

# Energy payment difficulty framework review

## Engage Victoria submission

Between 2 and 19 September 2021 we received submissions to our questions about the approach we proposed to take for this review. These questions are highlighted in blue.

**Submission written by: Alinta Energy**

**Date submitted: 19 September 2021**

1. How would you like to participate in the review?

Attend focused workshops	<input checked="" type="checkbox"/>
Participate in one-on-one interview(s)	<input checked="" type="checkbox"/>
Have a discussion with the project team	<input checked="" type="checkbox"/>
Provide a written submission	<input checked="" type="checkbox"/>
Other / comments	

2. What have you observed about the experience of customers in payment difficulty in the last two to three years?

Alinta Energy has found the Framework has facilitated engagement with some customers experiencing vulnerability and hardship. Nevertheless, there are aspects of the framework that are unnecessarily complex, impeding the ability of some customers to understand their rights and obligations. Opportunities to streamline and simplify the framework should be identified as a priority.

The COVID-19 pandemic has impacted customer engagement with retailers suspending some activities (e.g., disconnection for non-payment, credit collection actions, making it difficult to draw definitive conclusions on the effectiveness of the PDF after the start of 2020.

3. We have access to existing data, customer insights, and publicly available case-studies relating to the framework. Is there any other data, insights or research we should also consider?

Alinta Energy would caution against the ESC placing disproportionate weight on single case studies and focus the Review on trends in data for customers experiencing hardship and vulnerability. We believe the reporting undertaken by retailers provides the ESC with data that can be examined over time and assessed for external impacts such as the COVID pandemic.

#### 4. Are our key review questions appropriate for the review?

In general, we believe the key review questions are appropriate, however there does not seem to be a focus on the performance or bench marking of the framework to assess its benefits and costs. Alinta Energy would encourage the ESC as part of its Review to develop measures to assess the effectiveness of the Framework since its introduction, drawing on both other retail energy markets and non-energy sectors.