services to help them manage their energy usage, store energy and export electricity to the grid. Many of these services are more complex than traditional retail electricity services.

Some initiatives were launched in 2023-24 to support innovative offerings, including consumer protections to cover new energy services, and the integration of consumer energy resources into the wholesale energy market.<sup>159</sup> Three new initiatives stand out in 2024-25.

## Policy-led sandboxing approach

Regulatory sandboxes provide a framework within which participants can trial initiatives under relaxed regulatory requirements on a time-limited basis and with appropriate safeguards in place.<sup>160</sup> In February 2025, the AER signalled a new approach to testing and trialling new ideas in the energy

<sup>155</sup> Energy Consumers Australia, [Energy Consumer Sentiment Survey](#), 2024, p 9.

<sup>156</sup> QCA, [SEQ retail electricity market monitoring 2022-23](#), 2023, p 121.

<sup>157</sup> Between the June quarters of 2024 and 2025, wholesale electricity prices in Queensland increased by 25%. In the June of 2025, volume weighted average wholesale electricity prices were higher across the National Electricity Market (NEM) compared to the previous quarter, increasing by 33% in Queensland (AER, [Wholesale energy prices fluctuate in response to seasonal and market factors](#) [news release], 31 July 2025, viewed 28 October 2025), AER, [Wholesale markets quarterly Q2 2025](#) [April-June], 2025, p 4.

<sup>158</sup> A paper analysing how process and product innovations respond to cost and demand changes showed that an increase in production costs stifles product innovation, but incentivises process innovation (M R Battaglion and P Tedeschi, [How do demand and costs affect the nature of innovation?](#), *Journal of Economics*, vol 133, 2021, pp 199-238).

<sup>159</sup> For more information, see QCA, [SEQ retail electricity market monitoring 2023-24](#), 2024, pp 79-80.

<sup>160</sup> AEMC, [Regulatory sandbox arrangements to support proof-of-concept trials](#) [final report], 2019, p 1.

market with the introduction of policy-led sandboxing. In its paper on the topic, the AER outlined how a shift to a policy-led sandboxing approach could help to overcome barriers to access, deploy and orchestrate new energy resources with long-term benefits to consumers (such as community batteries, EVs and rooftop solar).<sup>161</sup>

## **Electricity pricing for a consumer-driven future**

The AEMC self-initiated a broad, forward-looking review in July 2024, looking at the role that electricity pricing, products and services will play in supporting the diverse needs of customers. The review will address the delivery of consumer energy resources for the energy transition and examine how markets and regulatory frameworks can provide the products and services that best match consumer preferences.<sup>162</sup> The AEMC expects to release a draft report in December 2025.

## **Cheaper Home Batteries Program**

The Australian Government's \$2.3 billion Cheaper Home Batteries Program provides households, businesses and community organisations a discount of about 30% on the upfront cost of installing a small-scale battery system (5–100 kWh). The program was launched on 1 July 2025 and is intended to reduce participating customers' electricity bills and to lower costs for everyone due to lower peak demand and a more stable electricity grid.<sup>163</sup>

---

<sup>161</sup> AER, [Innovative trials welcomed as AER introduces policy-led sandboxing approach](#) [news article], 13 February 2025.

<sup>162</sup> AEMC, [The pricing review: Electricity pricing for a consumer-driven future](#), AEMC website, n.d.

<sup>163</sup> The discount will be reviewed at least annually and will gradually decrease until 2030, in line with reducing battery prices (Australian Government, [Cheaper Home Batteries Program](#), Department of Climate Change, Energy, the Environment and Water website, updated 7 October 2025, viewed 29 October 2025).

# 9 Market competitiveness

## Key findings

Our assessment of key market indicators suggests that the outcomes we observed in the SEQ retail electricity market in 2024-25 reflect the characteristics of a competitive market. In particular:

- Market rivalry between retailers continued.
  - Many retailers continued to compete on price (including through discounts and/or financial incentives), rather than on new innovative offerings.
  - Switching between retailers increased.
  - Market concentration decreased in the residential and small business markets.
- Prices increased less than forecast costs.
  - In a competitive market, changes in underlying costs should be reflected in prices. Average market offer prices (bills) moved roughly in line with estimated costs in most years, including 2024-25.
  - Bills were lower than the costs we estimated for 2024-25.
- The spread of prices in the market was high.
  - Price differences between plans are expected to accelerate competition as they provide an incentive for customers to shop around.
  - The spread between the average standing offer bill and the average lowest market offer bill was at one of the highest levels over the past 10 years.

A number of challenges persisted in the market.

- Some customers were inactive or disengaged. While it may be a deliberate decision for some, it may not be a choice for others who find the market too difficult to navigate or do not have sufficient knowledge of the market.
- More choice and an increasing variety of plans are benefits of competition, but they can also add complexity and costs for customers.
- Customers experiencing vulnerability may face additional challenges due to language barriers, cultural issues, disability, low levels of numeracy and literacy and lack of internet access.

## 9.1 QCA methodology

As in previous years, we assessed the competitiveness of the SEQ retail electricity market using the following key market indicators:

- the extent of market rivalry between retailers (section 9.2)
- the movement of prices and costs (section 9.3)
- the spread of prices available in the market (section 9.4)
- the apparent inactivity or disengagement of some customers (section 9.5)
- the complexity of the market (section 9.6).

These market indicators allow us to gain insights into the competitiveness of the SEQ retail electricity market. The development of market outcomes and indicators should be considered over time, rather than over a single year. Furthermore, the market indicators should be interpreted in conjunction, as no single indicator can independently show whether the market is competitive and whether there are good outcomes for customers.<sup>164</sup>

## 9.2 Extent of market rivalry

The extent of market rivalry refers to the intensity of competition among retailers operating in the market. This rivalry can impact customer outcomes through pricing, service offerings, innovation and overall customer experience. To assess the extent of rivalry between retailers, we consider whether:

- the outcomes related to bills (Chapter 2 and Appendix A) as well as discounts, savings and incentives (Chapter 3) demonstrate that retailers were competing on price by adjusting their plans in response to the plans of other retailers
- there were new retail tariffs and plans (Chapter 8) that suggest that retailers were using new and innovative offerings to compete for customers
- customers were active and engaged with the market
- market shares and market concentration have changed over time, in particular due to customers switching retailers, presumably in search of a better plan and/or better service
- the number of retailers competing for customers has changed over time.

### 9.2.1 Price competition

One of the most direct indicators of market rivalry is pricing. In competitive markets, retailers typically offer competitive prices (including discounts or incentives) to attract and retain customers.

Most retailers did not have a market offer available in the June quarter of 2025 that was cheaper than their cheapest plan a year earlier.<sup>165</sup> However, despite higher prices for most tariffs and tariff combinations, we observed a wide range of prices for each of the tariffs and tariff combinations in 2024–25 and some retailers with cheaper plans (Chapter 2 and Appendix A). As a result, there were still opportunities for customers to find a cheaper plan in 2024–25 if they shopped around.

Discounts or financial incentives are commonly used by retailers and are often key features in advertisements, which may induce customers to switch and thereby increase competition. We found that the number of retailers offering discounts remained lower than it was a few years ago.<sup>166</sup> However, discounts were still offered to residential customers by a third of the retailers and to small business customers by nearly a quarter of the retailers in the June quarter of 2025 (Chapter 3).

Financial incentives were more common than discounts<sup>167</sup> and were offered to residential customers by half of the retailers and to small business customers by nearly a quarter of the retailers in the June quarter of 2025 (Chapter 3). Importantly, we found that the lowest market offers for most tariffs and tariff combinations we analysed had a discount or financial incentive attached (Chapter 2).

<sup>164</sup> Stakeholders should also refer to the ACCC's ongoing inquiry into the NEM and the AER's annual retail markets and state of the energy market reports to gain further insights into the operation and competitiveness of retail electricity markets in the NEM, including in SEQ (ACCC, [Electricity market monitoring inquiry 2018–2025](#), ACCC website, n.d., viewed 6 May 2025; AER, [Retail performance reporting](#) and [State of the energy market](#) reports, AER website, n.d., viewed 6 May 2025).

<sup>165</sup> An exception to this overall pattern was for the small business time-of-use tariff, where just over half of retailers had a market offer available that was cheaper than a year earlier.

<sup>166</sup> QCA, [SEQ retail electricity market monitoring: 2017–18](#) [updated report], 2019, chapters 2, 5 and 9 (section 9.3.1).

<sup>167</sup> In particular, we did not observe very high conditional discounts anymore. They were common a few years ago, when retailers competed on price predominantly by using headline discounts.

## 9.2.2 Competition on innovative tariffs and service offerings

Retailers can also compete on non-price aspects of their offerings. Retailers may, for example, attract and retain customers if they provide clear and simple plans that are easy to understand, have only a few plans that are straightforward to compare, offer a selection of payment options, have multilingual customer service representatives, invest in overall customer experience, offer incentives or reward programs, provide convenience through the option of bundling energy plans with non-energy products, or allow customers to reduce carbon emissions through GreenPower.

Competitive markets provide incentives for retailers to innovate and tailor products and services to meet their customers' preferences and needs. Related products and services that lower the costs of electricity supply, improve user experience, or provide other benefits to consumers are a potential source of innovation in the retail electricity market,<sup>168</sup> and an additional way for retailers to compete. Some customers may even pay more if a specific plan fits their needs and preferences.

Many retailers continued to provide offerings that were introduced in previous years. We also identified some new offerings in 2024–25, including plans with incentives to either use or export renewable energy during certain times. However, innovative offerings may face some barriers that limit their development and uptake (Chapter 8).

Competition on non-financial incentives also continued. In the June quarter of 2025, half of the retailers offered non-financial incentives to residential customers, and nearly a quarter of the retailers offered non-financial incentives to small business customers (Chapter 3).<sup>169</sup>

Retailers also continued to offer different plans that cater to the needs and preferences of customers, such as different contract durations ('no lock-in' contracts, 1- or 2-year contracts or ongoing contracts), a choice of payment and billing options (monthly or quarterly bills), or prices that may vary or are fixed for a certain time.

While product differentiation and innovative products can add value to customers, they also potentially add some complexity, especially when the plans are not substantially different. As such, the market may be 'characterised by a relatively large volume of superficially differentiated offers'.<sup>170</sup> This does not empower consumers nor does it reduce market complexity, make searching the market easier or enhance affordability. The Essential Services Commission (ESC) found that a 'small number of more differentiated offers' often included complex tariff structures that did not seem to be attractive to consumers.<sup>171</sup>

## 9.2.3 Switching rate

In a competitive market, customers are expected to be active and engaged with the market. The switching rate is one indicator of customer activity and engagement – and thus of competition.<sup>172</sup> If the market is competitive, we would generally expect engaged and well-informed customers to switch as new plans become available that are sufficiently cheaper and/or better suit their needs.

---

<sup>168</sup> AEMC, [2019 Retail Energy Competition Review](#) [final report], 2019, p 148.

<sup>169</sup> The ACCC had previously observed that retailers were spending more on customer loyalty programs (non-price product add-ons). It noted that 'non-price competition reflects retailers targeting consumers with specified preferences, appealing to consumers' need for convenience and generally promoting a culture of retailer membership' (ACCC, [Inquiry into the National Electricity Market](#), November 2021, p 40).

<sup>170</sup> ESC, [Victorian Energy Market Report](#), March 2022, p 20.

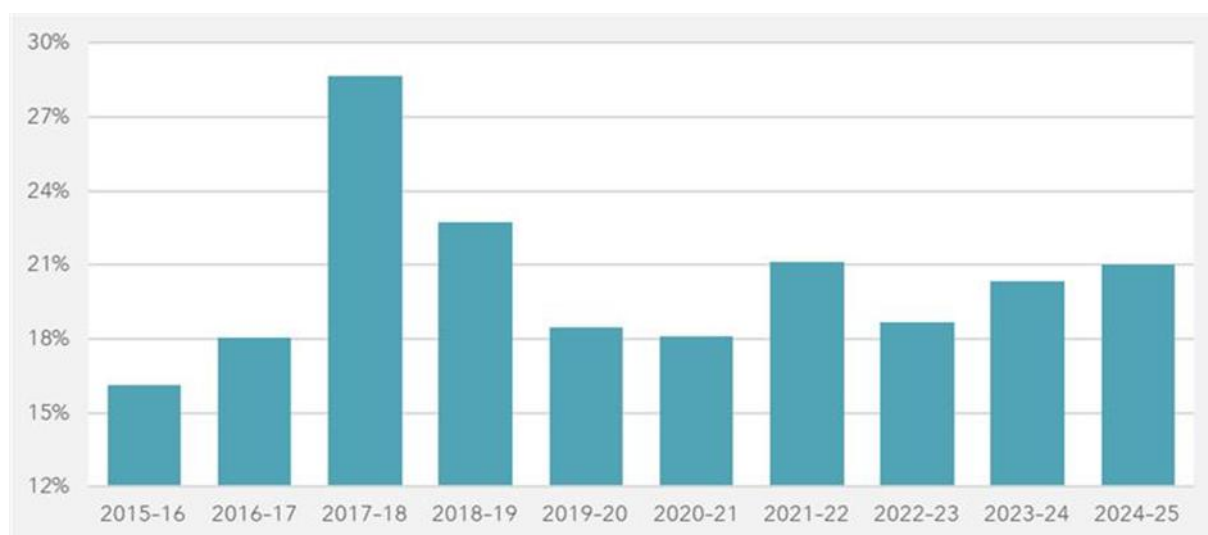
<sup>171</sup> ESC, [Victorian Energy Market Report](#), March 2022, p 10.

<sup>172</sup> The switching rate as a measure of consumer engagement is discussed in more detail in A O'Keefe and D Wong, '[Money left on the table or rational inertia? Consumer engagement in Victoria's retail electricity sector](#)', *Victoria's Economic Bulletin*, vol 3, April 2019, p 3.

Customers can switch either to a better plan of their current retailer or to another retailer. However, data is only available on customers switching to another retailer, as retailers do not have to report on customers switching to another plan. If retailers deliver good-quality, well-priced services in a competitive market, customers may not see any reason to switch retailers and instead decide to stay on their current plan or change plans with the same retailer. Recent regulatory changes aim to encourage this type of switching through the inclusion of 'better offer' messages on bills to show customers how much they could save by switching to a better plan with their existing retailer.<sup>173</sup> In this situation, customers would still be engaging with the market and accessing better plans but this would not be reflected in publicly available switching data.<sup>174</sup>

Figure 9.1 shows the annual switching rate since 2015-16. In 2024-25, we observed the highest switching rate since 2021-22, when large increases in wholesale energy costs led to steep increases in retail electricity prices, resulting in a spike in switching activity. Although the switching rate has continuously increased over the past 3 years, it is still well below the switching rate in 2017-18, when plans with high discounts and initiatives to encourage customer engagement were launched.

**Figure 9.1: Annual switching rate in SEQ, 2015-16 to 2024-25**



Notes: AER customer data for the June quarter of 2025 was not available at the time we finalised our report and we used data from the March quarter of 2025 instead. We removed customer transfer data that was a result of acquisitions, as this switching activity was not initiated by a customer (e.g. transfers of Click Energy customers to AGL in April 2021 and Powerdirect customers to AGL in October 2022).

Sources: Retail Transfer Statistical Data (monthly data) provided by the Australian Energy Market Operator (AEMO); AER, [Retail performance reporting](#), AER website, n.d., viewed 7 May 2025; QCA analysis.

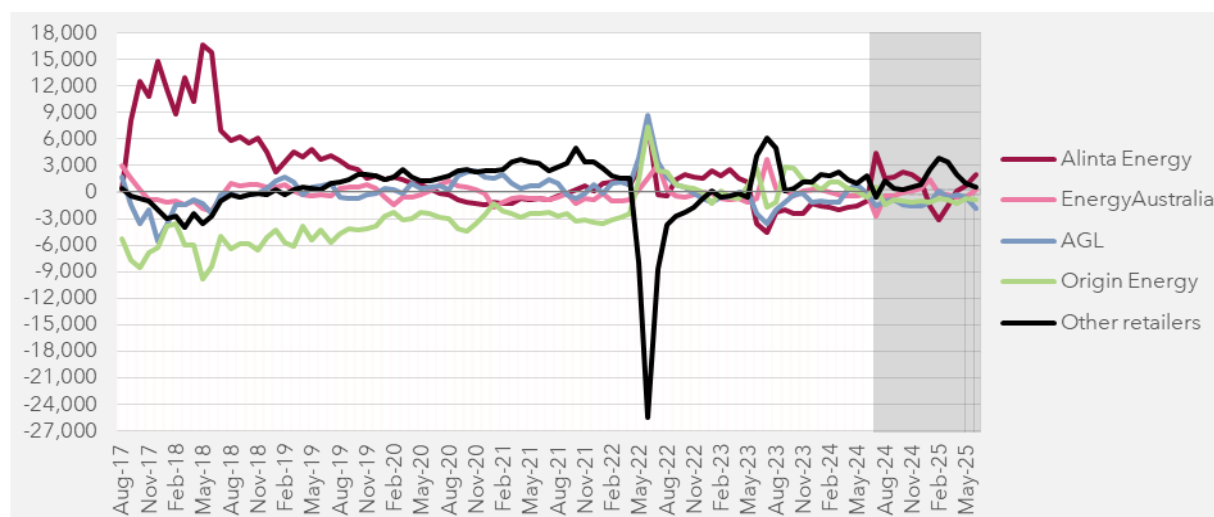
Another indicator of competitive rivalry can be customer switching activity between larger and smaller retailers. Figure 9.2 shows net customer transfers – that is, a retailer's customer gains minus its customer losses. A negative value means that the retailer lost more customers to other retailers than it gained, while a positive value indicates that the retailer had a net customer gain. The larger retailers are shown individually, while the smaller retailers are combined as 'other retailers'.

<sup>173</sup> AER, [Notice of Instrument: Better Bills Guideline](#) [Version 2], 2023; AEMC, [National Energy Retail Amendment \(Improving the ability to switch to a better offer\) Rule](#) [final report], 2025.

<sup>174</sup> AER, [State of the energy market 2024](#), 2024, p 280. Conversely, existing customers who sign a new contract when they move house are included in the switching data, which overstates customer activity.



**Figure 9.2: Monthly net customer transfers in SEQ, August 2017 to June 2025**



Notes: A net customer transfer is defined as customer gains minus customer losses during the same period of time. We removed customer transfer data that was a result of acquisitions, as this switching activity was not initiated by a customer (e.g. transfers of Click Energy customers to AGL in April 2021 and Powerdirect customers to AGL in October 2022). The category 'other retailers' includes all the other retailers not separately shown in this figure.

Sources: Retail Transfer Statistical Data (monthly data) provided by AEMO; QCA analysis.

Net customer transfers were mostly negative in 2024-25 for the 4 largest retailers – AGL, EnergyAustralia and Origin Energy recording net customer losses in most months in 2024-25, while Alinta Energy recorded a slight net customer gain.

Smaller retailers (summarised as 'other retailers' in Figure 9.2) collectively recorded net customer gains in almost all months in 2024-25, for a combined net gain of 16,143 customers. These results suggest that smaller retailers were becoming more competitive again after substantial net customer losses following the significant increases in wholesale energy costs and the 2022 market events.<sup>175</sup>

Although we observed regular switching activity over time, we acknowledge that some customers may not switch for various reasons. Some customers may find it hard to compare different plans and determine which plan is best based on their current circumstances and consumption. There are also costs and barriers to switching, including transaction costs (time and effort, and actual costs such as disconnection/ reconnection fees), a bias towards the status quo and fears of being worse off after switching.<sup>176</sup>

Some retailers also offer special retention plans (that are not generally available to other customers) to 'save' customers before the switching process is finalised.<sup>177</sup> A rule change request to stop retailers from offering 'save' or 'win-back' plans to prevent customers from switching (submitted to the AEMC in early 2022) was still pending in 2025.<sup>178</sup> These practices cause acquisition costs to the new retailer,<sup>179</sup> but active customers may still benefit as they receive a more competitive offer even if they end up staying with their current retailer.

<sup>175</sup> QCA, *SEQ retail electricity market monitoring 2022-23*, 2023, pp 97-98.

<sup>176</sup> Behavioural Economics Team of the Australian Government (BETA), *Improving energy bills: final report* [prepared for the Australian Energy Regulator], 2021, p 49.

<sup>177</sup> The AEMC made a final rule in December 2019 to speed up the process of transferring customers to a new retailer. As the customer transfer process resulted in significant delays, it provided opportunities for 'losing' retailers to conduct save activities. The AEMC considered that this may undermine retailers' incentives to maintain competitive prices and good customer service for existing customers (AEMC, *Reducing customers' switching times* [rule determination], 2019). Nonetheless, despite the AEMC's rule determination, we again found a number of retention plans on Energy Made Easy in 2024-25, which suggests that this practice is continuing.

<sup>178</sup> AEMC, *Preventing retailers making retention offers to switching customers*, AEMC website, n.d., viewed 29 October 2025.

<sup>179</sup> While statistics on the prevalence of this practice are not available, ReAmped Energy noted that up to 10% of the customers signing up with them each month were 'won back' by their existing retailer (ReAmped Energy, *We think it's time to put an end to cynical 'win-back' offers across the country* [rule change request], 2022, p 1).



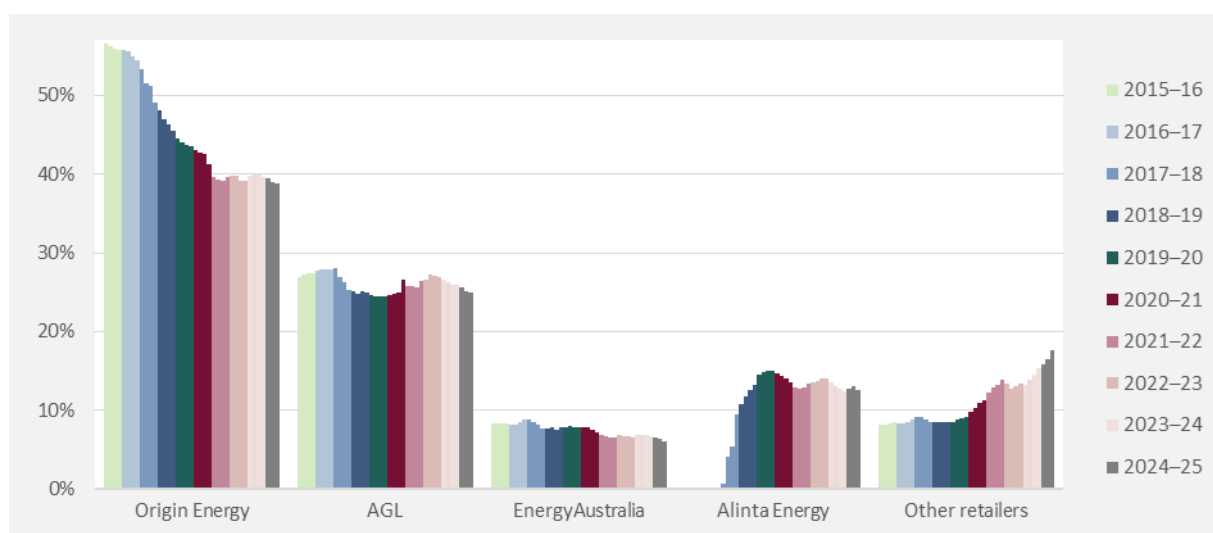
## 9.2.4 Market shares and market concentration

In a competitive market, competitors challenge the market position of the incumbents and try to gain some market share from them. Accordingly, we would expect to see a reduction in larger retailers' market shares and a decrease in market concentration over time if the market is competitive. In the following sections, we analyse how market shares changed over time and how this impacted on market concentration in the SEQ retail electricity market.

### Market shares

Figure 9.3 shows the market shares of the retailers operating in the SEQ retail electricity market from 2015-16 to 2024-25. The largest incumbent – Origin Energy – lost market share over time. So did AGL – the second-largest retailer – until 2020-21, when its market share rose again following its acquisition of the Click Energy Group, which operated Amaysim Energy and Click Energy. Nonetheless, the combined market share of these 2 largest retailers decreased from about 80% to 64% between the September quarter of 2015 and the March quarter of 2025.<sup>180</sup> This market share was primarily captured by Alinta Energy and some other (smaller) retailers.

**Figure 9.3: Retailers' market shares in SEQ by quarter, 2015-16 to 2024-25**



Notes: Market shares based on customer numbers collated by the AER (residential and small business customer numbers combined). The figure includes separate market shares for each quarter. Data for the June quarter of 2025 was not available yet at the time we finalised this report.

Sources: AER, [Retail performance reporting](#), AER website, n.d., viewed 14 July 2025; historical data provided by the AER; OCA analysis.

The 3 largest retailers – AGL, Alinta Energy and Origin Energy – had a combined market share of about 76% in the March quarter of 2025. The latest figures show that other (smaller) retailers have increased their market share over time, despite losing market share in 2022-23. Rising wholesale energy costs disproportionately affected some of these smaller retailers, several of which encouraged their customers to switch to another retailer or have since exited the market.

In 2024-25, the combined market share of the other (smaller) retailers increased, reaching a new peak of about 18%. In terms of the larger retailers, Origin Energy, AGL and EnergyAustralia each saw decreases in their market share of around 1%, while Alinta Energy's market remained largely unchanged between the March quarters of 2024 and 2025. Overall, Origin Energy and AGL retained their respective positions as the largest and second largest retailers in SEQ by market share.

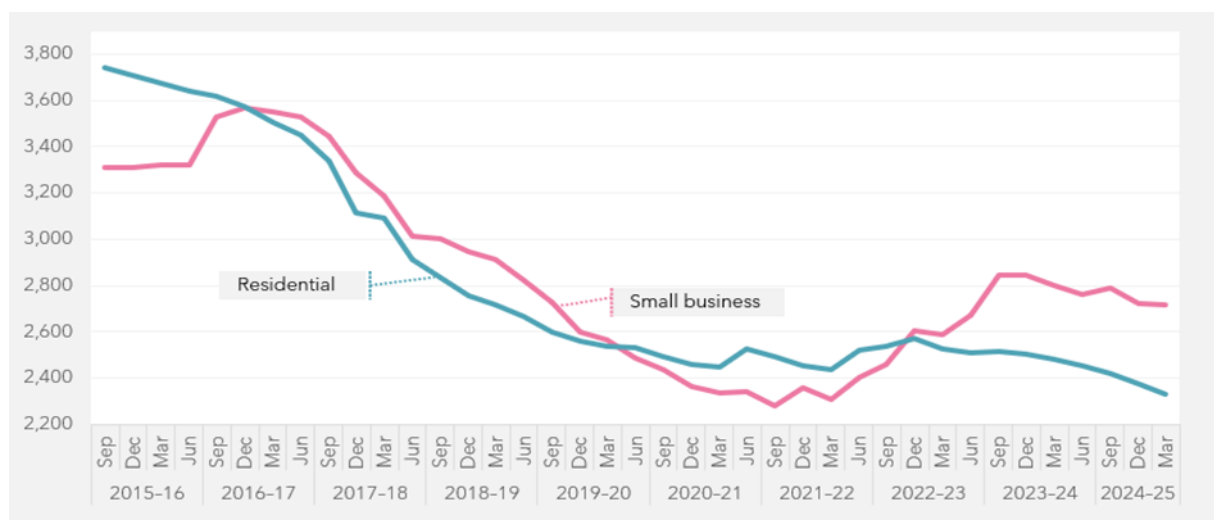
<sup>180</sup> Data for the June quarter of 2025 was not available yet at the time we finalised this report.

These changes in market shares are reflected in the net transfers of customers throughout 2024-25 (Figure 9.2). We consider that the market shares and the changes we observed are not, in themselves, inconsistent with a competitive market, particularly where it is apparent that the market shares of the 2 largest retailers have decreased slightly and smaller retailers have gained market share.

## Market concentration

Competitive markets tend to have a low level of market concentration. In line with the changes in retailers' market shares illustrated above, market concentration in the SEQ retail electricity market – measured by the Herfindahl-Hirschman Index (HHI)<sup>181</sup> for both the residential and small business customer markets – generally decreased from the second half of 2016-17 until 2021-22 (Figure 9.4). The decrease in the HHI suggests that competition was gradually developing and intensifying in the SEQ retail electricity market over time.

**Figure 9.4: Herfindahl-Hirschman Index – SEQ retail electricity market, 2015-16 to 2024-25**



Notes: The index is based on residential and small business customer numbers collated by the AER. Data for the June quarter of 2025 was not available yet at the time we finalised this report.  
Sources: AER, [Retail performance reporting](#), AER website, n.d., viewed 14 July 2025; historical data provided by the AER; QCA analysis.

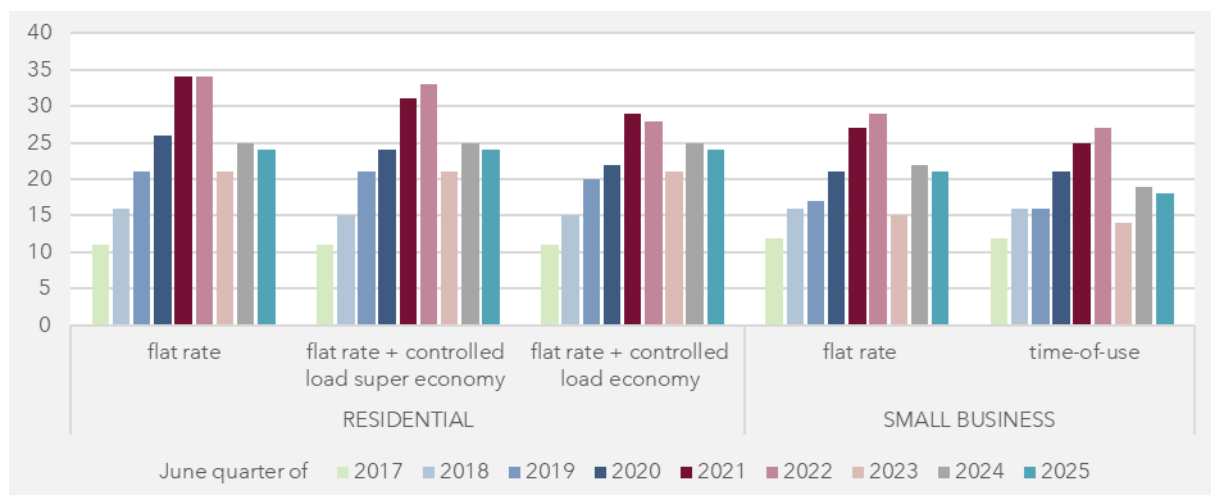
In 2021-22 and 2022-23 there was an increase in the HHI for both the residential and small business customer markets after several retailers exited the market and some customers switched from smaller to larger retailers (Figure 9.2). Since the December quarter of 2022, the residential HHI has gradually declined, while the small business HHI has remained elevated compared to previous years, although it has been decreasing since the September quarter of 2023. However, we do not consider that the small business HHI in 2024-25 is inconsistent with a competitive retail electricity market, given that we still observed retailers competing on price.

<sup>181</sup> The HHI is a commonly used measure of market concentration, which is calculated by summing the squares of the market shares of all firms competing in a market. A market that has a single firm (i.e. a monopoly) has a HHI of 10,000 (100 × 100), while a theoretically perfectly competitive market has a HHI approaching zero (see, for example, AEMC, [2020 Retail Energy Competition Review](#) [final report], 2020, p 28). The ACCC takes the HHI into account as part of an overall assessment of a merger between 2 firms. In its merger guidelines, the ACCC stated that it is generally less likely to identify horizontal competition concerns with a merger if the post-merger HHI is below 2,000 (ACCC, Merger Guidelines [amended November 2017], 2008, pp 34-35). The AEMC concluded that this threshold could therefore be interpreted as 'one indication of a workably competitive market' (AEMC, [2019 Retail Energy Competition Review](#) [final report], 2019, p 36).

## 9.2.5 Number of retailers

The number of retailers with at least one market offer available to SEQ customers increased substantially from the June quarter of 2017 to the June quarter of 2022 for the 5 tariffs and tariff combinations we cover in this report. The number decreased significantly by the June quarter of 2023 but increased again by the June quarter of 2024, followed by a slight decrease by the June quarter of 2025 (Figure 9.5).<sup>182</sup>

**Figure 9.5: Number of retailers with generally available market offers for customers in SEQ, June quarters of 2017 to 2025**



Sources: QCA, [SEQ market monitoring](#), QCA website, 2025.

The number of retailers with market offers decreased slightly for each of the 5 tariffs and tariff combinations between the June quarters of 2024 and 2025 (Chapter 2). While the overall number of retailers decreased slightly for residential customers, the overall number of retailers for small business customers remained the same or increased, depending on the tariff. Given that retailers primarily use market offers to compete, we consider that the number of retailers with market offers is more relevant in terms of assessing competition.

The AER noted that the growth in the number of alternative (smaller) retailers supports effective retail competition. That number grew strongly from 2016 and remained relatively stable throughout 2022. Since 2022, smaller retailers had been reporting that it was harder to manage exposure to volatile wholesale energy costs. The AER noted in 2024 that this volatility may subdue interest from new market entrants until wholesale prices stabilise.<sup>183</sup> In 2024–25, no new retailer provided market offers to residential customers in SEQ, but one additional retailer provided small business flat rate and time-of-use market offers in March and June quarters of 2025 (Nectr).

When there are more retailers, customers have more choice, but this can also add complexity and costs. The AER noted that many new retailers have sought to differentiate themselves through the inclusion of solar, batteries and innovations (such as VPPs) in their offerings.<sup>184</sup> More generally, a

<sup>182</sup> Under the National Energy Retail Law, retailers must hold a retailer authorisation (unless exempt from the requirement) before they can sell electricity to customers. Some authorised retailers are publishing electricity plans under their own name and under a different retail 'brand', which does not have an authorisation in its own right. The plans of the authorised retailer and those of its retail brand(s) are often substantially different in terms of price and/or other features. We therefore count a retail 'brand' as an additional retailer. We note that 2 retailers rebranded in 2023–24 and published plans under their old and new names in the June quarter of 2024 (Simply Energy rebranded to ENGIE in April 2024, and Tango Energy Pty Ltd changed its legal name to Pacific Blue Retail Pty Ltd in April 2023). In the June quarter of 2025, only plans of ENGIE were available, while both Tango Energy and Pacific Blue Retail had plans available.

<sup>183</sup> AER, [State of the energy market 2024](#), 2024, p 271.

<sup>184</sup> AER, [State of the Energy Market 2025](#), 2025, p 232.

larger number of retailers may increase costs for customers (search costs) and retailers (acquisition and retention costs), and create costs to the energy industry overall (transfer costs):

- search costs – a larger number of retailers could add complexity for customers trying to compare retailers and plans and thereby reduce customers' willingness to engage with the market. Finding the best deal or shopping around could be further complicated, as retailers' plans can vary significantly and 'hundreds of retail offers' may be available at any one time<sup>185</sup>
- acquisition and retention costs – these costs tend to be higher in jurisdictions with high switching rates, even though the costs should (in theory) be offset by reduced retailer profit margins that decrease in a competitive environment; however, there is a risk that competition may increase energy bills for customers if the costs of competing outweigh the competition benefits from efficiency and innovation<sup>186</sup>
- transfer costs – systems need to be established and maintained to facilitate the transfer of customers between retailers in a timely and smooth manner.

## 9.3 Movement of prices and costs

In a competitive retail electricity market, we expect changes in retail prices to broadly reflect changes in the underlying costs, which include network costs, energy costs and retail costs.<sup>187</sup> As these costs make up a substantial part of a customer's bill, an increase in prices (bills) may result when the underlying costs increase. By the same token, we would expect to see decreases in the underlying costs translate into lower prices (bills) if there is sufficient competition.

An in-depth assessment of retailers' actual costs is outside the scope of this report. However, we can gain some indicative views of how costs have developed over time compared to prices, using the cost components that we estimated and applied in the cost build-up methodology for the determination of notified prices in regional Queensland<sup>188</sup> as a proxy for the actual costs retailers incurred in SEQ for residential and small business flat rate tariffs.<sup>189</sup>

We grouped the cost components we used in our determinations of notified prices in regional Queensland for 2015-16 to 2024-25 ('build-up of prices') into 3 categories<sup>190</sup> – network costs, energy costs and retail costs – and then calculated the annual costs using the consumption levels of a typical SEQ residential or small business flat rate customer (see Chapter 2, Table 2.1). We then calculated average SEQ market offer bills to compare with the estimated costs (see Figures 9.6 and 9.7).

<sup>185</sup> AER, [State of the energy market 2023](#), 2023, p 220.

<sup>186</sup> AER, [State of the energy market 2023](#), 2023, p 222; AER, [State of the energy market 2024](#), 2024, p 244.

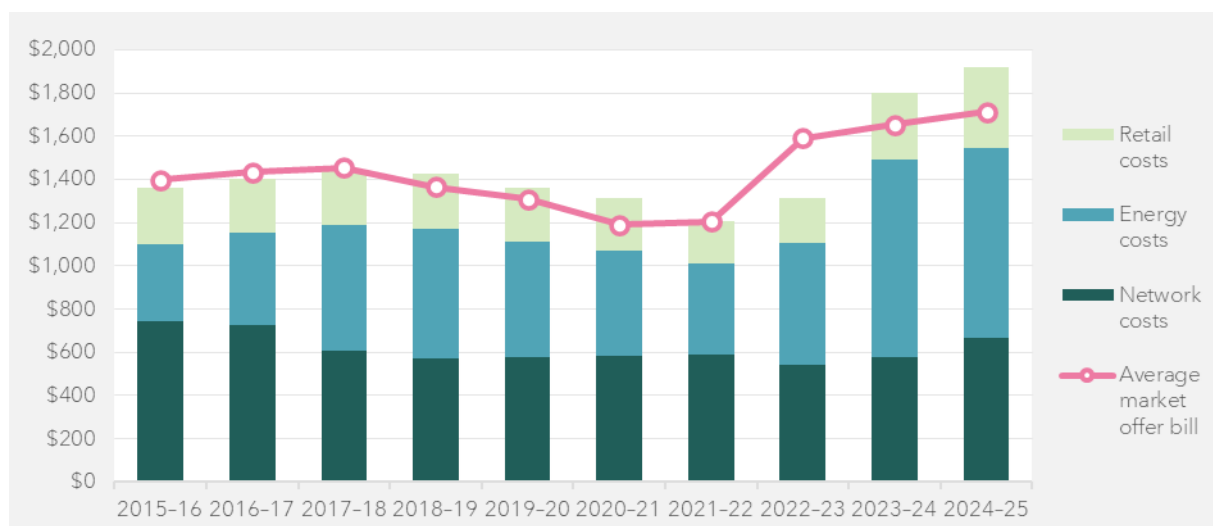
<sup>187</sup> The ACCC monitors and enforces compliance with the rules in the Competition and Consumer Act on electricity market misconduct that could harm competition in electricity markets. Among other things, these rules require retailers to pass on sustained and substantial reductions in their costs of procuring electricity to consumers by lowering their market offer prices (ACCC, [Electricity market misconduct regulation](#), ACCC website, n.d., viewed 8 May 2025; ACCC, [Guidelines on Part XICA – Prohibited conduct in the energy market](#), 2020. Part XICA of the Competition and Consumer Act was introduced by the *Treasury Laws Amendment (Prohibiting Energy Market Misconduct) Act 2019*).

<sup>188</sup> Separate from monitoring the SEQ retail electricity market, we set regulated ('notified') prices in regional Queensland each year. In accordance with the Queensland Government's uniform tariff policy, we set electricity prices for residential and small business customers in regional Queensland based on the estimated costs of supplying small customers in SEQ (QCA, [Regulated retail electricity prices in regional Queensland for 2024-25](#) [final determination], 2024, pp 10-12).

<sup>189</sup> We do not have access to retailers' actual costs in 2024-25 (nor in previous years). We consider that the ACCC is best placed to compare and report on how actual costs impact on prices in SEQ, given the information-gathering powers available to the ACCC under s 95ZK of the *Competition and Consumer Act 2010* (Cth). The ACCC regularly collects cost data directly from retailers, as actual retailer cost data is not otherwise publicly available.

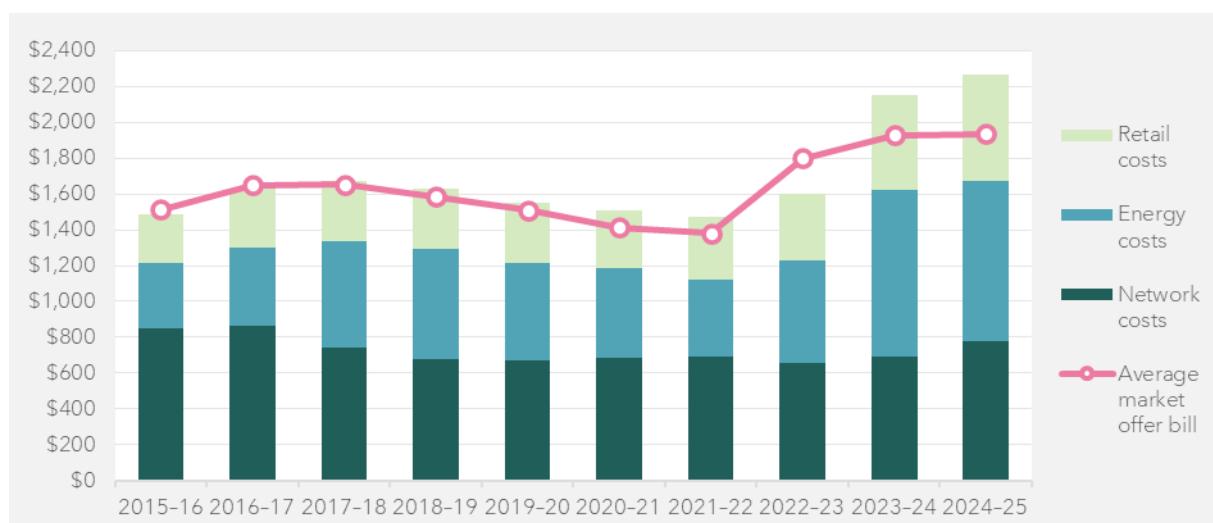
<sup>190</sup> For our analysis, we included costs related to the small-scale renewable energy scheme cost pass-through in retail costs and excluded the standing offer adjustment component of notified prices.

**Figure 9.6: Annual bills versus estimated costs – residential flat rate, 2015-16 to 2024-25**



Notes: Costs are estimates only and not actual costs retailers incurred. Annual costs and bills (in nominal dollars) include GST.  
Sources: QCA, [Regional electricity prices](#), QCA website, 2025; Energy Made Easy; QCA analysis.

**Figure 9.7: Annual bills versus estimated costs – small business flat rate, 2015-16 to 2024-25**



Notes: Costs are estimates only and not actual costs retailers incurred. Annual costs and bills (in nominal dollars) include GST.  
Sources: QCA, [Regional electricity prices](#), QCA website, 2025; Energy Made Easy; QCA analysis.

Figure 9.6 and Figure 9.7 indicate that the average market offer prices for residential and small business flat rate customers (expressed as annual bills) moved roughly in line with the costs we estimated in most years,<sup>191</sup> with bills in 2024-25 continuing this general trend.

However, it is important to be cautious when applying the estimated costs to any assessment of prices in the deregulated SEQ market, for the following reasons:

- Our pricing decisions for regional Queensland reflect our best estimate of costs based on the information available to us at the time of each determination; actual costs may be higher or

<sup>191</sup> The exception to this pattern was in 2022-23, when average market offer bills in SEQ increased more steeply than the costs we had estimated for our final determination of notified prices for 2022-23 (published in May 2022). This was due to that determination not fully reflecting increased wholesale energy costs faced by retailers that resulted from the volatility and uncertainty in the NEM in late 2021-22 and 2022-23. In contrast to notified prices (which cannot change during the year), retailers in SEQ could increase the prices of their market offers to reflect the increased wholesale energy costs (QCA, [SEQ retail electricity market monitoring 2022-23](#), 2023, pp 104-105).

lower than our estimate.<sup>192</sup> In addition, our decisions do not reflect differences in costs between retailers<sup>193</sup> or account for differences in the costs of supplying products with different attributes.

- We monitor annual bills (including discounts and incentives) for a typical SEQ customer based on plans that were generally available in a particular year, whereas it is the prices customers actually pay over time that enable retailers to recover their costs.
- Retailers use different pricing strategies to recover their costs, which can result in a wide range of prices in the market. For example, prices in a competitive market may vary to reflect the willingness to pay of different groups of customers. This may result in retailers increasing prices for less price-sensitive customers by a bigger amount than prices for more price-sensitive customers. Further, some retailers in SEQ use discounts and financial incentives to decrease prices for some of their customers. Retailers might also adjust the price components (such as supply and usage charges) to target high- or low-consumption customers. Comparing changes in regulated and market prices on the basis of 'typical consumption' can therefore be misleading.
- Our approach to assessing retail costs has been a benchmarking approach since 2016-17, using market offers available in several NEM jurisdictions.<sup>194</sup>

## 9.4 Spread of prices in the market

In competitive markets, firms may use a market segmentation strategy to compete for customers. This can include charging higher prices to customers who are less price-sensitive and/or less active in the market, to be able to compete for more price-sensitive and/or more active customers with lower prices – examples include lower movie ticket prices for students and pensioners, and varying prices for customers booking hotel rooms or airline tickets. Such price discrimination enhances overall consumer welfare, as the lower prices approach marginal cost, and output increases, relative to a situation with a single average price that applies to all customers. Price discrimination in retail markets is generally considered to be welfare-enhancing.<sup>195</sup>

Price differences provide an incentive for customers to shop around, given the potential savings that can be realised. A range of prices may also reflect the variation in service and product offerings, and the different price strategies retailers use to recover their costs.<sup>196</sup> In the long run, a decrease in the spread of prices (price dispersion) would therefore likely result in lower customer engagement and a lower share of active customers, which could in turn lead to less competition in the market.<sup>197</sup>

We expect to see some price dispersion in the SEQ retail electricity market, as retailers try to attract new and price-sensitive customers with lower market offers, while earning more from customers that are not engaged or less active in the market and/or are less price-sensitive and remain on more

---

<sup>192</sup> We generally make our final determination on notified prices to apply in the following financial year in May/June each year, taking into account the most current information available at the time. The final determination for 2024-25 considered market data up until 3 May 2024 to estimate wholesale energy costs.

<sup>193</sup> For instance, retailers use a variety of strategies to manage the volatility of electricity spot prices, which may differ from the market hedging approach we use in our pricing decisions. In addition to the market hedging approach (which involves purchasing financial derivatives), other hedging strategies include entering into long-term power purchase agreements with electricity generators and investing in electricity generation. Some retailers, particularly large retailers, are vertically integrated and own generation assets or are aligned with an electricity generation business. Vertical integration allows retailers/generators to insure internally against price risk in the wholesale market, which reduces their need to participate in hedge (contract) markets (AER, *State of the energy market 2023*, 2023, pp 70-71).

<sup>194</sup> QCA, *Regulated retail electricity prices for 2016-17* [final determination], 2016, pp 24-40.

<sup>195</sup> T Nelson, E McCracken-Hewson, P Whish-Wilson and S Bashir, 'Price dispersion in Australian retail electricity markets', *Energy Economics*, vol 70, 2018, p 158. However, we acknowledge that many people consider such a pricing strategy as unfair or inappropriate in the case of electricity, because it is an essential service with traditionally little product differentiation (IPART, *Monitoring NSW energy retail markets 2021-22 [draft report]*, 2022, p 17).

<sup>196</sup> IPART, *Monitoring the NSW electricity retail market 2020-21* [final report], 2021, p 2.

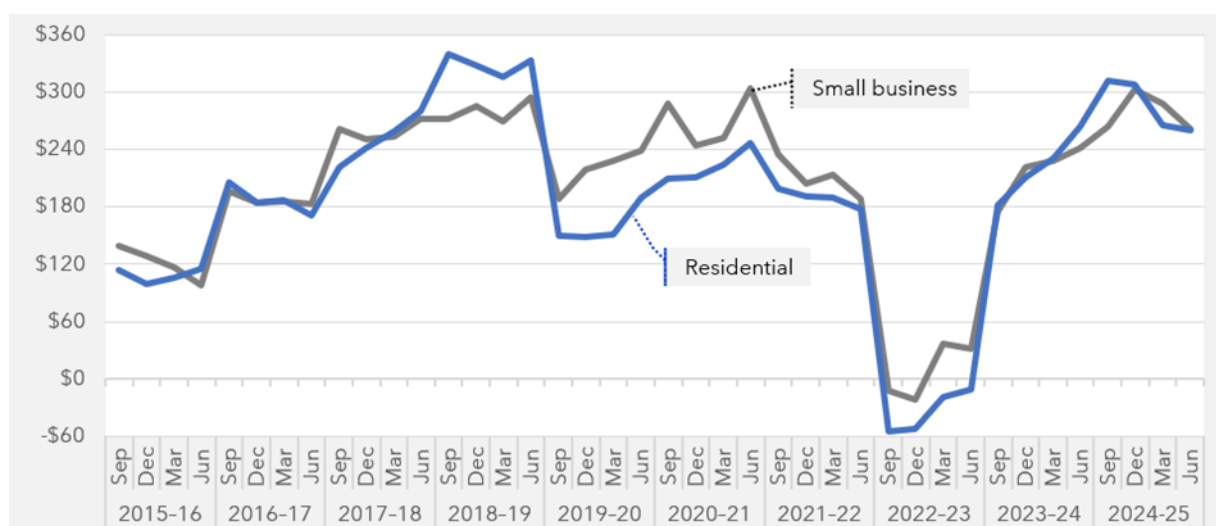
<sup>197</sup> AEMC, *Advice to COAG Energy Council: Customer and competition impacts of a default offer* [final report], 2018, pp v, viii; IPART, *Monitoring NSW energy retail markets 2021-22* [final report], 2022, p 55.



expensive market or standing offers.<sup>198</sup> A range of offers gives customers the opportunity to find the best plan for their circumstances, including their individual consumption.

Figure 9.8 shows the price dispersion since 2015-16 – that is, the difference between the average standing offer bill and the average lowest market offer bill for the typical SEQ customer on a residential or small business flat rate tariff.<sup>199</sup> While price dispersion decreased slightly over the course of 2024-25, the difference between average standing offer and lowest market offer bills remained at one of the highest levels over the past 10 years. This indicates that customers had ample opportunity to shop around to find a better deal.

**Figure 9.8 : Price dispersion in the SEQ retail electricity market, 2015-16 to 2024-25**



Notes: Price dispersion has been calculated as the difference between the average standing offer bill and the average lowest market offer bill for residential and small business flat rate customers. Annual bills for each quarter since 2015-16 have been recalculated using the consumption levels of the typical SEQ customer (Table 2.1) and are expressed in nominal dollars. Sources: Energy Made Easy; QCA analysis.

It is important to keep in mind that our analysis is based on average standing offer bills and average lowest market offer bills. Basing it on the absolute minimum and maximum bills (the cheapest and the most expensive plans published each quarter) would have resulted in a much wider spread of prices. However, we consider that such an approach could potentially lead to misleading results due to the direct influence of outliers,<sup>200</sup> even more so as it is unlikely that customers deliberately switch to such plans. The literature shows that the use of advertised prices can lead to an overestimation of price dispersion, as it is likely that not all the higher-priced plans are taken up by customers.<sup>201</sup>

## 9.5 Inactive or disengaged customers

Competition works when consumers can (and do) pick the best plan and switch when a better one becomes available. Evidence suggests that many customers regularly engage with the market. Survey data by Energy Consumers Australia indicates that close to two-thirds (65%) of residential customers in Queensland review their current energy plan and investigate whether there are better options available at least once a year. However, the data also indicates that 26% of customers only

<sup>198</sup> The Public Interest Advocacy Centre (PIAC) referred to the spread of prices as a 'subsidy' between consumers (PIAC, submission to DISER, *Competition and Consumer (Industry Code - Electricity Retail) Regulations 2019* [Post-Implementation Review], 11 October 2021, p 3).

<sup>199</sup> The spread of the other tariffs and tariff combinations we cover in this report was similar over time.

<sup>200</sup> We acknowledge that outliers also impact on average bills, as individual very high bills increase the average.

<sup>201</sup> A Ghose and Y Yao, '[Using transaction prices to re-examine price dispersion in electronic markets](#)', *Information Systems Research*, [articles in advance], 1 February 2010, pp 1-2, 20.



review their current plan or potentially better options every few years, and 9% indicated that they never do so.<sup>202</sup> ACCC analysis indicated that most customers, whether on a standing offer or a market offer, could save by switching to a competitive offer suited to that customer's circumstances.<sup>203</sup>

Although many customers reported they looked at their electricity plan and the options available to them, evidence – including our own findings – suggests that not many customers actually end up switching retailers. Despite the increase in the switching rate over the past 3 years, only about 21% of SEQ customers switched retailers over the course of 2024–25 (Figure 9.1).<sup>204</sup> The low switching rate may, in part, be due to customers changing to cheaper plans with their existing retailer. However, it may also be due to inattention, complexity of information and low levels of trust and confidence.<sup>205</sup> There may also be some customers who are not interested in actively shopping around and switching when a better plan becomes available, because they:

- are willing to pay higher prices, as they value the benefits they receive on their plan (e.g. no late payment fees, non-financial incentives, or the plan being easy to understand)
- feel that the benefits of shopping around do not outweigh the costs (e.g. the time it takes to search, compare and switch)
- are not very price-sensitive
- are, for various reasons, vulnerable and require targeted assistance with managing their plan.<sup>206</sup>

While not switching retailers or plans may be a rational choice for some customers, for other customers, the complexity and the lack of knowledge of the market may prevent them from fully benefiting from competition. Government and regulatory agencies have taken various steps to promote customer engagement and switching. For example, through the AER's Better Bills Guideline that requires retailers to include a 'better offer' statement on the front page of the bill to let customers know if the retailer can offer them a better deal and how to switch plans, and to include a link to the Energy Made Easy website.<sup>207</sup> A new rule was recently introduced to ensure that the 'better offer' message is also communicated in emails to increase customers' awareness of savings that can be achieved from switching plans with their retailer.<sup>208</sup>

However, despite these efforts, some customers do not engage with the market and will continue to pay more for electricity than they need to. Survey data by Energy Consumers Australia in June 2025 indicated that about 1 in 3 customers do not engage with the market at least annually. The research also provides insight into some of the reasons consumers reported for not regularly reviewing their energy plan (percentage of respondents in brackets):

- it is too hard to compare plans (37%)
- savings would probably be small (36%)
- they are satisfied with the current energy plan (32%)
- they would not know where to start (30%)
- they do not think switching is worth the effort (25%)
- switching would take too much time (19%).<sup>209</sup>

---

<sup>202</sup> Energy Consumers Australia, [June 2025 Household topline survey data](#), 2025.

<sup>203</sup> ACCC, [Inquiry into the National Electricity Market](#), June 2024, pp 49–53.

<sup>204</sup> Some customers may decide not to switch retailers or plans, or they switch to a different plan of the same retailer, which is not captured in publicly available data. Some customers who started the switching process may also have been offered special retention plans that retailers use to 'save' customers before the switching process is finalised.

<sup>205</sup> Behavioural Insights Team, [Testing comprehension of the reference price](#) [final report prepared for the AER and ACCC], 2020, p 8.

<sup>206</sup> QCA, [SEQ retail electricity market monitoring 2019–20](#), 2020, p 159.

<sup>207</sup> AER, [Energy bills simplified for consumers](#) [news release], 28 September 2023.

<sup>208</sup> AEMC, [National Energy Retail Amendment \(Improving the ability to switch to a better offer\) Rule](#) [final report], 2025, pp i–ii.

<sup>209</sup> Energy Consumers Australia, [June 2025 Household topline survey data](#), 2025.

## 9.6 Complexity of the market

Markets are usually more competitive when they are transparent, offerings are easy to understand and compare, and it is easy to switch between competitors. In the retail electricity market, this means that customers should be able to easily compare plans and at any time switch to the retailer with the plan that best suits their current circumstances.

Key benefits of competition are lower prices and more choice for customers, including innovation in the types of plans that are available (such as solar, EV or VPP plans) and plans that provide additional benefits (such as financial or non-financial incentives, discounts or GreenPower options). However, with more choice and an increasing variety of plans comes complexity. If customers find it too difficult to navigate the market, compare plans and switch plans or retailers, competition may not be working as effectively as it should, and customers may not be on the best plan for their circumstances.

We would expect consumers' confidence in their ability to make the right decisions to increase over time as they become more familiar with the market and find it easier to access the right information to make informed decisions. As consumers' confidence in the market increases, they are more likely to engage with that market, which promotes competition and efficient outcomes.<sup>210</sup> Energy Consumers Australia found in mid-2025 that more than half of the surveyed residential customers in Queensland (56%) were somewhat or very confident that they were on a competitively priced plan.<sup>211</sup>

However, the survey also found that 37% of residential customers in Queensland considered it too hard to compare plans and cited it as a reason for not regularly checking plans.<sup>212</sup> This is consistent with the observation that had often been made in recent years that customers find it challenging to compare numerous plans and retailers and choose the best plan. Previous surveys suggested that customers under financial pressure were even more likely to have trouble accessing information to help them with energy costs. Consumer advocacy groups have described the retail energy market as a 'confusopoly' – a market where complex offers and contract conditions have failed to facilitate informed choices by consumers.<sup>213</sup>

Although customers could save in 2024–25 by switching if a cheaper plan became available (Chapter 2), switching rates (section 9.2.3) suggest that many SEQ customers did not switch retailers. The complexity of the market may be a contributing factor in some circumstances. As discussed in our previous price monitoring reports,<sup>214</sup> we consider the following challenges are likely to continue:

- It can be difficult to choose between retailers and plans when there are multiple retailers offering multiple plans that are not always straightforward to compare (given various types of plans, features, restrictions and eligibility criteria).
- While discounts and incentives can provide value for customers, they also add complexity and require customers to evaluate the benefit to them. For example, the savings from a discount on usage charges differ between customers based on their consumption, and financial incentives may only be a one-off to entice customers to switch retailers.

<sup>210</sup> The AEMC considered consumer protections as an important factor in promoting and maintaining consumer confidence in retail energy markets (AEMC, [Applying the energy market objectives](#), 2019, p 9).

<sup>211</sup> Energy Consumers Australia, [June 2025 Household topline survey data](#), 2025. The survey results include responses from regional Queensland customers. As such, they may not be fully reflective of the sentiments of SEQ customers.

<sup>212</sup> Energy Consumers Australia, [June 2025 Household topline survey data](#), 2025.

<sup>213</sup> For example, Energy Consumers Australia, [submission to the AEMC, National Energy Retail Amendment \(Regulating conditional discounting\) Rule](#) [consultation paper], 23 September 2019, p 2; and PIAC, [submission to the Standing Committee on Economics, Inquiry into impediments to business investment](#), 11 May 2018, p 2.

<sup>214</sup> QCA, [SEQ retail electricity market monitoring 2022–23](#), 2023, pp 109–114.

- The variety and complexity of tariff structures may complicate bill comparisons, decrease customers' understanding and lower their engagement. Customers can find it difficult to understand the risks and benefits of different pricing structures.
- While comparison sites can help customers compare plans, these sites generally only compare 'traditional' plans and typically do not provide full bill estimates for newer plans, such as plans with demand tariffs. Accordingly, customers may not get a fulsome comparison of plans from these sites. Commercial comparison sites may also only present the plans of affiliated retailers and therefore not include the cheapest plans in the market.
- Customers experiencing vulnerability may find it more difficult to navigate the market due to issues such as language barriers, cultural issues, disability, low levels of numeracy and literacy and lack of internet access. Without targeted assistance, these customers may not be able to engage with, and benefit from, the market and access the best plan for their circumstances.
- Customers may find it difficult to understand information on their electricity bills that could help them compare their current plan to other available plans. This is particularly the case when retailers use complex language or different terminologies to describe charges and other items on a bill. However, the AER's Better Bills Guideline sets out requirements for information to be presented in electricity bills, which is intended to help customers understand their energy usage and costs and find the best energy deal with their retailer.

# Glossary

---

ABN	Australian Business Number
ACCC	Australian Competition and Consumer Commission
ADM	advanced digital metering
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
AGA	Allianz Global Assistance
Amex	American Express
BETA	Behavioural Economics Team of the Australian Government
CBA	CommBank or Commonwealth Bank of Australia
c/kWh	cents per kilowatt hour
CL	controlled load
COAG	Council of Australian Governments
Cth	Commonwealth
CTL Load	controlled load
DISER	Australian Government Department of Industry, Science, Energy and Resources
DMO	default market offer
Electricity Retail Regulations	Competition and Consumer (Industry Code – Electricity Retail) Regulations 2019 (Cth)
ESC	Essential Services Commission (Victoria)
EHA	Emergency Home Assistance
EV	electric vehicle
GST	goods and services tax
HEEAS	Home Energy Emergency Assistance Scheme (Queensland)
HHI	Herfindahl-Hirschman Index
IPART	Independent Pricing and Regulatory Tribunal (NSW)
kWh	kilowatt hours
Minister	Minister for Energy, Renewables and Hydrogen
MWh	megawatt hour
NECF	National Energy Customer Framework
NEM	National Electricity Market
NERL	National Energy Retail Law
NERLQ	National Energy Retail Law as applied in Queensland
NERR	National Energy Retail Rules
NMI	National Metering Identifier

NRMA	National Roads and Motorists' Association
NSW	New South Wales
PIAC	Public Interest Advocacy Centre
PV	photovoltaic
QCA	Queensland Competition Authority
QLD or Qld	Queensland
RACQ	Royal Automobile Club of Queensland
SEQ	south-east Queensland
SR	single rate
TOU	time of use
Typical SEQ customer	customer with a median consumption
VPP	virtual power plant

# References

---

- AGL, [\*Have a home battery? Get up to \\$1,000 worth of rewards\*](#), AGL website, n.d.
- Australian Competition and Consumer Commission (ACCC), [\*Electricity market misconduct regulation\*](#), ACCC website, n.d.
- [\*Electricity market monitoring inquiry 2018–2025\*](#), ACCC website, n.d.
  - [\*Card surcharges\*](#), ACCC website, n.d.
  - [\*Electricity Retail Code compliance and enforcement checks\*](#), ACCC website, n.d.
  - *Merger Guidelines* [amended November 2017], November 2008.
  - [\*Inquiry into the National Electricity Market\*](#), November 2019.
  - [\*Guidelines on Part XICA – Prohibited conduct in the energy market\*](#), May 2020.
  - [\*Guide to the Electricity Retail Code\*](#) [version 3], July 2021.
  - [\*Inquiry into the National Electricity Market\*](#), November 2021.
  - [\*Inquiry into the National Electricity Market\*](#), May 2022.
  - [\*Inquiry into the National Electricity Market\*](#), December 2023.
  - [\*Inquiry into the National Electricity Market\*](#), June 2024.
  - [\*Inquiry into the National Electricity Market\*](#), December 2024.
  - [\*Inquiry into the National Electricity Market \[Appendix C – Supplementary spreadsheet with retail pricing data, cost stack data and charts\]\*](#), December 2024.
  - [\*Inquiry into the National Electricity Market\*](#), July 2025.
- Australian Energy Market Commission (AEMC), [\*Preventing retailers making retention offers to switching customers\*](#), AEMC website, n.d.
- [\*The pricing review: Electricity pricing for a consumer-driven future\*](#), AEMC website, n.d.
  - [\*National Energy Retail Amendment \(Preventing discounts on inflated energy rates\) Rule 2018\*](#) [final determination], May 2018.
  - [\*National Energy Retail Amendment \(Preventing discounts on inflated energy rates\) Rule 2018 No 2\*](#) [final rule], May 2018.
  - [\*Advice to COAG Energy Council: Customer and competition impacts of a default offer\*](#) [final report], December 2018.
  - [\*2019 Retail Energy Competition Review\*](#) [final report], June 2019.
  - [\*Applying the energy market objectives\*](#), July 2019.
  - [\*Regulatory sandbox arrangements to support proof-of-concept trials\*](#) [final report], September 2019.
  - [\*Reducing customers' switching times\*](#) [rule determination], December 2019.
  - [\*National Energy Retail Amendment \(Regulating conditional discounting\) Rule\*](#) [final determination], February 2020.
  - [\*National Energy Retail Amendment \(Regulating conditional discounting\) Rule 2020 No 1\*](#) [final rule], February 2020.

- [2020 Retail Energy Competition Review](#) [final report], June 2020.
  - [Bill contents and billing requirements](#) [rule determination], March 2021.
  - [National Energy Retail Amendment \(Improving consumer confidence in retail energy plans\) Rule 2025](#) [rule determination], June 2025.
  - [The pricing review](#) [discussion paper], June 2025.
  - [National Energy Retail Amendment \(Improving the ability to switch to a better offer\) Rule](#) [final report], September 2025.
- Australian Energy Regulator (AER), [Retail performance reporting](#), AER website, n.d.
- [AER Retail Pricing Information Guidelines](#) [version 5.0], April 2018.
  - [AER removes retail performance data from its website](#) [news release], 11 September 2018.
  - [Retail energy market performance update for Quarter 1, 2017-18](#), September 2018.
  - [Default Market Offer Prices 2019-20](#) [final determination], April 2019.
  - [Default Market Offer Prices 2020-21](#) [draft determination], February 2020.
  - [submission to the AEMC, National Energy Retail Amendment \(Bill contents and billing requirements\) Rule](#) [draft determination], 5 February 2021.
  - [Retail Pricing Information Guidelines obligations for retailers](#) [guidance note], May 2021.
  - [Better Bills Guideline](#), March 2022.
  - [Notice of Instrument: Better Bills Guideline](#), March 2022.
  - [Notice of Instrument: Better Bills Guideline](#) [Version 2], January 2023.
  - [Energy bills simplified for consumers](#) [news release], 28 September 2023.
  - [State of the energy market 2023](#), October 2023.
  - [Review of consumer protections for future energy services](#) [final advice], AER website, 23 November 2023.
  - [Default market offer prices 2024-25](#) [final determination], May 2024.
  - [Default market offer prices 2024-25](#) [final determination, track-changed comparison], June 2024.
  - [Default market offer prices 2024-25](#) [revised final determination], June 2024.
  - [State of the energy market 2024, November 2024](#).
  - [Innovative trials welcomed as AER introduces policy-led sandboxing approach](#) [news article], 13 February 2025.
  - [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 2], March 2025.
  - [Retail energy market performance update for Quarter 2, 2024-25](#) [sch 4], March 2025.
  - [Energex – Determination 2025-30](#) [final decision, attachment 19: Tariff structure statement – Ergon Energy and Energex – 2025-30 Distribution determination revenue proposal], April 2025.
  - [Default market offer prices 2025-26](#) [final determination], May 2025.
  - [Wholesale Markets Quarterly Q2 2025](#) [April-June], July 2025.
  - [Wholesale energy prices fluctuate in response to seasonal and market factors](#) [news release], 31 July 2025.
  - [State of the Energy Market 2025](#), August 2025.
  - [Default market offer 2026-27](#) [issues paper], November 2025.



- Australian Government, [Cheaper Home Batteries Program](#), Department of Climate Change, Energy, the Environment and Water website, updated 7 October 2025.
- Battaglion, M R and Tedeschi P, '[How do demand and costs affect the nature of innovation?](#)', *Journal of Economics*, vol 133, 2021, pp 199–238.
- Behavioural Economics Team of the Australian Government (BETA), [Improving energy bills: final report](#) [prepared for the Australian Energy Regulator], October 2021.
- Behavioural Insights Team, [Testing comprehension of the reference price](#) [final report prepared for the AER and ACCC], June 2020.
- Energex, [Last year's network tariffs & prices](#), Energex website, n.d.
- [2024–25 Network Price List](#), March 2024.
- [Energex Network Tariff Guide, 1 July 2024 to 30 June 2025](#), May 2024.
- Energy and Climate Change Ministerial Council, [Consultation paper – Better Energy Customer Experiences](#), April 2025.
- Energy Consumers Australia, [submission to the AEMC, National Energy Retail Amendment \(Regulating conditional discounting\) Rule](#) [consultation paper], 23 September 2019.
- [Energy Consumer Sentiment Survey](#), June 2024.
- [Energy Consumer Sentiment Survey](#) [Topline Data], June 2024.
- [June 2025 Household topline survey data](#), July 2025.
- Essential Services Commission (ESC), [Victorian Energy Market Report](#), March 2022.
- Flow Power, [Our variable pricing – Your Price Efficiency Adjustment explained](#), Flow Power website, n.d.
- Ghose A and Yao Y, '[Using transaction prices to re-examine price dispersion in electronic markets](#)', *Information Systems Research*, [articles in advance], 1 February 2010, pp 1–23.
- Independent Pricing and Regulatory Tribunal (IPART), [Monitoring the NSW electricity retail market 2020–21](#) [final report], November 2021.
- [Monitoring NSW energy retail markets 2021–22](#) [draft report], October 2022.
- [Monitoring NSW energy retail markets 2021–22](#) [final report], November 2022.
- Nelson T, McCracken-Hewson E, Whish-Wilson P and Bashir S, '[Price dispersion in Australian retail electricity markets](#)', *Energy Economics*, vol 70, February 2018, pp 158–169.
- O'Keefe A and Wong D, '[Money left on the table or rational inertia? Consumer engagement in Victoria's retail electricity sector](#)', *Victoria's Economic Bulletin*, vol 3, April 2019, pp 1–14.
- Public Interest Advocacy Centre (PIAC), [submission to the Standing Committee on Economics, Inquiry into impediments to business investment](#), 11 May 2018.
- submission to DISER, *Competition and Consumer (Industry Code – Electricity Retail) Regulations 2019* [Post-Implementation Review], 11 October 2021.
- [submission to the AER, Draft Better Bills Guideline](#), 27 January 2022.
- Queensland Competition Authority (QCA), [Regulated retail electricity prices for 2016–17](#) [final determination], May 2016.
- [SEQ retail electricity market monitoring 2016–17](#) [scoping paper], October 2016.
- [SEQ retail electricity market monitoring: 2017–18](#) [updated report], March 2019.
- [Regulated retail electricity prices for 2019–20](#) [final determination], May 2019.

- [SEQ retail electricity market monitoring 2019-20](#), November 2020.
  - [Regulated retail electricity prices for 2021-22](#) [final determination], June 2021.
  - [SEQ retail electricity market monitoring 2020-21](#), December 2021.
  - [SEQ retail electricity market monitoring 2021-22](#), December 2022.
  - [SEQ retail electricity market monitoring 2022-23](#), December 2023.
  - [Regulated retail electricity prices in regional Queensland for 2024-25](#) [final determination], June 2024.
  - [SEQ retail electricity market monitoring 2023-24](#), December 2024.
  - [Market monitoring report 2024-25](#), QCA website, 2025.
  - [Regional electricity prices](#), QCA website, 2025.
- Queensland Government, [Gazette: Extraordinary](#), vol 369, no 36, 19 June 2015, p 190.
- [Compare and choose electricity retailers](#), Queensland Government website, updated 1 August 2023.
  - [Electricity and gas rebates](#), Queensland Government website, updated 10 September 2024.
  - [Queensland Budget 2023-24 – Tackling the cost of living](#), June 2023.
- ReAmped Energy, [We think it's time to put an end to cynical 'win-back' offers across the country](#) [rule change request], February 2022.

## Legislation and related material

Competition and Consumer Act 2010 (Cth)

Competition and Consumer (Industry Code–Electricity Retail) Regulations 2019 (Cth)

Electricity Act 1994 (Qld)

National Energy Retail Law

National Energy Retail Law (Queensland), current as at 31 May 2024

National Energy Retail Regulations, version of 7 March 2024

National Energy Retail Rules, version 42

Queensland Competition Authority Act 1997 (Qld)

Treasury Laws Amendment (Prohibiting Energy Market Misconduct) Act 2019 (Cth)