Submission to the ESC's Supporting Customers Avoiding Labels: Energy Hardship Inquiry Draft Report

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Supporting Customers Avoiding Labels: Energy Hardship Inquiry Draft Report

The Consumer Utilities Advocacy Centre Ltd (CUAC) is a specialist consumer organisation established in 2002 to represent Victorian energy and water consumers in policy and regulatory processes. As Australia's only consumer organisation focused specifically on the energy and water sectors, CUAC has developed an in-depth knowledge of the interests, experiences and needs of energy and water consumers.

CUAC welcomes the Essential Services Commission's (ESC)'s fresh thinking on assisting customers outlined in their *Supporting Customers Avoiding Labels: Energy Hardship Inquiry Draft Report* (draft report). We commend the ESC for diagnosing the problem well in their draft report (chapter 4) and for the research they have undertaken (chapter 5). We welcome the opportunity to participate in the ESC's forums on this subject matter.

CUAC supports a regulatory framework that aims to provide all Victorian consumers (not just consumers experiencing hardship) with a fair and equivalent consumer experience and equal access to essential services across all energy retailers.

CUAC has identified the following features as positive initiatives in the draft report's proposed regulatory framework:

- The intent to have a clear and unambiguous framework;[1]
- The focus on the 'shared responsibility' of customers and energy retailers working together to maintain access to supply,
- Early assistance/intervention, and
- Aligning energy usage with affordability.

These can lead to more sustainable outcomes for many consumers.

Further positive features are that:

- The draft report's proposed framework sets out the minimum requirements and is meant to provide all Victorian consumers with equivalent assistance across energy retailers;
- Offering genuine help before an escalation of debt is a sensible approach that benefits both consumers and energy retailers; and
- An approach that de-stigmatises consumers (by not labelling them as 'in hardship') and that does not require consumers to prove their financial circumstances before deferring

[1] This is, however, dependent on the drafting of the framework in the regulations, i.e. the Energy Retail Code.

their bill[2] or obtaining a payment plan, would likely help 'at risk' consumers and consumers who have shorter term payment difficulties manage their payments.

Clauses 4 and 19 of the *Consumer Protection Bill 2015* (which amends section 10 of the *Electricity Industry Act 2000* and section 18 of the *Gas Industry Act 2001*) provide that an objective of the ESC under the respective Acts is to promote customer protections, including in relation to assisting customers who are facing payment difficulties.

While CUAC acknowledges the draft report's positive initiatives above, CUAC is concerned that the proposed regulatory framework's overemphasis on debt management will lead to a framework that is silent on the consumers who simply do not have money to pay for their energy usage or who are unable (despite their best efforts) to reduce their usage.[3] We have heard from energy retailers that they increasingly encounter customers that do not have enough money to pay for a basic level of energy to allow participation in society. No amount of energy efficiency actions will ever address this. There is, therefore, a 'mismatch' between the draft report's proposed framework and the ESC's objective under the two Acts.

Terms of Reference

The Terms of Reference for the ESC's inquiry defines *'customers in financial hardship'* to include:

- *Residential customers with an inability to pay their energy bills in a timely manner, and*
- *Residential customers who are at risk of being unable to pay their bills in a timely manner.*

Within the former category is a sub-category of customers who are in chronic payment difficulty or financial hardship and who likely will never be able to pay their arrears or cover their energy usage, despite the assistance they receive from their energy retailers. The draft report's proposed framework well addresses 'at risk' customers, but does not provide solutions for customers in long term/chronic payment difficulty or financial hardship.

CUAC in collaboration with other consumer/community organisations proposes a modified framework (see **Appendix A**) which forms a constituent part of our submission.

CUAC has tried to respond to the questions raised in the ESC's draft report below. Given that there are 'gaps' in the architecture of the proposed regulatory framework, we find it difficult to provide a complete response as the draft report does not explain how the proposed regulatory

[2] Nonetheless, retailers, need to make it very clear to consumers requesting a bill deferral what the implication of a bill deferral is (it doesn't mean escaping a bill payment).

[3] For example: A recent ABC article reported that 32 per cent of Kildonan UnitingCare's clients are going without food, about 34 per cent are unable to heat their home, and about 83 per cent can't pay a bill on time. See http://www.abc.net.au/news/2015-09-02/more-victorians-choosing-between-heating-and-eating-say-welfare/6743412 <accessed on 29 Sept 2015>

framework is to be embedded into energy legislation and the Energy Retail Code. For example, it is unclear where the 'stages of assistance' sit in the Energy Retail Code and how they relate with the current billing cycle. The ESC has subsequently clarified that working group 2 will be reviewing the changes that will need to be made to the code to accommodate the finalised framework.

Questions for response

Objectives

> The proposed regulatory framework is premised on the objectives of avoiding debt, repaying debt, adopting leading practice in energy management and aligning energy consumption with affordability.
>
> 1. Are these objectives appropriate? Should any other objectives be considered?

CUAC is of the view that the overwhelming objective should be to facilitate continuity of supply to domestic customers experiencing financial hardship. This is specifically mentioned in the *Electricity Industry Act 2000* and the *Gas Industry Act 2001*, as the primary rationale for hardship policies, and is referenced in the draft report:

- To recognise that financial hardship may be suffered by domestic customers; and
- To promote best practice in electricity service delivery to facilitate continuity of supply to domestic customers experiencing financial hardship.[4]

But the draft report then refocuses on debt in drawing a conclusion about the regulatory framework from the Acts:

> *'The purpose of the regulatory framework for customers facing payment difficulty can therefore be defined as to:*
> *assist consumers to avoid long-term energy debt, and repay debt that does accrue, while wherever possible maintaining access to energy as an essential service.'*[5]

While debt minimisation and repayment are positive objectives, they should not be prioritised over maintaining supply as this would mean that customers who are unable to afford an essential service will be cut off from supply and unable to fully participate in society.

The ESC has subsequently emphasised that consumers who are engaging (even those who put in a very small effort of engagement) should be protected from disconnection. CUAC is heartened by this and anticipates that this important point will be embedded in the Energy Retail Code.

[4] Essential Services Commission (Sept 2015), *Supporting Customers, Avoiding Labels: Energy Hardship Inquiry Draft Report*, at 18.

[5] Ibid.

Incentives

The current regulatory framework provides the wrong incentives and opportunities. Outcomes for customers and retailers are uncertain.

2. Does the proposed framework adequately address incentives and opportunities to avoid and reduce customer debt and limit disconnections? What other measures could be considered to provide the right incentives and opportunities?

Consumers in chronic payment difficulty or hardship

The draft report's proposed regulatory framework is centred on debt management and as such does not address consumers who do not have sufficient money to pay for their energy usage or who cannot reduce their usage. These consumers do exist (see figure 2 below). One of the largest energy retailers, AGL, has 42 per cent of customers in their Staying Connected program on payment plans that meet neither their usage or debt targets and 34 per cent on payment plans that meet usage but not debt targets.

> *'In some instances, despite energy concessions, energy home visits, financial counselling and other support being provided – these customers accrue debt for many years.'*[6]

Consumers in chronic payment difficulty or hardship may include people on fixed benefits, large households, and those living in poorly insulated homes. In addition, consumers who lack functional literacy (47 per cent of the Australian population)[7] – this may include CALD communities and people with disabilities – will find it hard to navigate the draft report's proposed framework, which requires consumers to 'initiate' the process.

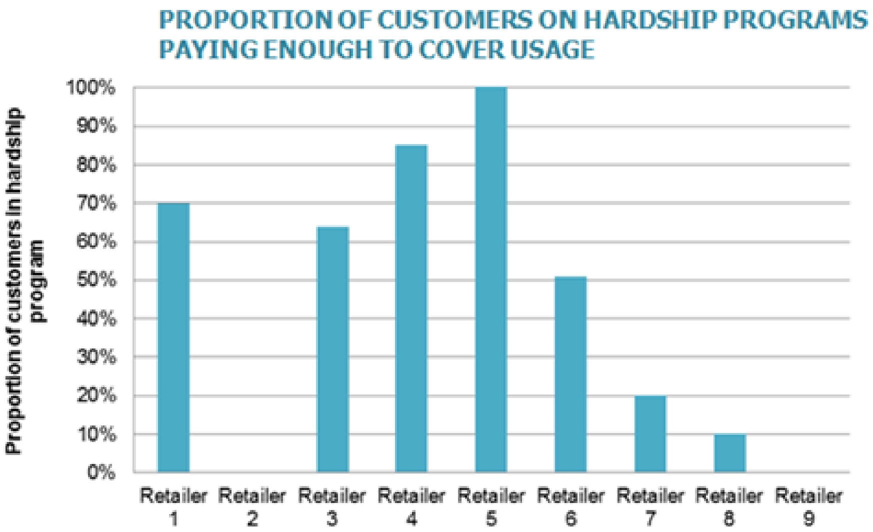

Figure 2: Slide from ESC's presentation to consumer groups on 3 Sept.

[6] http://aglblog.com.au/2015/09/effective-support-for-vulnerable-households-closing-the-gap-between-capacity-to-pay-and-cost-of-consumption-part-2/ <accessed on 29 Sept 2015>

[7] http://theliteracyinitiative.weebly.com/blog/about-the-literacy-initiative1 <accessed on 29 Sept 2015>

While behavioural change can make a significant impact on reducing energy consumption, it cannot overcome some of the barriers/disadvantages of inappropriate appliances or structural defects found in many homes, particularly for tenants.[8] According to the One Million Homes Alliance,

> *'A range of market barriers work against homeowners and tenants – particularly low-income and disadvantaged households – improving the efficiency of their homes. These barriers include the upfront cost of efficiency measures, the split incentive facing tenants and landlords, and a lack of timely and trusted information about efficiency options and costs.'*[9]

The draft report's proposed regulatory framework therefore risks marginalising consumers experiencing ongoing and chronic payment difficulties and in financial hardship. The framework does not offer many 'opportunities' for these consumers to maintain access to an essential service and avoid disconnection.

Payment plans

Arguably, the draft report's proposed framework sets consumers up for failure. Payment plans can be 'prescribed' (with a set formula and payment period) without taking into account a consumer's income level or their capacity to pay. While an energy retailer cannot ascertain in any comprehensive sense someone's capacity to pay (like a bank can), customers and energy retailers should be able to negotiate a payment plan and agree to an affordable arrangement.

The 'prescribed' payment plans remove agency from consumers and energy retailers to discuss workable options – This will adversely affect their relationship and their ability to work together to resolve payment difficulty issues. CUAC understands that the ESC's view has shifted somewhat after receiving feedback on their draft report from their public forums and that 'prescribed' payment plans are meant to be a last resort where negotiated payment plans have not worked. This is a positive response but it needs to be clearly articulated in the finalised framework and the Energy Retail Code.

Costs and Benefits

> When compared to the current regulatory framework, the proposed regulatory framework will involve costs and benefits in both the short and long run. Understanding these costs and benefits will be important to implementation.

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[8] Tenants Union of Victoria (2010), Utilities and Residential Tenancies: Part 2 Future Directions for Rental Housing Standards, p.10; available at: https://www.tuv.org.au/articles/files/housing_statistics/Utilities_Residential_Tenancies_Part_2.pdf <accessed on 29 Sept 2015>
See also Australian Council of Social Service (2013), Energy Efficiency and People on Low Incomes; available at http://acoss.org.au/images/uploads/ACOSS_ENERGY_EFFICIENCY_PAPER_FINAL.pdf <accessed on 29 Sept 2015>

[9] The One Million Homes Alliance Roadmap to 2025; available at http://environmentvictoria.org.au/2025-efficient-homes-roadmap <accessed on 29 Sept 2015>

3. Are there particular costs and benefits of the proposed framework that the Commission should be aware of?

At what cost?

The cost of debt incurred by consumers in chronic payment difficulty or hardship will result in higher energy costs for all Victorians. It is therefore important that the finalised regulatory framework offers an answer or at least some guidance as to how this problem can be addressed collectively (by consumers, energy retailers, governments and community groups) in a way that enables those most disadvantaged to retain access to an essential service without jeopardising their health and welfare.

First tier energy retailers have told us that they are seeing more consumers in hardship. Given that the draft report's proposed regulatory framework is silent on consumers who cannot pay, more pressure will likely be placed on already over-stretched financial counselling services. More resourcing of the sector is needed.

There is an economic, social and human cost to disconnections. CUAC has long held the position that no consumer should be disconnected because they are unable to pay for an essential service. Access to essential services is a human right. If consumers are to be kept on supply and if disconnections are to be minimised and a last resort, the finalised regulatory framework cannot be silent on how to address consumers with ongoing and chronic payment difficulties. The question we have for the ESC is: who is responsible for making sure that those who are unable to pay are given the help that they need to retain access to an essential service? Surely the solution can't be to restrict supply or impose prepayment as a solution to reduce the disconnection rate?

Limiting usage and prepayment (where consumers lack the money to pay) will be punitive and detrimental to a person's physical, mental and emotional health and wellbeing. This is an exceptionally heavy and unacceptable cost/burden for anyone to bear. Research undertaken by the Australian Council of Social Service (ACOSS) reveals that many people on low incomes are already rationing their energy consumption:

> *'There is a minimum level of energy needed to maintain health and wellbeing for all people, yet there is evidence of disadvantaged households demonstrating an 'energy conservation' response to higher prices (such as avoiding heating and cooling) rather than an energy efficiency response (such as installing insulation or energy efficient heaters) (DCCEE 2012). Separate studies in NSW (IPART 2011a) and Victoria (ABS 2009a) have found that people on low incomes use their air conditioners less frequently than people on high incomes.'*[10]

We discuss this issue further in the section on 'Intensive Assistance instead of Reconnection Plan.'

In addition, if the cost of disconnections is to be addressed, the disconnection (and reconnection) provisions need to be strengthened to ensure that disconnection is really a last resort and reconnection occurs promptly. This is discussed below under 'need for stronger disconnection provisions.'

[10] Australian Council of Social Service (2013), Energy Efficiency and People on Low Incomes; p.2.

Encouraging industry best practice

CUAC is not suggesting that energy retailers are in a position to provide holistic solutions to address the complex socio-economic needs of these consumers. Nonetheless, energy retailers can work in partnership with community organisations and other support services to assist these consumers remain connected to supply, including making the necessary referrals where appropriate.

In recent years, the first tier energy retailers have achieved good consumer outcomes in their hardship programs. It would be a shame if the improvements in hardship programs made by these energy retailers are somehow 'lost' or 'derailed' under the draft report's proposed regulatory framework. There is a risk that the resources industry is investing in their hardship programmes to address the needs of the most disadvantaged will be diverted since the proposed framework disincentivises industry from improving their hardship approaches. CUAC believes that good retailer practice should set the benchmark for all energy retailers.

CUAC is pleased that the ESC has confirmed that the finalised framework will include incentives for flexibility to innovate and drive best practice. CUAC is keen to continue engaging with and working with industry on their hardship approaches to deliver a fair consumer experience to all Victorians.

Staging of assistance

> The proposed framework is based on shared responsibility between retailer and customer to address payment difficulties at each stage.
>
> 4. Are the retailer obligations and customer responsibilities clear at each stage? If not, what further clarification is required?

Linearity

The draft report's proposed regulatory framework appears to be a linear 'staging of assistance.' The risk of linearity is that the framework can become rigid and inflexible, and therefore not accommodate the personal circumstances of each consumer.

'Entry points' should be negotiable between consumers and retailers. Consumers who self-identify (or through their financial counsellor identify) as experiencing chronic payment difficulty or financial hardship should have direct and immediate access to more 'active' or 'intensive' assistance. It is also appropriate for energy retailers to offer more assistance than a payment plan to consumers who present/identify (e.g. through the consumer's account history or through conversation between consumer and energy retailer) as experiencing chronic payment difficulty or financial hardship. It makes no sense to require these consumers to move from one stage to the next (rather than straight into more 'active' or 'intensive' assistance) as this 'staged' linear approach may exacerbate their personal circumstances and result in more debt accumulation. Greater clarity is also needed on what each stage is meant to entail.

Active Assistance Plan

The Active Assistance Plan is vague and needs to be fleshed out in much more detail so that it will truly act as a 'safety net' to catch all consumers before disconnection. As drafted, it appears similar to what is currently offered – tailored payment plans, referrals and energy advice (with the addition of a variable tariff). While these suggestions are good, there is a need for greater emphasis on increasing energy affordability through encouraging consumers to reduce usage (where possible) rather than increasing payments. In addition to analysing consumption data, energy retailers should be offering (actual) in-home energy audits (and other tools, like in-home displays) and placing consumers on the best market offer (before converting it to a variable tariff). There is a risk that 'active assistance', if not specified in greater detail, will result in a large proportion of consumers ending up in a very similar situation with what we have today, albeit with access to a variable tariff.

Given that one of the main aims of the new regulatory framework is to provide greater certainty (less discretion) for energy retailers and equal treatment for customers across energy retailers, more detail needs to be provided about 'active assistance.'

On the basis of feedback received, CUAC understands that the ESC:

- Has agreed that energy management assistance should be available at each stage of the finalised framework; and
- Will clarify existing legislative obligations around appliance replacement and energy audits.

CUAC welcomes these initiatives.

Intensive Assistance instead of Reconnection Plan

Any offer of more 'direct assistance' after disconnection – for example: parking the debt and allowing the consumer to pay for usage only – implies that an energy retailer has not provided adequate assistance to keep that consumer connected to supply. Disconnection is, therefore, not a last resort action. We recommend more 'intensive assistance' prior to disconnection rather than the 'reconnection plan' in the draft report's proposed regulatory framework. We are pleased that the ESC has subsequently acknowledged that consumers do not need to get disconnected before receiving the 'direct assistance' that is offered under the 'reconnection plan.' This needs to be included in the finalised framework.

In suggesting more 'intensive assistance' prior to disconnection, CUAC is not suggesting that we support prepayment or supply capacity control 'tools'. Indeed, it is positive that the ESC has subsequently clarified that there will be 'other tools' apart from these, available for consumers.

On supply capacity control, as previously mentioned, low income households are already rationing their energy supply. There are safety and health risks associated with supply capacity control products. We have many unanswered questions including:

- How do you ascertain the minimum kilowatt needed to run basic household appliances in each household given that there are many variables affecting household usage?
- How do you justify restricting usage in a household with young children?

If the ESC is contemplating allowing energy retailers to roll out this product, CUAC recommends that the ESC:

- Undertake a cost-benefit analysis and robust consumer testing; and
- Develop strict constraints/restrictions on how this product is to be used.

Supply capacity control effectively undermines the spirit of clause 76A of the Energy Retail Code v.11, which prohibits the use of supply capacity control as a credit management tool.

CUAC is not opposed to the idea of 'prepayment' if a consumer can afford to prepay. The problem is that consumers in chronic payment difficulty or financial hardship cannot afford to prepay. Our primary concern with prepayment is the potential for automatic disconnection when the credit runs out, which will not be visible to energy retailers, the ESC or the community.

Need for stronger disconnection and reconnection provisions

Earlier in our submission, we mentioned the need to strengthen the disconnection and reconnection provisions to address the 'cost' of disconnections.

CUAC's regulatory report[11] published in May this year highlighted the reduction in consumer protections (including the disconnection provisions) that arose with the replacement of the previous Energy Retail Code (v.10a) with the current Energy Retail Code (v.11). On the basis of our research findings,[12] CUAC recommends that the ESC:

1. Review the disconnection provisions in the Energy Retail Code (v.11) to ensure that they are relevant to current market conditions.

2. Review and tighten the diminished disconnection provisions under the Energy Retail Code (v. 11). In particular to:
    a. Ensure that all the disconnection provisions in the Energy Retail Code (v.11), which are key consumer protections, apply to market retail contracts (currently this is unclear because of inconsistent drafting); and
    b. Amend the timeframes and notification requirements between the issue of a bill and actual disconnection for all the disconnection scenarios outlined in the Energy Retail Code (v.11), so that they are not lower than the previous Energy Retail Code (v.10a).

3. For dual fuels, to include in the Energy Retail Code (v.11), the previous Energy Retail Code (v.10a) requirements on dual fuel, including:
    a. A statement with the disconnection warning notice advising customers when their gas and electricity supply will be disconnected; and
    b. A further disconnection warning notice before the customer's electricity supply is disconnected.

4. For shortened collection cycles, to include in the Energy Retail Code (v.11), the previous Energy Retail Code (v.10a) provisions on shortened collection cycles, with a view to maintaining the same:
    a. Notification requirements before a customer can be placed on a shortened collection

[11] Consumer Utilities Advocacy Centre (May 2015), CUAC Regulatory Review: A Critical Review of Key Consumer Protections in Victoria (vol.1); A Comparative Analysis of Key Consumer Protections in Victoria (vol.2).

[12] Ibid 16-17 (vol.1); 15-28 (vol.2).

cycle; and

b. Timeframes between the issue of a bill and actual disconnection (this should apply to both standard retail contracts and market retail contracts

5. Amend the Harmonised Code (v.11) to ensure that the connection and reconnection timeframes apply to both standard retail contracts and market retail contracts.

While smart meters make disconnection an automatic process, we must not lose sight of the fact that there is a person/family adversely impacted by disconnection. Every reasonable effort should be made to contact a consumer before disconnection. In this regard, CUAC recommends:

- Strengthening the disconnection process and 'Operating Procedure Compensation on Wrongful Disconnection' to include a requirement for face-to-face contact between a consumer and retailer/distribution business before disconnection; and

- Adopting Consumer Action Law Centre's recommendation in their *Heat or Eat* report to have the decision to disconnect someone taken out of the hands of energy retailers, and made instead, by an independent arbiter who can provide the necessary oversight for such a significant action.[13]

CUAC's recommendations will complement the legislative amendments in the *Consumer Protection Bill 2015* – increasing the wrongful disconnection payment to $500 and the introduction of a $5,000 penalty – and, hopefully, significantly reduce the disconnection rate.
According to the draft report (p110), reconnections are through 'EWOV or another registered third party.' It is unclear if consumers or financial counsellors/other support services acting on consumers' behalf are able to facilitate reconnection. They should be able to do so. We ask the ESC to clarify this in their final report. In addition, it is important that consumers understand what the various pathways to reconnection are. Energy retailers should communicate this information to consumers clearly, especially at the time of disconnection to facilitate a smoother and quicker reconnection.

Disadvantaged customers

> One aim of the proposed framework is to ensure that no customer with payment difficulties is disconnected if they engage with their retailer and cooperate with the active assistance provided by the retailer.
>
> 5. Are there any other groups of disadvantaged people in the community whose situation is not dealt with adequately by the proposed framework?

[13] Consumer Action Law Centre (Aug 2015), *Heat or Eat: Households should not be Forced to Decide whether they Heat or Eat*, p47.

It is not possible to come up with a definitive and exhaustive list of people in our community whose situation is not adequately covered by the proposed regulatory framework. As previously mentioned, the draft report's proposed regulatory framework does not provide solutions for people in our community who are in chronic payment difficulty or financial hardship, and who do not have money to pay for their ongoing usage, clear their arrears, or reduce their usage. This may include people on fixed benefits; large households, tenants living in poorly insulated homes, victims of domestic violence etc. It will also be hard for 47 per cent of the population who are functionally illiterate (this may include CALD communities and people with disabilities) to 'initiate' the process with their energy retailer.

Kildonan UnitingCare found through its two hour focus group session on 18 September with vulnerable energy consumers that the draft report's proposed framework will not accommodate this group of consumers. The participants indicated that early intervention through tailored debt and usage reduction measures should be implemented at the earliest opportunity via respectful conversations to achieve a meaningful outcome for them.

Implementation

> Implementation of change to the regulatory framework will require actions to be taken by all participants.
>
> 6. What steps are required to ensure that implementation goes smoothly?

Transition

> Before the implementation of any new framework there will be a transition period from the current arrangements to the date of introduction of the new framework.
>
> 7. What factors should the Commission consider during the transition from the current regulatory framework to the proposed framework?

Communication & Consumer education of new framework

CUAC understands that the ESC will have a strong communication piece on customers, focusing on developing constructive relationships between retailers and customers.

The communication piece should include a communication plan for the finalised framework. The finalised regulatory framework needs to be communicated to all interested parties , using multiple modes of communication – this includes consumers, financial counsellors and service providers. It would be useful to have a 'go-to' point at the ESC in case energy retailers have any queries on the finalised framework. Energy retailers will also need to communicate the finalised framework to their customers Merely putting this information on the website is insufficient.

Energy retailers and the Energy and Water Ombudsman (Victoria) will need time to train their staff on the finalised framework. Changes to internal processes or systems may need time to implement.

The transition to the finalised framework should not adversely affect consumers who are already being assisted by their energy retailers whether through payment plans or hardship programs.

Working groups

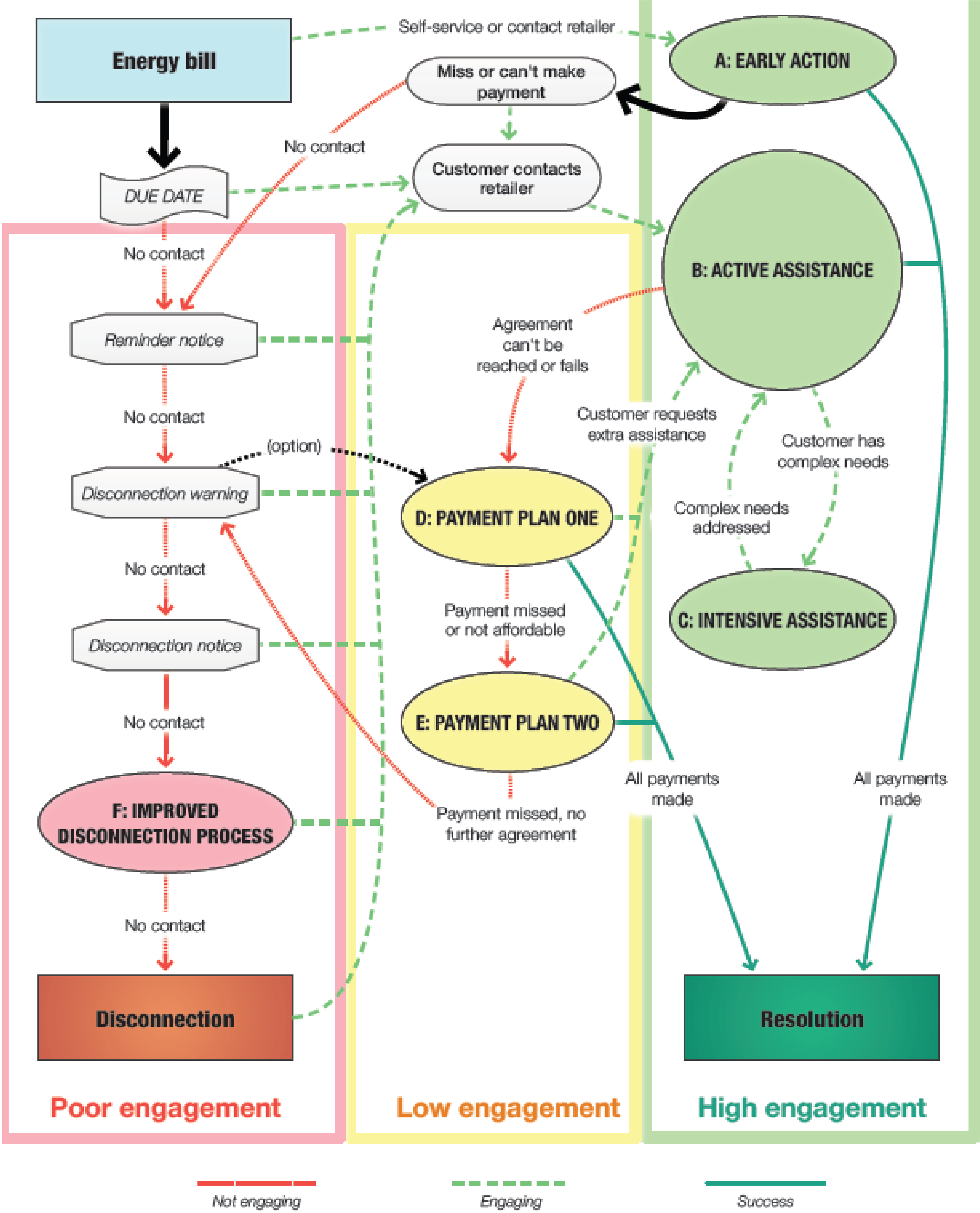
The working groups should be genuine working groups where consumer groups, energy retailers and the ESC work together to develop guidelines. It is unclear whether the guidelines that are to be developed are mandatory or optional. Would the ESC, for example, be able to enforce non-compliance under the proposed guidelines? This needs to be clarified in the final report.

Thank you for the opportunity to participate in the ESC's consultation on the hardship inquiry. Please continue to consider CUAC as an informed consumer representative organisation with a willingness to assist your activities in any way that will benefit the Victorian energy consumer.

If you have any queries on the above, please do not hesitate to contact Deanna Foong at [redacted].

Yours sincerely,

Appendix A



Energy bill
Self-service or contact retailer
A: EARLY ACTION
Miss or can't make payment
No contact
DUE DATE
Customer contacts retailer
No contact
B: ACTIVE ASSISTANCE
Reminder notice
Agreement can't be reached or fails
No contact
Customer requests extra assistance
Customer has complex needs
(option)
Disconnection warning
D: PAYMENT PLAN ONE
Complex needs addressed
No contact
C: INTENSIVE ASSISTANCE
Payment missed or not affordable
Disconnection notice
No contact
E: PAYMENT PLAN TWO
All payments made
All payments made
F: IMPROVED DISCONNECTION PROCESS
Payment missed, no further agreement
No contact
Disconnection
Resolution
Poor engagement
Low engagement
High engagement
Not engaging
Engaging
Success