

In our view, the key is to ensure that the AER reports on and responds to movements in the below indicators *per retailer*, as opposed to assessing the level of the indicator against an unclear view of 'effective performance' and seeking to compare across retailers. In terms of monitoring performance per retailer the key is to see whether the indicator is stable, improving or deteriorating over time.

Agreed indicators

1. Total number of customers on the program, collected monthly.
2. Customers denied access
Using definition of *denied access* as a customer is referred to a hardship program by any means (e.g. identified by the retailer or self-identified by the customer or by a third-party) but is not accepted into the hardship program. This does not include customers who decline to participate in the program, or accept an alternative arrangement (e.g. payment plan).
3. Forms of assistance, with number of hardship customers:
 - notified of government concessions, grants etc
 - notified of/referred to a financial counsellor
 - on the following payment arrangements:
 - regular payment plans
 - Centrepay
 - who received energy efficiency information (including phone audits, provision of leaflets etc)
4. Customers who are managing payment plans (payment plan 'success' rate), defined as number of customers who the retailer considers as making payments as a percentage of total number of plans under the hardship program. This is measured at a point in time.
 - **Notes:** We would like to maintain our support for this indicator as it shows capacity to pay and how it is being accounted for. This is not captured anywhere else. Shifts in this number per retailer can help the AER see and potentially understand any issues that may arise from the other indicators. Note also that this is not the same as people on the program (and therefore will not be 100%). Customers are not removed from programmes instantaneously and many stay on programs with broken arrangements, which the retailers then try and reinstate (numbers vary as to how many times this happens).
5. Total number of customers who exited, broken down into:
 - participants exiting a hardship program by agreement with the retailer (no transfer)
 - participants excluded/removed for not complying with requirements
 - participants who transferred away from retailer

Supplementary data

To inform general analysis and affordability report:

- Program participants who are concessions customers.
- Debt on entry, average per customer and also showing across debt bands of \$0 -\$500, \$501 - \$1500, \$1501-\$2500, \$2501+. The retailer may compile this information based on the balance outstanding as at the last day of the month or at point of entry.
 - **Notes:** We do not support a view that what happens before entering a hardship programme should be measured as hardship programme 'effectiveness' (as

different retailers have different places in their companies for the program and dollars on entry can understandably vary) and we do not want to imply that we can tell if a customer is in hardship in an objective sense. However, we recognise value in understanding what debts customers enter programs with, and for this reason, debt data is included here as 'supplementary'.

- Other assistance provided by the retailer (space for retailer to provide input in own words)
 - **Note:** This has not been agreed by all retailers. Several retailers are concerned that this will be an unreasonable point of comparison.
- Average debt per customer, using total debt across program, collected monthly. This can be compared to the debt on entry to show how debt tracks once in the program.
 - **Notes:** We do not support a view that the overarching objective of a hardship programme is to eliminate debt, but we recognise some value in understanding how debt levels track over time. For this reason, debt data is included here as 'supplementary'.