

30 October 2017



Ms Angela Catt
Executive Director Energy Delivery and Coordination
The Division of Energy, Water and Portfolio Strategy
via email: energy.submissions@industry.nsw.gov.au

Dear Ms Catt,

Proposed amendments to the NSW Social Programs for Energy Code

Thank you for the opportunity to provide feedback to the proposed amendments to the NSW Social Programs for Energy Code. PIAC welcomes the intention to improve the supporting frameworks for vulnerable and disadvantaged energy users. PIAC considers that further substantive reforms, most notably the introduction of proportionate concessions and/or the introduction of a safety net tariff, are required to fully support to those in need.

PIAC notes the tight timeline provided for feedback, which limits the depth of analysis it is able to undertake in response.

PIAC notes also that along with other organisations that support and represent disadvantaged and vulnerable NSW households, PIAC was not expressly invited to provide comment from a consumer perspective, but has been forwarded a letter intended for energy retailers.

The lack of targeted opportunity for consumer advocates to participate in the review process means that the proposed amendments cannot be considered within the context of a number of other key reviews relating to energy affordability.

PIAC has worked with the NSW Council of Social Service (NCOSS) in the development of their submission. In regards to the specific proposed amendments, PIAC raises the issues below and asks you please refer to the NCOSS submission, which it fully endorses.

A3.9.1 /E1.1.2/ E2.1.1 – 2.1.4

Many market contracts can have conditions attached to them, such as pay on time discounts and direct debit requirements, which result in higher bills for vulnerable households. The aim should be for all disadvantaged or vulnerable consumers to be on the best plan for them in their situation.

A3.10

In the absence of these amendments being carefully considered within the context of the other energy affordability reviews occurring, PIAC recommends the next review of these proposed amendments be brought forward to January 2019.

Level 5, 175 Liverpool St
Sydney NSW 2000
Phone: 61 2 8898 6500
Fax: 61 2 8898 6555
www.piac.asn.au
ABN: 77 002 773 524

A4.1.6

Providing rebate information in a variety of community languages is important in ensuring that many of the most vulnerable people in the community have access to this information. PIAC urges the department to seek feedback from the Ethnic Communities' Council of NSW on this process and which community languages to specify.

A5.14

PIAC is pleased that collecting information about rebate and EAPA uptake is included in the proposal and recommends this amendment be kept as it is. PIAC looks forward to future reform of the supporting arrangements to better cater for the dynamics of those in need, and sees this information gathering as key to providing a solid evidence base for future reforms.

E.2.1

PIAC is concerned that without a definition of "all reasonable endeavours", retailers may not make adequate effort to assist their customers to be put on better deals, and monitoring the outcome of this requirement for compliance purposes will be difficult. With the imminent roll out of digital meters, retailers will be well placed to help consumers understand their usage and ways to reduce their bills.

E2.2

PIAC agrees with NCOSS that some prescription is required to make it clearer when a retailer must contact a consumer regarding a more suitable offer.

PIAC would welcome the opportunity to discuss the proposed amendments to the NSW Social Programs for Energy Code in more depth. Please contact me if you have any questions or would like more information.

Yours sincerely,

Craig Memery
Energy and Water Policy Team Leader
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6522
E-mail: cmemery@piac.asn.au