

27 November 2024

By email only: energyreform@esc.vic.gov.au

Energy Consumer Reform
Essential Services Commission

Dear Essential Services Commission,

Energy Consumer Reforms Consultation

We welcome the opportunity to provide our submission to the Essential Services Commission (ESC) regarding the Energy Consumer Reforms consultation. We refer to our previous [submission to the Energy Retail Code of Practice \(ERCoP\) Review](#) throughout this paper.

A summary of recommendations is available at **Appendix A**.

About Consumer Action

Consumer Action is an independent, not-for profit consumer organisation with deep expertise in consumer and consumer credit laws, policy and direct knowledge of people's experience of modern markets. We work for a just marketplace, where people have power and business plays fair. We make life easier for people experiencing vulnerability and disadvantage in Australia, through financial counselling, legal advice, legal representation, policy work and campaigns. Based in Melbourne, our direct services assist Victorians and our advocacy supports a just marketplace for all Australians.

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We extend our support of the ESC's commitment to ensure most consumers receive the best offer. In the 2024 edition of Consumer Action's *Energy Assistance Report*, Victorians struggling with their energy bills had an average debt of \$2,626 - an increase of 27% since 2021. Growing numbers of Victorians are also trying to deal with historical debt – 18% of people had a closed energy account debt (up from 8.5% in 2022)³. In this context of immense hardship, methods to reduce energy prices for consumers will have significant impact to thousands of Victorians struggling to meet essential costs.

1. Automatic best offer for customers experiencing payment difficulty

Overview

We support the objectives of the ESC's proposed reforms to ensure people experiencing payment difficulty are receiving the best price their retailer can offer.

Our financial counsellors on the Victorian National Debt Helpline (NDH) observe that people experiencing financial hardship, or vulnerability, are often less likely to be actively involved in shopping around for the best offer, despite their need and desire to reduce the cost of energy.

There are significant benefits in streamlining the process of best offer switches to ensure that people in payment difficulty aren't languishing on legacy offers, and are supported to reduce the accrual of arrears by ensuring they are paying the lowest energy price possible.

However, experiencing payment difficulty shouldn't remove someone's right to choose which offer best suits their usage needs or override their entitlement of explicit informed consent.

Therefore, we are supportive of an approach that will assist the most consumers and incorporates multiple options for price relief for the growing number of consumers experiencing payment difficulty and/or energy hardship. Automatic switching consumers to the best offer may not meet the full requirements of explicit informed consent, however as outlined below there are good policy justifications for this. If implemented, it is important that as much notice prior and post switch to ensure consumers can exercise their rights to opt out.

Issues and insights from Victorian callers to the National Debt Helpline (NDH)

Ability to engage in the energy market

Insights from our financial counsellors:

"Our clients are quite vulnerable so the idea they'll call their retailer just to switch is quite unlikely. Similarly, our clients in debt are usually on payment plans, which likely means they're also not checking their bills, so they'd benefit from automating to the best offer available."

Kane, NDH Financial Counsellor

Through our support to Victorians contacting the NDH for assistance with energy hardship, our financial counsellors raise that people on low incomes are less likely or less able to engage actively in the energy market.

For many people in payment difficulty, setting up a payment plan for their energy costs can result in a 'set and forget' approach.

While this can be necessary for certain households who need to manage a tight budget, people on a fixed payment each month may be less likely to check their bills, and as a result missing best offer messages, or additional support available through the payment difficulty framework, such as concession entitlements, bill smoothing or Utility Relief Grants.

³ Consumer Action Law Centre, *Keeping the Lights On – Energy Assistance Report*, June 2024

Best offer switching

There are existing obligations in the Energy Retail Code of Practice (**ERCOP**) for retailers to provide customers experiencing payment difficulty information on tariffs most likely to minimise their energy costs². However, as noted in our submission to the ERCoP Review, we have observed cases of people being placed on payment plans as part of payment assistance without the retailer discussing switching to a better offer³.

In addition to an option to automate switching to a best offer, we support strengthening the existing obligation for retailers to help customers experiencing payment difficulty access the tariff that is most likely to minimise their energy costs by retaining existing requirements for retailers to check with someone experiencing payment difficulty that they are receiving the best offer, and facilitating a switch as relevant, as one of the first 'checks' in payment difficulty assistance.

We refer to the example of a Payment Difficulty Assistance checklist⁴ provided in our submission to the ERCoP Review as a method that could be implemented to support this reform.

Case Study - Justine

Justine* lived on her own in a mortgaged property.

A few years before, Justine had lost her job and was struggling with health issues. Recently, she had started getting back on her feet, but the debts she had accumulated in the meantime were unmanageable, including over \$28,000 in utilities debt. She had determined she would sell her home in order to clear this debt.

When Justine called the NDH, she disclosed her plan to downsize and pay off her debts. She said she was particularly concerned about her bill with her electricity retailer, which was around \$21,000. Justine has been a customer with this retailer for over 10 years.

Justine stated she had been so overwhelmed with the utility bills that she hadn't wanted to look at them. Even as she was accruing significant arrears, at no time did her retailer talk to her about moving to a better energy deal or other measures to help her reduce or manage her energy bills.

Justine stated she had previously requested a lower payment plan, or a reduction in her monthly bills. However, she said her retailer declined to provide any assistance.

**name changed*

Peak / off-peak usage costs

As time of usage tariffs become increasingly common, we note that there are constraints to peoples' ability to choose whether to use energy in peak or off-peak periods, including employment circumstances and household type. For example, 37% of Victorian callers to the NDH in 2023 who were experiencing energy-related financial difficulty were in a family household type (i.e. living with a spouse/partner and children)⁵. For families, adapting energy usage to off-peak times is often not possible, as their time of usage needs to account for their children's needs.

² Essential Services Commission, [Energy Retail Code of Practice \(v. 4\)](#) October 2024, Part 6 clause 128

³ Consumer Action Law Centre, [The Energy Retail Code of Practice review - Consumer Action Law Centre](#), July 2024 pp.12-13

⁴ Consumer Action Law Centre, [The Energy Retail Code of Practice review - Consumer Action Law Centre](#), July 2024 pp.11-12

⁵ Consumer Action Law Centre, [Keeping the Lights On - Energy Assistance Report 4th Edition](#) June, 2024, p.33

Related to this, for many people living in energy poverty⁶, underconsumption of energy has been a common method to reduce costs, despite the negative health and liveability impacts this is shown to have⁷. Switching off heating and sleeping in living rooms are some of the adjustments to save on energy costs that we hear of on the NDH.

Given that people with certain living circumstances and needs are unlikely to be able to adapt their usage times to receive the benefits of off-peak prices, we support accounting for these needs through the option of a tariff reduction or crediting the difference, as outlined in the options considered in the issues paper. This could be in addition to the introduction of automated switching to the best offer for consumers on single rate tariffs, or without other special features attached to their current plan. We consider that this approach would best balance reducing energy costs for the largest number of people, while enabling people with specific needs and/or preferences to lower their energy costs, without losing access to valued aspects of their current energy plans.

a. What should the method include?

We provide our feedback on the methods proposed by the ESC in the issues paper below, with the view to balancing consumer choice and needs with the objective of reducing energy costs for people experiencing payment difficulty

We propose that multiple options are implemented to balance reducing costs, and non-financial needs arising from different consumer circumstances. We provide examples in the sections below to demonstrate potential scenarios.

Automated switching to the best offer

From the options identified in the issues paper from the Australian Energy Regulator (AER)'s *Game Changer* report⁸, Option 2 ('Automated switch with pre-switch opt-out and post-switch reversal') could best meet the balance between obtaining explicit informed consent and providing energy price relief to the largest cohort of people.

When considering the challenges of automation in reducing a consumer's ability to choose a plan most suitable for them, we propose that energy retailers could use a method similar to the 'opt-out' migration used by the banking sector, provided as an example on page 11 of the issues paper.

In cases where someone experiencing payment difficulty has elected a plan that has specific preferences (e.g. paper bills or off-peak usage rates) which may preclude switching to a 'better' tariff which lacks these features, we support the approach that the retailer could identify this cohort through their databases, retain consumers' choices of this plan, and instead provide a quarterly credited difference, as proposed in the issues paper.

⁶ "Energy poverty deprives impoverished consumers of access to energy and limits consumption of socially and physically desirable levels of energy services for the household sector" quote in from Dr. Mita Bhattacharya in [Australia finally sees the danger as 'energy poverty' risk looms | IMPACT - Monash Business School](#) in reference to findings from Mita Bhattacharya, John Inekwe, Eric Yan, *Dynamics of energy poverty: Evidence from nonparametric estimates across the ASEAN+6 region*, Energy Economics, Volume 103, 2021, [Dynamics of energy poverty: Evidence from nonparametric estimates across the ASEAN+6 region - ScienceDirect](#)

⁷ "[E]nergy poverty in Australia is linked with difficulty both maintaining adequate warmth during winter and ensuring adequate cooling during summer. Energy poverty in Australia is, therefore, associated with cold-and-heat-related health issues" Sefa Awaworyi Churchill, Russell Smyth, *Energy poverty and health: Panel data evidence from Australia*, Energy Economics, Volume 97, 2021, <https://www.sciencedirect.com/science/article/pii/S01409883211003249>

⁸ Essential Services Commission, *Energy Consumer Reforms Issues paper*, October 2024, p.9

Reducing tariffs while keeping other terms and conditions

For consumers who have chosen a specific plan that meets their needs (for example paper billing or off-peak usage rates), we support utilising a tariff reduction option. Retailer data on consumers' usage, plan and preferences can be utilised to identify this cohort of customers, and implement this method.

As identified in the issues paper, this option will best protect consumers' entitlement to explicit informed consent and prevents the risk that people will lose access to non-monetary benefits of their current plans as a result of switching. We consider that addressing payment difficulty should not justify removing consumer entitlements to informed consent, or losing access to plans that meet consumers' preferences or needs. We consider that the option to reduce tariffs while retaining other plan terms and conditions balances these considerations.

Crediting the difference between the current plan and the best offer

In cases where consumers have accrued \$300 or more of debt, the option of crediting the difference between current plan and best offer would support the small proportion of consumers remaining on legacy offers.

As identified in Justine's case study above, cases where someone has remained on an outdated or legacy offer can result in people accruing significant energy debt, which may have been avoided or reduced if they had been placed on a better offer. This exemplifies the considerable benefits to consumers if a method is established to credit the difference between the existing and best offer price.

We support the retailer being required to credit the difference between the current plan and the best offer available, as part of tailored assistance for consumers experiencing payment difficulty. As identified in the issues paper, this method would complement existing protections of explicit informed consent and protect the rights of consumers to retain the plan that best suits their needs.

For people entitled to tailored assistance, retailers could credit the difference as a one-off measure to reduce the consumers' debt, then discuss with the person if they would like to switch to the best offer for their needs, for example, through a 'best offer overall' test.

Best Offer Overall Test

In addition to the option of reducing tariffs, we submit a proposed approach that retailers could make for people experiencing payment difficulty, to balance consumer preferences between their existing plan and the best offer available. In these cases, as part of payment difficulty assistance, retailers could provide a consultative assessment with the person experiencing payment difficulty that accounts for their energy usage needs, their elected preferences (e.g. paper bills) and the best offer available. The objective of this assessment would be to identify the best overall offer for an individual, based on a holistic review of their circumstances and preferences.

This assessment could be outlined in the ERCoP under the existing clause on entitlement to tailored assistance where retailers can provide practical assistance to inform the person of the tariff that is most likely to minimise energy costs (Clause 128 f (i))⁹. An update to this clause would capture movement to a tariff that would most likely minimise a customer's energy costs based on consideration of their usage needs, in addition to accounting for the customer's patterns of energy use, payment history and any other relevant factors (e.g. a need for paper bills).

⁹ Essential Services Commission, *Energy Retail Code of Practice*, v.4 October 2024; clause 128 (f) (i)

b. Who should be eligible?

When considering who should be eligible for an automated switch to best offer, we have considered the three tiers of customer types as outlined in Figure 2 of the issues paper³⁰, and potential consumer choices regarding specialised aspects of their plan. We have taken these aspects into account for what option is most relevant to the needs and circumstances of consumers, and proposed guardrails to support (as close as possible to) explicit informed consent. These options are provided below in Table 1.

Option	Eligible customer	Safeguards	Rationale
Reducing tariffs while keeping other terms and conditions	Where customer <ul style="list-style-type: none"> - Is experiencing payment difficulty - Has accrued \$55 or more in arrears - Has a specialised plan (e.g. time of use tariff or paper bills plan) 	<ul style="list-style-type: none"> - Retain existing plan - Requirement for clear information disclosure in quarterly bill of reduction amount, and comparative best offer 	Retains consumer choice and explicit informed consent requirements, retains preferred features of current plan, while reducing cost of energy and providing clear information on best offer.
Crediting the difference while keeping other terms and conditions	Where customer <ul style="list-style-type: none"> - Is experiencing payment difficulty - Has accrued \$300 or more in arrears 	<ul style="list-style-type: none"> - As part of tailored assistance, retailer can credit the difference between existing plan and best offer - This credit can be applied retrospectively from the date that \$300 of arrears was accrued 	Aims to address the higher accrued costs of legacy offers.
Automated switch to best offer with prior notice and post-switch reversal	Where customer <ul style="list-style-type: none"> - Is experiencing payment difficulty - Has accrued \$55 or more in arrears - Does not have a specialised plan (eg. time of use tariff or paper bills plan) 	Prior notice and 10 day cooling off period provides customer to opt out or option for post-switch reversal	In cases where there are no specialised aspects of a plan, the priority of receiving a lower price can be met without causing detriment to the consumer through removing the specialised aspects of the plan.

c. What safeguards should be in place?

We note that there may be some challenges in pursuing a more tailored approach. We are aware that one unintended consequence could be lowering the number of people eligible for a tariff change. In response to this

³⁰ Essential Services Commission, [Energy Consumer Reforms Issues paper](#), October 2024, p.13

challenge, we submit that for consumers who are not receiving a specialised plan, an automated switch can be implemented by retailers.

Safeguard to prevent excessive costs being passed on to consumers

Risk of passing on additional costs

With any of the options being considered, there is a risk that additional implementation costs to retailers will be passed on to consumers. To protect the long-term interests of consumers, the ESC and relevant Government bodies must carefully consider and implement directions to retailers to restrict adding the administrative costs of implementing these changes onto their customers. For example, this could take the form of a cap on the proportion of these costs which could be included in market offers, and a restriction on any costs being passed on to consumers on reduced-rate tariffs. As well, the introduction of these measures should reduce the number of customers in energy hardship, and the associated retailer costs of handling hardship applications.

Lack of Utility Relief Grant uptake

Another potential consequence of these proposed initiatives could be a reduction in customers being offered or taking up the Utility Relief Grant (URG). Realistically, URGs may amount to a larger 'discount' than any reduced tariff or the difference between a customer's current offer and the best offer they're automatically switched onto. ESC could prioritise monitoring retailers' compliance with the PDF to ensure customers are still taking up the option of accessing a URG where they meet the requirements of the scheme.

Lack of hardship offerings as result of switching, providing credit or reduced tariff

The measures must sit alongside all of the standard and tailored relief options available to customers in the PDF. One positive benefit of providing large scale relief to customers is that there should be a reduction in customers requiring hardship assistance, or the amount of arrears or hardship will reduce. However, some of the other options in the PDF might also really benefit a customer, such as an energy efficiency assessment, or arranging an affordable payment plan. The ESC should monitor data and retailer practices to ensure there are no unintended consequences of introducing the proposed initiatives.

ESC should conduct a review of the changes in approximately 2-3 years to measure the impact of the changes and to ensure retailer compliance with their standard obligations, and that unintended consequences of the changes are being mitigated.

RECOMMENDATION 1. Include a reduced tariff each quarter for people experiencing payment difficulty who have accrued more than \$55 in arrears, and have a specialised offer

RECOMMENDATION 2. As part of tailored assistance, in circumstances where the customer has accrued more than \$300 in arrears, include a credited difference to the best available offer to be applied retrospectively from the date \$300 was accrued.

RECOMMENDATION 3. For consumers experiencing payment difficulty who are not receiving a specialised plan, include an automated switch to best offer with prior notice and post-switch reversal.

RECOMMENDATION 4. For the ESC to continue their priority area of monitoring retailers' compliance with the Payment Difficulty Framework, and conduct a review of Energy Consumer Reforms changes 2-3 years after implementation

2. Improving the ability to switch to the best offer

We support introducing minimum requirements for provision of best offer information, to be provided through multiple communication means by retailers including email, SMS notices and paper bills. To improve people's ability to switch offers, we suggest the inclusion of an interactive method for consumers to agree to switching through their regular bills, for example a clickable button in email or link in SMS notifications.

In some examples seen by Consumer Action, people have received their bill stating there is a better offer they can switch to, only to find that they are already receiving that offer. In these cases, the price of the offer has changed,, but the customer isn't provided the reduced price. The customer remains on the original higher price and is simply informed of the difference at the end of the cycle. The problem with this is that it requires an engaged consumer to understand the (confusing) situation and make the switch themselves.

In these examples, our financial counsellors note that when contacting retailers to enquire about the changed price on a given plan, retailers have outlined that they can automatically move people to the increased price. However if a lower offer becomes available, the customer must engage and switch to a new offer to receive the lower price.

This practice can cause people's energy price to increase without explicit informed consent. However, receiving a reduced price or better offer relies on the person being actively engaged and knowledgeable

in the energy market in order to arrange for a lower price with their retailer. In our view, this is back to front.

In addition to establishing minimum requirements that facilitate the bulk of consumers receiving the best offer, retailers must also provide consumers with the lowest available price for the same offer they are receiving, if it reduces during the given quarter.

"Timeframes are important – people lose confidence of the benefits of switching, as they're unsure if the benefits will remain over time.

If the price lowers it should be automatically updated in a plan, similarly to when the price goes up.

If customers are notified about a better offer, they usually won't get that information until their bill (a month or quarter after the offer price), so switching to the best offer should be retroactive from the date the best offer was available."

Claude, NDH Financial Counsellor

RECOMMENDATION 5. Establish a minimum requirement to communicate best offers via email, SMS and paper billing, including an interactive method for consumers to select to switch to the best offer.

RECOMMENDATION 6. Establish a requirement for retailers to provide consumers the lowest available price for the same offer they are receiving, in circumstances where the price reduces during the given quarter

3. Improving the application of concessions to bills

We strongly support strengthening obligations for concession checks for all customers. While we acknowledge that automation and portability are outside of the scope of this review, we reaffirm our support for automation of concessions through integration with Services Australia as recommended by the AER's Game Changer report.

In response to the options identified in the issues paper, we propose three methods to enable a greater proportion of concession card holders to receive their entitlements.

New customers

We support including an obligation for retailers to check concession entitlements with all new customers upon sign up. This should be implemented in a way that accounts for any method a consumer may sign up for a new contract, for example via telephone, email and online systems.

Existing customers

Customers who hold a HealthCare Card (HCC) will have their HCC expiry date listed with their retailer as part of the administrative process of adding their

concession entitlement. Upon the expiry of a Health Care Card, consumers are at risk that their concession will be removed, unless they have updated the expiry period of their new card with their retailer. We suggest that retailers should be using this expiry date information to schedule proactive contact to customers regarding the upcoming expiry of their HCC, and to request the new details from the consumer.

This system would greatly benefit low-income households in ensuring they retain their concession entitlement longer term. This information and regular contact would also provide an opportunity for retailers to contact HCC holders regularly (for example every two years) to facilitate a discussion about any support that may be required (e.g. an application for a Utility Relief Grant (URG)).

Regularity of check

We support establishing a requirement for regular proactive checks to confirm any changes in the eligibility of all existing customers who are not currently recorded as receiving a concession. We submit that each six months would capture changes to consumer's circumstances (for example, in recently receiving a HealthCare Card) whilst also balancing administrative burden.

Retrospective application of the concession entitlement

In addition to the regularity of checks, in instances where a consumer has been entitled to receive a concession and it has not been applied, the retailer should backdate the entitlement to the date the consumer was in receipt of a HealthCare Card, and credit the difference to the consumer's account. This should act as a strong incentive for better administration of concessions and entitlements by retailers.

"The effort that vulnerable people have to go through to access entitlements can feel overwhelming for them, and often means they just miss out. Having retailers provide a regular notification about concessions is a small change for retailers that would make a real difference."

Katia, Director of Financial Counselling Practice

RECOMMENDATION 7. Establish an obligation for retailers to include concession checks for all new customers upon signing up for a new account.

RECOMMENDATION 8. Establish an obligation for retailers to check concession entitlement for existing customers each six months.

RECOMMENDATION 9. Include a requirement for retailers to retrospectively apply the concession from the customer's entitlement date and credit the difference to their account

4. Extending protections for customers on legacy contracts

Removing the grandfathering arrangements and limiting conditional discounts and fees to reasonable costs.

We support the option proposed in the issues paper to require all contracts be limited to the caps set by the ESC for pay-on-time discounts, including for contracts entered into prior to 1 July 2020. We note the success of the *'Ensuring contracts are clear and fair'* reform as outlined in the issues paper, and support extending this reform to all contracts to address the risk of people on legacy contracts with large conditional discounts being exposed to high costs.

We also support an extension of the rule that benefits must last the entire duration of the contract, to include contracts entered into prior to 1 July 2020.

We believe that in conjunction with reforms to improve the ability to switch to a best offer, these reforms would both protect people from high costs, while also helping to reduce the number of consumers remaining on legacy contracts.

Prohibiting conditional discounts and fees related to payment methods

We support prohibiting conditional discounts and fees related to payment methods. It is likely that for consumers electing to receive paper bills, they are electing this option for accessibility reasons, for example if they are less digitally literate. Similarly, there can be considerations for shared households who all contribute to the bill and prefer to have this information physically accessible for the whole household.

As the issues paper notes, this situation is one example of the 'poverty premium' that unfairly discriminates against low-income households, or people who require certain payment methods or billing for accessibility reasons. For this reason, we strongly support prohibiting these conditional discounts and fees

5. Improving awareness of independent dispute resolution services

Including information about the Energy and Water Ombudsman Victoria (EWOV)

We strongly agree with the proposed change outlined in the issues paper to include contact information (including website and phone number) for the Energy and Water Ombudsman Victoria (**EWOV**) in all bills. We support including some information about EWOV as part of this requirement, and that the information is included in all forms of billing, including in the body of email text, or in a visible place in online portals or apps. This change would

bring energy bills in line with statements or notices in other contexts such as financial services, where the Australian Financial Complaints Authority (AFCA) contact details are stated.

Including information about types of assistance under the Payment Difficulty Framework

With respect to existing obligations for retailers regarding provision of assistance to help people manage payment difficulty²², we propose that these obligations could be described on energy bills, including providing specific information on what types of assistance are available. We acknowledge this consideration is out of scope of this review; however, we raise it as an important way to reduce burden on services such as EWOV (or the NDH) by increasing customer awareness of supports available, and directing customers in the first instance to contact their retailer to ensure the business is providing customers what they are obliged to.

Including information about the National Debt Helpline

While it may be out of scope for this review, in addition to including information about EWOV and assistance available under the PDF, we also support the inclusion of information about the NDH including the phone number and information that it is a free-to-call number. We note that the information must be placed last (underneath retailer and EWOV contact information), and clearly note that the NDH can provide assistance regarding financial hardship. Again, at first instance it is best a customer contacts their retailer to receive hardship assistance, and this information should be made clear. But increasing awareness of the NDH would be another benefit to adding information on bills.

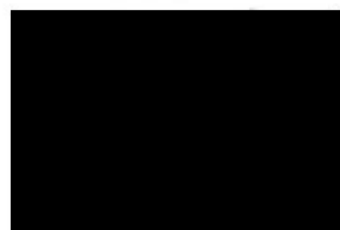
RECOMMENDATION 10. Include information regarding EWOV, their website and phone number in all forms of retailer bills

RECOMMENDATION 11. Expand existing obligations for retailers to communicate the measures available for payment difficulty assistance in bills

RECOMMENDATION 12. Include information about the National Debt Helpline in bills, including the free-call phone number

Please contact Policy Officer **Eirene Tsolidis Noyce** at **Consumer Action Law Centre** on [REDACTED] or at [REDACTED] if you have any questions about this submission.

Yours sincerely,



Stephanie Tonkin
Chief Executive Officer
CONSUMER ACTION LAW CENTRE

²² Essential Services Commission, *Energy Retail Code of Practice*, v. 4, October 2024, clause 138

APPENDIX A – SUMMARY OF RECOMMENDATIONS

- RECOMMENDATION 1.** Include a reduced tariff each quarter for people experiencing payment difficulty who have accrued more than \$55 in arrears, and have a specialised offer
- RECOMMENDATION 2.** As part of tailored assistance, in circumstances where the customer has accrued more than \$300 in arrears, include a credited difference to the best available offer to be applied retrospectively from the date \$300 was accrued.
- RECOMMENDATION 3.** For consumers experiencing payment difficulty who are not receiving a specialised plan, include an automated switch to best offer with prior notice and post-switch reversal.
- RECOMMENDATION 4.** For the ESC to continue their priority area of monitoring retailers' compliance with the Payment Difficulty Framework, and conduct a review of Energy Consumer Reforms changes 2-3 years after implementation
- RECOMMENDATION 5.** Establish a minimum requirement to communicate best offers via email, SMS and paper billing, including an interactive method for consumers to select to switch to the best offer.
- RECOMMENDATION 7.** Establish an obligation for retailers to include concession checks for all new customers upon signing up for a new account.
- RECOMMENDATION 8.** Establish an obligation for retailers to check concession entitlement for existing customers each six months.
- RECOMMENDATION 9.** Include a requirement for retailers to retrospectively apply the concession from the customer's entitlement date and credit the difference to their account
- RECOMMENDATION 10.** Include information regarding EWOV, their website and phone number in all forms of retailer bills
- RECOMMENDATION 11.** Expand existing obligations for retailers to communicate the measures available for payment difficulty assistance in bills
- RECOMMENDATION 12.** Include information about the National Debt Helpline in bills, including the free-call phone number