



12 December 2018

Ms Sarah Proudfoot
General Manager, Consumers and Markets
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

By email: AERConsumerandPolicy@aer.gov.au

Dear Ms Proudfoot,

Standardised statements for use in customer hardship policies

Alinta Energy (Alinta) welcomes the opportunity to make a submission to the Australian Energy Regulator's (AER) issues paper, *standardised statements for use in customer hardship policies (issues paper)*.

Alinta is an active investor in energy markets across Australia with an owned and contracted generation portfolio of nearly 3000MW, including 1700MW of gas-fired generation facilities and 1070MW of thermal generation facilities. Alinta has a strong renewable investment strategy across Australia and is pursuing renewable energy projects at an increasing scale. Alinta currently retails electricity and gas to more than 830,000 customers including more than 300,000 customers in east coast markets. Alinta is committed to contributing to energy market development across Australia and in all regions as it pursues its forward growth strategy. The diversity of Alinta's portfolio, its investment strategy, product offerings, and first-hand experiences across multiple jurisdictions sees it well placed to provide comments on the review of the issues paper.

Having reviewed the issues paper, Alinta Energy was very concerned by the AER's findings in the energy market in relation to three key issues of concern, namely;

- i. Lack of clarity for customers regarding their hardship rights and entitlements
- ii. Inconsistency of retailer application of minimum requirements; and
- iii. Challenges assessing retailer compliance with hardship obligations.

To that end, Alinta Energy are supportive of developing standardised statements for use in customer retailers' hardship policies. In our view developing a sub-set of uniformed standardised statements would allow for the consistent application of equitable access to assistance, as required under the National Energy Retail Law (NERL).

Having reviewed the standardised statements listed in Appendix B, Alinta Energy agree with the AER's representation within the issues paper that;

they will not place additional obligations on retailers beyond the existing requirements.



That said, Alinta Energy would like to ensure to the intent of the NERL is not lost, by continuing to give effect to the retailer having the responsibility of developing practical policies and procedures for the effective delivery of the hardship program itself.

Accordingly, Alinta Energy put forward the view that the standardised statements should be framed as a concise summary at the commencement of all retailers' hardship policies, but retailers should continue to speak to the application, accessibility and eligibility of the standardised statements within the body of the hardship policy. This would support the standardised statements by explaining any ambiguity that may result from what are concise and short statements. For the avoidance of doubt, no subsequent representations made within hardship policies limit the standardised statements or any other provision of the NERL about providing the minimum requirements to residential customers.

We look forward to working with the AER to refine and develop the standardised statements to ensure that issues identified as part of the AER's review have been adequately resolved.

Alinta would be happy to discuss any aspect of this submission, or earlier submissions, where required.

Yours sincerely

A handwritten signature in black ink, appearing to be "Ante Klisanin", written in a cursive style.

Ante Klisanin
Retail Regulation Manager