



4 December 2018

Sarah Proudfoot
Australian Energy Regulator
GPO Box 520
Melbourne, VIC, 3001

Dear Ms. Proudfoot

Powershop submission - Standardised statements for use in customer hardship policies

Powershop Australia Pty Ltd (Powershop) thanks the Australian Energy Regulator (AER) for the opportunity to provide comments on the issues paper *Standardised statements for use in customer hardship policies*.

Powershop supports the intent of the AER's draft standardised statements for use in customer hardship policies to the extent they are aimed at removing any perceived and actual barriers to access to assistance and the provision of information. While Powershop supports the intent of the changes, we also encourage alignment with Victorian requirements wherever reasonably possible, for reasons outlined in this submission.

Q.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?

We believe they do.

Q.2 Do the draft standardised statements contain user-friendly language that would be easily understood by a range of customers? If not, please specify.

We believe they do.

Q.3 Do the draft standardised statements sufficiently address access gaps by vulnerable customers by clarifying hardship rights and entitlements? If so, how?

Powershop has not identified any access gaps when it comes to vulnerable customer entitlements.

Powershop communicates customer entitlements not only through its Hardship Policy and procedures, but also through its website:

- Payment help webpage: <https://www.powershop.com.au/payment-help/>
- Concessions webpage: <https://www.powershop.com.au/concessions/>
- Life Support webpage: <https://www.powershop.com.au/life-support/>

Powershop understands that the intent of the change is to address the adverse findings of the AER during its hardship review. Powershop encourages the AER to align any prescribed language with the Essential Services Commission of Victoria (ESC) language to avoid further confusion in the market.

Q.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.



While there are no material issues or concerns with adopting standardised statements, having to go through a Hardship Policy redesign and resubmission process is an avoidable burden for those retailers who currently adequately communicate customer protections.

Victorian retailers have been through a long consultation and design process to finalise the payment difficulties framework, and are now in the final stages of costly systems development to support implementation and reporting requirements. Therefore we would encourage the AER to align itself as much as possible with the ESC requirements to avoid causing further confusion and cost.

If you have any queries or would like to discuss any aspect of this submission please do not hesitate to contact me.

Yours sincerely,

Haiden Jones
Operations Manager
Powershop Australia Pty Ltd