



Australian Government



Australian  
**Small Business and  
Family Enterprise**  
Ombudsman

7 April 2022

Anne Whitehouse  
Code Administrator  
Sales Assured  
PO Box 497  
PENRITH NSW 2751

*via: awhitehouse@salesassured.com.au*

Dear Ms Whitehouse

### **Draft National Customer Code for Energy Comparators and Energy Moving Services**

We welcome the opportunity to comment on the draft *National Customer Code for Energy Comparators and Energy Moving Services* (the Code). Energy comparators have an important role to play in ensuring small businesses can easily compare and source cost efficient and competitive energy supplies. To support the Code in providing adequate protections for small business we make the following comments.

1. **We recommend the Code go further to ensure the detailed disclosure of remuneration or commissions paid by Energy Retailers.** We support the inclusion of a requirement for Energy Comparators and Energy Moving Services to clearly disclose the existence of a formal relationship with a recommended Energy Retailer. However, details of commissions paid must be clear to consumers to ensure small business operators are able to make appropriately informed decisions when choosing an Energy Retailer.
2. **Consideration should be given to the inclusion of additional avenues for small business dispute resolution.** Whilst we acknowledge the Code's inclusion for signatories to have an effective Complaint Handling Process that complies with Australian standards, we suggest additional powers be given to allow the Administrator to act as a dispute resolution facilitator, or where appropriate, refer Code disputes involving small businesses to the Australian Small Business and Family Enterprise Ombudsman.

We support the initial implementation of the Code on a voluntary basis and recommend a review of the Code be undertaken shortly after its introduction. It will be important to effectively survey the small business community through this review to ensure the efficacy of the Code in providing adequate consumer protection.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Cameron Dyson-Smith on 02 5114 6105 or at [Cameron.Dyson-Smith@asbfeo.gov.au](mailto:Cameron.Dyson-Smith@asbfeo.gov.au).

Yours sincerely

**The Hon. Bruce Billson**  
Australian Small Business and Family Enterprise Ombudsman

T 1300 650 460 E [info@asbfeo.gov.au](mailto:info@asbfeo.gov.au)  
[www.asbfeo.gov.au](http://www.asbfeo.gov.au)

Office of the Australian Small Business and Family Enterprise Ombudsman  
GPO Box 1791, Canberra City ACT 2601