



25 February 2011

Mr Tom Leuner
General Manager
Markets Branch
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

By email: AERInquiry@aer.gov.au

Dear Tom,

ORIGIN SUBMISSION: GUIDANCE ON AER APPROVAL OF CUSTOMER HARDSHIP POLICIES

Origin welcomes the opportunity to provide a response to the AER's *Guidance on AER Approval of Customer Hardship Policies*. Origin supports the AER's approach, noting that the AER is focussing on retailers' processes to deliver the requirements of the National Energy Law and Rules under the National Energy Customer Framework (NECF).¹

The only concern we have with the AER's approach is the feasibility of a hardship policy adequately covering all of the information addressed in the AER's paper and also being a document that consumers will find accessible and informative. In fact, the purpose of the AER's proposed retailer policy document should be clarified: we know that the document is to seek AER approval for a retailer's hardship policy, but it is not clear why it needs to be on retailers' websites. Is this to inform consumers in hardship, or more to provide transparency about retailers' processes to other stakeholders?

We believe that the needs of consumers in hardship will not be the same as those seeking the detail: it may be that the comprehensive policy document approved by the AER will need to be changed to a shorter and more consumer-friendly version for consumer access on retailers' websites. This is not to say that the longer policy document might not also be publicly available, but that it is less likely to be effective on its own as a meaningful consumer information tool. This is because even if a retailer fulfils the requirement to have a policy written in clear and plain language, the complexity of the entire document as developed for the AER is likely to be overwhelming.

If you have any queries about this submission please contact me on the number below.

Yours sincerely

[signed]

Dr Fiona Simon
Policy Development Manager, Retail
03 8665 7865 - fiona.simon@originenergy.com.au

¹ While Origin has some concerns with the changes made to the NECF customer hardship provisions between the last version consulted on with stakeholders and the version agreed by the Ministerial Council on Energy, we recognise that these concerns are out of scope for the AER.