Customer Vulnerability Strategy

CitiPower Powercor

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Acknowledgement of country

CitiPower, Powercor and United Energy acknowledge the Traditional Custodians of the lands across Victoria on which we operate, live and serve.

We pay our respects to their Elders past and present and extend that respect to all First peoples living on country in Victoria.

We recognise that these lands have always been places of deep spiritual, cultural and community connection for the First Peoples a connection that has endured for thousands of years and continues to grow strong today.

As a vital service provider on these lands, we understand our responsibility goes beyond delivering energy. We are committed to playing our part in creating a better, more equitable future.

This includes working to ensure that First Peoples communities across our service area have safe, reliable and affordable access to energy—a fundamental enabler of health, wellbeing, economic opportunity and cultural vitality.

We are committed to walking alongside First Peoples communities in a spirit of partnership and reconciliation, as we power the future for all Victorians.

1. Executive summary

As an essential service provider, we deliver electricity through our three networks CitiPower, Powercor and United Energy. Together, we serve customers across metropolitan Melbourne, regional centres and rural communities, reflecting a wide mix of demographics and socio-economic circumstances. While households make up most of our customers by number of connections, commercial and industrial businesses are the largest users of electricity.

Across the 3 businesses, our networks of poles and wires cover approximately 95,800 km² in length and supply electricity to more than two million customers.

Across our three networks we serve approximately two thirds of Victoria including the Melbourne CBD, inner urban and western suburbs, northern and western Victoria to the South Australian and New South Wales borders and bayside communities in the southeast of Melbourne.

We define the experience of 'vulnerability' as circumstances that result in lacking the resources (financial, psychological, informational and communal) needed to secure, maintain safe, reliable energy at fair and equitable cost that leads to harmful consequences as a result. Individual and situational factors that can reduce the availability of resources over the short or long term are multidimensional, dynamic and interconnected.

We note that even the term 'vulnerability' itself is imperfect when used to describe individuals and their circumstances and that labels can exacerbate challenges faced in communities and even prevent people from accessing additional services that may be needed or be helpful. However, our approach intends to respectfully address vulnerability and deliver services in a relevant and helpful way to the communities that we service.

Through extensive engagement, we have heard clearly that customers expect us to play an active role in supporting those in vulnerable circumstances. Customers and stakeholders have told us that in addition to what we provide today, more needs to be done to address the challenges emerging from the energy transition so vulnerable customers do not get left behind. We see our unique role in supporting vulnerable customers as a combination of the organisational skills and services, relationships, independence, physical presence, knowledge and data we capture. These specific aspects directly relate to supporting the risk factors of vulnerability that could result from financial, psychological, informational, community and the energy transition.

As an essential service, we take our role in Victoria seriously in making electricity safe and accessible for every customer. We honour our social licence by supporting all customers, including customers in vulnerable circumstances and ensuring fair access to the energy market. However, we also recognise that vulnerability is changing and that our response must adapt. Factors ranging from socio-economic

drivers, including income, housing, health, education, geography and demographics, through to customers' ability to engage with and access new energy technologies and interpret data that supports an individual and community agency to make informed energy decisions, all influence how vulnerability is experienced.

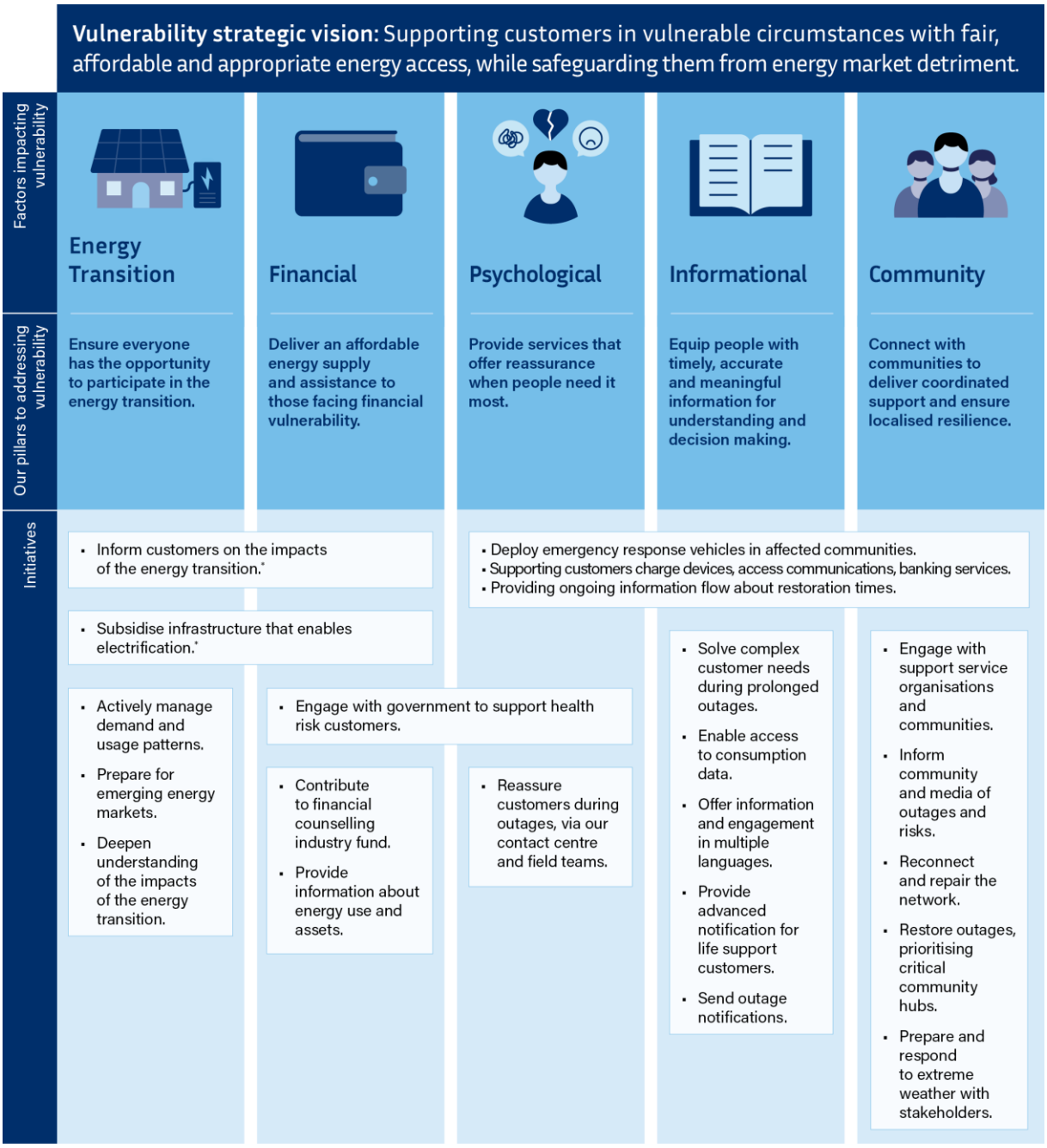
To address these challenges, we have committed to developing and delivering a Vulnerability Strategy (**strategy**) to support customers. It provides an overarching framework to:

- strengthen our understanding of customers in vulnerable circumstance so we can respond to address their needs
- bring clarity to our unique role as a distribution business, both within our organisation, across the industry and partners to ensure that the support provided is timely and relevant to us as a distribution business
- support the design, refinement and/or delivery of existing and new initiatives to be implemented from 2026 onwards.

This strategy has been developed through engagement with our customers, collaboration with our CAP, engagement with vulnerability experts, analysis of our internal and external data and a bespoke engagement with customers to directly support the key elements of this strategy. These inputs have ensured our customers remain at the heart of our approach and that the strategy is robust, forward-looking and responsive to customers' evolving needs.

An outline of how we are supporting customers in vulnerable circumstances is reflected in Graphic 1.

GRAPHIC 1. HOW OUR ORGANISATION IS SUPPORTING CUSTOMERS IN VULNERABLE CIRCUMSTANCES



* New initiative

Ownership of the Vulnerability Strategy is embedded throughout our organisation with accountability siting with two executives including: Corporate Affairs, Customer Strategy & Program Delivery, as well as Regulation. Senior leaders are responsible for delivery of initiatives and frontline staff play a vital role in identifying emerging vulnerabilities and delivering our specifically designed programs. External oversight is supported by our CAP who provide independent challenge and advice. All our initiatives will be subject to structured review cycles to ensure programs remain effective and relevant to our customers.

To support implementation, we are taking a continuous learning approach to remain responsive to customer needs and the evolving energy transition. Existing programs will be strengthened through feedback and performance data. New initiatives will be delivered using agile methods: trialled at a smaller scale, refined through feedback and expanded once proven effective. This approach ensures that delivery remains adaptive and is successful to ensure that customers are directly benefiting.

This strategy strengthens our organisational culture further, although teams already operate at a local level and work closely with the community to deliver reliable and affordable services; we need to ensure we remain alert to emerging risks of the energy transition impact on customer vulnerability.

2. What is vulnerability?

As providers of an essential service, we understand electricity is essential to every aspect of modern life. From powering our kettles and phones to fuelling public services, business and industrial centres, electricity is the lifeblood of our society.

Because of its importance, it is crucial that every person and business has equitable access to the electricity market. Supporting customers to build an understanding supports customer agency to make decisions, or take action based on their own best interest. Someone's inability to fully engage with this market can cause a vast range of issues that include overpaying on energy bills and missing out on the benefits that a low carbon future could bring. In more serious cases, as a result of the circumstances customers can face, improper use or lack of electricity can put people in life-threatening situations; this is the case, for example, where access to an electricity-power respirator is vital to one's wellbeing.

As a distributor, we have an important role to play in ensuring that electricity is accessible, safe and available to everyone, especially those in situations of vulnerability.

2.1 Definition

To support a common understanding, we have leveraged the definition of vulnerability from The Australian Energy Regulator (AER) and built on this to closely reflect what we understand about our customers in vulnerable circumstances. The AER has defined experiencing vulnerability as referring to:

> "Circumstances that mean a person may be less able to protect or represent their interests, engage effectively and/or are more likely to suffer detriment. This includes having insufficient capacity to pay for energy use."

Specific to our network and our role in the energy supply chain, we have developed the following definition.

Definition:

How our organisation as an energy distributor understands and identifies 'vulnerability:

Circumstances in which an individual or small-to-medium business are lacking the resources (financial, psychological, informational and communal) needed to secure, maintain safe, reliable energy at fair and equitable cost and suffering from harmful consequences as a result.

Individual and situational factors that can reduce the availability of resources over the short or long term are multidimensional, dynamic and interconnected.

They include:

- *individual circumstances: These factors affect a customer's financial resources and their ability to process and engage with complex information.*
- *time without power: The duration a customer is disconnected can directly contribute to or exacerbate vulnerability.*
- *situational circumstances: The broader environment significantly impacts risk. For instance, family and community support can mitigate the risk, while navigating a complex energy market or coping with the escalating effects of climate change can increase it.*

As individual circumstances, society, energy markets and the effects of climate change evolve, so too will the experience of vulnerability and associated risk factors.

2.2 Vulnerability risk factors

From the view of an electricity distribution network, vulnerability risk factors that can diminish the resources available to individuals, small-to-medium businesses and communities are grouped into three categories.

Individual circumstances	These include relatively stable personal factors such as income levels, chronic illness, literacy and English language levels. These factors can compound one another and may be structurally related. For example, a single parent with low literacy caring for a chronically ill child in poor quality rental accommodation, is more likely than others to be under financial and psychological pressure.

Situational circumstances	These factors can apply to anyone at any time. For individuals, these can include periods of ill health or distress, such as after death of a loved one, or a period of unemployment. For businesses, they may relate to local economic downturns or supply chain issues.
Time off power	This is a temporal factor, reflecting the cumulative impact of negative consequences that accrue over time. Some areas are prone to time off power due to geographical or network characteristics. Time off power may involve a high frequency of outages (and other issues such as brownouts or mandated disconnections in high-risk bushfire areas), the negative impact of which accumulates over a period of time. It can also occur as a one specific extended period, such as due to natural disasters or extreme weather events.

Figure 2 below highlights some of the factors which can increase the risk of experiencing vulnerability and examples of factors identified through relevant literature and consultations with customers and our front-line staff.

FIGURE 2. FACTORS THAT CAN INCREASE RISK OF EXPERIENCING VULNERABILITY

It must be recognised that all individuals, households or businesses can experience factors which make them vulnerable at different times of life. Sometimes individuals who may be classed as experiencing vulnerability do not necessarily perceive themselves as such. Sometimes experiences of vulnerability come unexpected and quickly, such as when a significant life event occurs and they find their usual resilience compromised, or when a business sees over time that they are increasingly disadvantaged by the capacity of energy infrastructure.

Customer context

The more factors faced by a customer, the greater the likelihood of experiencing vulnerability. This does not necessarily make them vulnerable, however, as family, community or industry context can mitigate the above factors. Context allows customers to borrow from other sources to access the resources they need to secure safe and reliable energy. This can include having family nearby who have access to a standalone solar generator, or a community service which helps customers access government concessions or compensation for damage caused by power surges. For small-to-medium businesses **(SMBs)**, it may involve support from industry associations or emergency services which seek to recognise the commercial or community impact of outages respectively. At community level, it may be the existence of a market regulator which acts to address market inefficiencies.

Vulnerability is therefore a function of a set of individual, situational and temporal factors, rather than a single defined state. It is dynamic and complex, with people potentially moving in and out of experiences of vulnerability at varying pace and with different mitigating circumstances. It can be triggered by external situations, like major life events, or by individual characteristics, such as health challenges.

2.3 The changing nature of vulnerability as a result of the energy transition

The energy transition

New challenges and ways for our customers to experience detriment, continue to arise. Many of the new challenges facing our vulnerable customers today arise from the ongoing transformation of the energy industry. This transformation, also referred to as the 'energy transition', can be broadly summarised by describing four fundamental shifts:

- **decarbonisation**: the Victorian Government has pledged our state to zero carbon emissions by 2045 as a necessary and fundamental measure to end its contribution to global warming and fight climate change. Meeting the net zero carbon target requires fundamental changes in the way we generate, use and store energy. Lowering the emissions of key sectors such as power, transport, heat and industry will shift customers towards more renewable energy, electric vehicles and low carbon heating solutions
- **decentralisation**: the closure of large fossil-fuelled generating stations, coupled with a large increase in small scale renewable generation and more homes and businesses generating more self-consumed electricity means that a significant proportion of the generating capacity is now connected to the distribution networks. Local networks and individual homes will increasingly play a vital role in running future electricity networks
- **digitalisation**: the introduction of smart meters at scale and low carbon technology equipped with modern sensors and smart digital appliances has

vastly increased the amount of data available. This gives rise to new services and products for the use of customers, networks and industry participants

- **democratisation**: the uptake of low carbon technologies, the rise in small scale renewable generation and the new products and services built on the wealth of the data being generated, give individual customers the ability to become ‘prosumers’. This is a fundamental shift away from the current model where the interaction with electricity is vastly passive and taken as a given.

Vulnerability arising from the energy transition

There is a broad community concern and a genuine risk, that the energy transition will leave behind customers who are already at higher risk of vulnerability due to reduced resources. Our experience and stakeholder engagement highlight three key concerns regarding increasing or compounding risks as the transition gains momentum:

1. **increased reliance on electricity (communal and safety risk):** as households and businesses move from gas to electricity for core needs (e.g., electric vehicles, electric heating, cooking, medical technology), customers become more reliant on electricity. Communities subject to frequent or extended outages will experience higher health, safety and comfort impacts. For instance, a property that once had gas cooking and heating may now lose all essential services during an electrical interruption.
2. **increased informational and psychological demand (engagement risk):** the evolving energy market requires new technologies, skills and capabilities. Customers will need sufficient psychological and informational resources to understand, engage with and benefit from this complexity. Those without these resources are expected to struggle with complex information and technologies like rooftop solar, batteries, or electric vehicle chargers.

3. **financial exclusion (equity risk):** accessing new technologies requires sufficient financial resources. Customers without adequate funds to invest in low-carbon technologies, demand management, or energy efficiency are at risk of being left behind and incurring additional costs as a result. This compounding of existing financial disadvantage is clearly illustrated by the challenges faced by rental tenants.

Structural barriers for renters

For those Victorians who rent, participation in the energy transition is particularly challenging. Renters have no ownership of the property and therefore cannot make permanent modifications like installing solar panels or new appliances without the landlord's permission. Landlords have little incentive to invest in these upgrades, as they do not directly benefit from the tenant's reduced energy bills.

We also know that Victorian rental properties are, on average, less energy efficient than owner-occupied homes, leading to higher energy bills for tenants (AHURI, 2022). This is because there is no incentive for landlords to invest in the upfront costs of energy-efficiency upgrades (like insulation or more efficient appliances) because they do not directly benefit from the tenant's reduced energy bills. While the Victorian government has introduced new minimum energy efficiency standards for rental properties, these are being phased in over time and are only triggered by events such as new leases or the end-of-life of existing appliances, meaning many rental homes will remain inefficient for years to come.

2.4 Additional drivers of vulnerability

Customers rely on financial, psychological, informational and communal resources to secure and maintain safe and reliable energy at fair and equitable cost. Factors that reduce resilience and increase the risk of experiencing vulnerability are those which diminish these resources, creating barriers to accessing safe and reliable energy supply at a fair and equitable cost. In addition to the energy transition noted above, we explore other risk factors below.

Financial resources

Financial depletion is the most immediate driver of vulnerability, directly impacting the ability to pay bills and invest in essential network or customer-side infrastructure e.g., upgrades. Financial pressure, or bill stress, can be associated with ongoing individual characterises such as chronic illness, disability or carer responsibilities, while temporary situational circumstances may include a period of unemployment or depleted savings due to significant and/ or unavoidable one-off costs. For businesses, financial resources may be limited during particular market cycles, such as in the lead up to crop harvesting for farmers, or during establishment of a new business or recent expansion into new markets. They may also be affected by

financial market dynamics, such as reduced availability of capital for business loans, tightened financial markets or increased interest rates.

Customer location and energy reliability requirements, also increase the costs associated with securing safe and reliable power. Location factors include things such as distance to network connection and reliability of the network area, as well as susceptibility to extreme weather and weather events such as storms, floods and fire. Energy intensive businesses may also require three phase power, which may not be available due to location along SWER (single-wire-earth return) lines and require significant customer investment in order to upgrade related infrastructure.

Bill timings and pressure points

The timing of bills has a significant impact on customers, particularly those on fixed incomes. Customers on the aged pension, veterans' payments or drawing on superannuation often prefer smoother, more predictable billing cycles, as it is difficult to manage multiple expenses arriving at once.

Around October each year, customers typically face a concentration of major household costs — including council rates, water service charges, telecommunications bills and potentially one of their largest annual energy bills. This creates a financial pressure point and increases the risk of hardship for those already managing tight budgets.

Other peak pressure periods include Christmas, when household spending typically increases due to gift-giving and social commitments. Families also experience higher energy usage during school holidays when children are home and appliances are used more frequently.

The timing and accumulation of these significant expenses are known indicators of increased financial stress and can lead to a higher likelihood of missed payments or risk of disconnection.

Support service organisation, stakeholder

Psychological resources

Factors that impede mental and cognitive health directly diminish the psychological resources needed to gather, understand, or utilise information, or even to manage daily life.

A significant driver of this depletion is financial stress. Persistent financial hardship, including difficulty paying ongoing energy bills or essential infrastructure costs, is increasingly recognised as a source of chronic stress and trauma (Crysalys Foundation, 2025). Furthermore, ongoing threats of utility service interruptions are an identified source of fear, shame and anxiety, acting as a severe psychological stressor that can worsen existing medical and mental health conditions (Columbia University Mailman School of Public Health, 2016).

Other factors that reduce psychological resources and resilience include:

- mental illness, including conditions that are chronic, periodic, or temporary
- cognitive impairment, including challenges arising from injury, disability, or as a function of ageing
- trauma, which can relate to a long history of complex trauma (such as family violence) or recent life events (such as a serious car accident or the death of a loved one).

These psychological barriers can preclude customers from developing or activating the personal knowledge, resilience, or other capacities required to effectively engage with energy markets, especially when the complexity, opacity, or emerging nature of these markets creates informational hurdles.

Financial stress

More households are under financial pressure due to the rising cost of living, making it harder for them to afford essential goods and services. Across Australia, customers on higher incomes are increasingly identifying as under financial pressure, with all income levels reporting higher levels of financial pressure (Energy Consumers Australia, 2024).

Financial stress is not merely a feeling of worry about money; it is a clinical state of psychological and physiological pressure that can have tangible negative impacts on a person's life (Australian Psychological Society, 2023). Research consistently shows a strong link between financial hardship and poor physical and mental health outcomes.

Customers under financial pressure are much more focused on finding ways to reducing energy costs than other members of the community. They will work hard to reduce their use such as choosing not to turn on heating or cooling systems and they are more likely to try to alter their usage to leverage off-peak tariffs where possible.

Informational resources

Factors that reduce a customers' informational resources are unique because they include characteristics of the market itself that create barriers to securing energy at a fair and equitable cost. These systemic barriers include market complexity and embedded information asymmetry (ACCC 2024).

The transition to a decentralised energy system, driven by increasing consumer adoption of solar, batteries and new tariffs, has introduced significant market complexity and exposed deep-seated informational inefficiencies within the Victorian and broader Australian electricity markets. The former model of centralised supply and simple, uniform tariffs has been replaced by a complex array of retail offers, time-

of-use charges and demand tariffs (ACCC 2024). This complexity represents a major barrier to energy equity, as it actively prevents a substantial proportion of consumers from engaging effectively with the market. Consequently, those who are already less engaged, typically those at risk of vulnerability due to factors already described, are unable to navigate the market to secure the best value offers, leading to a demonstrable "loyalty penalty" where they pay hundreds of dollars more annually than the median engaged customer.

Even in non-complex information environments, such as government provision of energy support payments, there are factors which create barriers to informational resources including poor English language, literacy difficulties and digital inclusion challenges (VCOSS, 2023)[1]. These factors are also barriers to sufficient informational resources and have led to recommendations for improved identification of customers experiencing energy vulnerability and related staff training.

Community resources

There are times when entire communities experience vulnerability as a result of the two types of vulnerability risk factors referred to above: personal characteristics and situational circumstances. Communities may share similar characteristics, such as socioeconomic status (SES) or share similar situational circumstances, such as being dependent on complex energy market conditions.

A distinct and critical risk factor is time off power, which refers to either frequent supply interruptions or extended outage periods. Time off power tends to emerge as a function of geographic location rather than just individual factors and has community wide impact on resources, as everyone’s resources are drawn down at the same time. Examples include geographic areas in which there is higher susceptibility to extended unplanned power loss caused by significant weather events and natural emergencies. In such circumstances, the whole of the local community is affected. Further, the longer the time off power, the greater the impact, particularly during extended outages.

For SMBs in particular, frequent or extended time off power can have drastic consequences which can reduce community resources in both the short and long-term. It is difficult to imagine many businesses which would not be negatively impacted by frequent or extended time off power given dependence of today’s economy on communication, computing and financial transactions. There are also other factors which may increase this impact, such as the extent to which the business is energy dependent. For example, butchers, grocers, cafes and supermarkets can quickly lose perishable stock, while poultry and dairy farmers can face high levels of animal disease and even death within one to two days of extended outages. Similarly, manufacturers may lose clients if they are not able to reliably

[1] These are the primary reasons identified by VCOSS regarding why eligible Victorians miss out on up to $793[1] in annual energy concessions and rebates

produce goods due to regular outages, or may be constrained in their physical capacity to grow due to network constraints such as unstable supply.

The impacts of diminished community resources are perhaps most apparent during severe weather and natural disasters when there is accompanying trauma already draining psychological resources and potentially looming recovery actions requiring significant financial resources. This linked to where the unique position we hold every day in supporting vulnerable customers is most apparent to the community and the benefits of investing in this capability is best showcased.

3. Responding to customer vulnerability

3.1 Purpose and vision

We recognise and embrace our duty to ensure that electricity is accessible, safe and available to every customer. We are proud of the role we play in safeguarding our customers experiencing vulnerability today and working towards ensuring that they have fair and equitable access to the energy market.

Driven by our organisation-wide vision to be a respected and trusted corporate citizen, we have defined a set of outcomes our strategy will strive to achieve for our customers in vulnerable circumstances. These outcomes define our role in addressing consumer vulnerability:

- fair and appropriate access to the opportunities presented by the energy market
- affordability of the energy supply above our organisation's impact on customer bills
- protection and safeguarding from detriment stemming from aspects of the energy market

To be clear, our vulnerability strategy is not about welfare payments, it's about agency; the ability to be informed and able to act. We believe through advocacy and empowerment we can best support our customers experiencing vulnerability and enable them to be equipped to navigate increasingly complex energy market.

Our vulnerability strategy directly aligns with our organisational vision *"To deliver affordable, reliable and safe supplies of electricity that empower our customers' choices and deliver services important to our communities and environment."*

The timing of this vulnerability strategy is critical. The energy transition is rapidly accelerating the complexity of energy markets customers face.

3.2 Our strategy principles

To support the development of this strategy and implementation, we have based it on four principles that include:

Customer-led

- ensure the strategy is informed by lived experience and actual customer insights to shape better decision-making processes
- build on our understanding of customers in vulnerable circumstances, including culturally and linguistically diverse customers
- we take care to ensure that our programs and interactions do not cause further harm. By adopting trauma-informed practices, we provide support that is safe, compassionate and respectful

Consistent and clear framework for decision making

- guide decision-making to support customers experiencing vulnerability this includes and not limited to processes, interactions, policy and advocacy positions
- ensure compliance with best practice design including regulatory and government standards
- enshrine a consistent approach that aligns with our role as a distributor.

Every employee is responsible for implementation

- a strategy developed by the organisation for customers to ensure it reflects our commitment to improving outcomes for customers in vulnerable circumstances
- every employee is responsible for delivery, with clear accountabilities and ownership of outcomes. From frontline staff with leadership of two executives across Corporate Affairs, Customer, Strategy and Program Delivery and Regulation; each of us plays a role in ensuring that our actions, interactions and decisions support customers and uphold our commitments.

Responsive

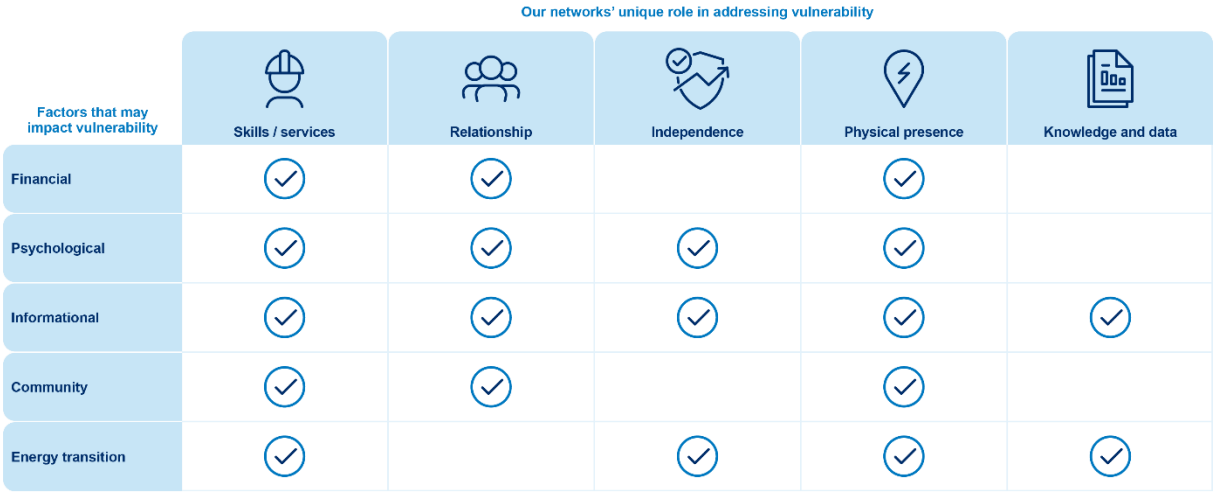
- adaptable to changing customer needs, market conditions and regulatory expectations
- dynamic and agile in how we respond which includes this strategy being a living document and updated following a clear governance and structured review cycles
- learnings are brought into broader business decision making.

3.3 Our unique role

Across the energy industry, there is a strong recognition of the importance of supporting customers in vulnerable circumstances. However, clarity is needed to avoid duplication and to ensure each organisation provides support within its unique role. Retailers, community organisations, advocacy groups and the regulator each have defined responsibilities in this space. Below, we outline the distinct role we play as a distributor to be part of the community context which helps to mitigate the risks of experiencing of vulnerability.

The figure below shows how these different aspects of our unique position can enable us to support customers where their access to resources may lead to experiences of vulnerability. These are discussed further below, including both current and potential additional ways in which we might leverage this unique position to reduce customers' experiences of vulnerability.

FIGURE 3: HOW OUR UNIQUE POSITION CAN MITIGATE VULNERABILITY RISKS



Skills and services

Every year, our frontline service staff provide support to over two million customers. Our staff are motivated by the desire to make sure our customers remain connected to safe and reliable power and respond swiftly to reconnect them when needed and support localised resilience. We know from experience that when customers are experiencing vulnerability, the quality of our response makes a significant difference. To provide the best support possible, we employ over 200 staff through three key service lines to ensure that when our customers do need us, we are there for them.

Our customer connections and requests team has over a hundred staff managing around 600-700 calls per week and 35,000 emails per year. They're responsible for turning customers' energy on and off, they physically add customers to the network (at a carefully regulated and lowest possible cost) and ensure the points of network attachment to customers' homes and businesses are safe.

This team also includes an energy services function, which supports renewables connections, including providing information to community groups including network data. This is currently provided on a transactional basis, but there is potential to increase this function to support a wider range of community members through the energy transition. Further to this, our customers have told us that there are third party operators who are promising renewables technology which either is not fit-for-purpose, or requires significant additional asset augmentation to work. This can carry significant costs to customers and highlights the need for independent information and a trusted source of knowledge in the community.

This team also looks after around 30,000 life support customers, who are some of our most clearly vulnerable customers by virtue of their physical dependence on power supply. Our team helps them develop backup plans in case of power loss and liaises with government departments including the Department of Families, Fairness and Housing (DFFH) and the Department of Health and Human Servies (DHHS) regarding keeping these customers safe.

Our customer operations team is responsible for supporting customers once connected to the network. Our contact centre fields around 1,000,000 calls per year with inquiries, complaints and questions. The compliance team is obliged to ensure that other customer-side infrastructure is safe and is also obliged to disconnect some properties on high bushfire days. The team also fields complaints from customers who are connected and report some level of vulnerability, such as being unable to afford to maintain customer side assets connecting them to the network. Other services include damage to assets and commercial losses in the event of power surges or weather events.

Our customer experience team takes a proactive approach to identifying and supporting customers at risk of experiencing vulnerability as result of individual, situational and time off power risk factors. The team manages all digital communication (social media, websites, portals) and issues regulatory notices and lots of proactive advice on planned (and unplanned) outages. This includes liaising with and updating broadcast media during outages and in the face of expected significant weather events. The customer experience team manages on ground support, including through the Mobile Engagement Response Vehicle (MERV), the Vehicle for Emergency Response and Advice (VERA) and various mobile generators. These are important emergency response assets when communities go off supply. We identify critical community hubs, such as hospitals, emergency shelters and relief centres and prioritise their power restoration during outages. We also set up MERV and VERA to supply emergency communications, emergency banking, phone charging and can become a default social hub for communities experiencing the trauma of extreme weather or natural emergency events.

This team is also proactive in promoting energy safety, using MERV and VERA at community events to provide advice and information on preparing for and responding to power outages. It also has engagement strategies for targeting communities with other identified vulnerability risks.

Caption: MERV and customer team

Relationships

Our relationship with our customers is unique in the energy sector; retailers may come and go but we develop enduring relationship with the communities we serve. As the descriptions above of our service line shows, we are interacting with the community and building relationships every day. One of the things we are most proud of is the development of a culture oriented to recognising and assisting vulnerability where possible. Taking this approach means we continue to develop our relationship with all customers but are particularly striving to develop relationships of trust with communities we know particularly need our support and advice.

These relationships are built up over years of managing local areas and provide us with insights into local community needs which cannot be gained by other arms of the energy market. We work with emergency services, the Department of Energy, Environment and Climate Action (DEECA) and local councils to prepare for and respond to events like floods, bushfires and storms. This involves work to build resilience within the energy sector from emergencies and minimise the impact on affected economies and communities. Additionally, we hold relationships with various groups such region specific committees, local community groups and sustainability groups. These groups are closely linked into their community or customers they represent and maintaining this relationship helps ensure we continue to understand the energy needs and changes at a community level.

Unlike other parties in the energy space, we are part of the communities we serve. Local depots and offices are located throughout our networks. Our employees are part of these communities and participate and live in the regional centres and towns through which we serve. Being part of the community provides a deep understanding of needs and expectations of customers. This is not easily replicable if your interaction with the community is via a national call centre.

Through these relationships, we have developed an understanding of how and why different risk factors generate, intersect and combine to create susceptibility to experiences of vulnerability and allow us to shape meaningful initiatives to respond to customer needs.

Independence

Our independence of retail and new technology markets allows us to provide unbiased technical advice and information to customers. We're already helping communities access the benefits of a modern energy grid, such as through renewable energy and battery storage. This can increase power reliability for communities in remote areas or those prone to frequent outages and ultimately help to reduce ongoing electricity costs.

The importance of unbiased and trustworthy informational resources cannot be underestimated in a period of such significant sociotechnological change within a market economy, as is presented by the energy transition. With such changes come business opportunities, but also the opportunity for misinformation and exploitation.

Information asymmetry is known market failure risk and we regularly hear stories from customers about having been misled or even taken advantage of by uninformed or ill-intentioned third parties. Unfortunately, by the time our customers inform us of the issue, it is often too late for us to help.

By boosting the informational resources of customers before they make investments in assets and technology which may not be fit for purpose, we have the opportunity to also help them avoid losing additional resources (particularly financial and psychological) and thus increasing rather than reducing their risk of experiencing vulnerability. We see the value of this increasing as energy supply and technological markets become more complex. Our independence from these markets places us in a unique and trusted position to advise our customers about what can or can't work in their network area.

As opportunities for large and small-scale electricity generation increase, our role is expanding, as we are effectively the backbone of the energy transition. We are the sole operator in each of our distribution areas able to connect renewable energy sources and facilitate export and imports to the grid. Even customers aiming to rely less on fossil fuel generation will still depend on our energy network for safe and reliable backup supply.

Our vision is to ensure the grid remains safe and reliable and help avoid a two-tiered energy system which ensures no customer is left behind in the energy transition.

Physical presence

Another aspect of our unique role in the energy market is our physical presence on the ground. This includes emergency response periods as described above, which are an important opportunity for us to support community resources, including information, social connection through facilities like phone charging stations as well as reassurance when people need it most. We also have an ongoing physical presence in the community through day-to-day activities like physically connecting properties, undertaking network maintenance and upgrades and safety activities such as tree clearances and connection safety checks.

We are also embedded in the community through our staff, many of whom live in or near the communities they serve. This again provides us with a unique insight into the communities.

Knowledge and data

As has been described above, we have unique insights about the energy network infrastructure we are responsible for managing, the demand and usage patterns within that network, existing and emerging markets and the community we serve. We are a critical source of information about energy supply during outages, short and long and understand the role of energy in people's lives in a way which is not available to other arms of the energy market.

We are in communication with our customers daily, gaining insight into how access to energy and loss of power affects their lives and the financial, psychological and informational resources they may be struggling to access in order to secure safe and reliable energy at a fair and equitable cost. We further support customers facing financial vulnerability through initiatives such as our contribution to the Financial Counselling Industry Fund.

3.4 Developing the strategy

To ensure the strategy is evidence-based, inclusive and aligned with best practice we adopted a comprehensive, multi-stage consultation and research approach. Each stage built on the one before, creating a comprehensive approach to understanding and addressing customer vulnerability.

Desktop research

The process began with a review of existing standards and frameworks in both Australia and the UK, including those set by the Australian Energy Regulator **(AER)**. This provided a foundation of best practice and regulatory expectations. A comparative analysis of sector strategies was also conducted to identify approaches that could be adapted to the organisaiton's context.

Internal consultation and initial insights

We began with a series of internal consultations, facilitated by independent research consultancy, Ipsos Australia. These consultations included our customer service leadership team and front-line staff to provide essential initial insights directly from those engaging with customers daily. This helped us identify what factors (individual, situational and temporal) can lead to experiences or risks of vulnerability.

These internal insights, combined with previous consultations conducted with communities in our networks, established an overarching view of:

- factors (individual and situational) that can lead to vulnerability
- the impacts of vulnerability on customers
- our current responses and ability to help.

Expanding understanding and external engagement

Drawing on this foundation and other established data and research, we sought to better understand how vulnerability factors and impacts are reflected across our three network areas. Some of these findings are detailed in Appendix A.4. Customers in vulnerable circumstances across the networks.

Building on this internal knowledge, we initiated external consultations with a diverse group of individuals and businesses known or likely to have experienced vulnerability and supporting organisations (refer to Appendix A.4 for details on who participated). Acknowledging the complex and dynamic nature of vulnerability, this sampling

included a range of factor types: personal characteristics, situational circumstances and time off power.

This external engagement stage was specifically designed to:

1. understand the current impact our organisation can have in easing or mitigating the challenges experienced by customers in a vulnerable state
2. explore how our organisation can optimise future support for vulnerable individuals and groups, especially in areas that may disproportionately affect customers in the future, such as through Australia’s energy transition and the escalating impacts of climate change (extreme temperature and weather events).

Throughout the framework's development, we have taken into consideration the perspectives of consultations we have undertaken with the general community, because as we have come to increasingly appreciate, drivers of vulnerability are not necessarily permanent or static; anyone can be at risk of experiencing vulnerability.

4. How we are supporting vulnerable customers

4.1 Customer impact criteria

To ensure we deliver the greatest value to customers, we have applied a clear set of impact criteria to guide the initiatives we have developed. These criteria reflect our responsibility to act within our unique role as a distributor, complementing existing support networks across government and industry. We want each action we take to be grounded in customer need and deliver transparent and meaningful outcomes.

Our customer impact criteria includes:

- customer and stakeholder led: initiatives should be designed based on customer needs and stakeholder insights evidenced through meaningful and robust engagement and research
- targeted impact: prioritise support for customers and communities experiencing the most acute or widespread vulnerabilities
- preventative focus: proactively reduce the risk of individual or groups of customers being 'left behind' through the increasing complexity of energy markets by addressing barriers before they deepen
- practical and scalable: a focus on solutions that are piloted, tested and deliverable and capable of being scaled
- within our unique role: initiatives are framed within the distinct role and responsibilities we hold as a distributor
- transparency and outcomes: initiative outcomes are clearly measurable and delivering meaningful outcomes
- value add: no initiative overlaps or duplicates existing services of government or industry participants without value being added that is aligned with our unique role in supporting vulnerable customers.

4.2 Initiatives

Today we already deliver a number of programs that have positive and meaningful outcomes for our customers experiencing vulnerability.

Table 4 outlines some existing initiatives that support customers in vulnerable circumstances

TABLE 4. EXISTING INITIATIVES THAT SUPPORT CUSTOMERS IN VULNERABLE CIRCUMSTANCES

Program	Objectives /goals	Customer impact
Via our website, we assist customers to download their consumption data before directing customers to existing resources (i.e. Victorian Government websites – Vic Energy Compare) to support customers manage their energy bills and help them to get onto the best retail deal for them.	To empower customers to better manage their energy bills by directing them to trusted, existing resources through our website along with their consumption data which is used to identify retail deals that may better suit their needs and reduce costs.	Customers gain easier access to reliable support services, financial relief options and practical tools to manage energy costs, improving bill management confidence.
Response vehicles to support customers during outages (providing information, coffee, tea, charging capabilities and internet access) Additionally, delivering key messages on restoration efforts and safety information for customers at community town hall sessions.	To support customer resilience and comfort during outages by providing timely information, refreshments, device-charging facilities, internet access and a place of reassurance. These vehicles support customers emotionally by helping them stay connected with family and community, while enabling them to plan and make informed decisions during an uncertain time. The vehicles also offer a communication channel alternative that is personal and physical for customers who may not have access or capability with digital channels.	Customers experience reduced anxiety and disruption during outages, gain access to safety and restoration information, remain connected with family/friends and feel reassured knowing there is visible, on-the-ground support available.
Attending community events to build energy literacy.	To support customers in preparing for and managing outages by providing clear and accessible information on weather-related risks, potential service interruptions and general energy information desired.	Customers increase their knowledge and preparedness, feel more confident navigating outages and increase their energy literacy.
Dedicated role to escalate complex customer cases. This role is empowered to provide a number of additional supports above and beyond our typical responses where deemed necessary. This can include making personal	To safeguard customer wellbeing during prolonged outages by providing access to paid hotel accommodation and food packages, ensuring comfort, safety and continuity of daily needs until power is restored.	Some immediate needs are met to support customers during extended outages.

contact with carers and support people, coordinating and paying for alternative accommodations, coordinating food or gratuity payments where appropriate.		
Translation and interpretation services for cultural and linguistically diverse **(CALD)** communities.	We translate a range of key information into commonly spoken languages in each of our networks. This includes multi language website information, plus multi language campaigns for key messaging such as our summer preparation messages – Be Safe, Be Smart Be Ready. These campaigns utilise multi language social media sites such as Weibo, Little Red Book, MPN and Yeeyi. Interpreter services are offered via our contact centre to ensure we can communicate with customers with English language barriers. Examples of translations are in Appendix A.5.	Supports CALD customer access critical safety, outage and preparedness information in their preferred language. This can support improved understanding and reducing risk during network events. Interpreter support and multilingual campaigns promote equitable access to information.
Life support customer (LSC) supports	We take a range of actions to support customers registered as life support, including: • providing a dedicated phone line that is prioritised above standard fault calls • utilising express post when issuing planned outage notifications rather than standard mail to provide additional time to prepare • proactively calling LSC after 20 hours during an unplanned outage to check on welfare and provide support • referring LSC information to DH/DFFH after 20 hours of an unplanned outage where	LSC experience improved safety and prioritised access to essential energy services. Proactive communication, welfare checks and prioritised fault resolution enable them to plan ahead, remain informed and maintain confidence in the reliability of their electricity supply that supports their wellbeing.

	they may be able to provide additional support • proactively calling LSC prior to planned outages to ensure they have enacted their plan and are prepared for the outage • issuing specific annual notifications and welcome packs to LSC with specific information relevant to their status as a LSC • not disconnect or de-energise LSC when retailers request this for non-payment.	
Contribution to Financial Counselling Industry Fund via organisational association with Energy Networks Australia. This funding is split between the Australian Energy Council and Energy Networks Australia.	To help address unmet demand for financial counselling services.	Increases access to independent financial counselling services for customers and individuals experiencing hardship.
Partnering with Monash University to undertake research program “Race for 2030”	This program supports three clear objectives that includes: • understanding how customers, including vulnerable customers’, daily lives will be impacted with the uptake of consumer energy resources • help our organisation understand and prepare for local and national impact of customer energy trends • building learnings into business planning on how we can best support vulnerable customers aligned to needs and preferences.	Improved product and services aligned with how we can support customers not be left behind within the energy transition.

Through our 2026-2031 regulatory proposals, we have sought to extend the range of initiatives addressing customers experiencing vulnerability. The proposed extension reflected feedback from customers, communities and stakeholders that the energy transition is deepening divides amongst our customers and that existing services and programs were not meeting the required need. It also reflected a recurrent message that trust in the energy sector is low. Whilst we don't shy away from being part of that energy sector, we were told repeatedly that are physical presence in communities, independence from the retail energy sector and oversight by regulators placed in a unique position to foster and develop that trust with customers.

The initiatives we included in our regulatory proposals were designed to satisfy our impact criteria. They also reflected our unique role in the energy supply chain. We expect that the impact of the initiatives will grow and evolve, as they mature and we find better and more effective ways to deliver and target them. We will constantly be revaluating the effectiveness of our initiatives in combination with the CAP as well as through direct interactions with our customers.

TABLE 5. NEW PROPOSED INITIATIVES THAT SUPPORT CUSTOMERS IN VULNERABLE CIRCUMSTANCES

Program	Performance measure				Unique role addressed
	Overarching measure	**CitiPower**	**Powercor**	**United Energy**	
Customer Assistance Package					
Vulnerable Customer Assistance Program Reduce energy-related hardship by lowering barriers to electrification and addressing essential infrastructure needs for eligible vulnerable customers.	Number of eligible households and small-to-medium businesses accessing reduced-fee upgrades to support electrification	**Overall households or businesses supported**			Skills & services Physical presence
		1,000	3,000	2,000	
		Key infrastructure support and estimated households and businesses accessing reduced fees			
		Pit installs			
		70	193	180	
		Fuse upgrades			
		900	2,500	1,800	
		Private-to-public for private overhead electric lines			
		N/A	150	N/A	

		Minor customer repairs i.e. switchboard defects, minor earthing issues			
		30	103	100	
Energy Care Improve energy literacy for customers in vulnerable circumstances through partnerships with trusted organisations.	60% of participants report an improved understanding of how to manage energy use				Skills and services Relationships Independence Knowledge and data
For both programs	Annual review of all customer vulnerability programs undertaken with the CAP to assess effectiveness, alignment with customer needs and opportunities for improvement.	• 100% of vulnerability programs reviewed by CAP aligned to governance structure • Documented “you said / we did” summary provided to CAP and referenced in public reporting			N/A

5. Governance

5.1 Internal governance

The strategy needs to be owned and embraced across our internal organisation. Hence our internal governance approach is designed to ensure that vulnerability is embedded across the entire organisation, with accountability at across multiple levels including:

- Executive Team – accountability sits across the executive team and lead by two executives who are responsible for the establishment and delivery of the strategy.
- Senior Leadership Group – accountability for delivery is shared across the Customer and Regulation teams
- Frontline team – as the first point of contact with customers, frontline staff play a critical role in identifying emerging vulnerabilities and informing program design. Their insights are formally reported into management and used to shape decisions, assess performance, ensuring that delivery remains grounded in delivering to success measures.

5.2 External governance and feedback loop

Ensuring our strategy is relevant and effective requires building timely feedback mechanisms and robust decision-making processes. This necessitates a structure that enables regular reviews and adaptive initiatives. Within the process mapped below, we have balanced responsiveness and a ‘learning-fast approach’ to ensure our resources are directed to maximise customer impact.

We have embedded a phased feedback process to ensure insights flow seamlessly from delivery teams to decision-makers. Importantly, customers and stakeholders can see how their input has shaped outcomes. Our feedback loop process includes:

- internal reporting – frontline staff report to senior management through findings and operational data that is escalated to the responsible executive. This ensures decisions are grounded in real experiences and evidence directly from customers
- external review –CAP, alongside ‘grass root’ customer panels, will provide independent challenge and advice on the design and delivery of initiatives
- 6-month review (years 1–2) – new initiatives will be subject to detailed review by the CAP, 6 months after implementation. These reviews will be focused on delivery, customer feedback and further refinements required before scaled roll outs to maximise outcomes for customers

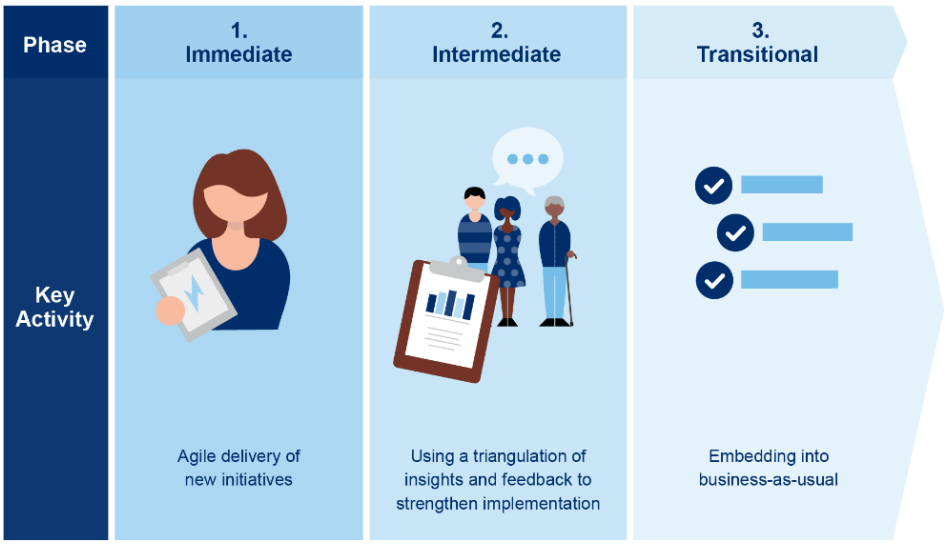
- annual reviews (year 2 onwards) – once initiatives are scaled, they will be reviewed on an annual cycle with the CAP and broader stakeholders, focusing on continuous improvement.

This phased process creates a continuous loop of listening, learning, augmenting as needed and finding areas of improvement. In this process we will evaluate initiatives through a set of evaluation principles (appendix A.3). It brings an agile in the early development of the new initiatives. This is to ensure optimal outcomes are being delivered to customers.

5.3 Continuous learning

Existing initiatives will not be stagnant. They will be continually reviewed and augmented to improve outcomes for customers. New initiatives will be delivered with an agile mindset, tested at small scale, refined through feedback and adapted before expanding. By embedding this approach, we ensure that our strategy remains dynamic and responsive to customer needs and evolution of the energy transition.

GRAPHIC 6. OUR APPROACH TO CONTINUOUS LEARNING INCLUDES THREE PHASES



Immediate

- agile delivery of new initiatives including:
  - internal training and set up to support implementation of new initiatives, including identification of customers in vulnerable circumstances
  - trialling programs on a smaller scale, gathering evidence of effectiveness and refining before broader rollout
  - using clear, customer-outcome metrics to assess the effectiveness and reach of programs, ensuring that impact, rather than activity is the key measure of success.

Intermediate

- using a triangulation of insights including data, customer insights and CAP feedback to strengthen initiative implementation, ensuring they remain relevant and effective. Data triangulation includes:
    - an always-on engagement approach to remain connected to customer needs
    - direct feedback captured through program implementation call notes and surveys
    - CAP feedback via our governance approach
    - insights and feedback from delivery partners
    - ongoing data analysis to identify emerging needs and trends
    - industry learning and collaboration, maintaining regular engagement with peers, industry bodies and regulators to share learnings, align with best practice and incorporate, both local and international insights into our evolving approach.

Transitional

- embedding into business-as-usual, ensuring lessons learned are integrated across teams so improvements benefit the wider organisation, not just isolated programs.

6. Living our strategy

We have millions of customer interactions annually across our organisation. To manage these interactions, we have established processes and procedures to support customers in vulnerable circumstances. Supporting customers is embedded in how we operate today and in the future.

It is important, however, that the processes and procedures we have in place do not become overly bureaucratic or stale and remain dynamic to maximise outcomes for customers as well as, empower and encourage front line staff interacting with our customers.

This strategy is to build on and strengthen, our culture of supporting customers in vulnerable circumstances by:

- bringing further clarity within our organisation as to who and where, customers in vulnerable circumstances are located across our networks
- supporting efficient and effective service delivery to customers through a consistent adoption and practice of responding to customers in vulnerable circumstances across the organisation
- identifying the ways and mechanisms we can assist customers in vulnerable circumstances given our position in the energy chain
- providing frameworks to support the effective implementation and delivery of new initiatives
- reinforcing or redesigning existing initiatives to align more closely with customer needs.

There is a lot more we can do to serve our customers. To support the implementation of this strategy, the following will be implemented into our organisation:

- training for senior management and frontline teams to build skills and confidence in recognising and responding to vulnerability
- inclusion in induction processes, ensuring all new employees understand our approach from day one
- sharing updates in company-wide and department-wide forums e.g. town halls, intranet communications
- organisational performance reporting, with progress on some new initiatives made visible through our Customer Commitments and inclusion in annual reporting.

A Appendix

A.1 Customers in vulnerable circumstances across the networks[2]

Our customers experience different vulnerability risk factors that can be specific to the network in which they live. While different vulnerabilities can exist anywhere across our network areas, some risk factors are more prevalent in specific networks. For example, the overall proportion of elderly Victorians (individual factor) is highest in United Energy's distribution area, but the risk of outage frequency and duration (time off power factors) is higher in Powercor's area due to the geographical expanse the powerlines must cover. We combined information from the Australian Bureau Statistics (ABS), Clean Energy Regulator and our own customer engagement to build a picture of the range of vulnerability risks faced by our customers. This data analysis is critical to support delivery of initiatives so we can design more equitable, effective and targeted support that is evidence-led.

Different vulnerability of risk factors, uniqueness of networks and information sources looked at:

- age
- income
- English proficiency
- education
- long term health
- unemployment
- rental status
- community volunteering rates
- Index of Relative Socio- Economic Advantage and Disadvantage (IRSAD) ratings for socioeconomic status.

We also considered time off power factors using our own knowledge of network outages and consideration of the Australian Disaster Resilience Index to consider capacity to adapt to climate change as the energy transition unfolds.

As will be seen, these indicated that customers in the Powercor distribution network area are, on average, at greater risk of experiencing vulnerability due to both individual and situational factors, as well as time off power. However, our CitiPower and United Energy network areas also have unique risk factor profiles which bring their own specific vulnerability risks and there is, significant variability of risk factor

2 Unless otherwise stated, data referred to in this section and related maps reflect data from the most recent census (2021) as provided by the Australian Bureau of Statistic (ABS). Data is provided only for postcodes in which at least 70% of the network is managed by that distribution provider. Adjustments have been made to postcode 3920 to avoid outlier effects given the unique population characteristics.

profiles across each of the networks, as is indicated by the factor heat maps in each section below.

Customer lived experience: Impact of 'underconsumption' among the elderly

Lin is a 70-year-old woman who came to Australia as a refugee and established a comfortable middle-class life with her husband. They have one son, own their own home and have gotten by on the pension for several years. However, increases in the cost of living - such as fresh food and access to medical care for her husband - have increasingly strained her capacity to pay for essentials and she is now cutting corners where she can.

Lin doesn't know who to ask about help for managing her energy bill, she distrusts government and thinks retailers are only after her money. As a result, she has effectively disengaged from looking at options to make her power more affordable. She grew up in a culture which values stoicism and the attitude of "I can do without" sees her now doing all she can to save money on power consumption, including by reducing her heating and cooling.

Her underconsumption has negatively affected the health of her husband, who suffers from multiple chronic illnesses. It has also reduced Lin's quality of life, as she now avoids socialising in her home, or becomes anxious about the cost of having people over due to related power expenses. Her priority now is to do whatever she can to keep her home because even though her son is settled in dual-income, middle-income households, he is also struggling with cost-of-living pressures, paying higher rents and getting caught up in of buy-now-pay-later schemes on multiple credit cards.

When Lin talks to friends her age and older, it gives her at least some comfort that she is not the only one forgoing heating and cooling in order to make ends meet and leave something behind after she is gone.

Customer support organisation, stakeholder

A.1.1 Powercor

Powercor's service area covers the western half of Victoria, including rural and regional communities. An overview of risk factors indicates that customers in this area are, on average, the most likely across the three networks to experience vulnerability. Noting however that we are among the most reliable rural networks in Australia. This is supported by demographic data concerning individual and situational risk factors, as well as network data and geographical attributes that increase the risk of frequent and/or extended power outages (time off power).

Demographic indicators of risk that are highest in the Powercor network area include the proportion of people with long-term health conditions, lower education levels, single parent households and low levels of socioeconomic status. The elderly population is also relatively high (though not the highest in Victoria), while overall unemployment rates are close to the state average. On the positive side, the Powercor distribution network also has lowest rate of renters.

While it also has the highest levels of Solar Generator Unit (SGU) installation, particularly compared to CitiPower customers, this is likely a risk mitigation feature in response to the network and geographic attributes that generate higher vulnerability. The vast distance covered by the network and the sparse population across broad expanses mean Powercor customers are the most vulnerable to time off power risk factors. The number and duration of unplanned interruptions across rural and regional areas are significant compared to more urban or peri-urban areas. Coupled with geographical isolation, this presents a substantial level of risk. Other physical factors also increase the time off power risk, including vegetation and high bushfire risks.

Regional and remote communities have told us[3] that they feel isolated when natural disasters impact energy reliability. They are particularly interested in Stand-Alone Power Systems (SAPS), which remove customers' dependency on the standard network of poles and wires, offering greater supply reliability to end-of-line customers or those in difficult-to-access terrain. Uptake of solar generator units indicates a community-level awareness of their vulnerability to power outages and is consistent with the lower relative level of rental households compared to owner-occupied homes.

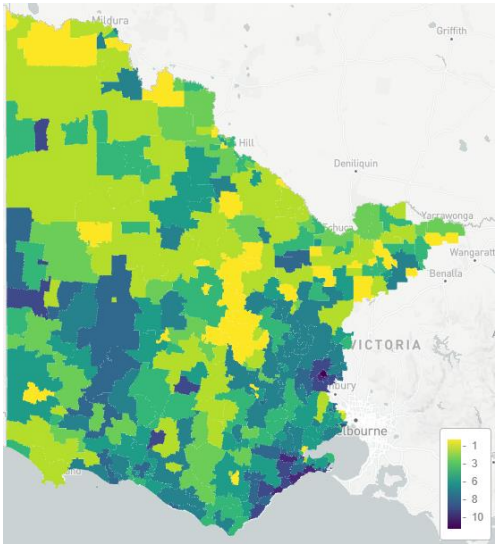
As can be seen in the following graphs, the sociodemographic vulnerability factors are not uniform across the network; they tend to balance one another out. For example, there are more renters but fewer elderly populations closer to metropolitan Melbourne. However, even these differences are less pronounced than those in the CitiPower and United Energy network areas. By contrast, the time off power risk factors, in terms of both frequency and duration, are more pronounced in postcodes within the less populated rural and regional areas.

FIGURE 7: SELECTION OF VULNERABILITY RISK FACTORS ACROSS POWERCOR NETWORK

[3] Customer and Stakeholder Engagement Strategy: Stand-Alone Power Systems, Citipower and Powercor, 2023

Powercor: Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD) by postcode

Socio-economic disadvantage is more prevalent in regional and rural locations.

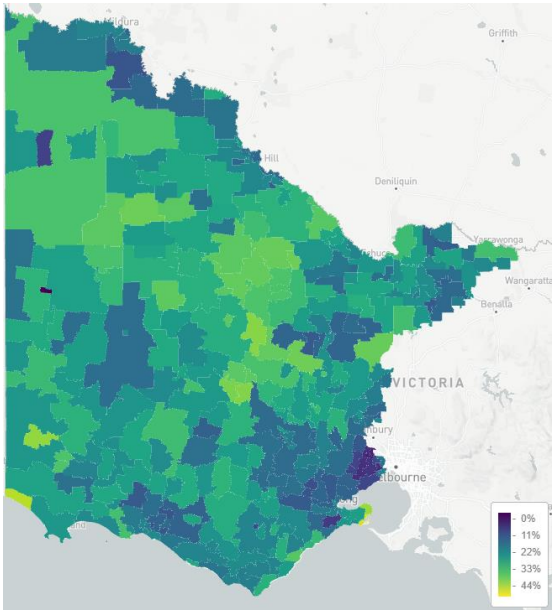


Key: A low score indicates greater disadvantage (e.g., low income, high unemployment), while a high score indicates greater advantage (e.g., high income, high education)

Source: ABS census data, 2021

Powercor: Percentage of older Victorians (65+ years) by postcode

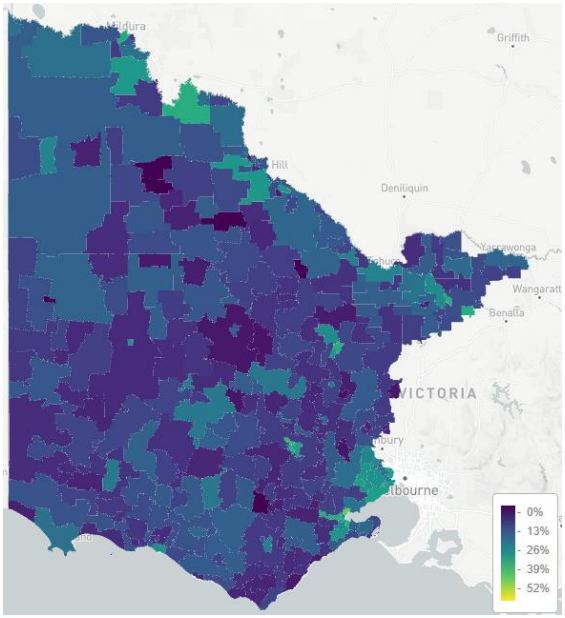
Higher percentage of older Victorians are seen in rural areas.



Source: ABS census data, 2021

Powercor: Percentage of rental properties by postcode

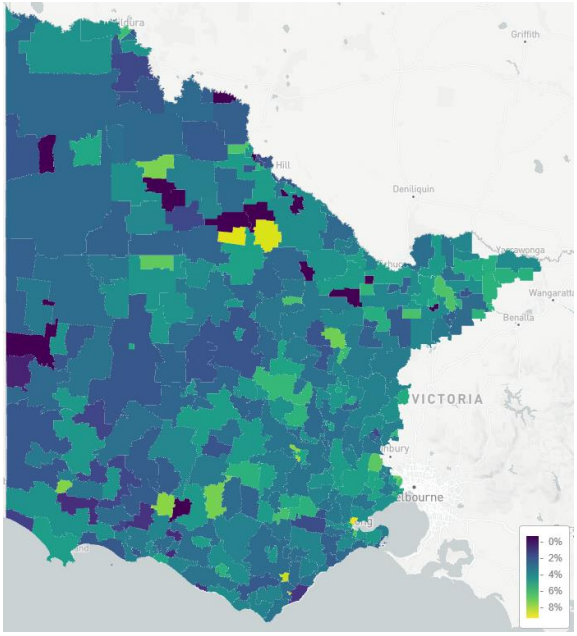
Rental properties are more prevalent closer to Melbourne CBD and along some parts of the Victorian and New South Wales border.



Source: ABS census data, 2021

Powercor: Percentage of single parent households, by postcode

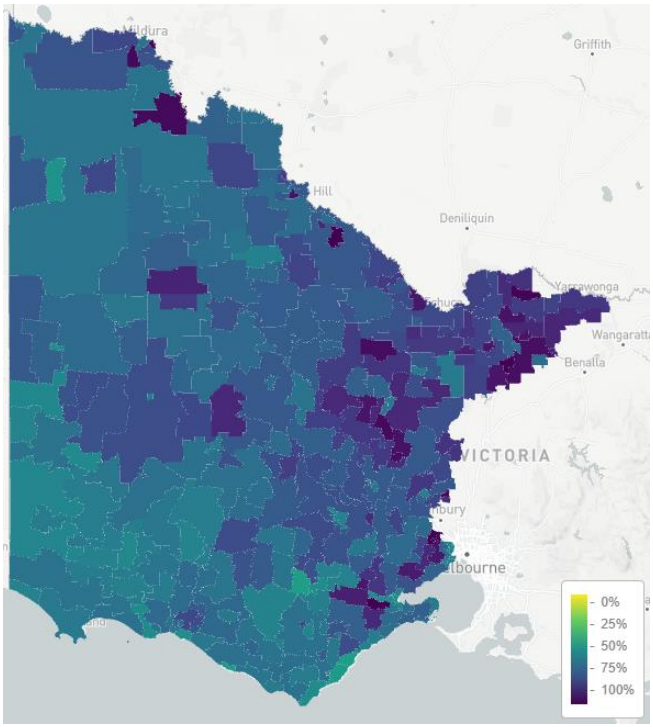
The percentage of single parent households is slightly higher in regional and rural areas middle to east of the Powercor network.



Source: ABS census data, 2021

Powercor: Percentage of households with solar power, by postcode

There is a lower percentage of solar uptake across southern, west and north-west Victoria within the Powercor network.



Source: Clean Energy Regulator, small generation units - Solar, 2025

Customer lived experience: Value to business of predictable power and well managed outages

Allegra runs an import/export wholesale/retail business and rents a building which serves as both showroom and warehouse. She is one of many similar businesses in a large industrial complex in Melbourne's inner-west. She is really grateful that her network distribution company has only ever scheduled power outages (such as for line maintenance) during weekends: usually on Sunday afternoons. She assumes this is done so that businesses like hers don't have to stop operations during the work week, which would impact her revenue and ability to get deliveries out to customers. She is also really appreciative of the early notifications about planned outages, as it means they can charge the forklift in advance if they're planning to move stock around on the weekend.

Fortunately, the business hasn't experienced any unexpected outages, but she thinks the impacts of this could be really serious. Her building is accessed through electric-powered gates and doors. If the power went off when the gates were down, she wouldn't be able to let customers in to pick up their goods or let incoming deliveries into the business. This would have flow-on effects not just in sales, but also in reputation. Her number one concern, however, is around the potential impact on security: if the power went off when the gates were up and/or doors were open, her key defence against theft or damage would be gone.

Allegra says she would like to install solar, because she feels strongly about the looming climate crisis and would be happy to invest in a system to reduce her emissions. However, this is not an option because she rents rather the owns the building from which her business operates. She wishes there was another way for her and other businesses in her industrial complex to access solar but is not aware of any options or who might be able to assist. She wishes the government would make solar compulsory for everyone so renters like her didn't get left out.

Powercor small-to-medium business customer

A.1.2 CitiPower

CitiPower serves the Melbourne CBD and surrounding inner suburbs, covering high density housing and commercial areas. It is one of Australia's highest performing networks for reliability (99.995% uptime), meaning the risk of time off power is very low. When events such as outages occur, the economic and social consequences can create a significant vulnerability. The density of high rise residential and commercial buildings poses unique risks such as when elevators and temperature control systems stop working. CitiPower also has the lowest number of SGUs across

the network, meaning that when power is lost, there are limited alternative electricity supply sources for customers and those with electric powered vehicles may be unable to leave the metropolitan area.

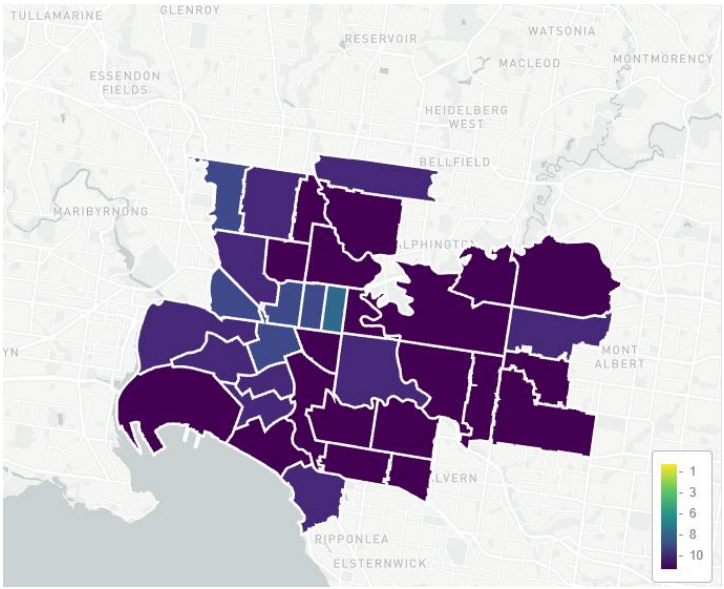
CitiPower's sociodemographic data also indicates a low average level of individual and situational vulnerability risk factors. Compared to Powercor, United Energy and Victoria overall, it has the lowest risk factors for chronic health conditions, elderly people, low SES, education levels, volunteer rates (that partially indicates community connectedness) and single parent families.

There is, however, very high variability in individual and situational risk factors across the CitiPower distribution area, as can be seen in the postcode maps below for a range of vulnerability risk factors. We also know that even within postcodes, there can be high concentrations of vulnerability, such as homeless and public housing high-rise tenants living alongside highly affluent Victorians, particularly around inner-city suburbs. This highlights the importance of being alert to the range of risk factors and context when assessing the relative risk of customer vulnerability.

Figure 8: A selection of vulnerability risk factors across the CitiPower network

CitiPower: Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD) by postcode

Social economic advantage and disadvantage is mainly homogenous across CitiPower customers.

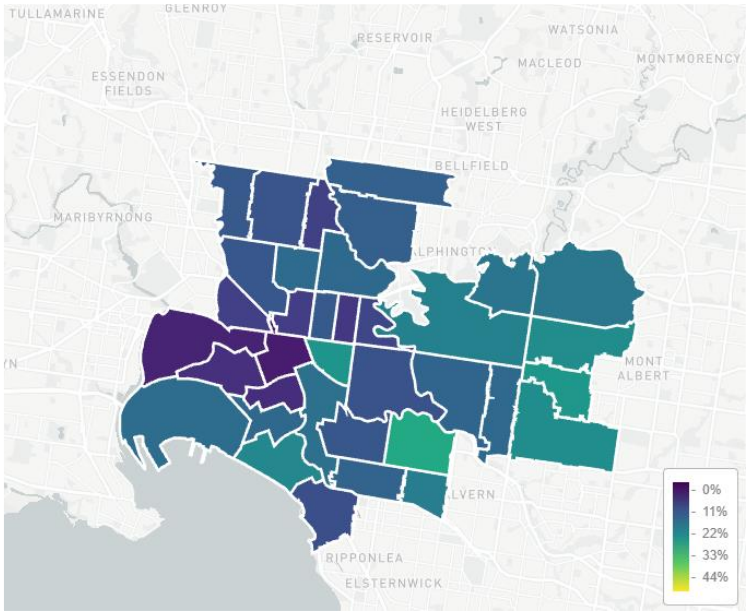


Key: A low score indicates greater disadvantage (e.g., low income, high unemployment), while a high score indicates greater advantage e.g., high income, high education.

Source: ABS census data, 2021

CitiPower: Percentage of older Victorians (65+ years) by postcode

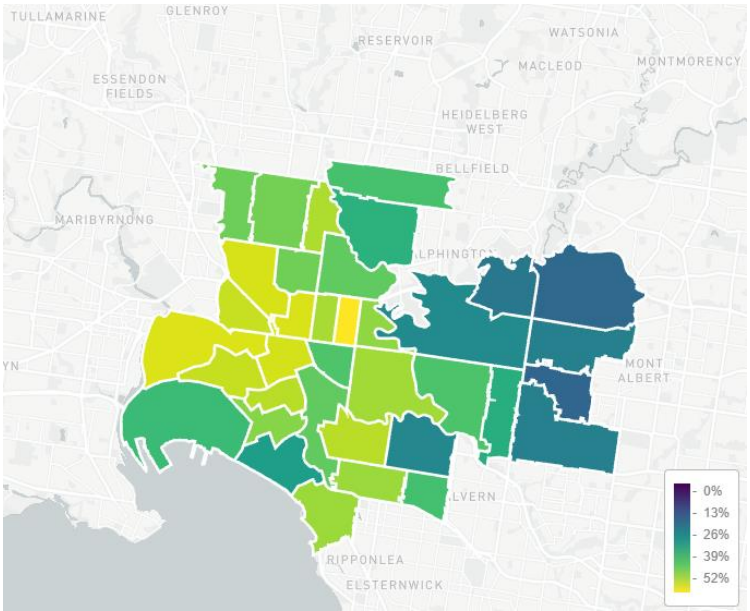
There is a higher percentage of older customers living east of the CitiPower network and Melbourne CBD.



Source: ABS census data, 2021

CitiPower: Percentage of rental properties by postcode

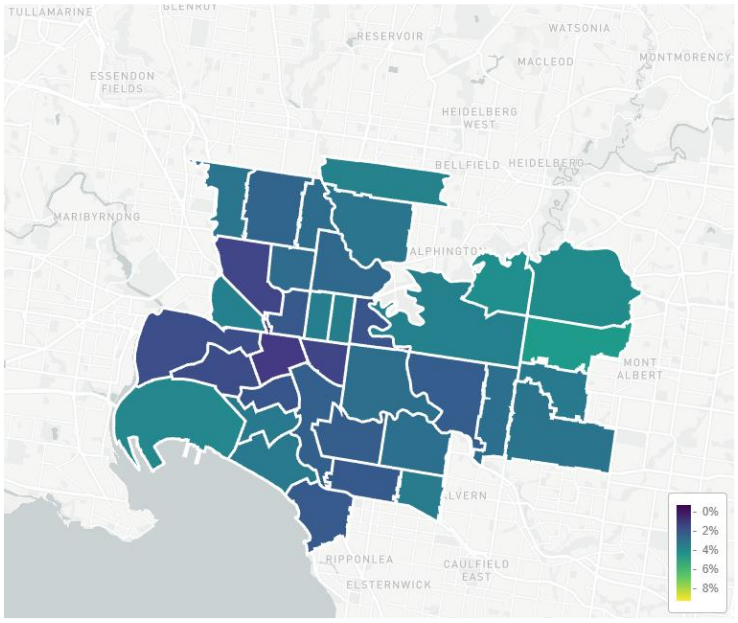
There is a higher percentage of rental properties west and within the Melbourne CBD.



Source: ABS census data, 2021

CitiPower: Percentage of single parent households, by postcode

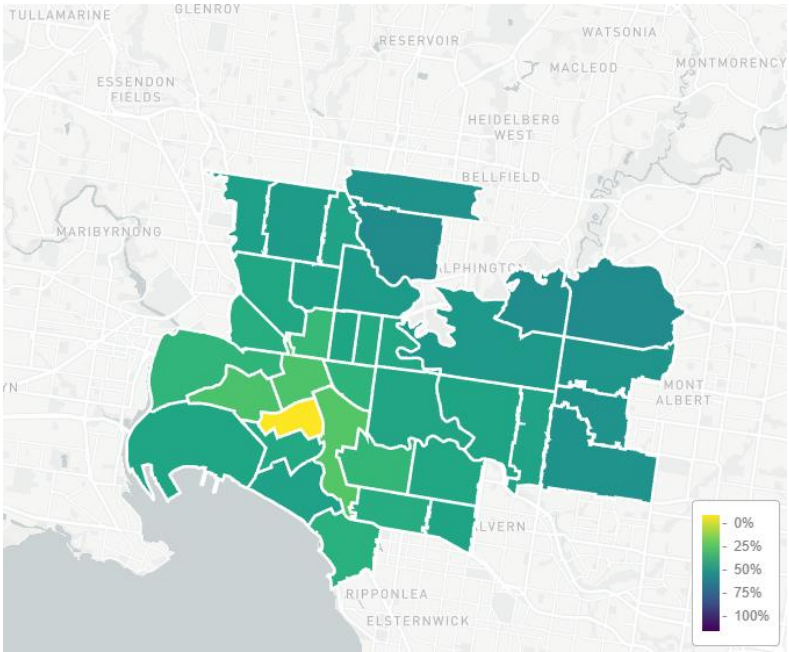
There is a similar spread of single parent householders across the CitiPower network.



Source: ABS census data, 2021

CitiPower: Percentage of households with solar power, by postcode

There is a similar spread of households without solar in the CitiPower network.



Source: Clean Energy Regulator, Small Generation Units - Solar, 2025

Customer lived experience: The personal nature of power dependency

Leo lives in his late mother's older house in an outer metropolitan suburb. The home is very reliant on traditional power sources.

He spends his time passionately engrossed in creating code using AI and studying computing philosophy. If there was a sudden power outage, his greatest concern is about losing access to the internet and related technologies. He knows he would need to deal without refrigeration, mobile phone charging and lighting, but these are not his primary concern.

Leo lives with a disability and uses ChatGPT as a mediation tool. He considers the possibility of losing access to ChatGPT as his greatest concern because it profoundly impacts his quality of life. To him, access to this technology offers him a sense of calm he cannot do without. Reflecting on the possibility of a prolonged outage, he said that without access to web-based technology, he would be in "a state of despair".

CitiPower residential customer

A.1.3 United Energy

The United Energy network serves a socially diverse region, primarily encompassing the growing, mixed-use, south-east and eastern suburbs of metropolitan Melbourne and the more disparate communities of the Mornington Peninsula.

The Melbourne suburban areas typically exhibit characteristics of high-density residential zones, a significant volume of commercial and industrial customers and a diverse range of socio-economic backgrounds and cultural communities as part of the broader urban sprawl. These areas are more likely to be rental properties and include postcodes with high migrant populations, concentrations of low SES and single parent households.

By contrast, suburbs in the general Mornington Peninsula area often have a higher proportion of ‘sea change’ residents, a large number of seasonal tourists and weekender households. The affluent coastal enclaves of Portsea and Sorrento, positioned at the far western tip of the peninsula, represent the high-end of this demographic, characterised by a notably older, wealthier population, a very high number of holiday homes and communities whose electricity use and priorities (like reliable supply for premium properties) differ significantly from the daily demands of the more inner-network metropolitan areas.

Embedded in the middle of the peninsula are areas such as Red Hill and Moorooduc which are more regional areas with small towns and farming communities. These communities tend to have higher SGU take up, perhaps because they are also situated in areas prone to higher risk of time off power.

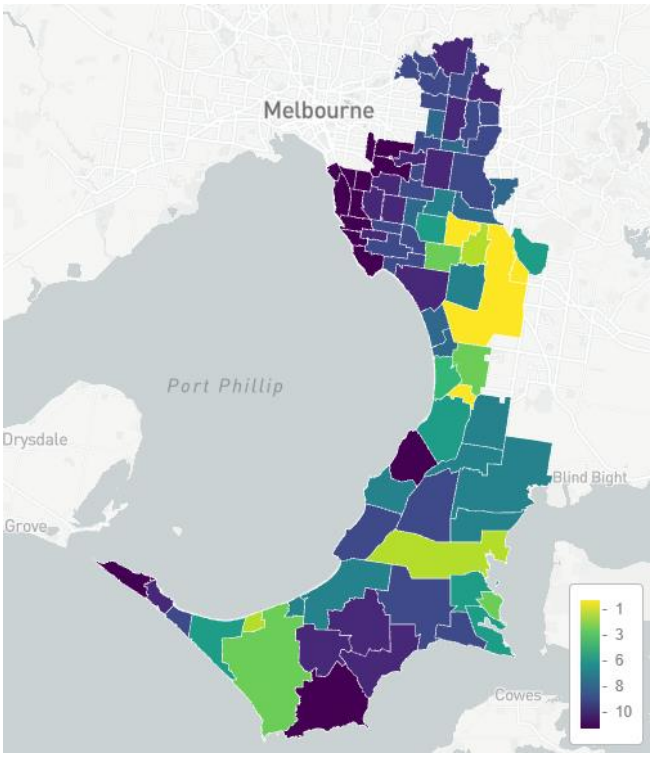
The high levels of tourists and weekenders lead to unique load demands and network challenges, particularly during summer, in areas of the lower peninsula. This means those visiting are exposed to the ‘time off power’ vulnerability factor which they may be unaware or unprepared for.

There is a high degree of variability across vulnerability factors, however, there appears to be a clearer clustering of similar customer types, with affluent sea-changers, regional areas and suburban areas with pockets of residents.

Figure 9: Selection of vulnerability risk factors across United Energy network

United Energy: Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD) by postcode

Lower socio-economic customers are seen in the south-east suburbs, further inland and some parts of the Mornington Peninsula within the United Energy network.

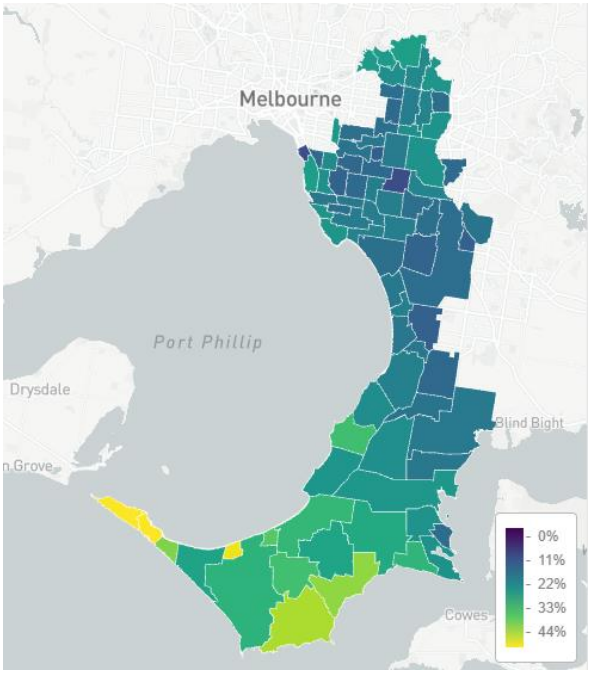


Key: A low score indicates greater disadvantage (e.g., low income, high unemployment), while a high score indicates greater advantage (e.g., high income, high education)

Source: ABS census data, 2021

United Energy: Percentage of older Victorians (65+ years) by postcode

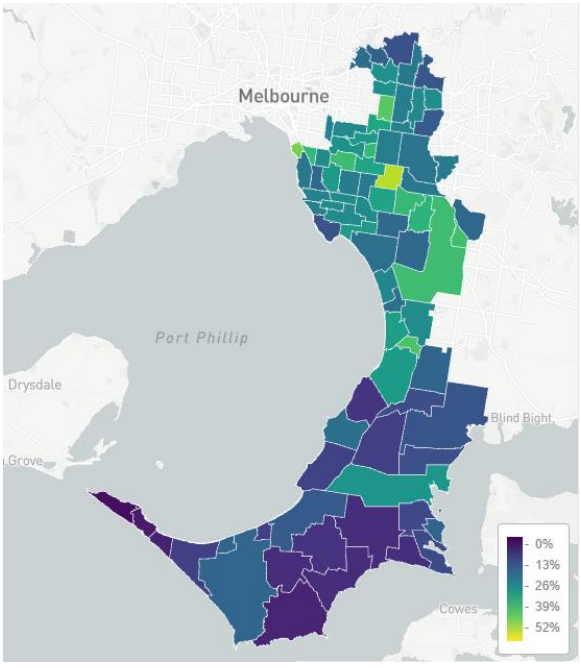
Older customers are spread across the network and are predominate along the at the end of the Mornington Peninsula including Portsea and Sorrento.



Source: ABS census data, 2021

United Energy: Percentage of rental properties by postcode

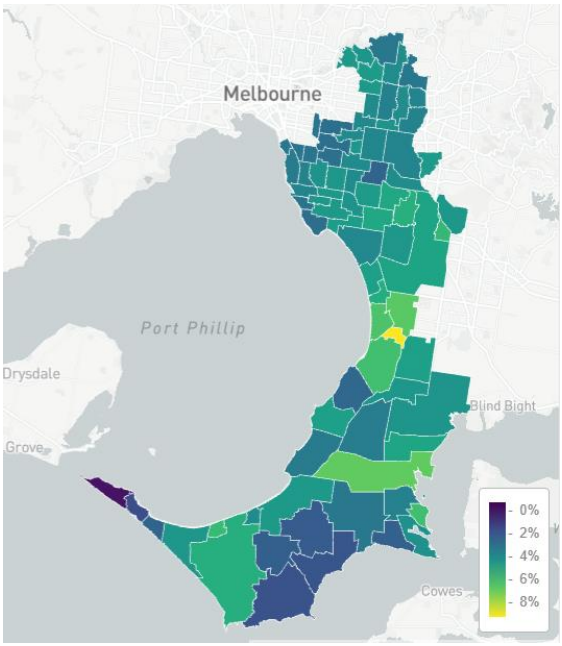
A higher percentage or rental properties is seen in the inner south-east suburbs of Melbourne.



Source: ABS census data, 2021

United Energy: Percentage of single parent households, by postcode

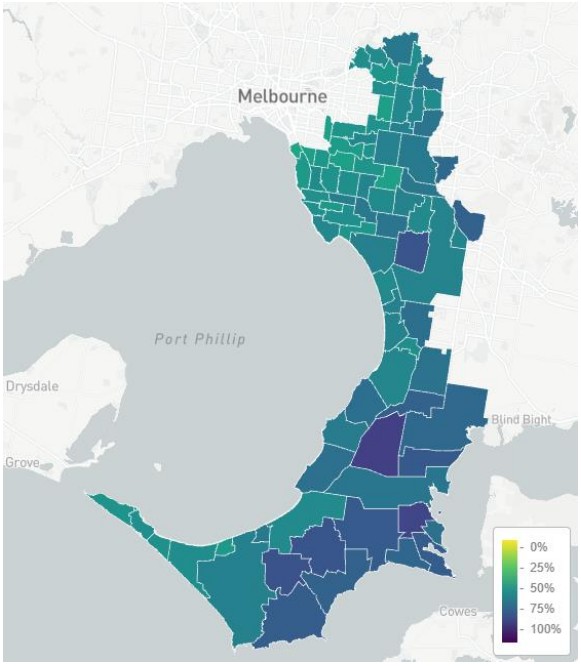
Single parent households are more situated in inner and outer suburbs of south-east Melbourne, with lower percentages seen across pockets of the Mornington Peninsula within the United Energy network.



Source: ABS census data, 2021

United Energy: Percentage of households with solar power, by postcode

Lower uptake of solar is seen in the inner suburbs of Melbourne.



Source: Clean Energy Regulator, small generation units - solar, 2025

Customer lived experience: Compounding effect of business and personal costs

Theo lives in regional Victoria and is a sole trader running his own business. His work uses large industrial printers and advanced digital technologies and he has contracts in Australia and in offshore markets.

Theo works predominantly from home, while caring for his daughter who has a chronic and debilitating illness.

Power outages are uncommon, but when they have occurred, they have been for prolonged periods; up to 24 hours. One outage resulted in him losing all the work he was progressing on his laptop and being unable to generate a hard copy because he could not use his printer. He missed a delivery deadline to one of his offshore contracts, meaning a payment was delayed to him for a period of months. He suffered reputational damage as a result and says he also thinks he lost future business.

Besides the substantial business impact, his sick daughter was also negatively affected in a way which he described as “extremely unpleasant and stressful”. Her illness requires consistent temperature regulation (heating and cooling) and also leaves her sensitive to gut microbiome issues brought on by spoiled food. Without a functioning freezer or refrigeration for a day, he had to throw out all their food as a precaution, resulting in further costs as a result of the outage.

United Energy, small-to-medium business

Customer lived experience: A Victorian carer’s experience with life support energy needs

In Bonbeach, Victoria, a full-time carer supports her partner with end-stage COPD who requires 24/7 oxygen concentration while raising their 10-year-old grandchild on a pension. Living in a rental for eight years, they face non-negotiable electricity costs for life-sustaining medical equipment. The oxygen concentrator she calls "the one thing we cannot do without."

Despite her tight financial situation and frustration with the retailer for inconsistently applying the life support rebate and the lack of resources to ease the cost of electricity through improvements such as solar panels, she maintains a pragmatic outlook: "It is what it is. We have a home".

The psychological burden of caring for a life support patient manifests as constant vigilance. Phones are always charged, oxygen bottles at the ready in case of outages, torch within reach. Despite only experiencing one 15- minute outage since living in her rental home, her sense of responsibility towards her partner drives a persistent underlying anxiety about the reliability of energy supply.

She manages this emotional toll through careful organisation and preparedness.

She values United Energy's proactive SMS alerts and warnings ahead of planned or potential outages and believes that they understand her household’s vulnerability. However, she lacks clarity over what support they would provide in the event of extended outages and hopes that they have clear protocols that would prioritise her household in this scenario.

Her experience with United Energy has been positive, giving her measured optimism that continued engagement will strengthen support systems. She asks for more communication in the face of outages, such as a welfare check phone call during extended outages and prioritising life support households in these events. For her household, reliable power isn't about convenience, but survival and clearer communication would transform current confidence into genuine security.

United Energy, residential customer

A.2 Future vulnerability and community resilience

More extreme weather events and participation in the energy transition are key factors which will shift or introduce new vulnerability factors in the future. The Australian Disaster Resilience Index (ADRI) is a tool that assesses the capacity of Australian communities to withstand, recover from and adapt to natural hazard

events like floods, bushfires and cyclones. It is a nationally standardised index measures relating to resilience based on two key areas including: coping capacity and adaptive capacity.

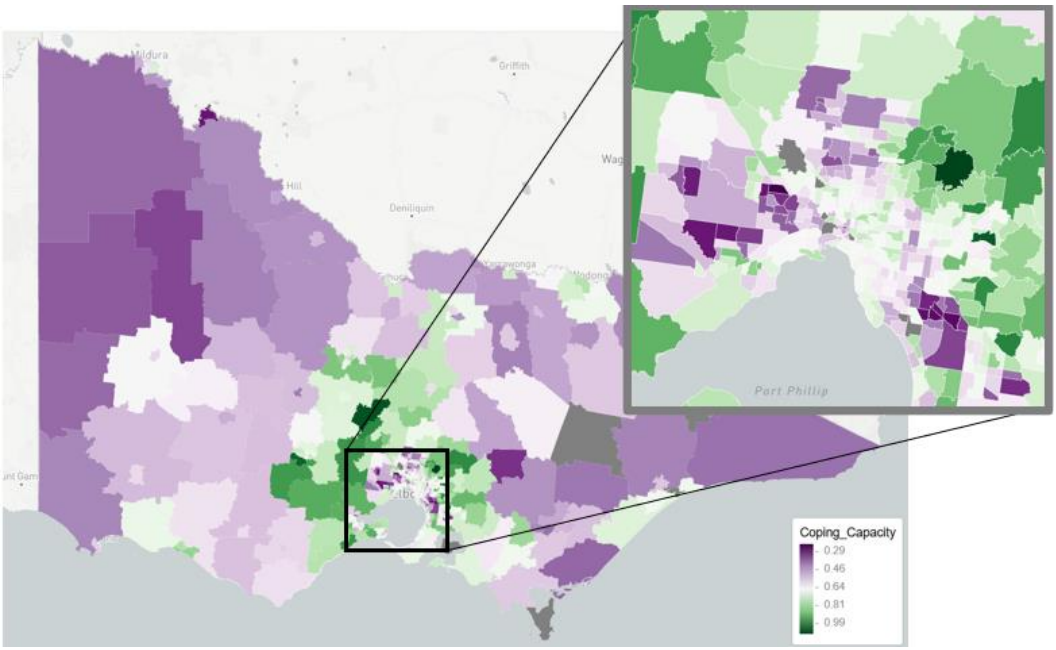
- ‘coping capacity’ mainly reflects current vulnerability to the immediate shock of a disaster. Communities with low coping capacity are likely to suffer greater immediate damage, loss of life and longer recovery times from a current hazard event.
- ‘adaptive capacity’, by contrast, primarily reflects future vulnerability and the long-term ability to reduce risk from changing and potentially intensifying hazards, such as those due to climate change. Communities with high adaptive capacity are better positioned to learn from past events, transform practices and implement long-term structural changes that reduce the impact of future disasters.

The overall index is generated by combining sub-indices from the two capacities, including currently available resources and abilities (such as financial resources) available for immediate recovery and emerging resources being facilitated by good governance, leadership community learning and information access.

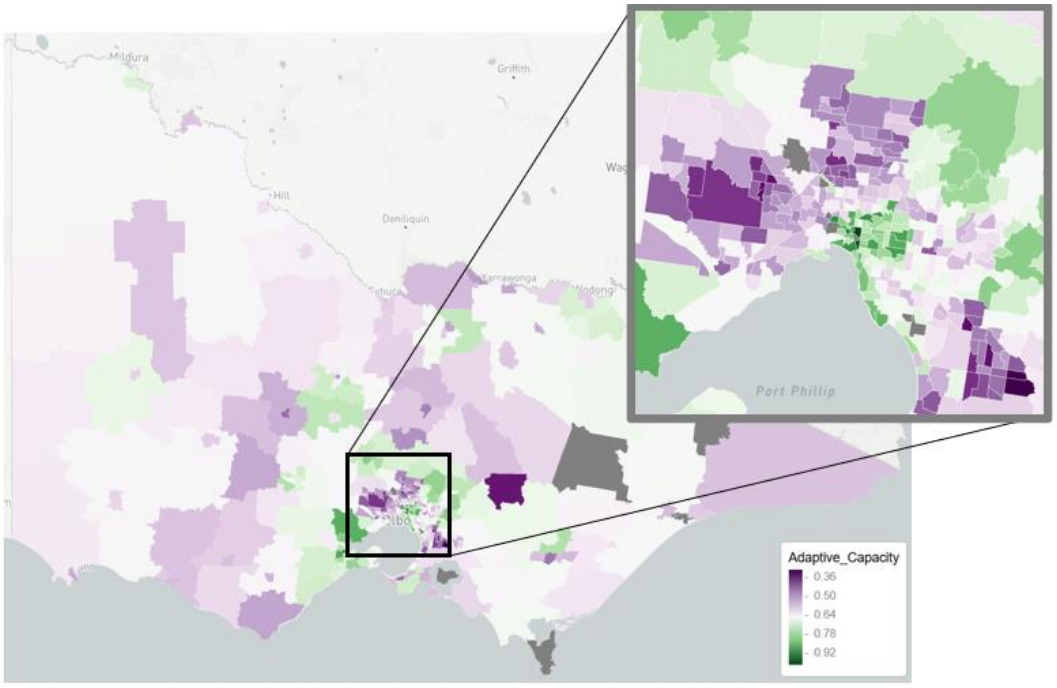
The Australian disaster resilience index (ADRI) in Victoria shows significant geographical variability, generally aligning with the national trend where disaster resilience capacity is higher in metropolitan and inner regional areas and lower in more remote and outer regional areas. This variation reflects the distribution of key resources and social factors measured by the index.

FIGURE 10: AUSTRALIAN DISASTER RESILIENCE INDEX: COPING CAPACITY, ADAPTIVE CAPACITY AND DISASTER RESILIENCE

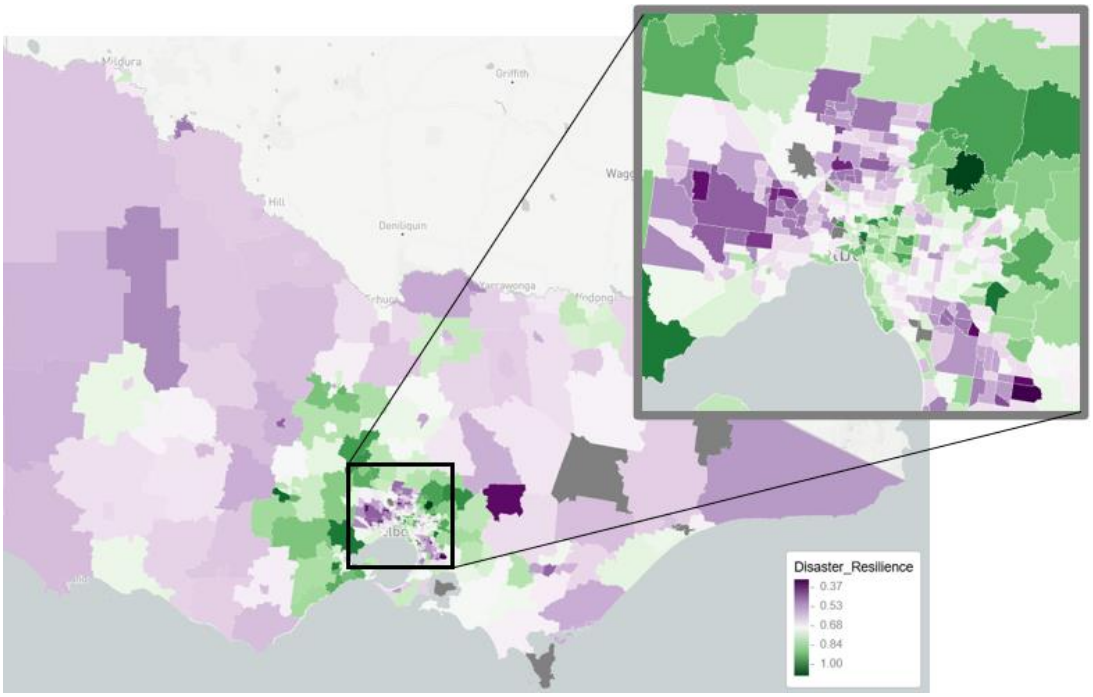
Coping capacity, Victoria



Adaptive capacity, Victoria



Australian disaster resilience index



As can be seen in the Victorian Australian disaster resilience index maps above, the areas currently most vulnerable to natural disaster, in comparison to surrounding Victoria, include remote and some inner-suburban locations. The communities which appear to be most protected are affluent inner city and bayside suburbs and regional areas between 1-2 hours of the CBD in the Central and Western Victorian regions

stretching from the central goldfields and spa country to the coastline of the Great Ocean Road.

Source: Australian Disaster Resilience Index: https://adri.naturalhazards.com.au/#!/

Key drivers of variability in the ADRI across Victoria is primarily driven by socio-economic and geographic factors specific to different Coping and Adaptive Capacity drivers.

	Key drivers of higher capacity	Key drivers of lower capacity
Coping capacity	Urban/metropolitan areas and major regional centres typically have higher scores due to: • higher wealth and income • greater availability and accessibility of emergency services • more developed infrastructure and regulatory planning • better access to information and media.	Outer regional, remote and peri-urban areas often face constraints from: • lower levels of wealth and income • geographic distance limiting emergency services response times and coverage • challenges in information access (e.g., poor telecommunications).
Adaptive capacity	Areas with strong civic participation and effective, flexible local government/ institutional arrangements for learning and transformation. Inner regional areas sometimes show high community capital and social/community engagement.	Constraints often appear in: • areas with low social cohesion or high social disadvantage (can occur even in metropolitan clusters) • remote areas with limited capacity for local governance and leadership to effect change.

Powercor has the greatest range and variability in ADRI, from high (major regional centres) to low (remote rural areas). Coping capacity is highly variable. Major regional centres have high economic capital and good services, however remote rural areas face significant constraints including: lower economic capital, sparse emergency services, limited or exposed infrastructure (leading to higher network unreliability) and poor information access (a major constraint in remote areas). Adaptive Capacity also shows pronounced variability. Community capital and

social/community engagement can be very strong in small towns (boosting capacity), but these are often counteracted by weaker governance and leadership resources at the local level compared to metropolitan councils. The geographic scale and dispersed population are also major limitations.

CitiPower exhibits the highest overall ADRI in Victoria. Coping capacity is extremely high, driven by very high economic capital (corporate and residential wealth), excellent planning and the built environment (underground network, dense infrastructure) and superior emergency services and information access. Adaptive capacity is generally high, supported by robust governance and leadership from state and city authorities and high levels of social and community engagement among its diverse, dense population.

United Energy's overall ADRI is high to moderately-high, with some pockets of lower resilience, especially on the peninsula. Coping capacity is generally high, benefiting from metropolitan economic capital and good infrastructure, but may be slightly lower due to more sprawling suburban and coastal areas, where some infrastructure is more exposed e.g., bushfire risk on the peninsula. Planning and the built environment is also more varied. Adaptive capacity is generally high in established suburbs. Lower-scoring areas occur on the Mornington Peninsula and can be constrained by issues like demographic factors e.g., older population, holiday homes reducing permanent community capital.

These observations align with the demographic and geographical vulnerability risk factors discussed earlier. They also indicate that Powercor regions are expected to remain the most vulnerable in terms of disaster resilience over time. While it is true most areas' resilience is projected to increase over time, there remain communities and individuals needing additional support to secure and maintain safe and reliable energy at fair and equitable cost amid the escalating effects of climate change.

A.3 Evaluation principles

Evaluation of new initiatives will include an external review process to ensure transparency, accountability and continuous improvement. The CAP will provide independent challenge and advice on the design, delivery and effectiveness of initiatives, ensuring they align with the intent of the strategy. Feedback and insights from the CAP will be integrated into program refinement, with outcomes reported through established governance processes.

The organisation will conduct a self-assessment of the principles prior to CAP review. This review will align with the evaluation principles outlined below to ensure consistency, transparency and rigour in assessing outcomes. These include:

- achievement of performance measures: extent to which measures are achieved, such as improved energy literacy

- equity and inclusion: evaluation will review who is accessing support and if support is being distributed equitably
- triangulation of insights: satisfaction with the documentation of additional insights that has strengthened the organisations understanding of vulnerable customers
- learning and adaptability: identification of learnings and the corresponding actions taken to refine or improve program design and delivery. This includes both within the delivery of initiatives, as well as broader business learnings
- transparency and accountability: reporting shared with the CAP and public reporting of “you said / we did” summary. Reporting also includes capturing feedback from customers who have participated in this strategy’s respective initiatives

A.4 Participants who engaged with us on the strategy

Sampling factors

In addition to vulnerable customer advocacy members, we applied the following sampling factors to ensure we engaged with a range of customers.

Primary engagement sampling factors:

- gender and life stage

Secondary engagement sampling factors:

- customer who had experienced an extended or frequent power outage (expect for CitiPower)
- self-reported difficulty in paying at least one bill in the past 2 years for essential services, housing or communications

Overall, we also engaged with a mix of customers across the following vulnerability factors:

- culturally and linguistically diverse
- lower income or individuals who receive support payments
- carers of elderly and or disability
- renting
- individuals with a disability

Sampling frame

Below is the total number of customers and support service organisation individuals we engaged with on the strategy across October 2025.

Category	Group Participants	Interview participants	Total
Total participants	**34**	**17**	**51**
Customers total	34	13	47
Support service stakeholders		4	4

A.5 Examples of translation and interpretation services for CALD communities

Examples of translated display ads

Examples of translated emergency communication brochures

For further information visit:

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