

4 March 2019

General Manager
Consumers & Markets Branch
Australian Energy Regulator
GPO Box 520
Melbourne, Victoria 3001

TasCOSS welcomes the opportunity to respond to the Australian Energy Regulators (AERs) Draft AER Customer Hardship Policy Guidelines Version 1.

TasCOSS is the peak body for the community services sector in Tasmania. Our membership includes individuals and organisations active in the provision of community services to low-income Tasmanians living in vulnerable and disadvantaged circumstances. TasCOSS represents the interests of its members and their clients to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

TasCOSS strongly supports the intent of the rule change to develop a binding Customer Hardship Policy Guideline as a single point of reference for industry and to strengthen protections for customers experiencing payment hardship. It further endorses the need to provide customers with a clearer understanding of their rights and entitlements, while ensuring consistency in the interpretation of the new guidelines in the policy and practice change needed within the industry.

TasCOSS does, however, draw attention to the emerging disparity between National Energy Market (NEM) jurisdictions and Victoria through a lost opportunity for closer alignment of the AER Hardship Guidelines with the Victorian Essential Services Commission's new Payment Difficulty Framework which commenced on 1 January 2019 and has already shown to be reducing disconnections.

A TasCOSS representative participated in the Stakeholder Workshop on the AER's Draft Hardship Guideline on Monday 25 February and, together with a broad range of stakeholders, took the opportunity to provide feedback in place of a formal submission and as part of AER's consultation process under rule 173 of the National Energy Retail Rules.

In addition, TasCOSS has been engaging with a subgroup of energy consumer advocates around the AER Hardship Guidelines including the Public Interest Advice Centre (PIAC), Australian Council of Social Services (ACOSS), Queensland Council of Social Services (QCOSS) Council of the Aging (COTA), South Australian Council of Social Services (SACOSS), Uniting Communities, Consumer Action Law Centre (CALC) and Ethic Communities Council (ECC).

Consistent with the recommendation of the subgroup, TasCOSS endorses the comprehensive PIAC submission provided to the AER and in particular supports an emphasis on staff training, a focus on protections and accountability together with policy and practice change within the retail energy sector that will assist customers who have difficulty in meeting their energy bills.

Yours sincerely



Kym Goodes
CEO