

# Application to Surrender

Application to surrender the Click Energy Pty Ltd (trading as amaysim Energy and trading as Click Energy) Gas and Electricity Retail Authorisations





# Table of Contents

<b>1. Executive Summary</b>	<b>3</b>
1.1. Background	4
<b>2. Statement of Reasons</b>	<b>10</b>
<b>3. Ensuring continued supply</b>	<b>12</b>
3.1. Moving customers into the AGL cohort	12
<b>4. Promoting positive customer outcomes</b>	<b>15</b>
4.1. Account history and attributes	15
4.2. Continued protections of life support customers	16
4.3. Dispute resolution	16
4.4. Customer hardship policies	17
4.5. Payment channels available to customers	18
<b>5. Timing</b>	<b>20</b>
5.1. amaysim Energy customer journey	20
5.2. Click Energy customer journey	20
5.3. Market engagement concerning the Click Energy customer integration	20
<b>6. Attachments</b>	<b>22</b>



# 1. Executive Summary

As the Australian Energy Regulator (the **AER**) is aware, on 30 September 2020 AGL Energy Limited (**AGL**) acquired 100% of the issued capital in Click Energy Group Holdings Pty Limited ACN 160 484 837. Consequently, AGL has acquired Click Energy Pty Ltd ABN 41 116 567 492. This corporate entity retails energy in the National Energy Market under two brands Click Energy and amaysim Energy (where discussed collectively these entities are referred to in this document as **Click Energy Group**).

AGL is proposing to migrate customers that are currently serviced by the Click Energy Group into AGL's billing and customer management systems. The goal is that this migration will provide these customers with access to AGL's well established service platforms, an improved range of products whilst also allowing AGL to service these customers more efficiently and effectively.

To integrate these customers to AGL's systems AGL is also required to update the relevant market participant identifier to AGL's applicable participant identifier. This plan is detailed in section 3.1.1. of this document. As is discussed in detail later, AGL and Click Energy Group will be seeking to rely on section 105(8) of the *National Energy Retail Law (South Australia) Act 2011* (the **NERL**) to move the Click Energy Group customers into the relevant AGL participant identifiers to facilitate the move into AGL's internal systems. To facilitate this process, Click Energy Group is now applying to the AER to surrender the following of its retail authorisations:

- Electricity retail authorisation TG12010
- Gas retail authorisation TG12010

At a high level there will be two treatment paths for customers undergoing the migration to AGL. Firstly, customers on products that can be easily replicated in AGL's systems, this is roughly 94% of the amaysim energy customers. These customers products will be replicated within AGL's systems with the same attributes such as price and discounts. We are doing this to minimise the impact to the customer and avoid any potential customer detriment. Secondly, there is a cohort of customers on products that cannot be replicated in AGL's systems, these products are discussed in detail in section 3.1.2 of this document. For customers on these products Click Energy Group has began a process of writing to the customers to terminate their Market Retail Contracts, providing them with 30 days prior notice, and informing them that at the end of their notice period they will be placed on a Standard Retail Contract with the related price. These customers have also been encouraged to review market plans that are offered by AGL and consider if one of them is suitable for their circumstances.

Both AGL and Click Energy Group are taking steps to inform all customers of the information relevant to their situation. Our key focus is ensuring that this migration is managed in a way that avoids customer detriment and customer inconvenience. Specifically, AGL is writing to customers of the Click Energy Group to inform them that:

- AGL has purchased the Click Energy Group and as a result AGL will be taking over the role of providing energy services to the customer



- Where applicable, that key components of their energy retail contract will not be changing. This includes the customers energy rates, contract terms and conditions and any discounts. [REDACTED]
- The fees and charges applicable to the customers energy plan. These will not align to AGL's normal fees and charges as AGL has made the decision to ensure that discretionary fees, such as late payment fees on Market Retail Contracts, are not increased from those customers are currently charged with Click Energy Group. We confirm that AGL's current intention is to maintain these specific exemptions to the fees and charges for the duration of the products lifespan. That being, until every customer has moved to a new fee the amaysim Energy and Click Energy fee exemptions will apply. [REDACTED]
- Tailored advice to support each customer through the transition and get them set up with AGL, this includes:
  - The AGL contact number for customers that are flagged as requiring life support equipment in the home
  - Advice about customers concession entitlements and that AGL will be working with the relevant government Departments to migrate these to AGL without the customer being required to take any steps
  - Advice about customers direct debits being transitioned to AGL to ensure that customers are able to continue to enjoy the ease of managing their energy bills via direct debit
  - Separate letters to customers that have hardship payment arrangements with amaysim and Click Energy informing these customers of the payment support offerings that AGL has available and giving them clear advice about how to access these

These customers will also be informed when they have successfully migrated into AGL and given tips and tricks to help them engage with AGL in a manner that works for them. A great example of this is AGL's electronic bill explainer which tells customers how to read their first bill with AGL or the specific messages that we will be sending to these customers that empower them to submit self meter reads.

As the AER is aware the Click Energy retail brand migration will be a big bang migration, with customer data and accounts being transferred over the [REDACTED] Click Energy Group is now seeking to have the surrender of their authorisations effective shortly thereafter, with a specific target date of Monday, 5 July 2021.

## 1.1. Background

AGL recently acquired the Click Energy Group. Under the Click Energy Group there are two retail energy brands: the amaysim Energy brand and the Click Energy brand. This included the acquisition of approximately 211,140 energy customers across Victoria, New South Wales, Queensland and South Australia. These are all areas where AGL has well established experience in servicing, satisfying and supporting energy customers.



The approach adopted by AGL from the beginning of the due diligence phase is to keep each of these approximately 211,140 customers and their unique experiences in the migration at the centre of everything that we do.

There are two approaches to mergers and acquisition activities that are traditionally adopted in the energy market. These are:

- Integrating the company into the purchasing companies' systems and customer base and then seeking to retire the retail brands that have been acquired
- Maintaining the retail brand within the energy market and optionally migrating the companies systems into the purchasing companies systems over time

AGL has experience in both of these approaches. We adopted the former in our 2014 integration of Australian Power & Gas and in 2008 we adopted the latter with our integration of Powerdirect.

### Guiding principles to integration

- Minimising disruptions to customers throughout this period
- Ensuring customers are no worse off by the transition to AGL
- Actively looking for opportunities to drive positive outcomes for these customers
- Promote customer access to added value in AGL's rewards program and product offerings

We have taken the learnings from both of these integration projects and determined that, having regard to both the experiences of our customers and our goals as a business, that a complete integration is most appropriate these circumstances.

This will allow us to offer customers a more streamlined and holistic proposition, as well as allowing us to promote simplicity in their services. This notion of simple and clear customer support, in addition to having a clear proposition for our customers was a key learning from our customers in the Powerdirect integration.

#### 1.1.1. Legal entities

As noted above, the entity acquired by AGL trades under multiple entities. The current corporate structure is detailed in the infographic at attachment 1. [REDACTED]

AGL has made contractual obligations to the previous owner of Click Energy Group Holdings Pty Limited, amaysim Australia Limited (ACN 143 613 478), around the timings of AGL ceasing to use the amaysim Energy brand. As a result, AGL has amended amend the name of the amaysim Energy retail authorisations to Click Energy Pty Ltd (ABN 41 446 567 492). The corporate entity is the same however its has been updated to remove the amaysim Energy brand.



### 1.1.2. AGL's extensive experience in similar migrations

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AGL has extensive experience in similar large scale migrations. This past experience places AGL in a unique position to be able to deliver an integration that puts customer satisfaction and experience at the centre of our integration approach. In forming this approach to migrating customers of the Click Energy Group to AGL, we have been able to harness this previous experience. This includes leveraging previous project plans, systems, documentations, risks and issues registers to pre-empt risks and take preventative steps to reduce the likelihood of their occurrence.

#### Australian Power & Gas

The Australian Power & Gas integration was very similar to the current planned Click Energy integration. AGL purchased the Australian Power & Gas business and was in full control of that business in the lead up to the integration. AGL staff were appointed to key roles within the Australian Power & Gas business to support a smooth transition to AGL.

In that integration AGL was able to work with the AER to arrange for the surrender of the Australian Power & Gas authorisation. This surrender was approved on several conditions. These include:

- Australian Power & Gas informing the AER when all customers were transferred from having a Market Retail Contract with Australian Power & Gas to holding one with AGL
- ensuring that where possible, the terms and conditions that are included in the Australian Power & Gas Retail Contract and the AGL Retail Contract were comparable (with minor exceptions)
- AGL ensuring that all customers on payment plans, registered with life support equipment and on the Australian Power & Gas hardship program were identified within AGL's systems

AGL has complied with these conditions and the surrender has now been finalised. All Australian Power & Gas customers have been transferred to AGL. We found the bulk transfer mechanism to be highly effective in supporting this.

We have also identified key members of the Australian Power & Gas integration project team within AGL and some of these key members are now working on the Click Energy integration. This includes:

- [REDACTED]

AGL is confident that we can use the learnings from the Australian Power & Gas project to drive positive customer and compliance outcomes through the Click Energy integration project.

#### Powerdirect and SunGas

In 2008 AGL also integrated two other retail brands into its customer management and billing systems. These were the integrations of the Powerdirect and SunGas businesses which AGL acquired from the Queensland government. In this instance the bulk change tool was relied upon again. AGL elected to maintain the Powerdirect retail brand in this integration and it is still an in-market retail brand offered by AGL.

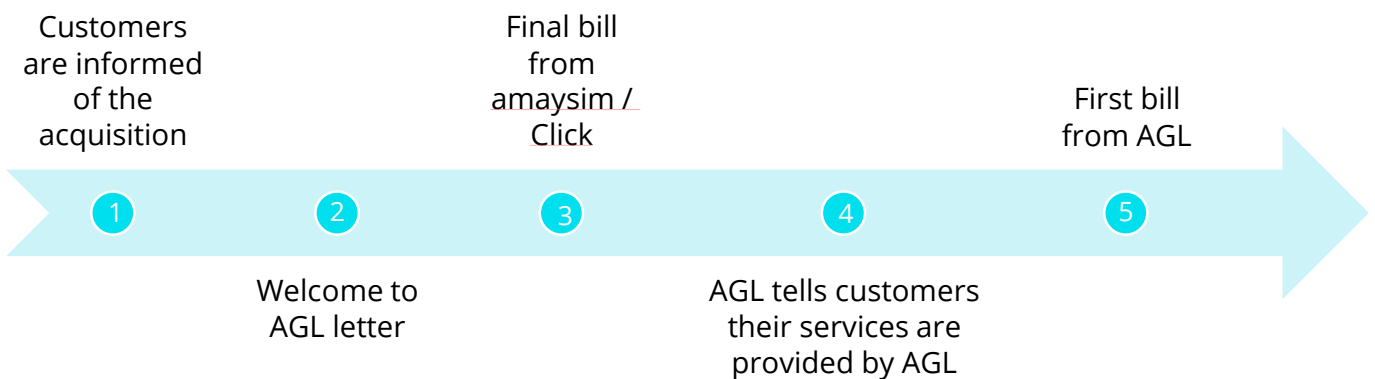


### 1.1.3. Customer communication and engagement

As noted above, AGL has extensive experience in these migration activities. AGL is leveraging this experience to deliver exceptional customer experience throughout this migration. Our customer integration program has five key customer engagement points. At all steps customers are able to contact AGL agents and discuss their options to take up a Market Retail Contract. Customers are also not charged exit fees at any time for leaving AGL.

We can also confirm that amaysim Energy and Click Energy do not currently charge any exit fees. Accordingly, in the event that a customer is informed that they are going to transfer to AGL and they are not comfortable with AGL becoming their energy retailer the customer will be able to contact another energy retailer and cease receiving services from Click Energy / amaysim Energy with no additional fees.

#### Customer integration journey



All key information concerning the transition and what to expect is explained to impacted customers at step 2 of the integration journey. This information is sent to all customers prior to the transfer into AGL to ensure that customers are well informed about their ability to engage another energy retailer, should they so desire. We are aware that a large amount of information can overwhelm customers, so we have worked to develop tailored communications to ensure customers receive clear information that is relevant to their circumstances.

A copy of these communications can be found at attachments 2 to 9 to this document.

### 1.1.4. Issue management and pre-emptive mitigation

The integration is highly dependent on technology and systems. AGL has formed a team of experts that are working to develop an online transfer solution, build the amaysim Energy and Click Energy branded product offerings in AGL's systems and create solutions for migrating customer data to AGL's billing and customer relationship management system. For these reasons AGL has developed a comprehensive testing and quality assurance regime to ensure that any issues are identified early and remediated quickly.



We are also taking time to analyse the learnings we are developing from the amaysim Energy integration, to apply those to the latter Click Energy integration. This is to ensure that we are continuing to manage and mitigate risks throughout this process.

Some of the key pre-emptive mitigation actions we are taking include:

- [Redacted]

- Standing up a small team of dedicated highly trained agents to support specific investigation and remediation activities for integrated customers that may be required. [Redacted]

- [Redacted]

- [Redacted]

- Providing training to all AGL agents about the integration and the likely supports these customers may require during the cutover period

From past integration activities that we have conducted common issues that may arise include:

- [Redacted]

- [Redacted]

In unlikely event that a major issue that threatens the overarching migration occurs [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]





[REDACTED]

Should any regulatory issues arise AGL will engage the AER and work constructively to manage them. We will, of course, seek to ensure our regulatory obligations and reporting obligations are complied with.



## 2. Statement of Reasons

AGL recently acquired the Click Energy Group. Under the Click Energy Group there are two retail energy brands: the amaysim Energy brand and the Click Energy brand. This included the acquisition of approximately 211,140 energy customers across Victoria, New South Wales, Queensland and South Australia. These are all areas in which AGL has well established experience in servicing energy customers. Click Energy Group is now seeking to surrender its following retail authorisations:

- Electricity retail authorisation TG12010
- Gas retail authorisation TG12010

This surrender is required for [REDACTED]

[REDACTED]

[REDACTED] This is consistent with the AER's *Retail Authorisation Guidelines*, which favour the surrender over transfer of authorisations in circumstances where the retail entity that has acquired another is already authorised. We are proposing for this surrender to be effective from 5 July 2021. [REDACTED]

AGL is seeking to ensure that, where possible, no customers are worse off due to the integration. This is supported by our guiding principles to migration, those being:

- Minimising disruptions to customers throughout this period
- Ensuring customers are no worse off by the transition to AGL
- Actively looking for opportunities to drive positive outcomes for these customers
- Promote customer access to added value in AGL's rewards program and product offerings

Finally, we have also developed detailed plans to ensure supply is not interrupted for all customers that are migrating. [REDACTED]

[REDACTED]

We believe that these arrangements both ensure continuity of supply for all customers but also ensure that customer detriment is avoided as much as possible.

### 2.1.1. Proposed conditions of surrender

Both AGL and Click Energy Group are aware that it is common for the AER to impose conditions on the surrender of an authorisation application. As AGL understands it, the AER, Click Energy Group and AGL share two common goals, those being ensuring no customers are worse off as a result of the integration activity and that all customers continue to be supplied with their respective fuels. To this



end, we have identified some potential conditions of the surrender that the AER may seek to impose on AGL and Click Energy Group in this process:

- That all customers have been moved into the relevant AGL participant identifiers before the surrender can be effective
- Consistent with section 105(8) of the *National Energy Retail Law (South Australia) Act 2011*, that AGL inform customers of their migration from the amaysim Energy and Click Energy retail brands to ensure that, even though AGL is not required to obtain explicit informed consent from each customer prior to the transfer, that each customer is empowered to choose another retailer should they so require

As an example, AGL and Click Energy Group believe that we can satisfy these conditions by:

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

# 3. Ensuring continued supply

## 3.1. Moving customers into the AGL cohort

AGL’s primary focus in this activity is to ensure that customers continue to receive supply and customers do not experience detriment as a result of the migration activity. To promote this, AGL has adopted an approach of replicating customers current product offerings within AGL’s billing and customer relationship management system. [REDACTED]

[REDACTED] Unfortunately, there are some product offerings that due to their nature cannot be replicated within AGL’s systems; these are detailed in 3.1.2. In these circumstances AGL has adopted an approach of terminating these customers arrangements and continuing to supply them on a Standard Retail Contract. These customers are also encouraged to contact AGL to discuss their options regarding a Market Retail Contract.

### 3.1.1. Updating participant identifiers

The below tables outline the specific participant identifiers that are allocated to migrating customer sites within the relevant markets. These customers are being transferred into the applicable AGL entity for each state and fuel.

AGL has been working closely with distributors to support them through this period and is aiming to reduce impacts on their day to day operations, whilst also ensuring that these customers are seamlessly integrated into AGL. These engagements have been incredibly productive to date and we are confident that any issues that arise in the migration can be managed.

#### Electricity customer entity transition

Jurisdiction	Distributor	Current participant ID	Future participant ID	Authorised AGL entity
New South Wales	ENERGYAP	[REDACTED]	[REDACTED]	[REDACTED]
	INTEGP	[REDACTED]	[REDACTED]	
	CNRGYP	[REDACTED]	[REDACTED]	
Queensland	ENERGEXP	[REDACTED]	[REDACTED]	[REDACTED]
South Australia	SAPN	[REDACTED]	[REDACTED]	[REDACTED]



### Gas customer entity transition

Jurisdiction	Distributor	Current participant ID	Future participant ID	Authorised AGL entity
New South Wales	Jemena	[REDACTED]	[REDACTED]	[REDACTED]
Queensland	Allgas APT	[REDACTED]	[REDACTED]	[REDACTED]
	Envestra	[REDACTED]	[REDACTED]	[REDACTED]
South Australia	SAPN	[REDACTED]	[REDACTED]	[REDACTED]

### 3.1.2. Products not offered by AGL

As noted above, AGL is focused on ensuring that customers are not worse off in this migration activity. This has led us to transfer customer arrangements to AGL without increasing any fees and attempting to replicate all customer product offerings within AGL’s systems. There are however some scenarios where AGL is unable to build an identical product offering in our billing and customer relationship management systems.

These circumstances, and AGL’s actions, are detailed in the table below. Further details of these product offers is found at attachment 11.

Product offered	Description	Customers	AGL actions
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Product offered	Description	Customers	AGL actions
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]
	[REDACTED]		[REDACTED]

### 3.1.3 Products that will be mirrored into AGL’s systems

As noted throughout this document, the majority of customers, roughly 97% will be migrated into AGL’s systems with no change to their product, rates, or terms and conditions. AGL confirms that through migration there will be no change to the customers contract terms and conditions, rates or fees, however these may change in the future as occurs from time to time as the wholesale energy market price changes.

The table at attachment 13 outlines details of customers that are integrating into AGL on their existing contracts, products, and rates from the amaysim Energy retail brand, our team is yet to commence the build phase of the Click Energy integration and so, whilst it appears that all products will be honoured, we are not yet aware of which customers we may have to migrate to the Standard Retail Contract due to timing or technological constraints.

### 3.1.4. Customers solar feed in tariffs

As the AER may be aware, Click Energy has highly competitive solar feed-in-tariff offerings for their customers. In total, Click Energy Group offers [REDACTED] distinct feed-in-tariffs. AGL is keen to ensure that customers do not experience detriment because of the integration however, each price path that is required to be built takes extensive resources from the integration team. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## 4. Promoting positive customer outcomes

### 4.1. Account history and attributes

AGL is committed to supporting all customers. We acknowledge that a key requirement of this is having access to customer data following the migration. For these reasons we are migrating customers account history with our bulk integration, currently planned for [REDACTED]. The customer data that will be migrated includes:

- Each customers consumption history
- All account preferences and attributes, such as customers billing preferences, payment methods and concession entitlements
- Customers life support records, position in the registration cycle and their protections
- Records of customers payment history including indications of financial difficulties
- Details of any previous disputes, both internal and with ombudsman schemes

AGL will also retain the customers preferred method of contact in all scenarios. [REDACTED] [REDACTED] AGL will retain this preference whilst also ensuring that the remaining [REDACTED] are on paper billing and will continue to be so following the migration into AGL's customer relationship management and billing systems unless the customer contacts AGL to provide their explicit informed consent to receive bills and other regulatory notices in another form.

#### 4.1.1. Continued focus on compliance

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AGL is committed to complying with all regulatory and legal obligations throughout this integration activity. This includes maintaining robust documentation throughout the integration and working collaboratively with our regulators, including yourselves and the Essential Services Commission. A key focus of the integration activity is to drive an improved customer outcome and a general compliance uplift.

We are also collaborating with our other external stakeholders, such as Government Departments that support the provision of customer concession entitlement and Ombudsman Schemes, distributors, and the market operator.

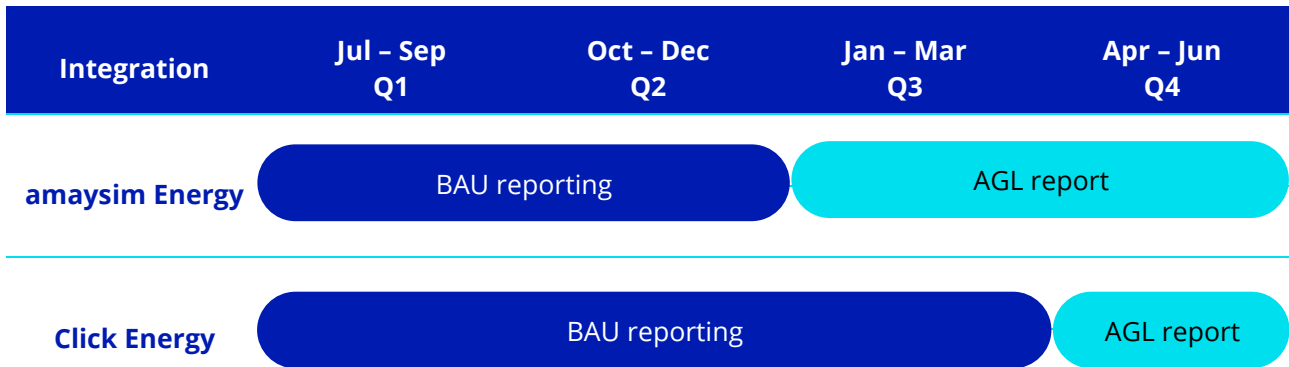
#### Performance reporting

As the AER is aware, there are differing timelines for both integrations. This has been addressed throughout the migration project plan. It is AGL's view that it has an obligation to report based on the customers that it is supplying energy to; this is determined by which market participant is the financially responsible market participant during the relevant reporting period. AGL's approach to



performance reporting will be reflective of this. Meaning that, customers will be reported in the Click Energy or amaysim Energy entities until such a time when they are migrated to AGL’s participant identifier within the market.

A summary of this approach and relevant timings is shown in the infographic below.



#### 4.2. Continued protections of life support customers

Both AGL and Click Energy are committed to protecting vulnerable customers throughout the integration and thereafter. For customers that are registered within Click Energy Groups systems as using life support equipment within their home AGL confirms that these customers, if they have provided medical confirmation forms to Click Energy or amaysim Energy will continue to be registered within AGL’s systems and will not have to do anything further to confirm their protections. AGL will ensure that their records are transferred to AGL and maintained by AGL.

For customers who are registered but have not provided a medical confirmation form, AGL will be proactively contacting the customers to request they provide medical confirmation of their requirement for life support equipment and ensuring that it complied with all regulatory requirements in this regard.

#### 4.3. Dispute resolution

AGL is committed to resolving any existing disputes between amaysim Energy, Click Energy and its customers throughout this integration. [REDACTED]

AGL has begun engagement with each of the Ombudsman Schemes and is looking forward to collaboratively supporting the wind down of the Click Energy retail operations following integration into AGL.

Following the surrender of the Click Energy Group retail authorisations AGL will be seeking to rely on its existing complaint management framework. Customer service agents will have access to the customers account history with Click Energy in AGL’s systems. Customers will also be able to make complaints





against Click Energy / amaysim Energy through our business as usual processes and agents will be empowered to address these issues. Our experience from Australian Power & Gas shows that, as time progresses, the likelihood of customers raising issues with Click Energy / amaysim Energy reduces significantly.

#### 4.4. Customer hardship policies

AGL has completed a detailed side by side review of the Click Energy Group hardship policy and the AGL hardship policy. Generally speaking, the policies offer the same level of protection to customers across the two entities. In our view, the AGL hardship policy is much clearer about a customer's entitlements under the policy and what the customer is required to do to continue to receive protections.

However, AGL acknowledges that the Click Energy Group hardship policy provides further detail on energy efficiency supports that are available to customers. Whilst the detail included in the Click Energy Group policy may be more explicit or descriptive about the energy efficiency supports that are offered they do not confer any additional protections to customers than the AGL hardship policy.

AGL has a very detailed energy efficiency program in place to support all customers, including those experiencing hardship. Customers can access home energy audits, and these are offered to all customers in the Staying Connected entry conversation.

A few of the key initiatives AGL has undertaken, and continues to invest in, to support our customers with energy efficiency and affordability include:

- AGL has partnered with the New South Wales Department of Planning, Industry and Environment and the Land and Housing Commission NSW to install solar panels on community housing properties. This provides direct support to vulnerable customers and has led to an annual reduction of approximately \$1,000 per customer
- AGL has partnered with Your Energy Saving Solution to deliver over the phone and in-house energy audits. During the audit customers are provided practical solutions to safely reduce energy consumption at the property while uplifting energy education. To date, this work has resulted in an annual reduction in energy costs of approximately \$165 annually per customer.
- AGL has partnered with Sustainability Victoria to upgrade 54 properties in the Latrobe Valley region with energy efficiency upgrades. These upgrades focused on replacing high energy consumption appliances with new energy efficiency items and improving the energy efficiency of the house through further home improvements i.e. window coverings and lighting upgrades. On average this initiative has led to an energy bill reduction of approximately \$320 annually for these customers.
- AGL has supported farmers and small businesses through our Farmer & Small Business Assist program. The program offers up to \$1,500 in immediate debt relief and between \$2,500 and \$25,000 off Solar PV system at the property. To date AGL has provided approximately \$950,000 to customers across both offerings with the program scheduled to run until June 21.
- AGL has an early predictive hardship program that has been in place since Jan 2019. This program identifies customers who are showing early signs of potentially experiencing financial difficulties. We write to these customers to inform them that AGL has a payment support program and how



they can access it. The goal of this initiative is to make customers aware of their entitlement to payment assistance before they might realise they need support from their energy retailer.

- AGL has recently engaged over [REDACTED] customers who have shown early signs of potentially experiencing financial difficulties, offering them incentives to enter into a medium-term payment arrangement.

AGL is committed to protecting these customers and ensuring that they are not worse off because of the integration. As they integrate into AGL's billing and customer relationship management system AGL's hardship policy will become the support policy assisting these customers. We will ensure that these customers are offered energy efficiency audits throughout hardship conversations and are happy to provide information to the AER about our processes to offer these customers energy efficiency supports.

Currently Click Energy offers three types of payment support options. These vary from one off payment extensions, to short term payment arrangements that cover a period of three months and then to long term payment plans that are the conventional payment plan for a customer experiencing financial hardship. AGL has obtained, and will continue to gather, information from Click Energy customer relationship management and billing systems that identify customers on each of these three types of payment arrangements. These data fields will be mapped to the relevant field in AGL's customer relationship management and billing systems to ensure that the customers payment arrangements will be migrated into AGL's system with no disruption to the customer.

AGL will migrate all active payment plans from Click Energy's system into AGL's system and we confirm that key details of these, such as payment frequency, amount and payment dates will not be changed. Once the customer's account has been migrated into AGL we will be sending a letter to all customers on a payment plan to inform them of any updated payment details and confirming the agreed upon payment details for the remainder of their payment plan. We will also be monitoring the Click Energy accounts and payment systems to ensure that if a customer continues to make payment towards the Click Energy account this will be reflected in their AGL account and the customer will not be negatively penalised.

## 4.5. Payment channels available to customers

Almost all payment channels will continue to be available to customers, there is one exception and that is American Express. AGL only supports American Express via PayPal. All customers of Click Energy Group will be informed of this and given steps for how to set this up. AGL will ensure that all other payment channels are offered to ex-Click Energy and amaysim Energy customers and will also offer them the additional options that they were not able to access previously, such as Australia Post Over the Counter as a payment method.

Customers are being notified in writing of the migration to AGL and what it means to them. Copies of this correspondence are included in the attachments to this document.

In terms of updated BPAY codes Click Energy customers will be informed of the updated BPAY codes in writing on their first bill with AGL.



AGL will also be maintaining the Click Energy biller code for at least 12 months after the integration date. This is to ensure that any future customer payments that are directed to the Click Energy BPAY code are acknowledged and correctly allocated to the relevant ex-Click Energy / amaysim Energy customer within AGL's systems. Following the 12-month period AGL will conduct a review of the customers that are still making payment to the Click Energy BPAY details and will determine, on that basis if it needs to be retained or not. We are also in the process of exploring options with our third-party banking partner to migrate the biller code to AGL's accounts to ensure a smooth transition going forward. When this is finalised we will be able to automatically reconcile customers who have made payment to the Click Energy biller code, prior to this we will be conducting a manual reconciliation daily.

## 5. Timing

As noted throughout this document, AGL is adopting two distinct approaches to customer integration. This is driven largely by [REDACTED]

### 5.1. amaysim Energy customer journey

It is proposed that all customers being serviced by the amaysim Energy brand will be integrated into AGL's customer relationship management and billing systems by [REDACTED]

### 5.2. Click Energy customer journey

[REDACTED] however they do not apply to the Click Energy brand. As a result, AGL has further time to develop a transfer solution for these customers. This is one of the reasons that AGL has adopted a bulk transfer approach in these circumstances rather than a market transfer approach.

The current proposed timeline for the Click Energy integration is the [REDACTED] [REDACTED] Our current plan is to have all customer data migrated during this weekend as well and, from the conclusion of that weekend, to service the customers from the AGL customer relationship management and billing platforms.

Accordingly, AGL will be seeking to have the surrender of the Click Energy authorisations effective shortly thereafter, with a specific target date of Monday, 5 July 2021.

### 5.3. Market engagement concerning the Click Energy customer integration

As noted throughout this document, AGL has been engaging with relevant distributors and the Australian Energy Market Operator (AEMO) to coordinate the integration of more than 213,000 customers into AGL's systems. While the Click Energy approach involves a 'big bang' approach targeting the [REDACTED] We have had kick off meetings with AEMO and distribution businesses on the use of the bulk transfer tool for this purpose. In respect to electricity, the feedback we have received has been incredibly positive and we have confirmed with our key delivery partners that [REDACTED] is likely to be achievable. We are still finalising certain matters with specific distributors to ensure that this work can be conducted and managed concurrently with their 2021 program of work. In respect to gas we have are still working through the approach and have received positive feedback from the AEMO team and all distributors. Some specific distributors have raised system based concerns with using the gas bulk transfer tool, we are partnering with them to develop a holistic approach and are assessing alternative options in their distribution patches, such as batched market based transfers.



We have discussed retrospectively transferring customers to avoid the need for some 213,000 meter reads being completed in quick succession and that approach is currently preferred. This is because it will minimise customer impact and disruption, thus facilitating a seamless customer experience.

## 6. Attachments

#	Document title	Application reference(s)	Confidential
1	Map of Click Energy corporate structure	1.1.1.	Yes
2	AGL Communications Plan	1.1.3.	Yes
3	AGL communications sent to customers previously on the subscription product	1.1.3.	Yes
4	AGLs welcome pack sent to customers whose energy plan could not be replicated within AGL's systems	1.1.3.	Yes
5	AGL successful transfer in letter for customers that have successfully transferred into AGL on a Standard Retail Contract	1.3.1.	Yes
6	AGL communications sent to customers on Standard Retail Contracts	1.3.1.	Yes
7	AGL communications sent to customers on Market Retail Contracts	1.3.1.	Yes
8	AGL communications sent to customers Market Retail Contracts with dual fuel services	1.3.1.	Yes
9	AGL communications sent to customers within areas where AGL does not operate	1.3.1.	Yes
10	Amaysim Energy Subscription product terms and conditions	3.1.2.	Yes
11	Specific product details for those not able to be retained within AGL's systems	3.1.2.	Yes
12	Breakdown of customers products we have been unable to directly replicate in AGL's systems by state, fuel and contract type	3.1.2.	Yes
13	Breakdown of customers products we are building in AGL's systems by state, fuel and contract type	3.1.3.	Yes
14	Example of amaysim Energy solar feed in tariff rationalisation exercise	3.1.4.	Yes
15	Timeline of amaysim Energy customer integration	5.1	Yes



16 Timeline of Click Energy customer integration

5.2

Yes