

SUITABILITY ANALYSIS FOR A CONSUMER DUTY IN RETAIL ENERGY MARKETS

REPORT #3.2

PRICING CONFUSION AND LOYALTY PENALTIES

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A. PRICING CONFUSION AND LOYALTY PENALTIES

Understanding energy pricing is difficult for consumers. Different pricing options, non-financial discounts, and differently (or similarly) named products can all lead to confusion for time poor consumers. Added to this confusion, is the concern that customers who don't regularly switch providers or products may be left on overly expensive deals, referred to as a 'loyalty penalty', for customers who do not regularly switch retailers or offers.

The following discussion considers concerns raised by CHOICE about factors that can lead to bill confusion and ACCC findings on the loyalty penalty. It then turns to mitigation strategies and the possible role of an Energy Consumer Duty.

1. Bill confusion and the loyalty penalty – findings from the ACCC

The Australian Competition and Consumer Commission's ('ACCC') recent *Inquiry into the National Electricity Market* (2024) evaluated the level of competition for new and switching customers in the energy market. Its report identified that customers who switch energy offers regularly 'tend to be on better prices' due to retailers intentionally engaging in differential treatment of price-setting and adjustment for new and existing customers.¹ The retail pricing analysis by the ACCC – which excluded rebates and concessions – found that across Australia, customers on flat rate offers that were two or more years old had calculated annual prices that were, on average, 16.9% or \$317 higher compared to customers on newer offers.² The difference was greatest in Victoria, where customers on older offers had calculated annual prices that were 19.0% higher than those on newer offers.³ Customers on older time of use offers and offers with a demand charge also paid higher prices than those on newer offers.⁴ Customers began incurring a loyalty penalty after a fairly short period of less than one year of 'not engaging in the market' by switching to an alternative offer – and the loyalty penalty increased with the age of the offer.

The loyalty penalty affects a significant number of energy customers around Australia. Analysis by Energy Consumers Australia suggests that 19% of Australian energy customers review their household energy plan and investigate alternative options several times per year, while 45% do so at least once per year; however, this does not necessarily result in those customers actually switching to a different offer.⁵ Of those customers in the dataset analysed by the ACCC, 43% or 2.1 million were on offers that were two or more years old, and 33% or 1.6 million were on flat rate offers that were between one and two years old.⁶

The analysis by the ACCC raises questions about the effectiveness of some recent consumer protections implemented to facilitate price comparison for consumers. The Default Market Offer⁷ and Victorian

¹ Australian Competition and Consumer Commission ('ACCC'), *Inquiry into the National Electricity Market* (Report, December 2024) ('National Electricity Market Report') 1.

² ACCC, *National Electricity Market Report*, 3. This analysis assumed 100% achievement of conditional discounts. Older offers examined by the ACCC, which were not subject to regulations limiting the size of conditional discounts to a 'reasonable estimate of costs incurred' for contracts entered into from 1 July 2020, were more likely to have significant conditional discounts attached: at 47.

³ ACCC, *National Electricity Market Report*, 48.

⁴ ACCC, *National Electricity Market Report*, 47.

⁵ Furthermore, 20% of surveyed customers only reviewed their household energy plan once every few years; 7% did so less frequently than every five years; and 9% 'never' reviewed their energy plan: Energy Consumers Australia, 'Consumer Energy Report Card Topline Data', *Consumer Energy Report Card Data* (Web Page, June 2025) <<https://energyconsumersaustralia.com.au/our-work/surveys/consumer-energy-report-card-data#heading1608-1>>.

⁶ ACCC, *National Electricity Market Report*, 49.

⁷ A price cap on standing offers.

Default Offer⁸ are pricing mechanisms set by the Australian Energy Regulator and the Victorian Essential Services Commission respectively. They apply to customers on standing offer contracts (although retailers are still able to offer contracts differing from the default as part of their market offers).⁹ Default offers were introduced ‘to protect customers by capping standing offer prices and acting as a common reference price for the majority of customers on market offers, enabling comparison of offer prices against a common benchmark.’¹⁰ However, most customers on longer-standing offers were not receiving the benefits of these protections. The ACCC found that almost 60% of consumers on flat rate market offers that were two or more years old were paying the equivalent of or above the default offer — compared to only 10% of customers on newer offers.¹¹

A measure intended to facilitate price comparison and switching for consumers consists of requirements for retailers to inform customers of whether there is a better offer available by including messages on their bills at prescribed intervals.¹² Known as ‘Best Offer’ messages in Victoria and ‘Better Offer’ messages in New South Wales, South Australia and South East Queensland, these messages are intended to provide consumers with an easy way to ascertain their retailer’s best available offer without actively searching for alternatives online.¹³ In an analysis of such messages, the ACCC found that 81% of energy customers could have benefited from switching offers at some point between 1 January and 10 August 2024, but apparently did not switch to the superior alternative.¹⁴ In Victoria — where Best Offer requirements have been in place since 2019 — only 22% of customers benefited from their retailer’s best offer.

The reasons for this may include the retailer practice of reusing offer names, which may be causing confusion and leading some customers to refrain from switching on the (mistaken) assumption that they are already benefiting from the better offer (see below the discussion of the CHOICE designated complaint).¹⁵ Many customers also do not open their bill — for example, because they have direct debit arrangements in place and are not required to open their bill in order to pay — and thus may not see such messages at all.¹⁶ These shortcomings of measures taken to facilitate consumer switching suggest a need to shift the burden of identifying the best retail offer further from the consumer to the retailer — which is the role for a consumer duty. One recent initiative in that direction was announced by the Australian Energy Market Commission in June 2025. This takes the form of a new draft rule under the National Energy Retail Law,¹⁷ and other measures that will prevent energy retailers from raising prices more than once every 12 months.¹⁸ Moreover, until recently, in the NECF retailers can increase prices for market

⁸ The price of a standing offer.

⁹ See Australian Government, ‘Default Market Offer and Reference Price Explained’, *EnergyMadeEasy* (Web Page, 13 September 2019) <<https://www.energymadeeasy.gov.au/hot-topics/default-market-offer-and-reference-price-explained>>; Essential Services Commission (Vic), *Victorian Default Offer* (Web Page) <<https://www.esc.vic.gov.au/electricity-and-gas/prices-tariffs-and-benchmarks/victorian-default-offer>>.

¹⁰ ACCC, *National Electricity Market Report*, 4.

¹¹ ACCC, *National Electricity Market Report*, 3, 12.

¹² See Essential Services Commission (Vic), *Guideline 1 (2023): Form and Content of Deemed Best Offer Messages* (23 November 2023); Australian Energy Regulator, *Better Bills Guideline — Key Obligations for Energy Retailers* (July 2025) 4.

¹³ ACCC, *National Electricity Market Report*, 53.

¹⁴ ACCC, *National Electricity Market Report*, 54.

¹⁵ ACCC, *National Electricity Market Report*, 55. Also the CHOICE complaint.

¹⁶ Australian Energy Markets Commission (‘AEMC’), *Draft Rule Determination: National Energy Retail Amendment (Improving the ability to switch to a better offer) Rule* (19 June 2025) i.

¹⁷ AEMC, *Draft National Energy Retail Amendment (Improving the ability to switch to a better offer) Rule 2025*.

¹⁸ AEMC, ‘AEMC delivers enhanced consumer protections to help customers find better energy deals’ (Media Release, 19 June 2025) <https://www.aemc.gov.au/news-centre/media-releases/aemc-delivers-enhanced-consumer-protections-help->

offers at any time with 5 days' notice. One of the new rules proposed by the AEMC (at the request of Energy Ministers)¹⁹ will limit retailers to increase prices once every 12 months.²⁰ A similar rule has been in place in Victoria.

By way of another example, Victoria's Essential Services Commission has recently reviewed the *Energy Retail Code of Practice*, publishing a Final Decision and draft revised code that provides for an automatic best offer for customers facing payment difficulty.²¹ The draft code also contains protections for 'customers on older contracts', with the objective of ensuring 'that a small customer on an older retail contract pays a reasonable price for their energy and is not unfairly disadvantaged in relation to the price they are paying in comparison to the price being paid by other small customers of the same retailer.'²² The draft code defines 'older customer retail contract' as 'a customer retail contract that is four years or older'. 'Reasonable price' is defined as 'a price determined by a retailer having regard to: (a) the lowest cost generally available plan available to new customers of the retailer; (b) the median price paid by customers of the retailer; (c) the price of the Victorian default offer or the retailer's standing offers; (d) the value of benefits available to the customer under their customer retail contract, including a discount, rebate or credit (including a conditional discount); (e) any other matters specified in a guideline published by the Commission. Clause 121B of the draft code requires a retailer to do the following:

- ensure that a small customer on an older customer retail contract is paying a reasonable price for their energy.
- review the tariffs of a small customer on an older customer retail contract at least annually.
- if a retailer identifies that a small customer on an older customer retail contract is not paying a reasonable price for their energy (whether through a review undertaken in accordance with these requirements or otherwise), the retailer must, within 30 days of identification: (a) reduce the tariffs paid by the small customer; or (b) subject to clauses 121C to 121F, switch the small customer to a cheaper plan.

2. CHOICE designated complaint and bill confusion

In May 2025, CHOICE lodged a designated complaint alleging that energy retailers may be in breach of the ACL's misleading and deceptive conduct provisions by using confusing pricing strategies that are designed to trick customers into paying more than necessary for their services.²³ CHOICE highlighted three problematic strategies.

Firstly, energy retailers commonly send consumers a 'same name message', which offers a more competitive plan under a name identical to that of their current plan.²⁴ The AER, in accordance with the National Energy Retail Rules, requires that energy bills contain a 'Best

customers-find-better-energy-deals. See also, AEMC, *The pricing review: Electricity pricing for a consumer-driven future*, AEMC website, Nov 2024.

¹⁹ AEMC, 'AEMC delivers enhanced consumer protections to help customers find better energy deals' (Media Release, 19 June 2025) <https://www.aemc.gov.au/news-centre/media-releases/aemc-delivers-enhanced-consumer-protections-help-customers-find-better-energy-deals>

²⁰ Other measures include removing 'unfair fees' for vulnerable customers; and ensuring 'hardship customers benefit from their retailer's cheapest available deals if they cannot switch.'

²¹ These changes are effective from 2026. See ESC, *Energy Retail Code of Practice* (draft, 2025, version 4). See also, ESC, *Reviewing the Energy Retail Code of Practice* (Web Page, September 2025) <https://www.esc.vic.gov.au/electricity-and-gas/codes-guidelines-and-policies/energy-retail-code-practice/reviewing-energy-retail-code-practice>

²² ESC, *Energy Retail Code of Practice* (draft, 2025, version 4) div 8 clause 121A(1).

²³ CHOICE, *The Power of Confusion: CHOICE 'super' complaint on energy plans* (Report, May 2025) 3.

²⁴ Ibid 9-10.

Offer’ message, which directs consumers to more competitive offers where they are available.²⁵ However, when the ‘Best Offer’ message contains a plan that bears the same name as their current plan, consumers tend to believe that they are already on the cheapest plan, or the retailer has made an error.²⁶ CHOICE estimates this causes around \$65 million in lost savings a year.²⁷

Secondly, energy retailers frequently market plans as offering ‘savings’, or label them as ‘saver’ products, despite these plans being poor value for consumers.²⁸ CHOICE reports that in some instances, plans marketed with such promotional language are more expensive than the retailer’s standing offer.²⁹

Thirdly, energy retailers often discourage consumers from accessing cheaper plans by falsely representing that they are ineligible for them.³⁰ For example, CHOICE reports that some retailers advertise certain plans as being available only to new or moving consumers, despite the offers also being accessible to existing customers.³¹

The cumulative effect of these practices, exacerbated by poor retailer-consumer communication and conflicts of interest with third-party utility connection services, is that consumers frequently end up on plans that are more expensive than necessary.³² These practices also present a systemic problem as they undermine policy interventions designed to inform consumers, and foster consumer distrust and disengagement with the market.³³ CHOICE notes that ‘the most acute impact’ is on vulnerable consumers, such as those facing financial pressure, renters, people with disabilities, physical and mental ill-health and/or neurodiversity, and people of culturally and linguistically diverse backgrounds.³⁴

As such, CHOICE recommends that the ACCC investigate whether energy retailers have engaged in misleading or deceptive conduct or made false or misleading representations about energy services, and take enforcement action where necessary.³⁵ In addition, CHOICE recommends that the ACCC investigate representations made by energy retailers regarding the ‘nature, value and availability’ of energy plans, and consider measures such as a ban on unfair trading practices, the introduction of an energy retailer duty of care, and more detailed guidelines for retailers to point consumers towards the best deals.³⁶

In August 2025, the ACCC issued a further action notice in response. The notice states that issues relating to the re-use of plan names are most appropriately dealt with through other bodies such as the AER and the Essential Services Commission.³⁷ It points to a recent AER decision which requires retailers that re-use plan names to include disclosures beneath a ‘Best Offer’ message that draw attention

²⁵ Australian Energy Regulator, *Better bills guideline* (Web Page, 2023) <<https://www.aer.gov.au/about/strategic-initiatives/better-bills-guideline>>.

²⁶ CHOICE (n 16) 9.

²⁷ Ibid 7, 11-15.

²⁸ Ibid 20.

²⁹ Ibid.

³⁰ Ibid 21.

³¹ Ibid 22.

³² Ibid 22-24.

³³ Ibid 15.

³⁴ Ibid 7.

³⁵ Ibid 5.

³⁶ Ibid 3.

³⁷ Ibid.

to cheaper same named plans.³⁸ The notice also stated that the ACCC would investigate the use of promotional language in energy plans and pursue enforcement action where these claims are misleading.³⁹ Further, it indicated that the ACCC may develop industry guidance or contribute to policy and legislative reforms.⁴⁰

3. *Existing and proposed mechanisms for avoiding bill confusion and the loyalty penalty*

There are a number of existing and proposed pricing reforms to assist consumers to navigate the retail entry market and avoid the loyalty penalty. These include:

- Requirements to include ‘Best Offer’ and ‘Better Offer’ messages in energy bills at prescribed intervals.⁴¹ These messages are intended to provide consumers with information about their retailer’s best offer without having to search for it. However, consumers may be confused by retailers’ use of identical plan names for plans with different rates, and may forego the better offer on the assumption that they already have the same plan. Also, some Best Offer and Better Offer messages promote plans that the specific consumer may not be eligible for, again leading to confusion and potentially deterring the consumer from investigating alternatives.
- Draft Energy Retail Code of Practice (version 4, 2025 – expected to take effect from 2026). Division 5 contains provisions with the objective of giving customers ‘an entitlement to clear, timely, easily understood information’ to allow them to evaluate the ongoing suitability of their customer retail contract and the steps they can take to find an alternative customer retail contract.⁴² This includes ‘prominently displayed, helpful information that enables them to easily... identify whether they are on their retailer’s deemed best offer; understand how to access their retailer’s deemed best offer; and understand how to access offers from other retailers via the price comparator.
- Draft rule under the National Energy Retail Law preventing energy retailers from raising prices more than once every 12 months; and ‘ensure hardship customers benefit from their retailer’s cheapest available deal if they cannot switch’.⁴³
- Also relevant to note here the ESC’s proposed rule that retailers must ensure a customer on a contract four years or older is paying a ‘reasonable price’ for energy (see p 4: [Energy Consumer Reforms](#)) (closer to a consumer duty style obligation).

Mechanisms to assist consumers to make better choices about energy products include:

- Requirements to include ‘Best Offer’ and ‘Better Offer’ messages in energy bills (see above). While intended to facilitate consumer decision-making, these messages may further consumer confusion due to the common practice of retailers offering differently priced plans with identical plan names; and offering plans that are not in fact available to the particular consumer. The latter practice in particular can dissuade consumers from pursuing a better offer in the future, as they believe the information available is inaccurate or irrelevant to them.⁴⁴

³⁸ Australian Energy Regulator, *AER requires retailers to include additional information on bills* (Web Page, 23 May 2025) <<https://www.aer.gov.au/news/articles/communications/aer-requires-retailers-include-additional-information-bills>>.

³⁹ Ibid (n 16) 3.

⁴⁰ Ibid.

⁴¹ Essential Services Commission (Vic), *Guideline 1 (2023): Form and Content of Deemed Best Offer Messages* (23 November 2023); Australian Energy Regulator, *Better Bills Guideline — Key Obligations for Energy Retailers* (July 2025) 4

⁴² ESC, *Draft Energy Retail Code of Practice*, clause 105(a).

⁴³ AEMC, ‘AEMC delivers enhanced consumer protections to help customers find better energy deals’ (Media Release, 19 June 2025) <https://www.aemc.gov.au/news-centre/media-releases/aemc-delivers-enhanced-consumer-protections-help-customers-find-better-energy-deals>.

⁴⁴ ACCC, *Further Action Notice – Designated Complaint – CHOICE – 19 August 2025*, 4.

- Draft Energy Retail Code of Practice (version 4, 2025). Division 5 (see above) aims to provide customers with a mechanism to consider and compare the features and prices of different energy plans.

Consumers may be misled into signing up for (or remaining on) energy plans that promote savings while actually offering poor value for the consumer compared to cheaper plans. The word ‘savings’ is described by the ACCC as ‘a potent descriptor and... an enticement to many consumers.’⁴⁵ According to a recent complaint to the ACCC by CHOICE, ‘consumers may rely on allusions to value and savings in energy plans and descriptions to inform their decision making when in fact there is no genuine saving’.⁴⁶ Proposed reforms include:

- Requirements to include ‘Best Offer’ and ‘Better Offer’ messages in energy bills (see above). The objectives of these requirements are undermined by retailers’ common practice of using plan names that refer to ‘savings’ when the plans are more expensive than the standing offer.
- May 2025 Australian Energy Regulator decision requires retailers that re-use plan names to provide additional information below their Better Offer message alerting consumers to a cheaper ‘same named’ plan.⁴⁷

4. Third Party Information Intermediaries

In principle, comparison sites might help consumers navigate confusing and misleading pricing offers. In practice the efficacy of the sites is uncertain and deserves further research. As Appendix 1 shows, some comparison sites have a limited number of offerings and in some cases relationships with energy retailers. They do not price retail offers with ‘add on’ benefits. They also do not provide assistance with choices about Consumer Energy Resources or New Energy Services.

B. RISKS AND RESPONSES

As shown by ACCC discussion and the recent CHOICE designated complaint, concerns about confusing pricing practices and consumers failing to secure the best prices for their needs have led to calls for more significant reform, such as through the introduction of an Energy Consumer Duty.

The key issues of concern about pricing are summarised in the Table below.

Column 2 indicates both existing law and some proposals to assist in making the pricing options clearer for consumers. The key difference is that the Consumer Duty places obligations on providers to ensure that consumers obtain fair prices, rather than leaving this to consumer (after being encouraged to switch) or prescriptive rules (eg caps on price increase). An Energy Consumer Duty thus represents an approach that takes the burden of navigating complex pricing off consumers to instead make retailers responsible for ensuring good outcomes. Elements of this approach are reflected in more recent proposed reforms (eg reasonable price). The Energy Consumer Duty provides a comprehensive rather than ad hoc approach to the goal of good consumer outcomes.

Description of consumer harm	Existing and proposed protections under the Energy Retail Code of Practice and the National Energy Retail Rules	A Consumer Duty (UK)

⁴⁵ ACCC, *Further Action Notice – Designated Complaint – CHOICE – 19 August 2025*, 3.

⁴⁶ ACCC, *Further Action Notice – Designated Complaint – CHOICE – 19 August 2025*, 3.

⁴⁷ AER, ‘AER requires retailers to include additional information on bills’ (Media Release, 23 May 2025) <https://www.aer.gov.au/news/articles/communications/aer-requires-retailers-include-additional-information-bills>.

Consumers on older contracts pay higher rates than those on newer contracts.	• Requirements to include ‘Best Offer’ and ‘Better Offer’ messages • Proposals for giving customers ‘an entitlement to clear, timely, easily understood information’. • Proposed restrictions on increasing prices. • Proposed rule for longer term customers to pay a ‘reasonable price’ for energy’.	A Consumer Duty would not rely on prescriptive rules about the form of information. Instead, it is an outcomes-based obligation. Accordingly, the key question will be: does the plan ensure a good outcome for consumers? This is not a one-time consideration but should be assessed on an ongoing basis. Key considerations would be around price and value. A comparison might be made with the considerations identified as relevant under the UK Banking Consumer Duty, as follows: A retailer must: ‘(1) ensure that its <i>products</i> provide fair value to <i>retail customers</i> in the <i>target markets</i> for those <i>products</i>’ (Principle 2A.4.2(1)). Principle 2A.4.8 states that: A <i>retailer’s</i> assessment of whether or not a <i>product</i> provides fair value must include (but is not limited to) consideration of the following: (1) the nature of the <i>product</i>, including the benefits that will be provided or may be reasonably expected and its quality; (2) any limitations that are part of the <i>product</i>; (3) the expected total price to be paid by the <i>retail customer</i> or that may become due from the <i>retail customer</i>. (4) any characteristics of vulnerability that <i>retail customers</i> in the <i>target market</i> display and the impact these characteristics have on the likelihood that <i>retail customers</i> may not receive fair value from its <i>products</i>. In an Energy Consumer Duty, the kinds of factors identified in the new Victorian Rules on a reasonable price would be relevant. However, rather than needing to be set in a prescriptive rule based form, a consumer duty would ask retailers to verify the methods they use to ensure longer
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		term customers are not paying the loyalty penalty.
Consumers find it difficult to make informed decisions, compare energy prices and ensure they have the best available offer.	- Requirements to include 'Best Offer' and 'Better Offer' messages in energy bills (see above). - Proposals to provide customers with a mechanism to consider and compare the features and prices of different energy plans.	As above. In so far as information is being provided to consumers the key considerations are that it is salient and able easily to be understood. Thus, The UK Consumer Duty is accompanied by the specific obligations addressing the consumer outcome of <i>consumer understanding</i>. This includes information in Principle 2A.5.3: (1) A <i>firm</i> must support <i>retail customer</i> understanding so that its communications: (a) meet the information needs of <i>retail customers</i>; (b) are likely to be understood by <i>retail customers</i>; and (c) equip <i>retail customers</i> to make decisions that are effective, timely and properly informed. (2) A <i>firm</i> must communicate information to <i>retail customers</i> in a way which is clear, fair and not misleading. This obligation requires firms to communicate 'in good time for retail customers to make effective decisions, including (1) before the purchase of a product; and (2) at suitable points throughout the lifecycle of the product (Principle 2A.5.5).
Consumers may be misled or confused as to which plan offers best value.	- Requirements to include 'Best Offer' and 'Better Offer' messages in energy bills (see above). The objectives of these requirements are undermined by retailers' common practice of using plan names that refer to 'savings' when the plans are more expensive than the standing offer. - May 2025 Australian Energy Regulator decision requires retailers that re-use plan names to provide	As above

	additional information below their Better Offer message alerting consumers to a cheaper 'same named' plan.⁴⁸ • Misleading and deceptive conduct prohibitions in the Australian Consumer Law, <i>Competition and Consumer Act 2010</i> (Cth).	
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⁴⁸ AER, 'AER requires retailers to include additional information on bills' (Media Release, 23 May 2025) <https://www.aer.gov.au/news/articles/communications/aer-requires-retailers-include-additional-information-bills>.

APPENDIX: PRICE COMPARISON SITES

AFFILIATIONS, SCOPE AND LIMITATIONS

- Deregulation refers to when the energy markets in certain regions can privatise and set their own prices, rather than being owned, operated and regulated by State and Territory governments.
 - NSW, SE QLD, VIC and SA are completely deregulated markets. WA, NT, Regional and North QLD are regulated markets for electricity.
 - Tasmania is regulated for Gas.
 - WA is deregulated for Gas.
- Most price comparison websites (including, all of the sites listed below) take solar into account. They include solar feed-in tariff (FiT) rates in their electricity plan comparisons.
 - A solar feed-in tariff is the rate a utility pays you for the electricity your solar panels export to the grid. If your system produces more electricity than you use, the excess is sent to the grid, and the utility credits you either with a financial payment or a reduction on your electricity bill.

Site	Type	Description	URL
Energy Made Easy	Government	Launched in 2012; Operated by the AER Compares energy plans for households and small businesses from States/Territories who have adopted the National Energy Customer Framework ('NECF'): NSW, QLD, SA, Tas and the ACT.	https://www.energymadeeasy.gov.au/
	Disclaimer	The Energy Made Easy site is maintained by the Australian Energy Regulator (AER). The information and publications made available on our site are solely intended to provide a general understanding of the subject matter and to help you assess whether you need more detailed information.	
Victorian Energy Compare	Government	Launched in 2015; Operated by the Vic Gov'tment Victoria's official independent energy comparison site – compares electricity and gas offers available to Victorian households and small businesses.	https://compare.energy.vic.gov.au/
	Disclaimer	The content of this website is provided for information purposes only. No claim is made as to the accuracy or authenticity of the content of the website. Information, data and advice on this website is provided on the basis that site users undertake responsibility for assessing the relevance and accuracy of its content. The Department of Energy, Environment and Climate Action and as owner of this site on behalf of the Victorian Government, makes no representations, either expressed or implied,	

		as to the suitability of anything on this website for any particular purpose. We do not sponsor or endorse any material on websites linked from or to this website, including any social media websites that may be linked in any way to this website. We do not accept any liability to any person: • for the information, data or advice (or the use of such information, data or advice) which is provided on this website or incorporated into it by reference • for any interference with or damage to a user's computer, software or data occurring in connection with or relating to this website or its use If you use automatic language translation services in connection with this site, you do so at your own risk. We make no representations, express or implied, as to the accuracy or usefulness of any translation of the information on this website.	
Compare the Market	Commercial	Launched in 2012; Covers deregulated energy market. Well-known Australian energy comparison and connection site but offers only 8 energy retailers (Red Energy, Lumo, Engie, Energy Australia, Origin, AGL, and Alinta Energy). Claims to have helped over 6 million customers, 2023 Award Winner by Product Review website and has a Platinum Trusted Service 2024 Award from Feefo.	https://www.comparethemarket.com.au/
	Disclaimer	We don't have access to all of the products available in your area: we do not compare all brands in the market, or all products offered by all brands. At times certain brands or products may not be available or offered to you. Learn more.	
	Ownership	• Website says that Compare The Market website and trading name are owned by Compare The Market Pty Ltd (ACN 117 323 378). • IHA Group owns Compare the Market Pty Ltd (IHA Group also owns Auto & General Insurance Company Ltd and Auto & General Holdings Pty Ltd (together, Auto & General), which underwrite and distribute home, motor, and travel insurance in Australia. Auto & General primarily operates under the brand Budget Direct. It also underwrites insurance for a number of other	

		brands, including ING, Qantas, and Virgin Money) (See: https://www.accc.gov.au/media-release/accc-does-not-oppose-compare-the-markets-owners-increasing-stake-in-iselect)	
Compare and Connect	Commercial	Launched in 2014; Covers deregulated energy market. Offers plans from 14 retailers (1st energy, ActewAGL, AGL, Alinta Energy, Blue NRG, Dodo, Energy Locals, Energy Australia, Lumo, Momentum, Origin, OVO Energy, Powershop and Red Energy). Claims to have connected over 500,000 customers, member of the Energy Comparator Code of Conduct ('ECCC').	https://www.compareandconnect.com.au/
	How it Works (no explicit disclaimer section, but page on how the platform works)	'When we display results to you, they are ranked in order of price (low to high). However, Compare & Connect does not compare products from all providers or all products of participating providers that may be available in your area. Further, certain suppliers, products or services may not be compared or offered to you based on the information you provide, including: In the case of electricity and gas: • your location • whether there is solar at the property; • whether you tell us you are moving or comparing plans; and • whether you choose a bundled offer, which may limit the range of offers we are able to present to you. ... Any adjustments you make to the above information may affect the results presented to you. Compare & Connect does not make assumptions when deciding what products to display to you. From time to time, we may have access to better offers that are only available over the phone. Call us to see if you are eligible. In the case of electricity, we will tell you how our supplier's unconditional price compares with the reference price for the type of consumer that you tell us you are. We will display any difference as a percentage of the reference price. You can find out more information about the reference price obligation at this link. ... We never charge consumers fees!	

		Instead, we take a commission from the company that you choose – whether it is finance, utilities, or telecommunications. We have commercial relationships with all of the suppliers whose products we compare. The commissions they pay are cost-effective way for our partners to advertise and attract brand new customers who may not otherwise be aware of their plans, prices and services. These payments allow us to continue to provide expert and catered services and attract new customers. While our service is provided to you without charge, you may be subject to charges in relation to your current service, including exit fees. You should check this with your current supplier(s)’.	
	Ownership	‘The platform is owned by Origin Energy Limited. Origin products are compared along with the brands of other suppliers. However, this does not affect how products are ranked or displayed’.	
Canstar Blue	Commercial	Launched in 2010; covers deregulated energy markets Part of Canstar, an Australian and NZ consumer research and comparison website initiative. Consumer review and comparison site. Provides customer satisfaction ratings to help customers make an informed choice about products and services.	https://www.canstarblue.com.au/
	Fine print (no explicit disclaimer section)	‘To our knowledge, all information in articles on the Canstar Blue website was correct at the time of publication. This information may have changed over time. Refer to the product fact sheet (or relevant similar documentation) before making any purchase decision. Canstar Blue's website terms and conditions apply’.	
iSelect	Commercial	Launched in 2000, but started energy comparison in 2012; Covers deregulated energy markets	https://www.iselect.com.au/

		One of the first comparator websites launched in Australia, operating for 25 years and based in Melbourne. 4.5/5 Trustpilot rating; fined for misleading or deceptive conduct/misrepresentations in relation to its energy comparison services; IHA has 26% of ownership shares	
	Ownership	Innovation Holdings Australia Pty Ltd (Subsidiary of IHA Group) owns 35% of iSelect (See: https://www.accc.gov.au/media-release/accc-does-not-oppose-compare-the-markets-owners-increasing-stake-in-iselect)	
WATtever	Commercial	Launched in 2017; Covers deregulated energy markets Energy comparison site which claims to compare plans from ALL energy retailers nationwide, 4.8/5 Star Rating on Products Review website.	https://wattever.com.au/
Finder	Commercial	Launched in 2006; Covers deregulated energy markets Claimed to have helped millions and that plan data is updated daily, and claims to offer plans from 40 energy retailers. At least in 2018 was Australia's leading comparison site (see: https://www.roymorgan.com/findings/over-1-million-visit-comparison-sites-finder-and-choice)	https://www.finder.com.au/energy
	Ownership	Independently owned by Fred Schebesta and Frank Restuccia	
GoSwitch	Commercial	Launched in 2010; Covers deregulated energy markets 4.7/5 Star Rating on Trustpilot; offers plans from 8 different retailers (1st Energy, AGL, Blue Energy, Energy Australia, Origin Energy, OVO, Momentum, and Dodo).	https://goswitch.com.au/

Zembl	Commercial	Launched in 2023 (when Make It Cheaper rebranded to Zembl); Covers deregulated energy markets. Claims to be the Energy Comparison Website of 2024, 96% positive feedback rating and helped over 30,000 customers	https://get.zembl.com.au/
BillHero	Commercial	Paid subscription service so does not accept any form of commission, nor does it promote any retailer/product. Claims to compare every plan from every retailer.	https://billhero.com.au/
Electricity Monster	Commercial	Launched in 2015; Covers deregulated energy markets Claims to have ‘brokered over 150,000 deals’, 4.9% Trustpilot Rating, 2025 Award Winner by Product Review website	https://electricitymonster.com.au/
Mozo	Commercial	Launched in 2008; Covers deregulated energy markets Partnered with 14 different retailers, publishes energy provider reviews on the site to help customers make a more informed choice, claims to be used by millions.	https://mozo.com.au/energy