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Ref MM/JS

3 May 2016

Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001

Attention: Mr Simon Kidd

Email: AERInquiry@aer.gov.au

Dear Sir

Ergon Energy Queensland Pty Ltd (EEQ) welcomes the opportunity to provide further feedback to the Australian Energy Regulator (AER) on its *Draft Sustainable Payment Plans Framework issues for additional consultation* ('framework').

This submission is provided by EEQ, in its capacity as a non-competing local area retailer and the largest electricity retailer in regional Queensland.

Feedback has been sought by the AER on three key aspects of the framework which EEQ has addressed below:

1. Proposal to publish a list of retailers that have adopted the framework on the AER website

EEQ's preferred position would be that retailers should be free to publish the framework on their website thereby providing this information to their customers around what to expect of both parties when requesting a Payment Plan.

EEQ is supportive of the introduction of the framework for an initial period of at least 12 months. If after this time, it has not led to improved customer outcomes then further measures including the Public Register could be considered.

2. A transitional period before the AER publishes a list of retailers

If a Public Register is to be introduced, EEQ agrees that a transitional period of at least 3 months will be necessary to ensure retailers' processes are fully aligned with the framework.

3. Facilitating flexibility around establishing what a customer can afford to pay on a Payment Plan.

EEQ welcomes the AER's suggestion of providing flexibility in the framework around how the retailer establishes what the customer can afford under a

Payment Plan. It is EEQ's current practice to negotiate the payment plan with the customer taking into consideration the amount they can afford to pay, usage and their individual circumstances. . This also includes a hardship assessment for referral to the EEQ Hardship Program where the need is identified.

EEQ always strives to carry out the 'What can you afford?' conversation in a compassionate and informative manner and suggests that the framework needs to allow the retailer to conduct this conversation on a case by case basis.

If you wish to discuss any aspect of this submission, please do not hesitate to contact John Sculli, Manager Retail Regulatory Affairs, on 07 3851 6791 or john.sculli@ergon.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Sculli', written in a cursive style.

John Sculli
A/MANAGER - RETAIL REGULATORY AFFAIRS