

In-person visits before disconnection

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About the Justice and Equity Centre

The Justice and Equity Centre is a leading, independent law and policy centre. Established in 1982 as the Public Interest Advocacy Centre (PIAC), we work with people and communities who are marginalised and facing disadvantage.

The Centre tackles injustice and inequality through:

- legal advice and representation, specialising in test cases and strategic casework;
- research, analysis and policy development; and
- advocacy for systems change to deliver social justice.

Energy and Water Justice

Our Energy and Water Justice work improves regulation and policy so all people can access the sustainable, dependable and affordable energy and water they need. We ensure consumer protections improve equity and limit disadvantage and support communities to play a meaningful role in decision-making. We help to accelerate a transition away from fossil fuels that also improves outcomes for people. We work collaboratively with community and consumer groups across the country, and our work receives input from a community-based reference group whose members include:

- Affiliated Residential Park Residents Association NSW;
- Anglicare;
- Combined Pensioners and Superannuants Association of NSW;
- Energy and Water Ombudsman NSW;
- Ethnic Communities Council NSW;
- Financial Counsellors Association of NSW;
- NSW Council of Social Service;
- Physical Disability Council of NSW;
- St Vincent de Paul Society of NSW;
- Salvation Army;
- Tenants Union NSW; and
- The Sydney Alliance.

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Recommendations

Recommendation 1

That in-person pre-visits in advance of disconnection be implemented as business as usual across electricity, gas and water services.

Recommendation 2

Investigate options to ensure that at least one contact attempt is made in person.

Recommendation 3

Investigate whether an additional time window between notification and disconnection is required and options to implement this if required.

Recommendation 4

Only field officers with compassion and appropriate communication skills undertake the home visits. Quality checks need to be in place and there must be a clear separation between those providing pre-visits and debt collection activities of retailers.

Recommendation 5

The Energy Charter help facilitate ongoing improvements to training and identification of suitable staff in their K2SC scheme as part of wider measures to ensure appropriate skills and training for those undertaking pre-visits

Recommendation 6

Pre-visits should be undertaken by energy distributors in the first instance – and in any case should never be directly undertaken by energy providers / retailer and their agents.

Recommendation 7

That reviews of energy and water disconnection regulation and policy explore options formalising pre-visits undertaken by independent social / community service providers.

Recommendation 8

Investigate options for improved communications, systems and information sharing between providers and distributors, and where appropriate, local community welfare services.

Recommendation 9

Continue to work towards achieving industry-wide consistency in supporting households experiencing payment difficulty / at risk of disconnection.

Recommendation 10

Improve disconnection warning notices, including ensuring they include or are accompanied by supportive messaging and information shown to encourage more positive responses.

Recommendation 11

Providers establish direct lines for customer disconnection support.

Recommendation 12

People contacting their provider to avoid a disconnection should default into a 'hardship' program, unless it is clearly established that the household faces no affordability challenges.

Recommendation 13

That energy debt remains protected when a consumer switches providers.

Recommendation 14

That EAPA be able to be applied to closed accounts.

Recommendation 15

Consumer advocates continue to work with the Energy Charter and other pre-visit providers to improve the effectiveness of supports and assistance material provided during pre-visits.

Recommendation 16

Energy retailers commit to no remote disconnections for non-payment.

Recommendation 17

As part of the 'Towards energy equity Action 9: Encourage improved engagement to promote disconnection as truly a last resort,' the AER prohibit remote disconnection for non-payment.

Recommendation 18

Develop leave behind materials and other supports for people who are reconnected.

Recommendation 19

People contacting their provider to reconnect their service should default into a 'hardship' program, unless it is clear that the household faces no affordability challenges.

Recommendation 20

The AER collect data on disconnection warning notices issued and match these against completed disconnections.

Recommendation 21

Continue to set up processes to ascertain the effectiveness of pre-visits, including by hearing directly from households who have experienced a visit.

Recommendation 22

Undertake a trial to test pre-visits provided by social / community service workers, with scope to engage more holistic, wrap around support for households in energy (and water) debt.

Introduction

The Justice and Equity Centre's (JEC) research into energy and water debt and disconnection¹ has shown that disconnections for non-payment – even the threat and fear of disconnections – causes a range of escalating harms.² It also shows that many disconnected households are already likely to be experiencing a range of vulnerabilities, including disability, illness and mental illness. The experience of disconnection compounds the impacts of these vulnerabilities.³ Given the increasing essentiality of energy to household health, wellbeing and inclusion, threats of disconnection for non-payment should be regulated and restricted in a way which reflects the harmful impact of disconnections.

Requiring an in-person visit before initiating disconnection processes may be an effective means of slowing those processes and ensuring the potential harms of disconnection are appropriately managed. This report investigates the concept and practice of these visits, their value and risks and assesses what role they could have in more effective management of energy related debts.

Research methodology

Throughout 2023, the JEC (then known as the Public Interest Advocacy Centre) undertook research examining how NSW households are impacted by debt and disconnection related to their use of electricity, gas and water services. This report into pre-disconnection home visits draws together findings from across:

- Household consumer interviews and a large-format survey of households who identified themselves as:
 - having experienced a disconnection from their energy or water service in the last two years ('disconnected' households);
 - being notified of a disconnection, but managed to avoid the disconnection ('notified' households); or
 - households who are seriously worried about being disconnected and making sacrifices to afford their energy/water bills ('worried' households).
- Interviews with frontline workers such as financial counsellors and community service ('frontline workers').
- Interviews with industry:
 - The three NSW electricity distributors: Ausgrid, Endeavour Energy and Essential Energy.
 - The main gas distributor in NSW: Jemena Gas Networks.
 - A large energy retailer: Energy Australia.
 - The two largest water providers in NSW: Sydney Water and Hunter Water.

¹ All reports from our disconnections research can be found [here](#).

² Public Interest Advocacy Centre (PIAC), [Powerless: Debt and disconnection](#) (2024) 47-50 and 66-80.

³ Ibid 6-8 and 12-14.

- An interview with the Energy and Water Ombudsman NSW (EWON).

Whilst the research looks at both energy and water debt, this report is focussed on energy.

More information about the research objectives, methodology and context of the research can be found in our document [Powerless: Background and methodology](#). More information about the wider research findings can be found in our report in [Powerless: Debt and disconnection](#).⁴

Disconnection pre-visits in NSW

To help avoid disconnections for non-payment, visiting a home ahead of a disconnection – initially, simply to personally hand the householder a disconnection warning notice - has been part of some energy distributors practices for some time. The primary motivation for considering this practice was a desire to reduce ‘truck rolls’ by the distributor. Handing a disconnection notice to a householder could help alert the householder that action was required and may avoid a disconnection visit that is often followed very soon after by a visit to reconnect supply. A single ‘pre-visit’ being preferable to undertaking a disconnection and a reconnection.

Prior to structural separation of distribution and retail businesses, this was an established practice. For example:

- As ‘Country Energy’, Essential Energy undertook these visits. They continued the practice until 2019 in an ad hoc way, depending on the capacity at the local depots.
- As an integrated business, EnergyAustralia undertook visits to homes both for debt recovery as well as to help avoid disconnections.
- It was also established practice for gas customers to get an in-person visit as part of disconnection processes. This shifted when retail and distribution services were split. As a Jemena Gas Networks staff member explained:

“The retailers ask us to disconnect, that's what we have to do...Our job is to simply do the work that they've asked us to do. You can appreciate that if we knocked on everybody's door, there's a high probability that no one would ever let us disconnect and we have to be performing the work that the retailers requested.

Notes:

- Where percentages do not add to 100%, this is due to rounding.
- Quantitative survey results are often shown by total and analysed by three types of respondents: ‘disconnected’, ‘notified’, and ‘worried’.
- Any quotes from participants are presented in quotation marks.
- Names of participants are pseudonyms to ensure confidentiality.
- ‘Provider’ and ‘retailer’ are used interchangeably in this report and refer to energy retailers and corporations and councils that provide water services.
- For public health reasons, water is not completely disconnected but it is restricted, significantly reducing the water flow. For brevity, in this report when referring to both energy and water services, we use the term ‘disconnection’ to refer to disconnection of energy services and restriction of water services
- The complete survey questionnaire can be obtained from the JEC on request.

So, it's taken that kind of change to say, 'Okay, we're not going to knock on your door and have a conversation about it because the retailer should have already done all that with you.' Our job is to perform the work that the retailer is requesting and in effect paying us to do."

Jemena Gas Networks staff member

Some water providers (NSW water providers are integrated businesses) also undertake home visits as a way to make contact with the household and avoid having to undertake a restriction. For example:

- Sydney Water visits people with water debt they have been unable to make contact with. This is seen as a last resort and done on a case-by-case basis. The decision to undertake a 'safety site visit' is only taken after multiple other steps have been taken and after at least 100 days of attempts to make contact.
- Hunter Water began home visits in 2016 for pensioners with debt. These expanded to include anyone with debt who was not 'engaging' with them. This practice has resulted in less debt for the business. The personal approach during door knocks is considered crucial in understanding their consumers' circumstances, providing information and offering support. Leave behind material enables people to start paying minimum amounts towards their debt without direct communication with Hunter Water, if preferred.

Development of the Knock to Stay Connected initiative

In 2019 Essential Energy began a formal trial of pre-disconnection home visits (pre-visits). They tracked results and found a substantial decrease in 'completed disconnections'. Based on the JEC's work establishing the harm of disconnection and the ongoing cycle of escalating payment difficulty it contributes to, we saw potential for these pre-visits to be utilised as a platform for improved assistance. The JEC worked with the Salvation Army and St Vincent de Paul Society NSW to develop a range of supportive information into a [flyer](#) that could be provided alongside the disconnection warning notice. The purpose of this flyer was to provide support and a range of information at the moment of most impact, when the household is likely to be focused on addressing their issues and would benefit from assistance to get help from their retailer, community organisations, and government programs. The principle behind this is something that will be examined in this report.

Success in reducing complete disconnections led to Essential Energy implementing the program as business as usual. It now involves a pre-visit by field staff (likely a meter reader) who knocks on the door of a household. If the householder is home, the field officer hands them a disconnection warning notice and the supports flyer. The field officer works to a simple script encouraging the household to contact their retailer. If no one is at home, the notice and the flyer is left (preferably) at the door or (otherwise) in the mailbox. Essential Energy's model had no system changes and no additional costs to retailers. Whilst the program does cost Essential Energy additional money, the range of benefits recognised by the business are deemed worthwhile.

Based on Essential Energy's results, Endeavour Energy, undertook a pre-visit trial with a similar model to Essential Energy's. Their successful results also saw subsequent implementation as

business as usual, including using a version of the supports flyer facilitated by the JEC. The third NSW electricity distributor, Ausgrid, sought to pilot a similar initiative in partnership with retailer EnergyAustralia. However, EnergyAustralia developed its own version of the door knock process without the involvement of Ausgrid, with Ausgrid eventually deciding not to undertake pre-visits. Jemena Gas Networks also trialled pre-visits (initially with EnergyAustralia) and has now implemented them as business as usual with a model based on Essential Energy's but with their own version of the supports flier.

EnergyAustralia independently undertakes its own pre-visits of homes at risk of disconnection.⁵ Visits are undertaken before EnergyAustralia formally raises a disconnection service order, and are undertaken by a third party. After the visit, the household has 14 days to engage with EnergyAustralia (or switch to another retailer) before EnergyAustralia raises a disconnection service order (which triggers the relevant distributor to undertake the disconnection process). Three to four days before the scheduled disconnection, EnergyAustralia make another attempt to engage with the householder through SMS and email.

"The key driver [of the visits] for us was Covid-19. Covid-19 added a degree of uncertainty for a lot of people. Our eastern states were going in and out of lockdowns, so they were working and then they weren't working. The regulators came over the top of all of that and said you can't disconnect. So, it was okay, if we can't disconnect, how can we try and attempt contact with a customer? How can the customer see that we're reaching out and we're really trying to contact them? ... It's not threatening. It's not a collections tool, it's an engagement tool. That would be my biggest learning. There's no force. They have their list of questions...[The field staff] listen for the triggers of hardship, like, 'I've lost my job.' We get all that information and our next action is very different. From there, our agents and specialist team will try to contact them; they send a different line of collateral. Before we do any disconnection assessment, we read the reference to the field visit."

EnergyAustralia staff member

On the basis of demonstrated success, and a desire to ensure consistently best-practice application, pre-visits were adopted into an [Energy Charter](#) initiative called 'Knock to Stay Connected' (K2SC) with a voluntary [Customer Code](#) in 2023. This was also seen as a mechanism for industry participants to share learnings and resources.

What is success?

As noted earlier, re-adopting disconnection pre-visits was predominantly seen as an efficiency measure for distribution businesses, but there are also a range of other potential benefits for businesses and households. The relative importance and priority of these benefits is critical in considering the success of pre-visits, their ideal form, and how they may or may not be employed.

⁵ At time of writing another energy retailer, AGL, had also started undertaking a trial but their initiative is not included in this report.

Benefits and success for businesses

Overall pre-visits are seen as successful by businesses because they improve safety, field staff experience, cost effectiveness and efficiencies; and foster positive engagement with and outcomes for households.

Safety and improved employee experience

Pre-visits improve safety of field staff, helping to reduce confrontations with household members who are taken by surprise and stressed by a disconnection occurring.

“Fundamentally...the safety aspect for the field officer. It's a much better engagement than just turning up just to disconnect.”

Distributor

Essential Energy noted the improvements to employee morale and safety given that completing a disconnection is a stressful and unpleasant job that can put workers at risk, particularly where an anxious householder reacts to the disconnection. EnergyAustralia noted the approach has also created a positive employee experience, with staff expressing pride in being part of a solution-oriented approach, resulting in a relatively high employee engagement score.

“Apart from the physical safety benefits, we've seen a decline in those threatening behaviours from customers - for good reason, of course. But also, I think the psychological welfare of the people that are doing those visits as well. The anecdotal evidence that we got back during the trial, talking to the guys in the field that do the role, is it has made it much easier. So, the extra visit, the knocking on the door, leaving them something with more information in the event that they did need to go back, it was an easier process, easier conversation for them. Some of the comments that we got back during the trial was like, 'Oh, the customer was really grateful that we weren't there to actually disconnect them and they're going to act.' The field officer also then doesn't feel as stressed... really important to the delivery of this program with respect to retention of staff.”

Distributor

Cost-savings and operational efficiency

Distributors and providers consider pre-visits to be a cost-effective alternative to traditional disconnection processes. The effort involved is less resource-intensive than disconnecting supply and then returning to the home soon after to undertake a reconnection.

“Those customers where you don't need to go through with that disconnection process, and it's just the effort to hand over a letter and have a conversation with the customer, it's a lot less effort than having to go to the meter board and perform a fuse removal or whatever disconnection process.”

Distributor

Pre-visits are seen to significantly improve operational efficiency in preventing multiple visits to the same home.

“99% of the time, if we disconnected on a Tuesday morning, we were going back there Tuesday afternoon to reconnect them. We’d disconnect, customer gets upset, calls their retailer, retailer puts them back on. Clearly not a great process. So, that was one of our drivers as we know from experience that most of the time when we rock up and do something, it results in a reconnection.”

Distributor

[At the launch of the Customer Code](#), retailer EnergyAustralia talked about the financial benefits they experienced from their program, speaking about the significant increase debt repayments they were able to recover from the participating households. Although it must be noted only 10% of the households went on to join their hardship program.⁶ EnergyAustralia contended that many of the households who had not previously responded to communication about payment didn’t necessarily have payment difficulties. Their contention was that many people had simply moved into their home and not yet contacted a retailer to set up an account so had not paid for any of the energy they were using. It will be necessary to examine these issues further, to ensure pre-visits are not simply used as a tool to exert additional ‘pressure’ in eliciting debt repayment.

A better business practice for customers

Many businesses see pre-visits as aligning with their desire to be ‘customer focussed’. Some distributors also see a broader role for distributors in helping people understand the energy transition and help dispel myths and fears surrounding the energy industry, with practices like pre-visits supporting improved trust. Others saw that pre-visits are also an opportunity to connect discussions about climate change with education on what constitutes energy efficient appliances. Again, a closer examination of this is required to ensure pre-visits are a platform for helpful engagement with households.

Some distributors see a benefit in pre-visits helping households to advocate from themselves, empowering them in their interactions with the retailer.

“I think it goes to show that with human connection and with the actual ability to chat with the customer, you can often get them on the right path. The path itself is quite daunting, but the customer need only contact their retailer and say, ‘Hey, look, I don’t have the money to pay this bill. I don’t want my lights to go off. How do we work this out?’ And the customers are actually protected under the financial hardship laws as well, which they might not be aware of. So, I think it’s in everyone’s best interest to keep the customers’ lights on and for the customer to be in contact with the retailer.”

Distributor

Many businesses recognised that having a person visit the home provides a chance to recognise the particular risks of disconnection, particularly where there are babies/young children or older people living in the home, or there may be other concerns such as mental health or family violence. A human visit can help identify where it is inappropriate or unsafe to undertake a

⁶ It is important to note that just because only 10% of households joined the hardship program that this represented the number of households who actually needed to be part of the program. The JEC [has written previously](#) about the difficulties people experiencing payment difficulties have in accessing assistance programs.

disconnection. This is a critical harm-mitigation aspect of pre-visits which will be explored further, particularly in the context of who is best placed to undertake this assessment and how.

“The business is engaged because it seems to be the right thing to do. We want to keep the power on, we want to make sure that customers that may be in vulnerable circumstances are still getting [their service].”

Distributor

Benefits and success for households

While the primary motivation for trialling pre-visits and formalising them may have been benefits for the businesses involved, the most significant potential benefit is to households at risk of disconnection. Given the compounding impacts of the threat of disconnection on households any measure which can reduce instances of disconnection may be seen as a success. Further, any measure which slows the process of disconnection or provides additional opportunities to identify and avoid the risk of severe impacts on vulnerable households has a significant benefit.

Avoiding disconnection

Essential Energy’s trial in 2019 indicated 80% of ‘completed’ disconnections being avoided. That is, as a result of the pre-visit, the householder either contacted their provider and negotiated to avoid the disconnection or switched to another retailer. This rate has fallen as pre-visits become business as usual, but remains between 50-60% of disconnections not proceeding.

Endeavour Energy’s pilot resulted in 45-47% of disconnections not proceeding. Jemena Gas Network’s (very small) pilot found a 50% avoidance rate.

Jemena Gas Networks found that the face-to-face engagement was crucial to avoiding the disconnection but that placement of the disconnection warning notice and supports information (eg at the door or in the mailbox) did not appear to make a difference to avoidance of disconnection.

EnergyAustralia reported that despite only 11% of people being home for a visit (which were undertaken across multiple distribution areas and not just in NSW), material left behind (separate to the material designed in partnership with the JEC) helped result in 69% of households contacting them. However, this did not investigate how many of these households actually avoided the impending disconnection.⁷

For households, disconnections are at the very least extremely inconvenient and at worst seriously harmful. Avoiding the harms of impending disconnection is the primary benefit for households. Having a person visit a household - even if no direct contact is made - can have a safety assurance function. Field crew (particularly with some support or training) can prevent disconnection proceeding where it may present unreasonable possible risks to the household. Depending on processes and systems, they may also be able to provide information to the retailer to aid the provision of further assistance. Given the high levels of vulnerability associated with households who are disconnected, this is an important potential benefit of the initiative.

⁷ <https://www.theenergycharter.com.au/knock-to-stay-connected/>

Whilst the initiative has shown high rates of avoided disconnection, it is important to note that the immediate benefits of avoiding the disconnection can't necessarily be considered an unmitigated success. From our research, we see evidence that contacting a retailer and negotiating to avoid a disconnection is not necessarily resulting in improved outcomes for the household – for example, they are unable to set up an affordable and sustainable payment solution that avoids future threats of disconnection⁸ and doesn't impact affording other essentials.⁹ Indeed, often a household is left worse off through being pressured into an unaffordable payment plan or other arrangements that increase their likelihood of future disconnection. There is also great variability in the assistance provided, often depending on the retailer and sometimes even on individuals at the retailer.¹⁰

Even where a sustainable payment arrangement is made, without addressing the wider issues being faced by the household, ongoing problems with energy affordability are likely to occur. For example, debts related to other essentials, poor housing energy efficiency, which leads to high bills (or going without essential energy); high housing costs or other costs of living which means there will never be enough money to afford energy; as well as a myriad of other issues which may be affecting affordability such as illness, lack of job security, poor mental health and addiction. If they have a choice,¹¹ a householder might switch retailers, which means their debt with their former retailer no longer has protections attached to it and is likely to be sold to a debt collector. This is common and contributes to a hidden debt 'ecosystem' that impacts retailers as well as households.

Supporting long term affordability

The pre-visit initiative also presents an opportunity to assist households access the supports they need to address the challenges above and alleviate some of the broader issues which might be contributing to or driving their affordability challenges.

On the basis of data captured to date, there isn't clear evidence the initiative helps people avoid a future disconnection – that is, there no clear evidence the contact or information is effective in helping people to address avoid future payment difficulty. But it is this potential which the JEC is particularly interested to explore further.

Below in *Experiences and perceptions of home visits*, we examine these issues in more detail, based on a survey with households, and interviews with households and frontline workers such as financial counsellors and community workers. Beyond this report, the JEC is interested in examining the potential of the initiative as a 'circuit-breaker' measure to address debt and long-term payment difficulty.

⁸ PIAC (n 2) 31-34.

⁹ Ibid 47-50.

¹⁰ Ibid 44-45.

¹¹ In energy, some consumers don't have a choice of retailer, such as households in certain [embedded network](#) arrangements. There is generally no choice in water providers, with contestability in water services limited to large developments.

Experiences and perceptions of home visits

Household experiences and perceptions of home visits

To help us examine pre-visits from a household perspective, the JEC and our research partner approached Essential Energy, Endeavour Energy and EnergyAustralia to assist us to reach households who they had engaged with as part of K2SC. Unfortunately, no contacts were provided. However, two households interviewed as part of our research indicated they had received a visit from a worker about a disconnection. Another two households spoke of experiences of interactions with workers who came to disconnect them. To gauge reception to the idea of pre-visits, we asked all other consumer interviewees, survey respondents and frontline worker interviewees to provide their feedback on the idea of the initiative.

Mixed responses from households who actually received a visit

In interviews, four households spoke about the experience of a worker coming to their home about a disconnection. Two of these households interviewed recalled a visit from a worker ahead of a disconnection. We were unable to verify whether these people received a visit as part of a pre-visit program. These presented mixed outcomes.

One household had a positive experience, where the visitor was perceived positively for their helpfulness and transparency. This household appreciated guidance on who to contact and how to address billing issues. This encounter was seen as informative and constructive:

“[We had an issue with our billing due to confusion with our house number], and the actual meter reader guy was really helpful. He was great. He told us who to contact and what to say and explained where he was coming from with it. He had to come out twice. I think it was an Essential Energy [worker]. It was actually transparent, what he was trying to tell us.”

Bradley (38 years old)

Conversely, the other household had a negative experience and did not feel that the visitor treated her respectfully or left her feeling empowered to deal with the problem:

“[The person who did the door knock] was walking around, and I think she might have put something in the mailbox. It was a letter about disconnection, but she didn't actually switch the power off. She said, ‘You'd better ring them today, otherwise they're going to [disconnect you] in 48-hours or something. You feel like you just want to pack in your lease and move out. It was a bit nasty, the way she was approaching it. She was looking at the table [of my energy usage] and looking at me. She shouldn't be standing there looking at me with [the table showing my energy usage] trying to make you feel bad for how much power you're actually using.’”

Anna (39 years old)

This feedback highlights the importance of the nature of the approach in conducting pre-visits, indicating proper training, quality checks and screening of who does the visit is crucial.

A third person recalled an experience where the meter reader came to undertake a disconnection that was not a pre-visit – that is, it was an actual disconnection.

“The second time, the guy came out to turn it off and I begged and pleaded with him, saying, ‘Please don’t. I’ll get the money and I’ll pay it today I swear.’ He said took my word for it and I did, I found the money somewhere and got it put back on.”

Angela (44 years old)

While not a pre-visit it provides a demonstration of the value of an in-person visit in recognising and avoiding risks of harm. This is particularly the case when a member of the household is likely to suffer negative health implications of a disconnection, instances where a disconnection might cause other dangers such as where there is family violence, or confusion such as where the householder has a significant mental illness or intellectually disability.

A fourth person had an experience of an interaction with a worker who came to undertake a disconnection that was also not a pre-visit. Although this next example did not have a positive outcome in the short term, it still demonstrates the value of an in-person visit ahead of a disconnection to assess the circumstances and avoid wrongful or potentially harmful disconnections. This example indicates a failure of processes between the retailer and the ombudsman rather than failure of a human undertaking the disconnection.

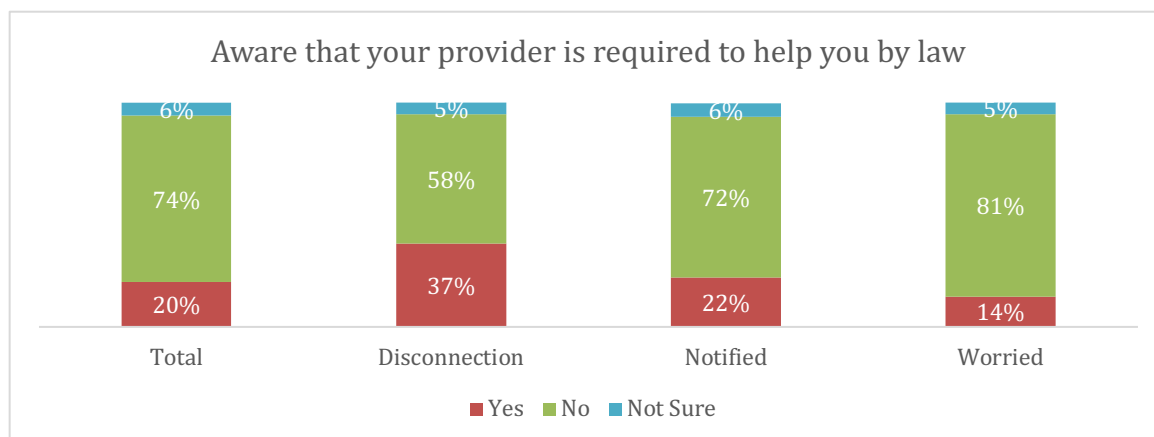
“I was home one time and I got a knock at the door, and it was a fellow who wanted to confirm my name and he said, ‘I have been sent to disconnect you.’ I had actually contacted the ombudsman [before this happened] because the disconnection was impending. I was told that if you had a case before the ombudsman that they couldn’t disconnect you, so I told this gentleman I have a case before the ombudsman, please ring the ombudsman to find out. I even had the name of who I had spoken to, and she said it could take a week or two to rectify but that it wouldn’t be disconnected in that time. He didn’t end up speaking to anyone [at the ombudsman], but he called my provider and spoke to someone there and was told to go ahead, so I was disconnected.”

Jodi (58 years old)

Household perceptions of the concept

Questions about the concept of pre-visits were included in the main quantitative survey and in interviews with households as part of our *Powerless* research, to explore perceptions (and/or experiences) in the community. The questions were asked in a hypothetical nature to better understand how the initiative may be received by someone facing a disconnection and to explore options for improvement.

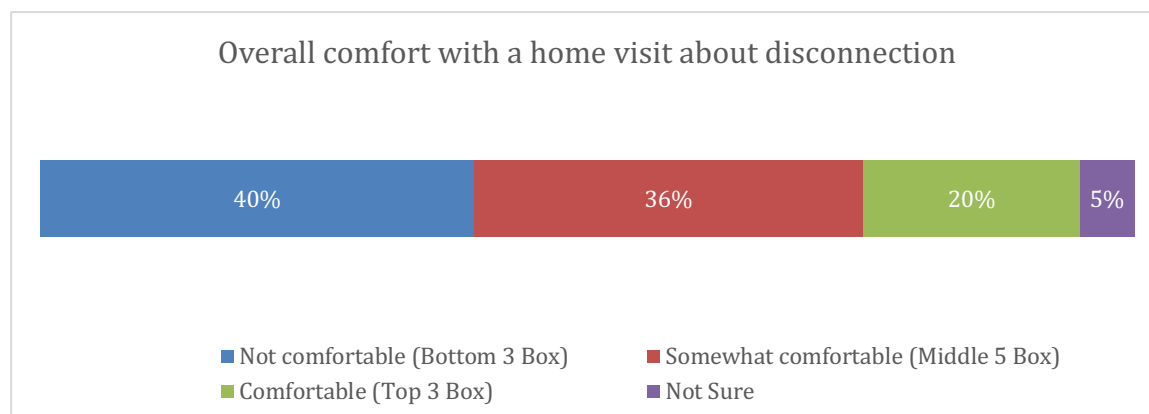
Majority unaware provider must help them with affordability



The majority of all respondents (74%) are unaware their provider is required to help them if they are having difficulty paying or facing disconnection. For those who have experienced a disconnection or notification, awareness of this is higher (37% and 22% compared with 14% for people who are worried).

Having such a large percentage of people being unaware that their provider must help them is problematic as it re-enforces the inherent power imbalance between providers and their customers and reduces households' ability to effectively advocate for themselves. However, pre-visits present an opportunity for households to be better informed of their rights, which may help their ability to access more suitable and sustainable assistance when they contact their retailer.

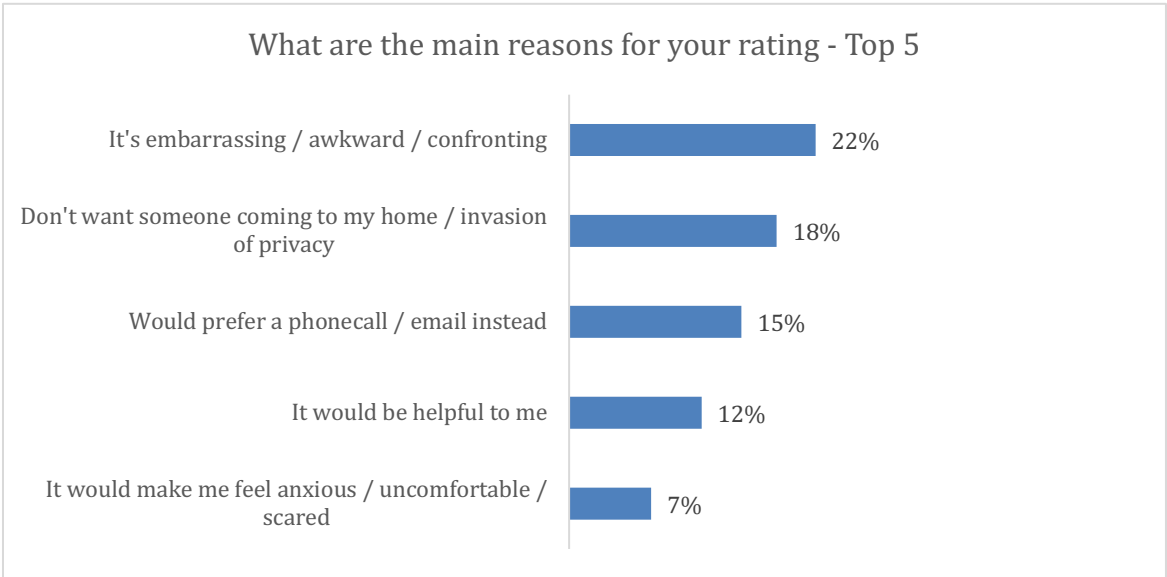
Mixed responses to comfort and perceived benefits



In our research, respondents were asked:

“How would you feel about someone visiting you at your home to let you know that you will be disconnected / restricted from your energy or water service and to provide you with helpful information so that you have time to take action to avoid the disconnection / restriction and get other assistance?”.

Fifty-six percent of people responded that they would be at least somewhat comfortable, but 40% indicated that they would not be comfortable with this at all.



The discomfort with a home visit includes a feeling they would find it embarrassing, awkward and / or confronting. Some people would prefer a phone call or email instead of someone coming to their home, though this response is influenced by the fact we did not include explanation that these contact attempts from the retailer would already have occurred regardless.

During interviews, people were also asked about the concept of a visit to their home ahead of a disconnection. It was revealing that not everyone understood exactly what the visit would include, with some expecting it would involve more assistance than the current pre-visit programs (including K2SC) involve. The perspectives and comfort levels of a door knock intervention varied among the individuals interviewed, as detailed below.

Positive perceptions that K2SC would improve understanding

Some interviewees expressed a preference for face-to-face communication, emphasising that having someone speak to them directly could provide a better understanding of the situation and potential solutions. This approach was seen as more helpful in addressing concerns about disconnection.

“I would have been comfortable with [Knock to Stay Connected]. I think that would have been great. Someone to actually come and sit down and talk, actually explain this is what's happening and this is what you can do to fix it. Really, anyone in that field [would be okay to do the visit].”

Lyndon (20 years old)

“It's just more comforting [being able to speak to someone face-to-face], rather than a letter. A letter doesn't show any kind of understanding or emotion. Someone over the phone or face to face, it's just easier to talk to, I guess. I'd probably go into the retailer [instead of having them visit me].”

Craig (between 35-39 years old)

Another person welcomed the idea of a person-to-person intervention but noted it would be better arranged ahead of time to avoid surprise. This person imagined the visit would involve someone coming into the house to provide assistance rather than the more limited visit involved in current programs.

"[Having someone to talk to face-to-face] would be really, really helpful actually. I wouldn't be a hundred percent comfortable [with someone visiting my house]. I'd be a little bit scared, but I think it would be good because it would make me confront the bill. If they didn't call in advance to tell me they were coming I'd be kind of upset and I probably wouldn't let them in the house.

"There was a period of time, a little bit under a month, where I got the warning email [to when I was disconnected]. I must have just kept glossing over [the email], but a face-to-face visit would help, even a phone call would help too."

Christine (between 25-29 years old)

It is noteworthy that these people interpreted that a visit was not simply that the person doing the visit would hand them information and the disconnection warning notice, but people at risk of disconnection identified that what they needed when facing a disconnection was someone to explain the situation and help them find a solution.

Prefer assistance in other ways

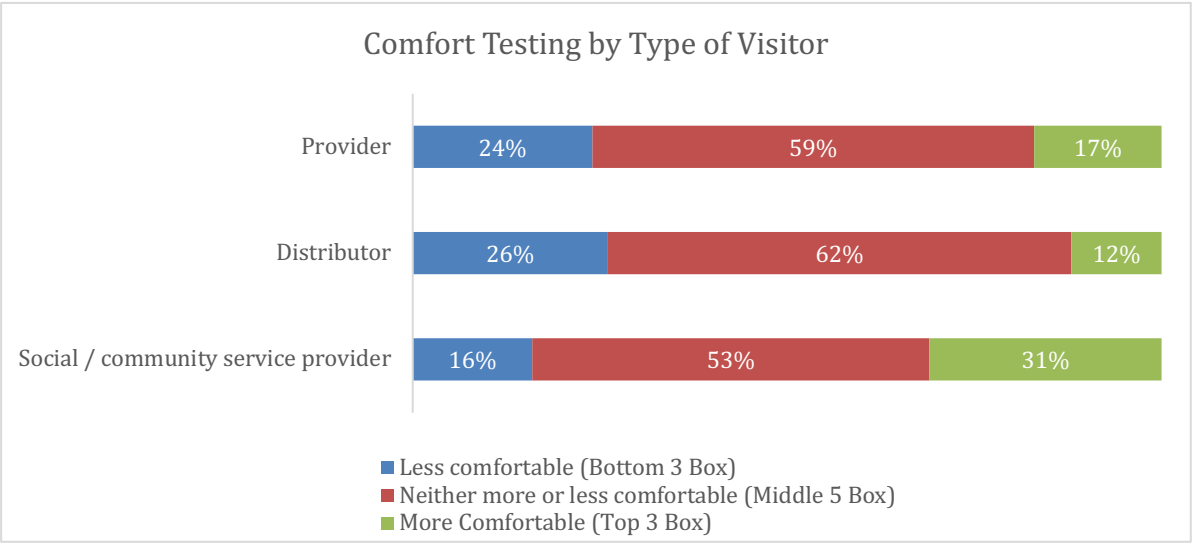
Other households expressed reservations about a visit as they imagined it. They often explained it might make them feel uncomfortable and whilst they would like to speak to someone, they would prefer a phone call or video chat.

"I wouldn't mind if [a person-to-person intervention] was done over the phone or on video chat, but I don't think I would be keen to offer my home. If it was done online or if there was a course or seminar, that would encourage me to do it. But having someone come over, I would not be very comfortable with that. And it's just not very efficient."

Cathy (29 years old)

This person also envisaged a much more substantive visit than current programs involve. But this again highlights a strong appetite for more extensive assistance at this point of payment difficulty.

Greater comfort with social / community service provider undertaking visit



When asked to consider whether who was doing the visit was important, the preference was that people would feel more comfortable if the visit would be done by a social / community service provider (31%). However, the mixed results could also show that many people were not thinking fully through the implications of who conducted the visit, and we consider that more detailed investigation of this is warranted.

The JEC sees significant value in a social or community worker undertaking the visit. The skills and role of social or community workers would better align with people’s interest in – and need for – more extensive assistance that was expressed as a strong preference. People with such training are also better equipped to deal with and assist people experiencing more complex issues. This is relevant given our research found high rates of mental health issues and family violence amongst household members where there was a disconnection.¹²

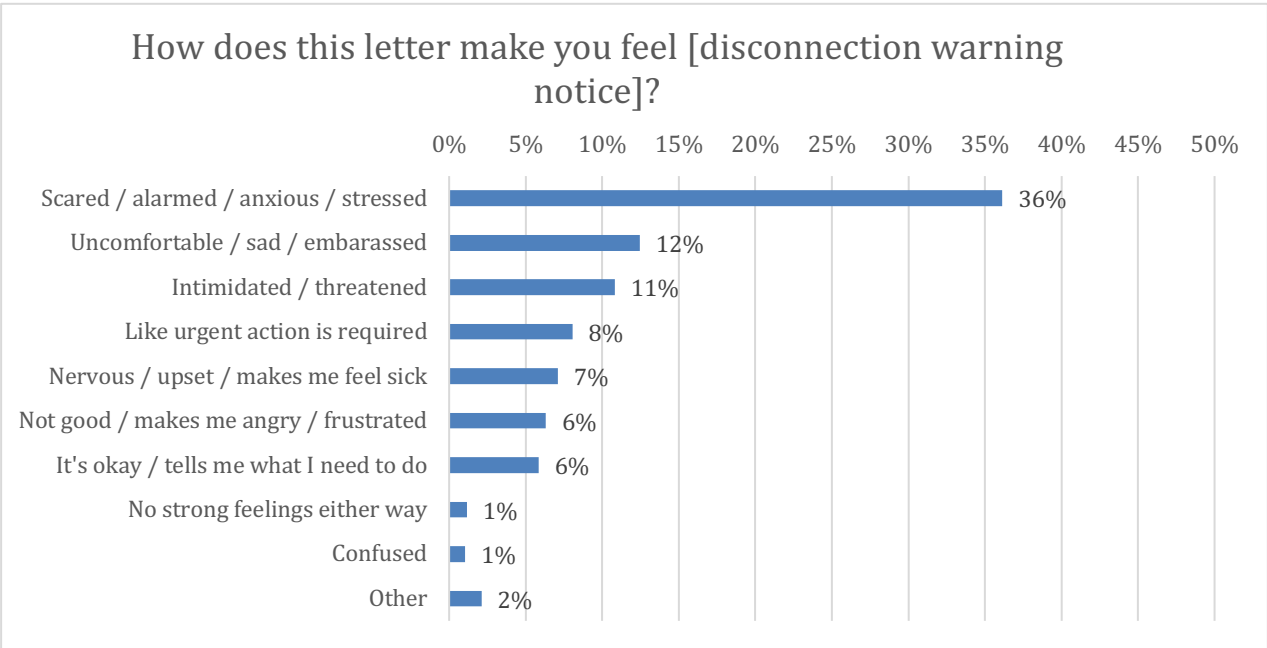
We have strong concerns about pre-visits being conducted by energy providers (retailers) because their priorities and incentives are not necessarily aligned with the best outcomes for the household. For instance, they have an incentive to maximise recovery of debt through the program.

Distributors are less exposed to this risk and tend to have other priorities such as avoiding disconnections which are soon followed by reconnections, and the welfare of their field crew. None of these are at risk of being in conflict with the interests of the household. As such, we see pre-visits undertaken by or on behalf of a distributor as preferable to being undertaken by a retailer. However, in the long-term, we consider merit in exploring a system based on third-party/community worker provision and potentially incorporating scope for a more substantive intervention. We discuss this further in the final section of this report.

¹² Powerless page 12-13, 18 and 23-24.

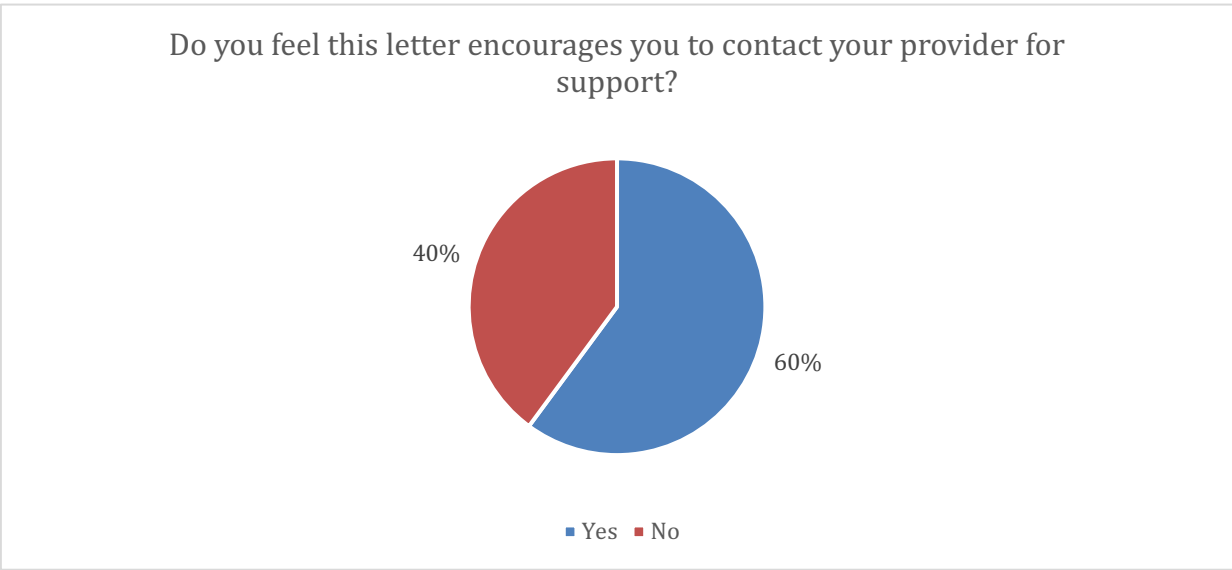
Household perceptions of leave behind material

Disconnection notification letter elicits negative response



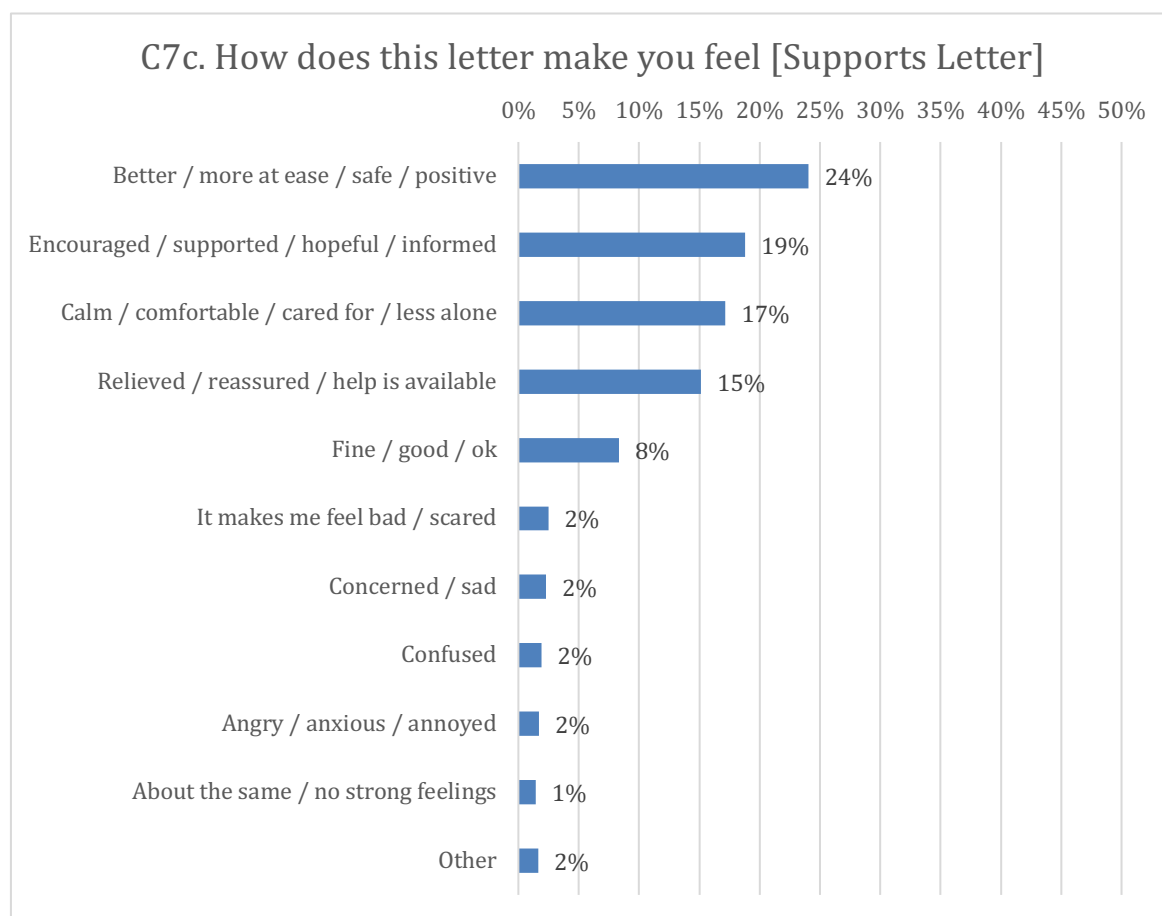
Ahead of a disconnection, consumers must be provided with a ‘disconnection warning notice’ which must contain certain information.¹³ Current pre-visit programs (including K2SC) hand deliver this notice to the householder, either directly or leaving it somewhere appropriate on the premises.

Respondents in the survey were shown an example of a disconnection warning notice and asked how it made them feel. Respondents mostly felt the disconnection warning notice was scary and that it made them feel alarmed, anxious or stressed. Others said that receiving a letter like this would make them feel uncomfortable, sad or embarrassed, with 11% reporting that it was intimidating or threatening. While only 8% felt that the letter made them feel that urgent action was required, overall, the majority felt negatively towards the letter.



When asked if the disconnection warning notice encouraged them to contact their provider, only 60% said that it did. Providers often argue that disconnection notification and disconnection itself is an effective communication tool, eliciting consumers to contact them. These results give a strong indication this is not the case, with a significant minority not being encouraged to contact their retailer. Given the negative responses to the message, it is also clear that even those who might be encouraged to contact their retailer are not doing so from the position of confidence, strength or positivity that would be likely to see them get the help they need.

Supports flyer helps encourage more effective responses

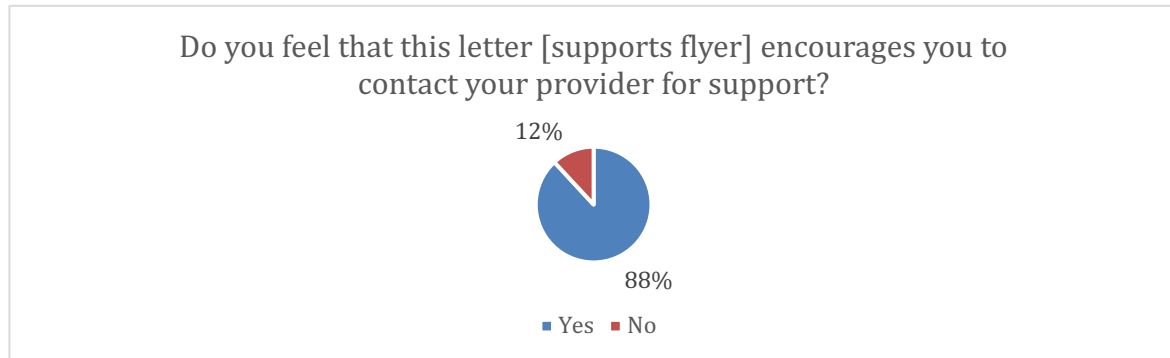


When shown the supports flyer (the information developed by the JEC and others) the response was overwhelmingly positive. 24% said it made them feel better, more at ease and / or safe. People felt more encouraged / supported (19%) and calm / comfortable (17%) when reviewing this flyer, with some reporting they felt relieved that help was available (15%).

The JEC's research indicated high rates of mental illness including depression and anxiety (32%) within households experiencing disconnection or payment difficulty. Mental illness is even more prevalent among households that have actually been disconnected (39%).¹⁴ This rate of mental

¹⁴ PIAC (n 2) 12-14.

illness is [substantially higher](#) than overall rates in the community. Given this, how communication is undertaken is a crucial consideration in managing the harm and risks of harm associated with disconnection. Poorly framed communications are likely to be actively harming consumers experiencing payment difficulty and undermining their ability to get the help they need.

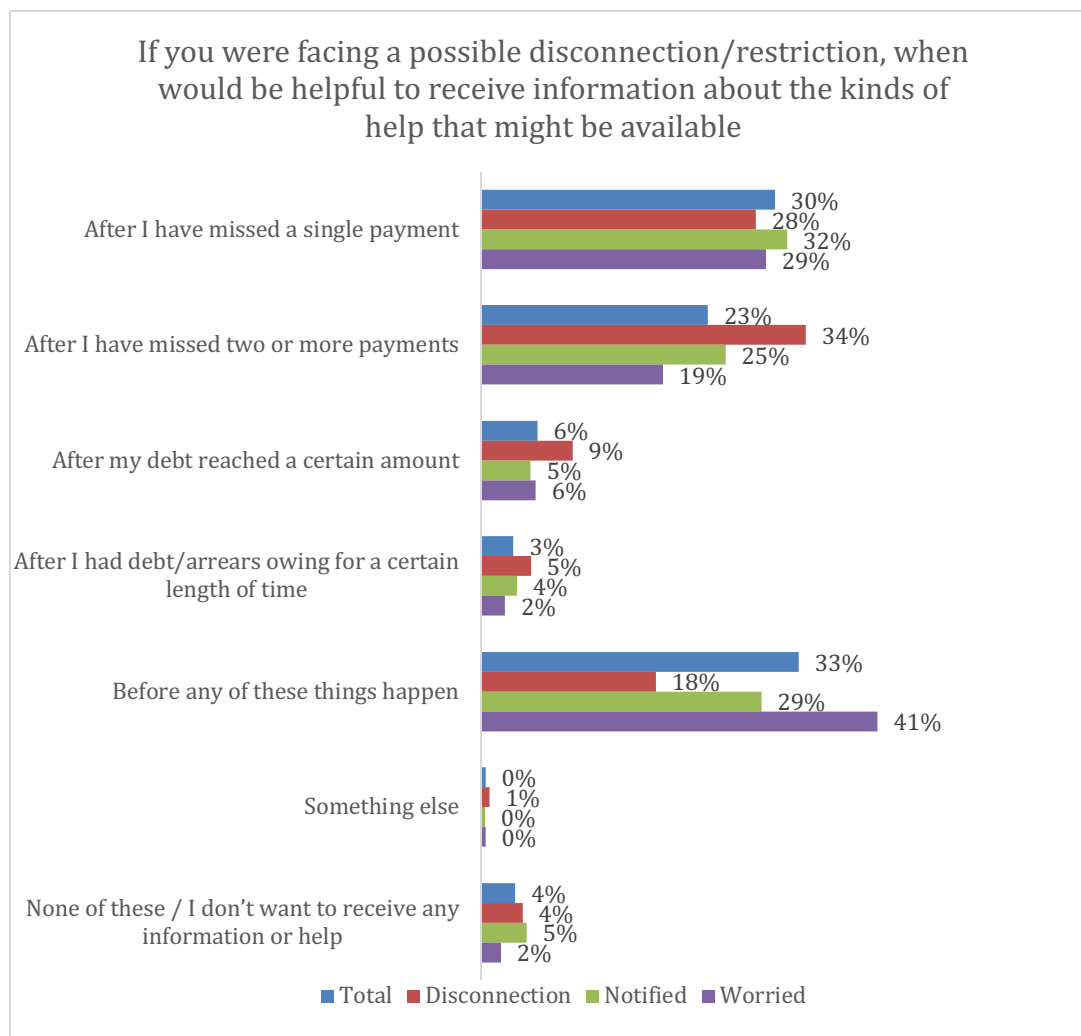


Respondents indicated the JEC supports flyer was much more likely to encourage them to contact their provider for support (88%). Given the reasons people don't contact their provider for help includes discomfort, shame, embarrassment and anxiety, communication which makes people feel like there is support available and that there is no shame in their situation is more likely to result in people accessing assistance. The stated aim of the supports flyer is to help people get assistance with the issues causing their payment difficulty and avoid future payment difficulty. This research indicates it might also increase the likelihood of people contacting their provider to get the help they need because it builds confidence. We recommend more work to examine this in detail.

People want help early

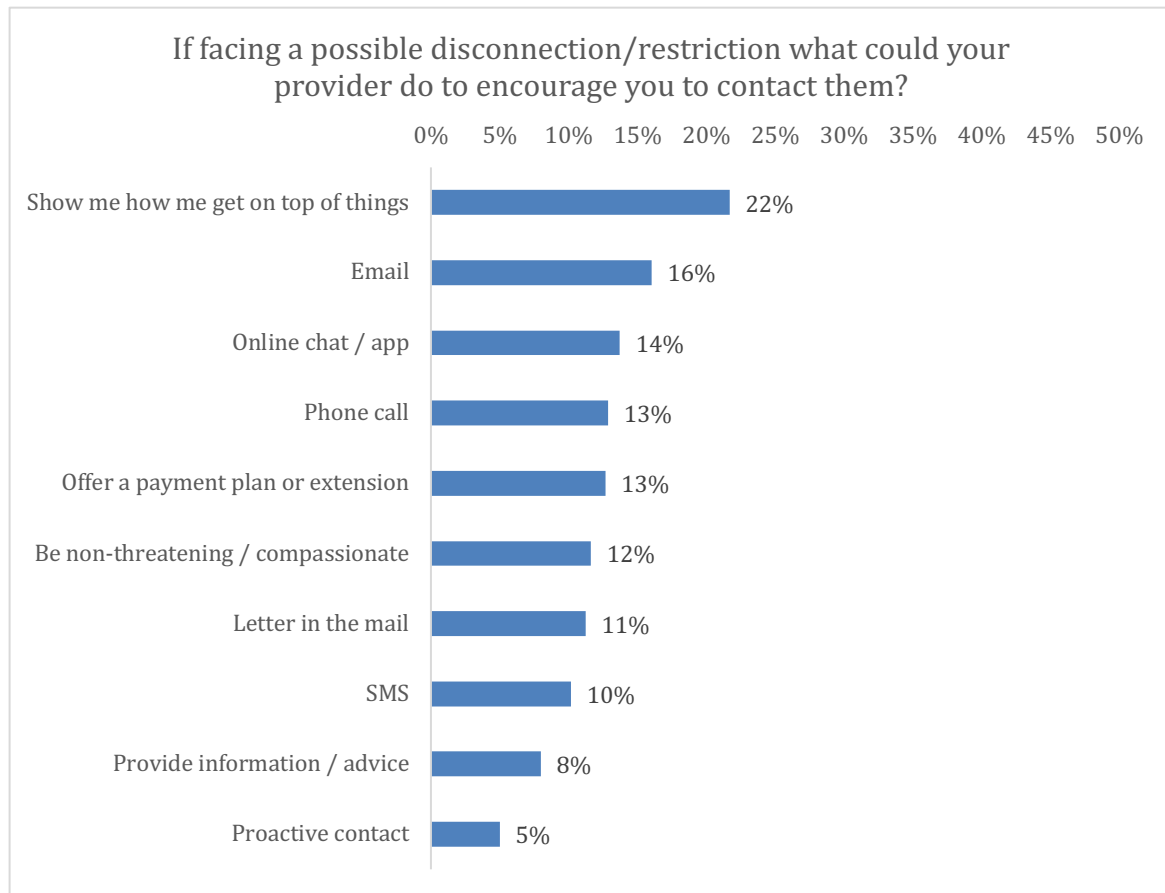
Early intervention is preferred to help people avoid risk of disconnection

Despite results showing effectiveness of pre-visits (such as K2SC) people would prefer not reach a point where a disconnection is a possibility:



If facing a possible disconnection there is a strong preference (33%) for assistance before there is a single late payment or debt accumulated. A further 30% want assistance after a single late payment. Worried households are especially keen for assistance to be provided early, indicating that the longer situations persist, the more difficult it may become to get a positive response from the household. While it is speculation, this may be because households become accustomed to their circumstances and the stresses of dealing with payment difficulty.

Support wanted ahead of facing a disconnection



Given communication from providers seems to have been ineffective at helping address their affordability challenges, we asked respondents what a provider could do to encourage them to contact their provider for support. Overwhelmingly people would be encouraged to reach out if their provider showed them how to get on top of things and avoid disconnection. Email, online chats, phone calls or payment extensions, were some of the top-of-mind ideas people had for what would encourage them to reach out to their provider for help, though this response was provided assuming these avenues have not already been attempted.

Summary of views of households

Household views on pre-visits can be summarised as follows:

Face to face is seen as beneficial to most

Most people (56%) would at least feel somewhat comfortable with a visit to their home and thought that a face-to-face visit would have really helped them know what assistance was available and how to access this assistance. Speaking to a person who can help is seen (at its best) as positive and reassuring. It can help overcome anxiety and helplessness and help some people realise they need to address the issue, with a positive path to do so. Some people who like the idea of a visit would still like to be told in advance. Outside of this research, where there are cases of retailer communication regarding disconnection being unseen by the household, a visit to the home can help avoid a disconnection.

Negative perceptions of home visits would need to be addressed

A significant minority of respondents expressed discomfort with the idea of a visit, considering it embarrassing or a potential invasion of privacy. It is important to note they seemed to assume an in-home visit would be much more substantive than is currently employed, and their comments on preferred contact methods indicated they were not aware that any visit would only ever come after multiple other attempts to contact them had not resolved the late payment. Any continuation or augmentation of a 'pre-visit' approach should specifically consider measures to address privacy concerns and mitigate potential embarrassment to the householder. In any case, a visit should only occur once the risks involved in the visit (including concerns about privacy or embarrassment) are outweighed by the risks of not connecting the household to assistance.

Strong preference for more comprehensive assistance platforms

In responding to other questions, most people indicated they would like to get more comprehensive assistance to deal with payment difficulty. This raises the question of how communication can be better utilised to enable more comprehensive assistance earlier in the payment difficulty experience.

There is value in having a person involved in the process

Even at the point of disconnection itself, there is material benefit in an in-person process. At the very least this provides an unofficial safety assessment and scope not to proceed with the disconnection if the person sent to undertake the disconnection determines that it is inappropriate or unsafe to proceed with the disconnection. While this is currently ad-hoc, there is a valid risk-management dimension to this role and formalising this in the disconnection process should be considered further.

Low awareness of rights

People generally have an extremely low awareness of providers' responsibility to help them if they are experiencing payment difficulty. This is critical. Assistance information provided through the pre-visit platform do seem to be an effective opportunity to inform people in need of their rights and how best to exercise them to get what they need.

Disconnection warning notices elicit a strong negative response

People had mostly negative feelings towards disconnection warning notices, with only 60% of people indicating that it encouraged them to contact their provider and most indicating that any contact which did result would not be commencing on a positive basis.

Supports flyer encourages contact

People responded positively to the supports flyer, with 88% saying it encouraged them to contact their provider, with other responses indicating this contact would have a greater chance of being effective.

Compassionate, independent party

Although there wasn't an overwhelming preference for who should undertake a pre-visit, social / community service provider were preferred than other options. Experiences of a visit indicates that the person undertaking the visit needs to be compassionate and understanding.

More extensive assistance is needed

Many people interpreted pre-visits as someone coming to their home to help explain the situation and help them know what to do. This indicates a strong desire for more substantive support and help dealing with payment difficulty.

People want help well ahead of disconnection threats

Pre-visits should only come at the end of significant efforts to avoid payment difficulty, and most people support intervention with assistance well before problems arise.

Frontline workers perspectives of pre-visits

Interviews with frontline service were included to get a broader understanding of the issues affecting the community. Frontline service providers can also talk about issues such as mental health and family violence and the impact this has on affordability, that individuals may be less comfortable to speak about. Working with clients every day and dealing with supports and assistance systems, some frontline workers can also imagine different ways that needs can be addressed and services can be provided.

Frontline workers broadly saw potential value in pre-visit to assist those in need. But like households, this came with a significant caveat that such visits must be approached with sensitivity and respect for individuals' situations and cultural backgrounds.

However, frontline workers did express a preference for considering a more comprehensive approach to address the underlying issues contributing to financial hardship. This could include addressing housing affordability and energy efficiency standards and access to living wages, to address the long-term drivers that put people at risk of payment difficulty and disconnection.

A sympathetic approach to pre-visits would be required

Some frontline workers had a very positive response to pre-visits explaining it would be helpful for households, providing a communication opportunity that would be difficult to ignore. They expressed a need for any materials left behind to be well thought through since not everyone will be home at the time of the visit. Mostly, however, they expressed a need for those undertaking the visit to be trained to take a compassionate approach.

"I think the initiative in terms of knock before disconnection sounds like a fabulous thing because it's harder to not engage when that happens, and you're also more aware of the implications in terms of what you've done."

"I think [Knock to Stay Connected] would be really helpful. There'll still be some people who will ignore that, but the information will be left so it'll just be another way to access. If the communications were branded, perhaps not with the retailer name, then that would be helpful. You'll still get some people who won't pick up or follow through with that, but I think it probably will reduce."

Financial Counsellor

"I think [Knock to Stay Connected] would be amazing. I think that would definitely help as long as those people were trained to use compassion. I'm finding a lot of the people that work in the hardship area [of the energy companies] do not have any compassion at all and they're quite rude and it's more about getting their money than having compassion for the person and what they're going through, this is in the hardship area of the retailer! When we're doing EAPAs,¹⁵ they can be very rude and judgmental and there's just no compassion in their voice."

"I think definitely doing more to get in contact with them when their bill is out of control. I think [an initiative] when they come around to the house and talk to them, that's great. I think that would be awesome as long as they were trained to have compassion and empathy, to use empathetic language."

Team Leader, neighbourhood centre

"[Knock to Stay Connected] sounds a lot like where I was working at one stage, where they were running a pilot around sustaining tenancies. So, what you're talking about sounds a lot like that but from a utilities point of view, being able to sustain your energy... So sustaining tenancies was about someone coming in and identifying maybe where you were struggling and then being able to link you in with people that could help you and it would avoid eviction."

Outreach Coordinator, youth services provider

"I work in a small regional town which has very few CALD residents. So, if anybody has a slight accent that's not Anglo-Australian, [clients] really struggle with it... So, I think, particularly in the regions, having that face-to-face contact, it would be so good."

Financial Counsellor

There are potential risks in pre-visits for some people

Other frontline workers noted the success of the program might depend on the circumstances of the household. They considered it could be a positive experience for many households, but not others. Some thought the person doing the visit should not be from the provider in case the householder feels like they are not being heard by the provider, or the household has had a previous negative experience with the provider.

"I think [Knock to Stay Connected] could definitely go either way. Like, someone could find it as a form of harassment, having someone rock up at their front door, you know, wanting to know what's going on. But in the same sense, it could also be welcome because then it could open those doors for support and for them

¹⁵ EAPA is an acronym for Energy Accounts Payment Assistance which is a payment funded by the NSW Government to help people afford their energy bill during a crisis.

to try and get on top of their situation with their power bills. I think it could be good depending on the person's circumstances definitely as to whether it would be welcomed or not."

Financial Counsellor

"I see issues with [the door knock approach]. I think it would be beneficial, but definitely there will be some technical issues around it. If you've got a family who's already feeling stressed, overwhelmed... Say for example, there is a client out there who's bashing on the energy services' door about their issues, but they're not being heard, they might also think, 'If you're not hearing me then, how are you going to hear me in person?'"

"You might run into the issue of having someone out to the house and that client, especially with mental health, drug and alcohol issues, they might feel like 'Oh, they're sending someone out to intimidate me.'"

Case Manager, homelessness services provider

"I would probably say a third party, like someone separate to the retailer outside of the organisation [would be best suited to perform the human intervention]. I would be of the opinion that that would probably make my clients, in particular, more comfortable if they have had a negative experience in the past with that particular retailer or maybe a different energy provider before, it's like a completely separate independent person that they can speak to about it."

Case Manager, women's domestic violence service provider

Other frontline workers expressed the concern that a visit could exacerbate issues, particularly for households where there is family violence and for First Nations households. Concern was also raised for the safety of the workers undertaking the visits.

"I would say that the person would need to show quite a lot of empathy because you never know what that person's experiencing. I know that I worked with one mum who, from the outside, you would think is travelling okay, but she had a lot of suicidal thoughts and her bills were piling up and she actually got admitted to the mental health unit. So, if someone were to knock on this mum's door... I think it's a huge requirement to come from an understanding approach and come from an approach to work together to not get disconnected. I would probably say it wouldn't be as alarming for that family if it came from a person with that kind of social skill."

"Often, you'll find that when we have an active domestic violence case, we don't go to the home. There are times when we do visit a home however, this is a case by case and often the conversations are held in front of the home on the front porch. However, workers' safety needs to be prorated and this could look like two workers visiting the home... and I guess, the retailer wouldn't have any knowledge of [the situation], and it might not be appropriate for them to have all that knowledge, but it's about how they approach it."

Case Manager, regional community service provider

"I think overall the women that we support are in crisis, so sending an energy provider or someone to knock on the door... I really feel like that wouldn't be appropriate but of course, [the people doing the door knock] might not necessarily be made aware that this woman is currently in crisis or is in a really unsafe situation. So, for our clients, I don't think that would be appropriate."

Case Manager, women's domestic violence service provider

"So, if you're First Nations and somebody comes to knock on your door, what do you think that looks like? Especially when it's a meter reader type person. What do you think they're coming for? So, right at the end when everything's stuffed and you're stressed out of your brain, some human is going to come out of the woodwork, that you don't know, and they're going to knock on your door to tell you how you can do it better because you've screwed up by not paying energy on time? But you haven't screwed up. You know, people who aren't struggling with energy at the moment are those who have got resources behind them. The majority of First Nations families are only in second and third generation money earner households which means they are not asset wealthy - they don't have houses; they don't have a backup. So, when they are behind in their energy, they are behind in everything, and somebody telling them they could just avoid disconnection with a payment plan is not the same as being preventative. And being preventative is what needs to happen by making energy an affordable thing for people on lower incomes so that they're not sacrificing their health and their kids' wellbeing in order to meet an essential expense."

Financial Counsellor

We regard these as critical perspectives and considerations which need to be explored further in determining the appropriate role for pre-visits, and how the benefits and risks of potential harm to households can be appropriately recognised and managed.

Summary of views of frontline workers

Frontline workers' views on pre-visits can be summarised as follows:

More efforts to avoid disconnection threats are required

Pre-visits should only come at the end of improved measures to avoid payment difficulty and debt leading to potential disconnection. This includes measures to make energy affordable for people on low incomes.

There are benefits to pre-visits

Pre-visits offer a lot of opportunity to provide valuable assistance, especially for individuals in crisis or struggling with energy bills.

Compassion and training are required

Compassion and proper training are essential for those involved in pre-visits as many people in hardship are vulnerable (particularly in their own home) and need understanding and support.

Intimidation and embarrassment must be avoided

There is a risk that poorly structured or conducted pre-visits could be seen as an intimidating or embarrassing to some vulnerable households, potentially creating anxiety and fear. Pre-visits must manage this risk by being provided appropriately and sensitively and avoid any perceptions of being threatening, or prioritising debt collection.

Cultural considerations are important

Cultural understanding is needed, especially for First Nations communities, as approaches may need to be tailored to specific cultural contexts.

Pre-visits should be by independent parties

The person visiting the home should not be from an energy company but from an independent party, such as a social / community worker who is well trained in assisting people experiencing a crisis. It is crucial that their only consideration is the interest of the household and that this is clear to the household.

Manage safety concerns

There are safety considerations for people conducting visits in cases of domestic violence or mental health crises. There is need for mechanisms to determine when home visits should not occur, and ensure systems and training minimise risk.

Industry perspectives on challenges and opportunities

Energy and water businesses we interviewed broadly noted the success of pre-visits but also spoke about the challenges of the current model – such as that adopted by K2SC - and the opportunities to improve it.

It's an end of the line intervention

Distributors expressed an awareness that pre-visits are an intervention that happens when debt has built up and they saw the value in more effective measures to help households before the debt gets so serious they are at risk of disconnection.

Concern about who is doing the visit

There's an awareness from distributors that not all the field staff (often contractors) have the skills to talk to people about disconnection and deal with them at a vulnerable time.

The value of a conversation

Given the success rate of avoided disconnections when the visit involves a direct conversation, distributors noted the challenge presented by people who want to avoid a conversation.

The value of connections to other supports

One distributor noted the potential value of local community organisations being aware of an impending disconnection (and pre-visit) so they could assist the household more comprehensively. A water provider raised the idea of being able to automate referrals for assistance to government agencies, though we see a range of risks in such a response. Broadly, they see value in the industry simplifying the customer journey across agencies to minimise the need for people to contact multiple agencies (government, community and business) and repeat their stories. There is a desire for improved collaboration and information sharing among services to create a more cohesive system. There are obvious privacy considerations that need to be managed in exploring this.¹⁶

Tight timeframes apply in energy processes

Some distributors find the five day window between getting the service order from a retailer to undertake a disconnection and fitting in a visit before having to complete the disconnection

¹⁶ [Thriving Communities Australia's One Stop Story Hub](#) could be considered as a way to achieve these connections.

challenging. Distributors with more of a contracted workforce found this particularly challenging in terms of scheduling someone to undertake the pre-visit within this time. This issue could be exacerbated with the smart meter roll out, with less field staff 'on the ground' who can undertake a door knock. It should be noted that wider, more substantive implementation of pre-visits would have to involve a reconsideration of the regulation of the whole disconnection process.

Challenges arising from differences between retailers

Distributors explained that different retailers have different perspectives with regards to their willingness to help households experiencing payment difficulty:

"Some retailers go all out to support the customer, and some retailers are doing what the legislation says and that's that."

Distributor

This makes it harder to put pre-visits into practice within the current framework, with some retailers working with them to make them work, while others are not interested.

"Some of the feedback ... is, 'If we ask you to disconnect it, we just want you to disconnect it.' And my response to that is, 'That's entirely up to you anyway. If you don't cancel the service order, we'll do it. But there's an opportunity there for us to engage with your customer before that.' I don't know why anybody wouldn't want that because, as I said, if the customer rings them and they make a satisfactory agreement, that should be a good thing."

Distributor

There seems to be some lack of awareness of pre-visit initiatives among retailers, and a lack of understanding of their purpose and benefit. This is particularly true of smaller retailers. Distributors consider that improving retailer commitment and participation would enhance the overall effectiveness of the initiative. Improved communication and education efforts might address this issue, including clearer information on the benefits, costs, and potential changes required, or finding solutions to alleviate retailer apprehensions.

Different retailers also share different levels of information about their customer interactions to distributors. This can cause problems when the field officer undertaking the visit does not have enough information about what problems they might encounter during the visit and how the safety and success of the visit could be improved. Any successful wider implementation of pre-visits would have to involve more effective communications systems.

Trying to create uniformity is challenging

One of the benefits the Energy Charter brings through K2SC pre-visit initiative is uniformity and information sharing to improve the program. However, retailer systems and approaches vary considerably which means having single, efficient processes is difficult under the current regulatory framework.

"Everyone uses different platforms and has different policies and then you've got different size retailers, which makes a difference. Some of the smaller retailers will literally hand hold a disconnection, whereas the big ones, it's [automated]."

Distributor

Dealing with people not home at the time of the visit

Many people aren't home during the day limiting the effectiveness of the visit (given the understanding that it is the human intervention which makes the biggest difference). However, there are increased costs to undertake the visits outside business hours.

The potential impact of smart meters

The smart meter rollout will remove distributors from the process and theoretically enable the possibility of more rapid, remote disconnections including for non-payment. This removes the scope for an onsite check to make sure it is safe and help manage risk to the household. It will also reduce the numbers of field officers (often meter readers) able to undertake a visit within the required timeframe. This is a critical issue of consumer protection that needs further examination.

Meeting the needs of our multicultural community

Ensuring that resources and support are accessible to people with different cultural backgrounds and low or no English proficiency is crucial. Cultural diversity of field officers, cultural diversity training for field crew and developing multilingual and plain language resources could enhance the effectiveness of outreach efforts.

Engaging during the reconnection process

For households who do end up getting disconnected, the reconnection process becomes an important opportunity for households to access the assistance they need to avoid future payment difficulty. Ensuring this process is not only fast and easy but designed to maximise the scope to get effective help, should be part of further consideration reforms to disconnection processes.

Quantifying the effectiveness of the initiative

One participating distributor has not set up a system to track whether an actual interaction with the resident occurred or whether the information was simply left behind. This undermines the ability to determine whether it is the human interaction which makes a difference or whether the warning notice and accompanying information is the critical factor. More work must be done to examine these aspects robustly.

Another distributor receives a 'free text' comment from the person undertaking the knock, such as 'handed to the customer' but they do not have an automated process to categorise the 20,000 comments and match them against the outcome to determine the most effective way to deliver the program.

Further, distributors can't track households, only connections (homes). This undermines any assessment of whether the initiative helped prevent the household from cycling back into payment difficulty eg, whether the supports flyer helped and whether their retailer helped set them up in a hardship program. Although retailers are somewhat better placed to track this (as long as the consumer doesn't switch), to date there isn't a willingness to share this information. Any wider implementation of pre-visits must consider the most effective information sharing platforms as part of considering who is the most appropriate agent to undertake pre-visits.

Conclusions and recommendations

The evidence drawn from pre-visit trials and our research shows real value in pre-visits and indicates significant potential in further development of the platform. Human intervention has helped avoid disconnection and is likely to improve the instances and effectiveness of people accessing the help they need to avoid future payment difficulty. Pre-visits are an opportunity to:

- Provide a 'last resort' intervention to help households avoid an imminent disconnection.
- Assist households to access supports to address energy affordability issues.
- Improve household awareness of their rights, assisting them to negotiate better with their provider and access more effective assistance.
- Improve household access to wider supports and assistance measures to address issues impacting the household (and causing payment difficulty) – that is, using the moment of crisis as a trigger point to get wider assistance.
- Undertaking a risk identification and harm assessment – providing an opportunity to determine when it is not safe or appropriate to disconnect because of potential risk to the household.
- Alert the provider of issues happening in the home, providing a platform (where appropriate) to trigger additional assistance and protections. For instance, identifying potential family violence or mental health (noting that privacy and systemic protections would need to be robust).

For businesses, minimising disconnections has benefits for workers undertaking them. Pre-visits have proved to have positive impacts on morale and employee satisfaction for distributor staff, as well as delivering efficiency gains for businesses. Helping vulnerable households avoid a disconnection and get assistance also aligns with stated business goals to be customer focused.

Who conducts the visits, how they are undertaken and what the purposes of visits are is critical to the effectiveness of pre-visits. While there has been some success, there are many aspects of pre-visits which need further examination and improvement to fully deliver on the potential of pre-visits as a platform. In their current form, pre-visits (including the K2SC initiative) are not appropriate or effective for many households. There is no consistent and effective information sharing between retailers and distributors and ineffective links with local community service providers.

To build on the success of the platform these issues must be addressed. The broader objective should be to utilise a respectful intervention as an opportunity to engage assistance and supports to help people afford the energy / water they need on a long-term basis, not merely avoid the immediate disconnection.

Principles and recommendations for improvements

Drawing on our findings, we have developed a range of principles and recommendations to guide any development and expansion of the disconnection pre-visit platform.

Principle #1: Avoid as many disconnections as possible

Being disconnected is stressful, expensive and often extremely harmful. Avoiding disconnections must be the priority objective and pre-visits, properly structured and conducted, are an effective

measure to help achieve this. For people who don't or can't respond to the range of other interventions regarding late payments / debt, an in-person visit can not only initiate contact with the provider to help avoid a significant number of disconnections but serve as a 'circuit-breaking moment' to engage the full range of assistance measures the household needs to re-establish themselves on a sustainable footing.

Pre-visits should be business as usual across electricity, gas and water services

There is enough evidence the pre-visits are effective and provide benefits worth realising more broadly. An in-person pre-visit should be required ahead of any process of disconnection for non-payment in energy and water services.

Recommendation 1

That in-person pre-visits in advance of disconnection be implemented as business as usual across electricity, gas and water services.

Pre-visits be regarded as a final best endeavours contact attempt

The National Energy Retail Rules (NERR) require retailers to make “best endeavours to contact the customer” in person, by telephone, or by facsimile or other electronic means. They stipulate that receipt of this contact attempt must be acknowledged by the customer.¹⁷ Where a home visit has not already been made, this could be an opportunity to require that this final contact attempt be made in person. The householder would still need to contact the retailer to make a payment arrangement, which may need to be done straight away. There is currently no time requirement regarding when this final “best endeavours” contact is made and when a disconnection can take place.

Recommendation 2

Investigate options to ensure that at least one contact attempt is made in person.

Developing / regulating an extended service order window (energy)

One distributor found that the rigid timeframe required between receiving a disconnection service order and actually undertaking the disconnection made it difficult for them to undertake a pre-visit. They indicated the need for a longer window between notification and disconnection, possibly through a separate service order, to enable more time to conduct a visit without breaching service order obligations. This would also enable more time for households to contact their provider and make arrangements to access money to make a payment (as is often required). It is important to note that this issue would be addressed if pre-visits were formally required in regulation as part of the disconnection process

Recommendation 3

Investigate whether an additional time window between notification and disconnection is required and options to implement this if required.

¹⁷ Rule 111(1)(e).

Principle #2: Who undertakes the visit and how it is undertaken is critical

Focus on staff training and choosing compassionate people to undertake visits

For some households who haven't been able to respond to previous contact from their provider, a home visit can work well as a final prompt to get in touch with their provider. For others the visit could cause embarrassment, awkwardness or feel confronting. This needs to be recognised and considered as a significant risk. This means how the visit is done, the skills and training of the person undertaking the visit, who they are acting for and their priorities in undertaking that visit are critical. The interests of the household must be the undiluted priority, with avoidance of disconnection **and** enabling assistance to address their payment difficulty, critical to ensuring pre-visits are seen as a positive.

Preferably, the person undertaking the visit would also guide households through their options to get assistance – perhaps even commencing the process to engage assistance directly. Given the vulnerabilities of people facing disconnection, it's necessary for pre-visits to be a 'gentle place to land' where people receive a sympathetic response, which provides clear direction about where and how to get help. The research shows that a substantial majority of households who go through a disconnection / threat of disconnection don't get assistance that improves their circumstances, with 83% of all respondents still grappling with payment difficulties sometime after their payment difficulty / disconnection experience. Pre-visits have the potential to break the cycle of payment difficulty and regularly getting close to disconnection.

Given the approach and communication style of the person undertaking the visit is crucial to the success of the program. Screening and ongoing quality checks of field staff is important, including checking in with households regarding their experience.

We do not consider that it is appropriate for pre-visits to be undertaken directly by retailers or agents seen as acting on their behalf. Pre-visits cannot be seen as a debt-collection tool in reality or in the eyes of the impacted households. To the degree retailers support pre-visits, it must be through supporting and enabling completely independent parties with a clear and undiluted remit to protect the interests of the household and support them to improve their circumstances.

Recommendation 4

Only field officers with compassion and appropriate communication skills undertake the home visits. Quality checks need to be in place and there must be a clear separation between those providing pre-visits and debt collection activities of retailers.

As pre-visits mature, there is an opportunity (if not a need) for more clarity on who should be undertaking visits and more extensive training for staff, to equip people undertaking the home visits with:

- Greater ability to:
 - explain the payment situation;
 - understand consumer rights and how to empower households with knowledge of these rights;
 - understand what supports are available to households and where they can go to get help; and

- commence connection with supports and assistance.
- Skills in taking a compassionate approach.
- Awareness of the combination of structural issues and personal circumstances that lead to payment difficulty and ensuring an assumption that people want to pay their bills.
- Cultural awareness training including communicating with people who have low or no English language skills.
- Understanding mental health conditions.

Recommendation 5

The Energy Charter help facilitate ongoing improvements to training and identification of suitable staff in their K2SC scheme as part of wider measures to ensure appropriate skills and training for those undertaking pre-visits

The party that does the visit is important

The JEC does not support any model of pre-visits where energy retailers or providers or their agents undertake the visit directly. There can be no conflict of interest and no perception that the purpose of the visit is retail debt collection or debt management. To be clear, the perception of conflict is as dangerous as its actual existence.

Ideally, visits should be undertaken by independent social / community service providers, trained to assist people in crisis and capable of providing access to broader supports as well as helping the householder contact their provider to negotiate to keep the service on and get the assistance they need. We understand this approach involves significant reform of disconnection processes and additional systemic costs in the first instance. We strongly support further investigation of this model and its benefits to households and the systemic handling of debt and payment difficulty. This can align with the Australian Energy Regulator's (AER) Opportunity #13: Consider alternatives to disconnection to manage risk in the energy market, as outlined in their [Review of payment difficulty protections in the NECF- Findings report](#).

If more assistance was provided earlier by retailers, including a proactive engagement obligation based on an objective trigger ([as identified as an opportunity by the AER](#)), then the numbers of people at risk of disconnection could be significantly reduced, making a program of visits by independent social / community service providers for a much smaller number of households and therefore a more financially viable program, designed to assist the most hard to reach households and help them get the supports they need.

In the interim, the JEC supports pre-visit models where distributors and their agents undertake the visit. They do not experience any conflict of interest and are able to act as a neutral party acting in the interests of the household.

"[We are] seen by most customers to have more authority within our network than retailers and third-parties. I've certainly seen that when we send [our field crew] to deal with something, the customer usually responds a lot quicker or takes a little bit more notice."

Distributor

Recommendation 6

Pre-visits should be undertaken by energy distributors in the first instance – and in any case should never be directly undertaken by energy providers/retailer and their agents.

Recommendation 7

That reviews of energy and water disconnection regulation and policy explore options formalising pre-visits undertaken by independent social / community service providers.

Improved retailer participation and information sharing

There are ongoing challenges in consistent, effective retailer participation and information sharing to enable pre-visits. Enhancing collaboration and addressing privacy concerns for the exchange of customer information is crucial for improved implementation of the existing pre-visit schemes and will be critical to any wider implementation. Standardising customer data and intervention strategies could improve field officer efficiency and safety. In addition, inconsistent customer numbering systems hinder effective data management. Proposals for standardisation, potentially through a central body were made by some stakeholders, although concerns about privacy and cybersecurity obviously need to be addressed.

Improved support and decisions about the appropriateness of a visit for people with certain vulnerabilities, especially those facing family or domestic violence, is needed. Privacy-related challenges in contacting and supporting these individuals require attention, for example when information is suppressed for privacy reasons on a disconnection service order but the lack available / relevant information then adds risk to a pre-visit. Inclusion of local community welfare organisations could help with identifying the appropriateness of visits as well as accessing broader and ongoing support. Again privacy risks would need to be addressed. We consider these risks would be less prevalent where pre-visits are undertaken by properly auspiced, independent social / community worker.

Strengthening collaboration with retailers and emphasising the value of the initiative is crucial. The Energy Charter K2SC initiative is a mechanism through which a number of these challenges could be addressed in the short term, but wider, formal implementation is preferable.

Recommendation 8

Investigate options for improved communications, systems and information sharing between providers and distributors, and where appropriate, local community welfare services.

Industry-wide consistency

Households in similar situations should expect the same ‘best practice’ approach to help address their payment difficulty. However, achieving industry-wide consistency in customer support approaches is challenging. In particular, distributors explained that different retailers have different willingness to help their customers avoid disconnection. Ongoing efforts through the Energy Charter K2SC initiative help address this, but there is a need for governments and regulators to pick up the initiative and develop it into a standard practice.

Recommendation 9

Continue to work towards achieving industry-wide consistency in supporting households experiencing payment difficulty / at risk of disconnection.

Improve disconnection warning notices

Many respondents described disconnections warning notices as scary, alarming, intimidating, or threatening. Whilst 60% did report that it encouraged them to contact their provider, the response to the 'supports flyer' was both more positive (88% versus 60%) and qualitatively more likely to lead to a good 'support outcome' indicating that tone and sentiment matters. Improvements should be made to disconnection notices, including ensuring that all notices are accompanied by supportive information designed to encourage and assist.

Recommendation 10

Improve disconnection warning notices, including ensuring they include or are accompanied by supportive messaging and information shown to encourage more positive responses.

Personalisation of material left with householder

Personalisation of the material left with a householder could help improve response rate to the visit, including by taking out barriers to contacting retailers. This should include listing who the household's retailer is, and a direct phone number for that retailer's hardship team.

Principle #3: Pre-visits are intended to engage support for payment difficulty

People must get all the help they need when they call to avoid a disconnection

Avoiding a disconnection cannot only be seen as engaging to make a payment or start resolving a debt. Contact after a disconnection pre-visit must be seen as an opportunity to engage the household in a 'hardship program', ensure they are on the provider's best offer, ensure any rebates are being applied, and make sure a sustainable payment plan is put in place. Preferably, the provider should waive debt and look at other ongoing assistance – such as energy efficiency, emergency payments and other community service support - which may be appropriate. This approach needs to be the default, and it cannot be left to households responding to a pre-visit to self-advocate.

As it stands, many interactions with providers don't have such positive outcomes. The fear and threat of a disconnection drives people to unhealthy responses which endanger their health and wellbeing. They often feel threatened to agree to financial arrangements which are unsustainable and cause further financial difficulty, manifesting as future energy payment difficulty, payment difficulty elsewhere in their life and / or going without essentials such as healthy food and the energy they need. As such, simply 'engaging' with a retailer cannot not be regarded a successful outcome for pre-visits, or disconnection threats more broadly.

Dedicated support line for disconnections

Recognising the urgency and sensitivity of disconnection issues, we recommend retailers establish direct lines for customer disconnection support. This would reduce wait times and enhance accessibility, particularly for those in immediate need and experiencing stress. This line

should be attached to assistance and hardship staff, rather than payment and debt-management staff.

Recommendation 11

Providers establish direct lines for customer disconnection support.

Default that people at risk of disconnection should be put in 'hardship' program

The default for anyone responding to a pre-visit or calling to stop a disconnection should be to be put into a 'hardship' program. That is, a precautionary / harm mitigation principle should inform the default response. It must be clearly established that a household has simply 'missed' paying, or there are no affordability challenges to override this 'default'.

Recommendation 12

People contacting their provider to avoid a disconnection should default into a 'hardship' program, unless it is clearly established that the household faces no affordability challenges.

People get the protections and assistance they need when they switch providers

Evidence shows that fear often drives people to avoid a disconnection by switching to a new provider. Unfortunately, most households are not aware that switching at this point means the former provider no longer has a responsibility to help with the debt, and the debt is often sold to a debt collector. This leaves the householder with a debt to manage themselves and the new provider with a customer who is unlikely to be able to afford their on-going usage whilst also paying off their old energy debt. In the long-term measures to minimise this should be considered as it adds to cumulatively worse outcomes for the household and retailers.

The JEC recognises debt is debt, and debt from a previous provider still impacts people's ability to afford their ongoing energy needs. Policy reform options could include requiring the initial retailer to retain this debt and either write it off as part of their bad-debt provisions or continue to assist the consumer with it; mechanisms to transfer debts to the new retailer; or supported measures to ensure a customer stays with the original retailer and is better supported to deal with this debt. Preventing the sale of debt for external (to the energy system) recovery must be a key consideration.

Recommendation 13

That energy debt remains protected when a consumer switches providers.

In addition, the NSW crisis support payment, Energy Accounts Payment Assistance (EAPA) can't be applied to closed accounts. This is often the case with government supports. The JEC recommends that EAPA (and other government supports) should be able to be applied to closed accounts. For the household there is often no difference to their financial stability between the impact of debt on closed accounts, and that of the current account.

Recommendation 14

That EAPA be able to be applied to closed accounts.

Ongoing improvements to supports and assistance material

Improving the supports flyer (or other similar platforms), particularly where it is based on experiences of program participants, will help households address their broader payment difficulty and ensure the pre-visit platform fulfills its potential as a 'circuit breaker'.

Recommendation 15

Consumer advocates continue to work with the Energy Charter and other pre-visit providers to improve the effectiveness of supports and assistance material provided during pre-visits.

Supports should be automatic and minimise the onus on householders

In current pre-visit initiatives, the onus remains with households to 'engage' with their provider. The householder only has a matter of days to get in contact with their provider and advocate for themselves for the energy / water to be kept on. Yet we know that for many households facing disconnection, they are facing many other competing priorities and stresses, which makes this a difficult task with a much lower likelihood of success. For example, the disconnected households in our research are more likely to be experiencing family violence, mental health issues, intellectual disability and physical disability. These factors have significant impact on capacity to effectively contact their retailer and get help. Where possible, ways to reduce bills should be applied without effort or responsibility by the householder. For example, [rebates should be automatically applied](#) and [people should be put on their providers' best offer](#). Measures such as applying debt-waivers in advance should also be explored.

Principle #4: Disconnections should only be undertaken in person

Given the harm risks involved in disconnection, they should only ever be undertaken in person. Remote disconnection for non-payment increases potential risks of harm to the household. The ongoing rollout of smart meters poses a fundamental challenge to the current models of pre-visits, removing distributors from the process and enabling disconnections to be undertaken remotely. A human undertaking the disconnection helps to ensure that it is safe and appropriate to undertake the disconnection and offers a final opportunity to avoid potential harm. One distributor spoke about how that it is not uncommon for field crew sent to undertake a disconnection to report back:

"Look, we were sent out for a disconnection, however, the customer is home. I've had a conversation with them and they're going to contact their retailer, so the disconnection wasn't done."

Distributor

Another distributor explained that sometimes a disconnection is not undertaken because it is inappropriate:

"I do see cars who keep going out and not disconnecting due to very valid reasons... our team would say, 'Hey, I don't feel safe or morally right disconnecting this person.'"

Distributor

Evidence in Victoria shows remote disconnection resulted in substantial increases in disconnection completion rates - and repeated disconnections - of households.¹⁸

Given the harms disconnection causes and valid safety concerns, the JEC agrees with the AER that disconnection for non-payment should be a truly last resort.¹⁹ A number of actions must be taken to deliver on this intent. In general, disconnection processes should involve friction. They should involve multiple points where the disconnection can be avoided, including by ensuring processes are not automated.

Given the importance of a human intervention ahead of a disconnection and the value of pre-visit initiatives like K2SC, the JEC does not support the remote disconnection of households for non-payment. In the long term, we recommend reform to disconnection processes which prevent it, and in the interim, call on retailers to commit to not undertaking remote disconnection for non-payment. Any potential 'savings' that may arise from remote disconnections involve an unacceptable cost and risk of harm to some of the most disadvantaged people in our community.

Recommendation 16

Energy retailers commit to no remote disconnections for non-payment.

The JEC also urges governments to consider the importance of a human undertaking the disconnection and consider reform to the broader regulation of the disconnection process and regulation.

Recommendation 17

As part of the 'Towards energy equity Action 9: Encourage improved engagement to promote disconnection as truly a last resort,' the AER prohibit remote disconnection for non-payment.

Principle #5: Reconnection is considered another important intervention point

Where a disconnection does occur, a return visit to reconnect should be considered another opportunity to help a household. Leave behind materials catered to this scenario could be developed, evolving the supports flyer material which includes information about wider community supports, about managing bills as well as specific information about local community service providers. Where privacy risks can be addressed, it might be appropriate for a social / community worker to contact the household to perform a welfare check and offer of support as part of reconnection (where this has not been possible prior to this point).

Recommendation 18

Develop leave behind materials and other supports for people who are reconnected.

¹⁸ St Vincent de Paul Society (2016) *Households in the dark: Mapping electricity disconnections in South Australia, Victoria, New South Wales and South East Queensland*, 4.

¹⁹ Australian Energy Regulator, [Towards energy equity: A strategy for an inclusive energy market](#), Action 9: Encourage improved engagement to promote disconnection as truly a last resort

When households contact their provider to reconnect, as above they should default into hardship program.

Recommendation 19

People contacting their provider to reconnect their service should default into a 'hardship' program, unless it is clear that the household faces no affordability challenges.

Principle #6: Monitoring for effectiveness is necessary

Evolution of pre-visit initiatives and any expansion that manages the risks and issues requires effective monitoring and evaluation against robust objective markers of success for households.

Whilst figures for completed disconnections are provided to the AER, no figures are collated for issuing disconnection warning notices. Yet the threat of disconnection itself causes harm, even if the disconnection doesn't go ahead.²⁰ This needs to be addressed as part of a wider consideration of effective measures of success in avoiding disconnection and accessing support.

Recommendation 20

The AER collect data on disconnection warning notices issued and match these against completed disconnections.

Additional data which could help develop ongoing improvements to the program include:

- Household participant feedback analysis by implementing surveys or feedback mechanisms to obtain comprehensive insights into customer experiences and perceptions of pre-visits.
- Automated processes to record what occurred at the visit and what was the outcome to help gauge the most successful interventions.
- Collecting data on rates of repeat disconnection / notification of disconnection to gain insights into ways to assist people in long term payment difficulty.
- Collecting data on the assistance accessed after a pre-visit or disconnection notice – and developing longitudinal measures of the longer-term status of the household after a pre-visit.

The Energy Charter may be best placed to coordinate this in the first instance, as part of its K2SC initiative, but wider implementation would require the development of new AER reporting and monitoring.

Recommendation 21

Continue to set up processes to ascertain the effectiveness of pre-visits, including by hearing directly from households who have experienced a visit.

²⁰ Our research shows that people who received a notification but the disconnection did not go ahead are more likely to experience anxiety or stress than households who actually experienced the disconnection – indicating that the very idea of the disconnection is harmful in itself. This group of 'notified' households are also more likely than disconnected households to significantly reduce the amount of energy/water they used to keep their bills down. See pages 70-73 of [Powerless: Debt and disconnection](#) for more information.

Opportunities for pre-visits as a holistic wrap around approach

There is an opportunity to re-imagine what disconnection pre-visits could look like. Where people are experiencing payment difficulty – any intervention, including a pre-visit, should be seen as an opportunity to help that household get back on their feet financially as well as to help them address some of the underlying issues that have led to their payment difficulty.

We highlight the example of a protections model in place in Catalonia which demonstrates alternative approaches to disconnection focussed on identifying and managing the risk of harm to households. This framework takes a precautionary principle to electricity, gas and water disconnections. At the point of considering disconnecting a service for non-payment, a provider must first consult the social services of the applicable city council to determine whether the household may be in vulnerable circumstances. If the social services determine that household members are experiencing vulnerability, the provider is prevented from disconnecting the householder and must continue to guarantee supply.

Where a household has been protected against disconnection, the utility company and the public administration must cover or cancel the debt that the householder has accumulated. To date, the utility company has covered from 50% to 100% of debt, with the public administration covering the balance. While this is a preferred aspect of this program, it is not necessarily a part of an approach of this kind.

The determination of vulnerability also requires the utility company to provide lower prices by removing profit margin through:

- Putting the household on to the 'regulated market';
- Offering a social bonus (discount) for electricity;
- Seeing whether the contracted power can be lowered; and
- Deleting any extra services which have been added to contract conditions.²¹

While this model is not directly applicable to an Australian context, it does provide an example of measures which can be adopted to ensure households who are vulnerable are better protected. It also demonstrates approaches to engaging broader assistance for households at risk of disconnection, including assisting with other debts they have, to help them achieve more long-lasting financial security.

Another vision of a home visit comes from one of the frontline service providers interviewed for the research. It presents a vision of a gentle approach to a home visit, focusing on addressing problems before they turn into payment difficulty:

“And that visit might be someone coming around saying, ‘Here, let us help you.’ It’s an option. Like, ‘We’ve noticed your bills are really high. Would you like us to come over and check your appliances and see if there’s some way we can reduce your costs? These are the types of things we can do; we’ll send you a link to a video so you can see an example of what we do. If you don’t want that, that’s fine. But please know that we think it could make a substantial difference to your long-term expenses. Unless something

²¹ Alliance Against Poverty, ‘The case of ban on disconnections in Catalonia: The law 24/2015, *Manifesto for a ban on energy disconnections in Europe*, 2023.

significant happened in your last month and you've had lots of family staying or something, we think there might be something that if we just tune up the energy and we can walk you through that.' Maybe we pay local providers to do it, like a lovely, little retired electrician can come around and have a little yarn and a cuppa with you and help you out. Train up community members to do it in certain communities."

Financial Counsellor

Consideration should be given to how the pre-visit platform could be expanded and improved upon. This should include:

- Engaging third-party social / community service providers to undertake pre-visits.
- Otherwise notifying local community service providers, where appropriate, to offer additional assistance.

This may be progressed through a trial in a designated area, perhaps with the support of the NSW (or other jurisdictional) Government - for example as part of their energy debt relief initiative - to help consider best ways to deliver the program to achieve the best short and long term outcomes for households. This could also help further support the AER's Opportunity #13: Consider alternatives to disconnection to manage risk in the energy market, as discussed earlier.

Recommendation 22

Undertake a trial to test pre-visits provided by social / community service workers, with scope to engage more holistic, wrap around support for households in energy (and water) debt.