



## Issues paper

# Standardised statements for use in customer hardship policies

November 2018

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# 1. Overview

The Australian Energy Regulator (AER) is responsible for energy market regulation. Among our functions, we monitor, investigate and enforce compliance with obligations under the *National Energy Retail Law* (Retail Law), the *National Energy Retail Rules* (Retail Rules) and applicable Regulations. One of our key objectives is promoting the long term interests of consumers.

The rising cost of energy remains a key issue for Australians, with our lowest-income households spending, on average, 6.4% of their income on energy<sup>1</sup>. The ACCC's *Retail Electricity Pricing Inquiry* highlighted a serious electricity affordability problem – adding strain on household budgets.

Effective hardship policies are vital to ensuring customers in financial hardship have adequate protection and assistance. The Retail Law requires that retailers have in place customer hardship policies, the purpose of which is *‘to identify residential customers experiencing payment difficulties due to hardship and to assist those customers to better manage their energy bills on an ongoing basis’*<sup>2</sup>.

In response to concerns about the adequacy of customer hardship policies, the AER commenced a review in September 2017 under section 44 of the Retail Law. The review culminated in the AER submitting a rule change proposal to the Australian Energy Market Commission (**AEMC**) which proposed amendments to strengthen existing protections for customers in hardship. The proposed rule change sought to allow the AER to develop binding Customer Hardship Policy Guidelines (**Hardship Guidelines**) that would:

- be a single point of reference to industry on how the hardship obligations should be applied, and
- provide customers with a clear understanding of their rights and entitlements.

The AER further proposed that the Hardship Guidelines may specify **standardised statements** which would give effect to the minimum requirements set out in the Retail Law for the purpose of guiding consumers on their rights and obligations.

This paper is the first step in seeking stakeholder views on standardised statements that the AER considers should be included in all retailer customer hardship policies. We consider the inclusion of standardised statements would address many of the concerns we identified during our recent review of retailers' hardship policies; in particular, a lack of consistency and clarity about the support customers can expect. In the event the AEMC's final rule does not provide for them, we propose developing a recommended set of standardised statements and encouraging their use across retailers.

We invite submissions on this paper from all interested stakeholders by **7 December 2018**.

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<sup>1</sup> Australian Council of Social Services and the Brotherhood of St Laurence *“Energy Stressed in Australia”*; October 2018

<sup>2</sup> Section 43(1) Retail Law

## 2. Consultation process

We encourage stakeholders to comment on the issues raised in this paper by responding to the specific questions listed. The list of consultation questions can be found at **Appendix A**.

Interested parties are invited to make written submissions on the issues raised in this paper by close of business **7 December 2018**.

Submissions should be sent electronically to [AERConsumerandPolicy@aer.gov.au](mailto:AERConsumerandPolicy@aer.gov.au) with the subject line "Submission – Standardised statements for use in customer hardship policies".

Alternatively, submissions can be mailed to:

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

We prefer that all submissions be publicly available to facilitate an informed and transparent consultative process. Submissions will therefore be treated as public documents unless otherwise requested. Parties wishing to submit confidential information are requested to:

- clearly identify the information that is subject of the confidentiality claim; and
- provide a non-confidential version of the submission for publication, in addition to the confidential one.

All non-confidential submissions will be placed on the AER's website at [www.aer.gov.au](http://www.aer.gov.au). For further information regarding the AER's use and disclosure of information provided to it, see the ACCC/AER Information Policy, June 2014, available on the AER's website.

Enquiries about this issues paper or about lodging submissions should be directed to [AERConsumerandPolicy@aer.gov.au](mailto:AERConsumerandPolicy@aer.gov.au)

## 3. Background

### 3.1 Retailer obligations relating to customer hardship

Part 3 of the Retail Rules and Division 6 of the Retail Law set out the obligations on retailers to identify and assist customers having difficulties managing the cost of their energy service. Retailers are required to develop, maintain and implement an AER-approved customer hardship policy.

#### *Minimum requirements – section 44 of the Retail Law*

Each customer hardship policy must contain, at a minimum, the following requirements:

- processes to identify residential customers experiencing payment difficulties due to hardship, including identification by the retailer and self-identification by a residential customer; and
- processes for the early response by the retailer in the case of residential customers identified as experiencing payment difficulties due to hardship; and
- flexible payment options (including a payment plan and Centrepay) for the payment of energy bills by hardship customers; and
- processes to identify appropriate government concession programs and appropriate financial counselling services and to notify hardship customers of those programs and services; and
- an outline of a range of programs that the retailer may use to assist hardship customers; and
- processes to review the appropriateness of a hardship customer's market retail contract in accordance with the purpose of the customer hardship policy;
- processes or programs to assist customers with strategies to improve their energy efficiency, where such processes are required by a local instrument; and
- any variations specified or of a kind specified by the AER; and
- any other matter required by the Rules.

#### *'Purpose' test and other factors*

When approving hardship policies or variations, the AER must be satisfied that the policy:

- contains the minimum requirements as set out in section 44 of the Retail Law; and
- will, or is likely to, contribute to the purpose in section 43(1) of the Retail Law; to *"identify residential customers experiencing payment difficulties due to hardship and to assist those customers to better manage their energy bills on an ongoing basis"* [the 'purpose' test]

In addition, when assessing a retailer's customer hardship policy, the AER must also have regard to the following principles<sup>3</sup>:

- that the supply of energy is an essential service for residential customers;
- retailers should assist hardship customers by means of programs and strategies to avoid de-energisation (or disconnection) solely due to an inability to pay energy bills;
- that de-energisation (or disconnection) of premises of a hardship customer due to an inability to pay energy bills should be a last resort option; and
- that residential customers should have equitable access to hardship policies, and that those policies should be transparent and applied consistently.

### 3.2 AER Hardship Review and Rule change request

Our 2016-17 *Annual Report on Compliance & Performance of the Retail Energy Market*<sup>4</sup> revealed concerning trends in relation to the implementation of hardship programs. Specifically, the report demonstrated high energy debt levels, a fall in the number of customers successfully exiting hardship programs and higher overall electricity disconnections.

On the basis of these findings, we commenced a review of retailer customer hardship policies under section 44 of the Retail Law. The review showed, among other things, that there was a wide variation in the quality of hardship policies, and many hardship policies lacked specific action statements regarding how a retailer would act or respond, and assistance a customer was entitled to receive under the law.

Accordingly, the AER submitted a rule change request to the AEMC on 21 March 2018 which specifically proposed amendments to broaden the current rule 75 (Hardship program indicators) of the Retail Rules. The rule change aimed to strengthen existing protections for customers in hardship, by requiring the AER to make Hardship Guidelines to act as a single point of reference for hardship obligations. The AER proposed that the Hardship Guidelines may specify standardised statements which would give effect to the minimum requirements for hardship policies as set out in the Retail Law for the purpose of guiding consumers on their rights and obligations.

### 3.3 Interaction of this consultation with draft AEMC Rule and Hardship Guidelines

#### *AEMC Draft Rule*

In response to the rule change proposal by the AER, the AEMC released preferable draft rules on 6 September 2018. The AEMC draft rules are aimed at strengthening hardship protections and *'improving the quality and clarity of information in hardship policies through the Hardship Guidelines'*<sup>5</sup>.

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<sup>3</sup> Section 45(3) National Energy Retail Law

<sup>4</sup> <https://www.aer.gov.au/retail-markets/performance-reporting/annual-report-on-compliance-performance-of-the-retail-energy-market-2016-17>

<sup>5</sup> AEMC Draft Rule Determination, *National Energy Retail Amendment (Strengthening Protections for Customers in hardship) Rule 2018*; September 2018 p.9

Specifically, the AEMC considers that that the proposed approach in the draft rule will give the AER a more effective mechanism to improve hardship policies *“but will not provide the AER with any powers it does not already have under the NERL with regards to approving hardship policies”*.<sup>6</sup>

The AEMC’s more preferable draft rules (draft rules 75A and 75B of the Retail Rules) require the AER to develop, maintain and publish Hardship Guidelines (in accordance with the retail consultation procedure) that contain:

- processes, timeframes and requirements in relation to approval (or variation) of hardship policies;
- clear and specific action for inclusion in hardship policies to:
  - give effect to the minimum requirements under the Retail Law; and
  - provide guidance for customers on their rights and obligations.

While the final rule is yet to be made, based on the more preferable draft rules (including the timeframes indicated in those for the broader process), we anticipate the AER will be required to develop Hardship Guidelines which will also contain prescribed standardised statements.

Consultation on the contents of Hardship Guidelines will be undertaken in accordance with the retail consultation procedure and subject to any prescribed timeframes. Given the particular interest in the standardised statements, we are beginning this consultation – specifically on the standardised statements – ahead of publication of the AEMC’s final determination. Additional consultation will be undertaken through the Hardship Guidelines’ development process.

We consider the use of standardised statements to be an important step in improving the clarity and consistency of hardship assistance generally. As such, even in the event the final rules do not provide for them, we propose developing a recommended set of standardised statements and encouraging their use by retailers.

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<sup>6</sup> AEMC Draft Rule Determination, *National Energy Retail Amendment (Strengthening Protections for Customers in hardship) Rule 2018*; September 2018 p.9



## 4 Standardised Statements

The AEMC's proposed Rule 75A(2) of the Retail Rules requires that the AER's Hardship Guidelines specify the standardised statements that retailers must include in their hardship policy to:

- give effect to the minimum requirements as set out in section 44 of the Retail Law; and
- provide guidance to customers on their rights, and retailer obligations with respect to Part 2, Division 6 of the Retail Law.

As detailed in its draft rule determination, the AEMC's proposed rule has been drafted to give effect *only* to the:

- minimum requirements set out in section 44 of the NERL;
- purpose of hardship policies as outlined in section 43 of the NERL; and
- principles the AER must apply when approving hardship policies, as outlined in section 45 of the NERL<sup>7</sup>.

The purpose, scope and operation of the proposed standardised statements is discussed below.

### 4.1 Purpose of standardised statements

The introduction of standardised statements in customer hardship policies is intended to address three key issues of concern:

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

These issues are discussed further below.

### 4.2 Lack of clarity for customers regarding their hardship rights and entitlements

Hardship policies are customer-facing documents that should clearly explain to customers how they can access a retailer's hardship program and a retailer's commitments to customers on the program; crucially, the services and assistance the customer will be offered.

We consider the general nature of most hardship policies means that they may not provide customers with sufficient clarity around their rights and entitlements under the Retail Law and Retail Rules. Our 2017 review of retailer hardship policies showed many policies do not contain specific statements as to how a retailer will act or respond, or what assistance a

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<sup>7</sup> AEMC Draft Rule Determination: *National Energy Retail Amendment (Strengthening protections for customers in hardship)* Rule 2018 p.17

customer is entitled to by law (as opposed to what initiatives happen to be offered by that retailer).

By containing principles-based or vague commitments that do not align with the minimum requirements sufficiently, and do not oblige the retailer to act in a certain way, many customers may find it difficult to understand what their rights are under the Retail Law and what assistance they are entitled to receive from their retailer. Specifically, we have observed that some hardship policies are worded subjectively and may minimise a customer's protections under the Retail Law, further contributing to customer uncertainty. For example, depending on the wording of a hardship policy, a customer may only be offered hardship assistance if a call centre agent 'believes' or 'thinks' a customer is experiencing payment difficulties due to hardship.

Standardised statements will, by design, alleviate customer confusion by ensuring hardship entitlements are more easily understood and therefore more accessible—facilitating successful participation in such programs by vulnerable customers.

### 4.3 Inconsistency of retailer application of minimum requirements

For the requirements around hardship to be effective, it is crucial that the minimum requirements specified in the Retail Law are not only included in hardship policies, but are applied consistently to all customers experiencing payment difficulties.

Our monitoring, compliance and enforcement work in the area of hardship has shown there are inconsistencies across the industry in the application of the hardship protections by retailers, including when a customer may be identified as requiring hardship assistance, and the level of assistance offered.

Such variation across retailers was also voiced in Energy and Water Ombudsman NSW (EWON) 2017-18 Annual Report which noted that rather than providing customers with an equal level of support, *"the level, accessibility and quality of assistance provided to customers experiencing financial hardship varied significantly across retailers"*<sup>8</sup>.

The proposed standardised statements – which use consistent and transparent messaging in the form of specific action statements – will create retailer consistency by removing the ambiguity around how the minimum requirements in section 44 of the Retail Law should be applied.

### 4.4 Challenges assessing retailer compliance with hardship obligations

Our compliance and enforcement work in particular has shown general hardship policies offer customers a low level of protection. Accordingly, it can be challenging to link a retailer's conduct to a specific failure of their hardship policy.

Strengthening the hardship obligations on retailers will assist in more effectively monitoring how retailers are implementing their hardship policies, and allow the AER to take action where necessary.

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<sup>8</sup> Energy and Water Ombudsman NSW *2017-18 Annual Report*, October 2018 p.19

In November 2017, the AER issued Origin Energy with an infringement notice for allegedly failing to maintain and implement its hardship policy under section 43(2)(c) of the Retail Law. We alleged that Origin Energy failed to offer a customer hardship assistance in accordance with its policy which stated *'if we're on the phone with a customer who seems to be experiencing hardship, then we'll transfer them to the Power On team right away'*. This statement is a good example of a specific commitment made by a retailer to its customers that is able to be enforced by the AER.

Consistent, action-based standardised statements would permit the AER greater oversight as to how retailers are applying their hardship policies in practice by determining whether the minimum requirements are being applied. General, principles-based statements have proved difficult to enforce – leading to poor customer outcomes. Table 1 below provides a summary of the key findings of our hardship review in terms of deficiencies with current hardship policies, the resultant customer detriment and the benefit of standardised statements to address the detriment.

**Table 1 Summary of issues standardised statements will address**

Issue with current hardship policies	Customer detriment	Benefits of standardised statements
Inconsistent application of the minimum requirements across retailers	Customers do not receive assistance with managing their energy service – exacerbating financial hardship and potentially leading to disconnection for non-payment.	Standardised statements – expressly listing retailer commitments – will improve the overall quality of hardship policies and promote greater consistency in the provision of hardship assistance to individual customers.
Generalised policies containing vague statements make it difficult for customers to understand that they have a right to be offered assistance under a retailer's hardship policy.	Customers do not request assistance as they are unaware of their entitlements. May not self-identify as being in financial difficulties.	Standardised statements would mean that policies more clearly set out a customer's rights. This would allow customers to be able to more readily compare different hardship policies.
Difficult to assess whether a retailer is meeting the hardship obligations under the Retail Law and Rules	Overall quality of hardship policies varies from retailer to retailer. Potential for poor customer outcomes if a breach is difficult to establish.	Standardised statements would improve the AER's ability to monitor and enforce the hardship obligations under the Retail law and Rules – leading to improved customer outcomes.

## 5 Proposed standardised statements

The AER has developed a set of standardised statements that are based on, and align directly with, the minimum requirements for hardship policies contained in the Retail Law.

### 5.1 Use of standardised statements in hardship policies

The draft rule provides that standardised statements must be included in all retailer hardship policies as they are drafted in the Hardship Guidelines. This is to ensure consistency across industry in the provision of hardship assistance, and to ensure the AER has a uniform basis from which to monitor and assess hardship policies.

This will, ensure customers are better informed in relation to what support and assistance retailers provide – giving them greater ability to compare different hardship policies. The inclusion of clear and specific standardised statements across industry will also mean hardship policies, as a whole, will be more ‘customer friendly’. The comparable nature of the standardised statements will mean a customer’s rights and entitlements are clearly and consistently reflected – resulting in better customer outcomes.

The standardised statements alone are not intended to act as a ‘pro-forma’ hardship policy per se; they will be required to be inserted into hardship policies to indicate what specific actions and assistance a retailer will take to identify and assist hardship customers.

Retailers will still be required to develop a hardship policy in accordance with the Retail Law and Retail Rules, having regard to the principles of hardship policies and the ‘purpose test’ applied by the AER. As part of this requirement, retailers must also ensure that hardship policies submitted to the AER for approval are consistent with the content of the standardised statements.

### 5.2 Meeting the minimum requirements

The standardised statements are based on the minimum requirements for hardship policies contained in the Retail Law – these requirements are existing obligations on retailers.

The standardised statements are expressed as clear and specific statements of action that will allow the AER to monitor and enforce hardship policies effectively; they will not place additional obligations on retailers beyond the existing requirements. They will be useful to customers relying on retailer hardship policies, helping them readily understand their rights and how they need to engage with their retailer in the event they are experiencing payment difficulty due to hardship. The AER considers the standardised statements will be a beneficial tool for both retailers and customers.

### 5.3 Entry to hardship programs

The standardised statements do not provide for automatic entry of any customer into a retailer's hardship program. The standardised statements will instead focus on ensuring retailers have processes for identification and early response. The standardised statements provide an opportunity for retailers to engage with customers that may be in financial difficulty or hardship and that may benefit from being offered the protections inherent in hardship programs. The standardised statements do not remove a retailer's right to assess customers for entry onto its hardship program.

Once a retailer has identified a customer who may be experiencing payment difficulties, that retailer must engage with the customer to assess whether entry to the hardship program is appropriate. Whilst the retailer must take specific actions in this respect, the retailer still retains the ability to determine which customers will be offered entry to a hardship program.

### 5.4 Flexibility in hardship programs

The standardised statements will not remove a retailer's flexibility in offering programs and initiatives to its hardship customers that may go beyond what is provided for in the minimum requirements.

We recognise that some retailers offer programs and initiatives to their hardship customers that go beyond what is provided for in the minimum requirements (for example, appliance replacement schemes) and the standardised statements will not remove this flexibility. The standardised statements are only intended to reflect the minimum level of assistance that should be provided to customers.

## 6. Next steps

The proposed timeline and milestones for consideration of the standardised statements are shown in Table 2 below. Notably, the proposed timeline details the development and release of the final draft rule and anticipated Hardship Guidelines, which will house the standardised statements.

We will decide on the final timeline and milestones for the standardised statements after reviewing responses to this issues paper. We may alter the timeline and milestones as appropriate in response to emerging issues.

**Table 2 Proposed timeline and milestones: standardised statements**

Date	Milestone
November 2018	Issues paper on standardised statements released for consultation
November 2018	AEMC issues final hardship rule
December 2018	Submissions on standardised statements issues paper close
December 2018	Hardship Guidelines issues paper released by the AER for consultation
January 2019	Submission period on Hardship Guidelines issues paper closes
February 2019	Consultation on draft Hardship Guidelines (including standardised statements)
March 2019	Final AER Hardship Guidelines issued

In the event the final rule made by the AEMC provides for the development of AER Hardship Guidelines, the AER will develop those in accordance with the retail consultation procedure. As noted above, this process will supplement that consultation in the event the final rule provides for the inclusion of standardised statements in the Hardship Guidelines.

The AER may also conduct additional consultation in relation to the standardised statements following the release of the draft Hardship Guidelines. We expect this would occur in February 2019.

We invite submissions on this issues paper from all interested stakeholders by **7 December 2018**. Information on how to make a submission is included at the start of this document.

## Appendix A Consultation questions

1. Do the draft standardised statements at Appendix B provide a clear description of the minimum requirements set out in section 44 of the Retail Law? If not, why not?
2. Do the draft standardised statements contain user-friendly language that would be easily understood by a range of customers? If not, please specify.
3. Do the draft standardised statements sufficiently address access gaps by vulnerable customers by clarifying hardship rights and entitlements? If so, how?
4. More generally, are there any issues or concerns about the application within a retail business of the standardised statements as they are currently drafted? If so, please provide specific examples, making reference to the minimum requirement in question and which section of the drafting is of concern.

## Appendix B Draft Standardised Statements

### General statements

**This policy applies to all residential customers experiencing difficulties paying their energy bills due to hardship.**

**This policy:**

- 1. Explains how we can help you manage your energy costs**
- 2. Helps us take your circumstances and needs into account when determining how we can assist you, and**
- 3. Explains your rights and responsibilities as a customer in our hardship program.**

**If you have a financial counsellor you can ask them to contact us on your behalf.**

#	NERL minimum requirement	Standard statement
1 & 2	Processes to identify residential customers experiencing payment difficulties due to hardship, including identification by the retailer and self-identification by a residential customer	<p>We will tell you about our hardship program and how it might help you if:</p> <ul style="list-style-type: none"> <li>• you tell us you are having difficulties paying your bill</li> <li>• you are referred to our hardship program by a financial counsellor or other community worker</li> <li>• we think you may be experiencing financial hardship</li> </ul>
	Processes for the early response by the retailer in the case of residential customers identified as experiencing payment	<p>We will recommend that you speak to a staff member about entry into our hardship program if:</p> <ul style="list-style-type: none"> <li>• your payment patterns show late payments and requests for payment extensions</li> <li>• we have issued disconnection warning notices on your account</li> </ul>



#	NERL minimum requirement	Standard statement
	difficulties due to hardship	<ul style="list-style-type: none"> <li>• you have applied for or used relief grant or other emergency assistance to pay your bills,</li> <li>• you mention personal circumstances (e.g. death, illness, family violence, unemployment) that suggest hardship support may be needed</li> </ul> <p>Our staff member will talk to you about your individual circumstances and eligibility for the hardship program.</p> <p>[Retailer can insert its timeframes for assessing a customer’s application for hardship assistance]</p> <p>If you are accepted onto our hardship program, we will tell you</p> <ul style="list-style-type: none"> <li>• whether you are on the most suitable plan for your circumstances or if there is a plan that may better suit your needs</li> <li>• concessions and rebates you may be able to receive</li> <li>• how you can reduce your current and future energy use</li> <li>• a suitable payment amount that considers your capacity to pay</li> <li>• whether you can use Centrepay as a payment option.</li> </ul> <p>We will send you information confirming the details of your agreed payment arrangement and the contact details for our hardship team. We will send you a copy of our hardship policy at no cost if you ask for it.</p>
3	Flexible payment options (including a payment plan and Centrepay) for the payment of energy bills by hardship customers	<p>When you are in our hardship program, we will offer you flexible payment options, based on your individual circumstances.</p> <p>There are different payment options available to hardship customers, including:</p>

#	NERL minimum requirement	Standard statement
	<ul style="list-style-type: none"> <li>• payment plans</li> <li>• the use of Centrepay.</li> </ul> <p data-bbox="716 461 1205 488">[Retailer to add additional payment options].</p> <p data-bbox="716 542 1472 570">When agreeing a payment plan with you, we must take into account:</p> <ul style="list-style-type: none"> <li>• your capacity to pay (how much you are able to pay)</li> <li>• your debt with us (how much you owe), and</li> <li>• how much energy we expect you will use in the next 12 months.</li> </ul> <p data-bbox="716 773 1650 800">Our payment plan will include an offer to pay in advance or in arrears by instalments.</p> <p data-bbox="716 854 1388 881">Once the payment plan is agreed we will send you details of:</p> <ul style="list-style-type: none"> <li>• how long it will run</li> <li>• how many payments you need to make, and when you need to make them, and</li> <li>• how we calculated your payments (in advance or in arrears).</li> </ul> <p data-bbox="716 1084 1934 1141">It is important that you make these payments when they are due. If you make payments as agreed, we will not disconnect you for non-payment.</p> <p data-bbox="716 1198 1944 1255">If you can't meet the payments we agreed as payment plan, or if your circumstances change, please contact us immediately on [X] so we can talk about this with you. We can review your hardship program including payment</p>	

#	NERL minimum requirement	Standard statement
		plan arrangements.
4	Processes to identify appropriate government concession programs and appropriate financial counselling services and to notify hardship customers of those programs and services	<p>If we notice you have missed a payment, we will contact you [retailer must set out contact process when a hardship customer misses a payment plan instalment]</p> <p>It is important you let us know if anything comes up that means you might not be able to make the payments agreed for your payment plan or hardship program. You also need to let us know if you have new contact details, If you do not do that, we may consider removing you from the hardship program.</p> <p>Depending which state you live in, you may have access to Government schemes, concessions and rebates that are designed to help with your energy bills.</p> <p>We will tell you about government concession programs and financial counselling services. We will explain these programs to you so you understand how they can help you.</p> <p>If you find out you are eligible for these programs, please let us know immediately so that we can help you.</p>
5	An outline of a range of programs that the retailer may use to assist hardship customers	<p>We also offer the following services to assist you whilst you are participating in the Hardship Program: [insert other services/products offered to hardship customers].</p> <p>We will take into account your individual circumstances to find the programs or services that can best help you.</p>

#	NERL minimum requirement	Standard statement
6	Processes to review the appropriateness of a hardship customer's market retail contract in accordance with the purpose of the customer hardship policy	<p>As soon as you enter our hardship program, we will discuss your energy usage and whether you are on the most suitable plan for your circumstances.</p> <p>If we agree you will benefit from changing to a new plan, we will explain it to you and get your consent to transfer you to the new plan at no cost.</p>
7	Processes or programs to assist customers with strategies to improve their energy efficiency, where such processes or programs are required by a local instrument	As soon as you enter our hardship program, we will tell you ways you can improve your energy efficiency (how much energy you use). This may vary according to what state you live in.
8	Any variations specified or of a kind specified by the AER	N/A
9	Any other matters required by the Rules.	<p>We will not:</p> <ul style="list-style-type: none"> <li>• charge our hardship customers late payment fees, or</li> <li>• require our hardship customers to provide a security deposit.</li> </ul>