

March 3 2021

Mr Eric Groom
AGNSA2021@aer.gov.au

Dear Mr Groom

RE: SAFCA submission re AGN's revised gas access arrangement proposal and AER draft decision for the period 1 July 2021 to 30 June 2026

Introduction

The South Australian Financial Counsellors' Association (SAFCA) represents and supports 220 financial counsellors and support workers in South Australia and the Northern Territory. Financial counsellors provide guidance and advocacy for their clients and their services are free, independent and non-judgemental. Financial counsellors work for some 26 not for profit agencies in South Australia.

We are pleased to make comment on the AGN's revised proposal and the AER draft decision

SAFCA's Involvement in the AA Determination

SAFCA has been active in the energy sector for 6 years, representing the views of residential consumers and in particular, vulnerable consumers in South Australia. SAFCA has worked with and been a member of the AGN SA Reference Group since 2018.

In addition to the 2021 – 2026 Gas Access Arrangement proposal, the SA Reference Group has been pleased to be engaged in a number of areas of AGN's business including:

- COVID 19
- Vulnerable Customer Assistance Strategy
- Renewable Gas Blend for UAFG
- The Innovation Scheme

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AGN Vulnerability Customer Assistance Program

SAFCA is very supportive of the proposed Step Change around the Vulnerability Customer Assistance Program (VCAP). SAFCA along with some of its members, attended the workshops at which the Program was developed.

Customers told AGN that it has a social responsibility to support people in the community who are experiencing vulnerability including pensioners, low income earners and people dealing health and mental health issues.

AGN found 76% customer support for the Draft Plan proposal for a VCAP. Customers and stakeholders noted that AGN could work in partnership with social service and not-for-profit organisations to deliver the VCAP over the next AA period.

We are satisfied that AGN seeks an amount of \$780 million over the next AA period to support:

- A dedicated resource to run the program;
- Assistance for appliance rebates and audits for vulnerable customers;
- Rebates for new connections;
- Rebates for switching to more efficient gas appliances;
- Gas efficiency audits; and
- CRM enhancements for improved/ targeted services.

We commend AGN on the Vulnerability Program and also on the stakeholder engagement around VCAP and the wider gas access arrangement proposal development. Furthermore, we consider the AGN revised proposal capable of acceptance by the AER.

Yours sincerely



Wendy Shirley
Executive Officer