**ACT Energy Consumers Policy Consortium Submission to:**

**Issues Paper: Access to Dispute Resolution Services for Exempt Customers June 2017**

ACT Energy Consumer Policy Consortium members:

* **[ACT Council of Social Service (ACTCOSS)](https://www.actcoss.org.au/)**
* **[Care Financial Counselling Service](http://www.carefcs.org/)**
* **[Conservation Council ACT Region](http://www.conservationcouncil.org.au)**
* **[SEE-Change](http://www.see-change.org.au/)**
* **[Small Business Taskforce of the Canberra Business Chamber](https://www.canberrabusiness.com/advocacy/taskforces/small-business-task-force/)**

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The views expressed in this document do not necessarily reflect the views of Energy Consumers Australia nor the ACT Government.

Attention: Sarah Proudfoot

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We refer to your invitation to make a Submission to the *Issues Paper Access to Dispute Resolution Services for Exempt Customers June 2017.*  The ACT Energy Policy Consortium welcomes the opportunity to provide a submission.

The Consortium is comprised of representatives of [ACT Council of Social Service (ACTCOSS)](https://www.actcoss.org.au/), [Care Financial Counselling Service](http://www.carefcs.org/), [Conservation Council ACT Region](http://www.conservationcouncil.org.au), [SEE-Change](http://www.see-change.org.au/) and the [Small Business Taskforce of the Canberra Business Chamber](https://www.canberrabusiness.com/advocacy/taskforces/small-business-task-force/). The consortium considers the importance of social, environmental and economic factors in the formation and implementation of energy policy and that enhancement of equity and inclusion improves outcomes across all sectors.

The Issues Paper asks a number of questions related to exempt customers. At this stage issues associated with exempt sellers have low visibility in the ACT and consequently with are unable to make detailed comment.

However, some of these exempt sellers such as caravan parks and retirement villages have a concentration of consumers in vulnerable situations and it important that these consumers are not denied protections afforded to other customers. At this stage the major issue that has come to the attention of the Consortium is that some consumers in exempt networks are unable to access concessions, despite being on Centrelink payments.

It is also noted that communications with other energy consumer advocates sees the issues associated with exempt networks as increasing, and it is likely that the need for consumer protection will grow.

The Consortium endorses that: “Consumer protections should be available on an equitable basis to all consumers, regardless of how their energy is supplied. Specifically, residential and small business customers should have access to fair, free and independent external dispute resolution”. Therefore the Consortium agrees in principle with the approach to extend access to Ombudsman schemes to exempt customers. It does note however that given the small size of the problem, in the ACT any changes to be made need to be balanced with the cost of legislation changes which may be complex and that the legitimate concerns of affected providers should be considered.

The Consortium believes that given the rapid changes to the Energy Market, AER monitoring of the number of exempt sellers should be undertaken to see if there is likely to be an expansion of issues.

Thank you for the opportunity to make this Submission