

# OPERATING EXPENDITURE

## CUSTOMER ASSISTANCE PACKAGE



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# 1. Overview

This attachment outlines our response to the Australian Energy Regulator's (AER) draft decision for the regulatory period 2026–2031. This document also details the additional work undertaken since the submission of our original proposal. It should be read alongside:

- UE BUS 9.02 – Customer assistance package – Jan2025 -Public
- UE RRP ATT 4.05 – Customer vulnerability strategy – Dec2025 – Public
- UE RRP ATT SE.01 – First People Advisory Committee Chair letter – Dec2025 – Public
- UE RRP ATT SE.02 – First People Advisory Committee Minutes – Dec2025 – Public.

Together these documents set out an understanding of the initiatives included in this attachment and our overarching approach to supporting customers in vulnerable circumstances.

This addendum presents our revised forecast for the Customer Assistance Package and includes the following:

- a summary of the background and intent of the Customer Assistance Package, including the five initiatives originally proposed
- an outline of the further engagement undertaken with customers and stakeholders since the January 2025 submission
- a synthesis of key insights gathered through these engagements, demonstrating triangulated evidence and broad-based support for the initiatives; and
- our response to the AER's draft determination.

The document also references the operational and governance frameworks established through the Customer Vulnerability Strategy, which defines our organisation's top-down approach to identifying and supporting customers in vulnerable circumstances. These frameworks, together with the bottom-up delivery models developed for implementation in 2026, form a co-ordinated and considered response to the supporting the growing needs of customers in vulnerable circumstances.

Our revised forecast for the Customer Assistance Package is presented in table 1.

**TABLE 1      REVISED PROPOSAL: CUSTOMER ASSISTANCE PACKAGE (\$M, 2026)**

<b>CATEGORY</b>	<b>REGULATORY PROPOSAL</b>	<b>AER DRAFT DECISION</b>	<b>REVISED PROPOSAL</b>
Energy care	1.4	0.4	0.4
Community Energy Fund	3.5	-	-
Vulnerable Customer Assistance Program	4.3	4.3	4.3
Energy Advisory Service	1.5	-	-
First Peoples Program	4.0	4.0	4.0
<b>TOTAL</b>	<b>14.7</b>	<b>8.7</b>	<b>8.7</b>

## 2. Background

In January 2025, we submitted five initiatives under the Customer Assistance Package, this included both First People specific programs, as well as programs designed to provide targeted and practical support for customers in vulnerable circumstances. Feedback from customers, advocates and stakeholders reinforced that distribution networks have an important role to play by actively supporting customers in vulnerable circumstances.

Our Customer Advisory Panel (CAP) has been instrumental in shaping this position. Across multiple engagements, the CAP has emphasised that while a range of support services already exist, further targeted action is needed to address the significant and growing needs of customers in vulnerable circumstances and our organisation has a key role in delivering this.

### **We have developed a customer vulnerability strategy to support initiative delivery**

Throughout 2025, the CAP encouraged us to bring greater clarity to the implementation and delivery of these programs. In response, we have adopted both a top-down and bottom-up approach. The top-down approach has focused on the development of our Customer Vulnerability Strategy, providing clear governance, oversight and clarity to who and where vulnerable customers are across our network. The strategy clearly defines our unique role within the energy supply chain. It articulates how our skills and services, relationships, independence, physical presence, and the knowledge and data we capture, enables us to directly respond to the risk factors that contribute to vulnerability. We have also developed a clear definition to more accurately identify vulnerable customers across the network to respond appropriately. The bottom-up approach has focused on defining the practical frameworks, processes and delivery considerations required to implement these initiatives as effectively as possible in 2026.

### **Further engagement has shown support for initiatives**

To support the development of our customer vulnerability strategy 51 customers and support service stakeholders were engaged with. The primary focus of this engagement was building a deeper understanding of the lived experiences and flow on impacts that energy on and off supply had on their lives. We also tested the energy care and vulnerable customer assistance program to further respond to the AER's determination and engage on whether customers and advocates see value in delivering these.

Within the topline summary it was reported that there was an opportunity for distributors to play a clearer role in supporting those at-risk of vulnerability and in mitigating risk factor. Overall, the initiatives were positively viewed. Advocates had admired the proactive steps taken to address vulnerability and other hardships.

### **Triangulation of customer feedback in support of customer assistance package initiatives**

Over the significant engagement conducted on the regulatory reset, we continued to hear that customers in vulnerable circumstances need more support. For our customers, the following key themes were clearly and continuously articulated:

- supporting vulnerable customers is non-negotiable: across engagements, there is a clear expectation that the distribution business must actively support customers in vulnerable circumstances. This includes areas including financial hardship, digital or language barriers, age, health, and accessibility challenges, ensuring no one is left behind as the energy transition evolves
- equity in the energy transition: equity and inclusion in the transition to renewables and electrification was wanted. Stakeholders fear these customers will be left behind, due to

affordability, limited access to infrastructure (especially in regional and rural areas), or a lack of clear guidance on how to participate

- education and customer agency is required: there is a strong call for greater education and transparency to empower customer agency that enables them to make informed decisions about their energy use. This is a message we continue to hear from our CAP. Supporting vulnerable customers is not about welfare, it's about supporting customer agency. Customers emphasised the need for clear, practical information about energy consumption, tariffs and available support to build confidence
- accountability: when testing initiatives with our CAP, there was clarity that there is transparency in how programs are measured and reported on to ensure impact is being delivered to customers.

## 2.1 Our regulatory proposal

Our regulatory proposal presented five programs that supported First Peoples and customers in vulnerable circumstances by providing access to tools, information and support. A summary of the five programs initially proposed included:

- Energy care: In-person energy literacy programs and web-based hub to provide customers with bill interpretation and enhanced understanding of energy consumption
- Community energy fund: enhancing inclusiveness and supporting customers towards an equitable energy transition
- Energy advisory services: expert guidance to assist communities in building their own energy programs
- Vulnerable customer assistance program: targeted at assisting customers and communities to transition away from gas-based appliances. Financial assistance for fuse replacement and upgrades to support electrification
- First Peoples Program: Enhancing First Peoples energy access through programs that support resilience, increase heating and cooling for First Peoples over 60, support renewable energy projects and provide tailored energy-related information.

## 2.2 AER draft decision

The draft decision did not accept our full proposed operating expenditure for the customer assistance packages and instead allowed a substitute estimate of \$8.7 million.

In making its draft decision, the AER determined that:

- this initiative was developed with input from and is strongly supported by, both customers and the network's CAP
- the AER is looking to ensure that what is being proposed are not duplicative of existing programs or costs and reflect activities where a distribution network is specifically or uniquely well placed to assist
- costs should be treated as a category specific forecast, rather than an opex step change
- review of outcomes is implemented, with ongoing input and oversight from consumers warranted.

Specific to each initiative, in its draft decision the AER determined the following:

#### Energy care

- the AER supported the CAP feedback to develop partnerships with community organisations who already support people in vulnerable circumstances to ensure the proposed initiatives are prudent, efficient and provide incremental benefits to consumers
- initiative covers community support worker training and of supporting employees
- remaining costs were not included to deliver direct energy literacy services, not being satisfied that these are prudent and efficient, given the existence of similar in-person, phone-based, and web-based programs.

#### Community energy fund:

- energy fund was not included in the AER alternative estimate, as it appears duplicative of similar initiatives already provided for or supported by other existing programs and bodies from time to time
- there was no clear mechanism under the National Electricity Rules (NER) to ensure unspent funds are returned to customers, creating a risk of increased costs if suitable projects are not identified.

#### Vulnerable customer assistance program

- the network was seen to be uniquely positioned to provide these services
- there is evidence of consumer support that the program aligns with the intent of the Game Changer and other reforms to reduce barriers and enhance outcomes for vulnerable customers
- upgrade component of the program is well detailed in the proposal and other cost categories are not well explained
- it is unclear from the information available whether the CAP or consumers generally support the full scope and cost of the program.

#### Energy advisory services

- this program was not included in the determination
- bespoke data requests are not a new service and it is unclear why discounted services have not been offered previously
- the proposal focuses on discounted data services; however, the cost breakdown also includes existing services and a web hub, which appears to overlap with what already exists in industry
- there is no clear mechanism to ensure unspent funds are returned to customers.

#### First Peoples program

- program included as a placeholder
- strong support seen from stakeholders including the First Peoples Advisory Committee (FPAC) and its alignment with the AER's Game Changer intent
- a relatively high proportion of administrative costs included (approximately 40%) was associated with delivering the service
- networks are encouraged to further consult with FPAC to evidence support for the benefits of the program relative to administrative costs.

### 3. Our revised proposal

Overall, we agree with the feedback provided by the AER and have one update to the Community Energy Fund program which we have proposed initiatives to sit under the innovation allowance. This ensures that vulnerable customers are directly considered in the ideas and ultimate innovative initiatives that flow through our governance structure to ensure support is considered for those most in need.

Withstanding this change, all other feedback from the AER is accepted. Where required, we have provided additional information in this document to address key issues raised in the draft determination.

Our revised proposal expenditure over the 2026–31 regulatory period for the Customer assistance package is outlined in table 2 below.

**TABLE 2      CUSTOMER ASSISTANCE PACKAGE EXPENDITURE SUMMARY (\$M, 2026)**

INITIATIVE	FY27	FY28	FY29	FY30	FY31	TOTAL
First Peoples	0.8	0.8	0.8	0.8	0.8	4.0
Energy care	0.1	0.1	0.1	0.1	0.1	0.4
Vulnerable customer assistance program	0.8	0.8	0.9	0.9	0.9	4.3
<b>Revised proposal</b>	<b>1.7</b>	<b>1.7</b>	<b>1.7</b>	<b>1.8</b>	<b>1.8</b>	<b>8.7</b>

#### 3.1 First Peoples Program

##### 3.1.1 Response to AER draft decision

**First Peoples Program required evidence from FPAC that supports net benefits of the program.**

We acknowledge the AER's feedback and have provided two additional sources of evidence demonstrating FPAC's support for these programs. The accompanying letter and FPAC meeting minutes address both the net benefits of the programs and the administrative resources required to deliver them effectively, ensuring optimal outcomes for First Peoples.

Please refer to the following attachments:

- UE RRP ATT SE.01 – First People Advisory Committee Chair letter – Dec2025 – Public
- UE RRP ATT SE.02 – First People Advisory Committee Minutes – Dec2025 – Public.



## 3.2 Customers in vulnerable circumstances

### 3.2.1 Response to AER draft decision

We acknowledge the issues raised in the AER's draft decision across the four programs relating to vulnerable customer programs and below is our response to overarching feedback raised, with a detailed summary on each initiative following this section.

#### **Considerations have been made across all Customer Assistance programs to ensure programs provide optimal outcomes for customers**

We have worked closely with our CAP throughout 2025 to think more critically about the practicalities of delivering these initiatives. Recognising that these are newer initiatives for the business, we have sought to anticipate potential challenges and refine our approach ahead of approval for funding. The following actions are designed to ensure that administration costs are minimised, we build on learnings, not 're-invent' what's already working and that more of the funding flows directly to customers. Three overarching actions we have addressed includes:

#### **1. Identifying learnings from industry**

Engagement with other utilities has helped us understand common challenges in delivering support programs for vulnerable customers. These include:

- overly rigid eligibility criteria, which can unintentionally cause trauma for individuals seeking access. We are addressing this by developing a clearer, more inclusive definition of vulnerability and aligning criteria to reduce unnecessary barriers
- ensuring there is a distinction between individual customers and communities in vulnerable circumstances. This will help with understanding eligibility criteria and focus for energy literacy programs.

#### **2. Developing a vulnerability strategy**

Our strategy will provide the foundation for:

- identifying who our vulnerable customers are and where they are across our network
- ensuring we are clear on our unique position to ensure we remain delivering services within our remit
- establishing a robust governance framework
- building in trial periods to test and refine initiatives before scaling
- proactively considering the impacts of the energy transition on vulnerable customers, including energy literacy challenges and the emergence of new forms of vulnerability.

The strategy will reduce administration costs and improve outcomes for customers through:

- clearly defining and identifying vulnerability
- enabling a consistent operational response
- performance measured through metrics to identify where improvement is needed and areas to continue.

#### **3. Clear governance and trial period**

All new initiatives will commence with a structured year 1 trial, overseen by the CAP. Each program trial will look difference in size, as the programs are very unique. A review will capture lessons learnt from this initial delivery phase and embed improvements in subsequent years to reduce any inefficiencies and costs. Further detail is outlined in the vulnerability strategy.

## **Within 2025 we obtained further feedback from customers and stakeholders on the programs**

In shaping our customer vulnerability strategy, we engaged with customers and stakeholders primarily focused first on understanding lived experiences and secondly, on testing solutions within the customer assistance package. We engaged with 51 customers in vulnerable circumstances and support service stakeholders to hear directly about how energy supply and outages affect their daily lives and wellbeing.

Summary insights continued to show that there was an opportunity for distributors to play a clearer role in supporting those at-risk of vulnerability and in mitigating risk factors. Overarchingly, the initiatives were positively viewed, including support shown for the vulnerable customer assistance program. This was especially for customers who were no longer able to access gas or were soon to be disconnected. Relating to energy care, there was support with questions to understand if this duplicated existing initiatives and understanding who was eligible for this support.

Support service individuals were surprised that distributors were considering such proposals and admired the proactive steps to address vulnerable customers. The future focus relating to the energy transition was also seen as a signal that distributors were “getting on the front foot” before customers are having to consider urgent changes to their power supply makeup (switching off gas, for instance). This is a particularly important point as the insights also reported that ‘determinants of vulnerability are difficult to isolate; individual and situational factors are often compounding meaning risk-factors can be discreet until a critical stage is reached.’

When this feedback is considered alongside insights gathered over the previous four years, the triangulation of evidence demonstrates consistent and broad-based support from customers and stakeholders for these programs.

## **3.3 Energy Care**

### **3.3.1 Response to AER draft decision**

**For the Energy Care program, the organisation will embed the CAP’s recommendation and AER feedback to focus on partnerships with organisations and where the network is uniquely placed to prevent duplicating similar programs.**

We accept the feedback outlined by the AER in the draft determination. With this amount allocated to an employee and agency costs, we have anticipated the following activities will be delivered by the Energy Care employee:

- mapping and relationship-building with core organisations to enable effective energy literacy delivery
- development and delivery of energy literacy materials aligned to the agreed framework (outline below)
- attendance, support and preparation for community events, expos or sessions to educate customers on energy, with a focus on supporting vulnerable customers
- training of support workers or team leads, where requested by partner organisations
- ongoing program monitoring, reporting, evaluation and ongoing improvements aligned to our governance structure (including program reach and effectiveness).

Beyond delivering energy literacy, these individuals will act as subject matter experts on customer vulnerability, playing a critical role in:

- ensuring the Customer Vulnerability Strategy is continuously updated, providing clarity on who and where vulnerable customers are across the networks
- feeding insights into regulatory planning and inclusive communications
- supporting the identification of vulnerable customers to inform the Energy Fund program
- delivering internal training programs to build a unified understanding of vulnerable customers and their energy needs across the business
- reactively attending to outages to support frontline teams by delivering critical information to customers during times of need, particularly in extended outages.

To ensure effective outcomes of the partnership approach, we have seen success with other organisations where they have tailored materials to reflect the formats customers already engage with through existing, trusted organisations. This has said to support customer agency where customers can research existing information, when social workers are unable to take on further requests from consumers. To achieve this, agency costs will be required to adapt content into formats that:

- tailor energy literacy materials to match the style, wording and branding used by partner organisations that support trust and consistency in supportive information
- professional translation into multiple community languages
- ensure screen reading capability (for individuals who are dyslexic or partially blind) and other content accessibility requirements.

### **Framework for delivering the Energy Care program**

We have developed a framework for partnering with existing organisations to improve energy literacy outcomes for customers, remove duplication and ensure we continue to deliver services aligned to our unique role.

We recognise the challenges faced by social workers and community organisations, particularly their limited capacity and time. When connecting with organisations in the industry, we have seen how a framework has been optimal to aid in the time challenge posed by individuals who are key to ensuring customers in vulnerable circumstances are getting the right information in a way that is already familiar to them.

This approach will reduce overheads whilst improving delivery through established expertise and trusted community relationships. The framework (below) has been developed following success from other utilities, mainly South East Water.

Framework for the year 1 trial includes:

- identifying critical partnerships for 2026–27, ensuring coverage across each network and in areas with high density of vulnerable customers
  - in mapping partnerships, we will also consider working with overarching organisations and peak bodies, not just individual welfare agencies. This ensures broader coverage, consistency and efficiency in supporting vulnerable customers across our networks.
- building relationships with these organisations and understanding the information their consumer base most needs relating to energy
  - employment of individuals with established connections and industry experience will support our relationship build and the optimal way to connect in with potential partners
  - we will ensure alignment of education with our unique role as a distributor, while avoiding duplication of services. Some of this information may already exist that can be used

immediately, or alternatively we will adapt content to ensure it's in a format the organisations already use to communicate information with customers in a consistent way.

- supporting identified gaps by developing materials in formats these organisations already use to communicate with their customers. Gaps will be determined by the partnering organisation in the first instance, as they are most aware of the common questions or concerns raised by individuals relating to energy
- we will also introduce unforeseen energy literacy needs, which can proactively support customers that might not be identifiable by partners i.e. impacts of the energy transition on customer in vulnerable circumstances.

### 3.4 Vulnerable customer assistance program

#### 3.4.1 Response to AER draft decision

**The AER has accepted this package as a placeholder yet also required evidence that customers and the CAP understood the program and costs.**

To support the Vulnerable Customer Assistance Program, detailed cost breakdowns were presented to the CAP for feedback prior to submission to the AER. There was consensus on the proposed costs by the CAP, with feedback primarily focused on:

- evaluation of program success being assessed in the governance process outlined in our Customer Vulnerability Strategy. The trial phase will include a six-month review with the CAP to enable an agile, evidence-based approach that supports early learning, continuous improvement and consistency in program delivery during the initial two years prior to scale-up. Refer to the Customer Vulnerability Strategy which also includes clear measures, aligned to the cost breakdown below
- another consideration was raised as to whether concentrating on a smaller number of initiatives and delivering them to a higher standard could achieve greater overall impact for customers. It was agreed that if the number of customers being supported does not meet vulnerable customer demand, this will be reviewed and addressed through the scheduled CAP review sessions as outlined in our strategy.

Cost breakdown that was engaged on with our CAP is outlined in table 3 below.

**TABLE 3 COST BREAKDOWN OF VULNERABLE CUSTOMER ASSISTANCE PROGRAM**

ITEM	COST PER ITEM	NUMBER OF CUSTOMERS	TOTAL COST
Pit installations (50% discount being applied to customers)	\$7,500	180	\$1,350,000
Fuse upgrades	\$1,500	1,800	\$2,700,000
<ul style="list-style-type: none"> <li>Truck fee</li> <li>Admin for site assessment</li> </ul>			
Minor customer repairs	\$1,000	100	\$100,000
<ul style="list-style-type: none"> <li>POA damages</li> <li>Switch board defects</li> <li>Minor earthing issues</li> </ul>			
Training for identification and engagement with vulnerable customers	\$150,000		\$150,000
Number of households/ businesses serviced*		2,080	\$4,300,000

\*Note: Please note that the number of customers this service extends to is beyond the number of households and SMBs noted in this table. Services support costs and outcomes will support entire households with some having multiple individuals residing in them and small-to-medium businesses that could support the owner/operators' livelihoods, as well as their employees.

### Eligibility

Eligibility criteria have been developed for all applicable programs, outlined below. This is criteria we have engaged with the CAP on.

To be eligible for support under the Program, customers must:

- reside within our electricity distribution network area
- be seeking to transition from gas to electric appliances (e.g., induction cooktops, reverse-cycle heating/cooling, electric hot water systems)
- require a fuse or phase upgrade at their premise to enable electrification
- demonstrate one or more forms of vulnerability (e.g., concession card, health condition, income verification, referral from support service)
- be the account holder or have consent from the account holder if applying through a support organisation.

The program is open to both residential customers and community housing providers acting on behalf of eligible tenants.

### What we will fund

The types of requests that will be covered by this initiative includes:

- subsidised or waived fees for single-to-three phase upgrades or fuse upgrades where these are required to support household electrification

- support for both overhead and underground supply types
- coordination with relevant authorised installers /community agencies where appropriate.

We may also fund limited pre-works or investigations to confirm upgrade needs in complex cases.

#### **What will not be funded under this initiative**

The types of requests that will not be covered by this initiative includes:

- requests from properties outside our network
- upgrades not related to electrification (e.g. air-conditioning for lifestyle preference)
- costs of internal electrical work not related to the fuse or phase upgrade
- commercial or industrial customers
- projects where vulnerability criteria cannot be demonstrated.

#### **How this initiative supports vulnerable customers**

Customers in vulnerable circumstances often face unavoidable costs when upgrading or maintaining essential electricity connections. Some may need to, or want to move from single-phase to three-phase supply to support electrification, such as replacing failed hot water systems yet cannot afford associated fuse upgrades. Others are required to install underground connections (pits) when overhead lines are no longer an option, creating costs they cannot afford and were not expecting.

Minor customer repairs, such as restoring a fuse board or point of attachment damaged during storms, are critical to restoring supply quickly. Without assistance, these customers may face prolonged outages or safety risks while awaiting repairs. Our team are sometimes already on the ground repairing supply and have the skills to be immediately supporting these customers who may otherwise have to call an electrician, creating additional unexpected costs for customers. The program helps bridge these cost and capability gaps, ensuring vulnerable customers can safely and affordably maintain access to electricity and participate in the energy transition.

In terms of customer engagement, section 3.2.1 provides further information on engagement conducted since our regulatory submission relating to this initiative.

## **3.5 Community Energy Fund**

### **3.5.1 Response to AER draft decision**

We have considered the AER feedback on the Community Energy Fund and propose to reposition this to sit under the innovation allowance. This will optimise resources and ensure a consistent approach to governance processes for initiatives that deliver the greatest impact for customers. Our innovation allowance business case addendum contains further details.<sup>1</sup>

## **3.6 Energy Advisory Services**

### **3.6.1 Response to AER draft decision**

The AER has noted that bespoke data requests do not represent a new service offering and questioned why discounted data services had not previously been provided, particularly in light of the opex underspend observed in the current regulatory period. It was also observed that the proposed cost structure includes existing services and a web hub, which may overlap with the CER Data

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<sup>1</sup> See UE RRP BUS 3.9.01 – Innovation allowance – Dec2025 – Public

Visibility initiative, potentially resulting in double counting. In addition, the regulator identified the need for a clear mechanism to ensure that any unspent funds are appropriately returned to customers.

We accept the AER's feedback and will be providing discounted data services for individuals or small-medium businesses who align with the vulnerability definition as outlined in our strategy and meet the initiative eligibility criteria.

### 3.7 Revised proposal forecast

We accept the feedback from the AER and propose to continue with the draft determination amounts to sit within the customer assistance package.

A detailed expenditure forecast for the 2026–31 regulatory period for the First Peoples program. Energy Care and the Vulnerable customer assistance program is respectively outlined in table 4, table 5 and table 6 below.

**TABLE 4 FIRST PEOPLES PROGRAM (\$M, 2026)**

CATEGORY	FY27	FY28	FY29	FY30	FY31	TOTAL
Original proposal	0.8	0.8	0.8	0.8	0.8	4.0
Draft determination	0.8	0.8	0.8	0.8	0.8	4.0
Revised proposal	0.8	0.8	0.8	0.8	0.8	4.0

**TABLE 5 ENERGY CARE (\$M, 2026)**

CATEGORY	FY27	FY28	FY29	FY30	FY31	TOTAL
Original proposal	0.3	0.3	0.3	0.3	0.3	1.4
Draft determination	0.1	0.1	0.1	0.1	0.1	0.4
Revised proposal	0.1	0.1	0.1	0.1	0.1	0.4

**TABLE 6 VULNERABLE CUSTOMER ASSISTANCE PROGRAM (\$M, 2026)**

CATEGORY	FY27	FY28	FY29	FY30	FY31	TOTAL
Original proposal	0.8	0.8	0.9	0.9	0.9	4.3
Draft determination	0.8	0.8	0.9	0.9	0.9	4.3
Revised proposal	0.8	0.8	0.9	0.9	0.9	4.3



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