

Rank the Energy Retailer

Victorian financial counsellors rank the financial hardship policies and practices of energy retailers

Financial and Consumer Rights Council, August 2014



FCRC

Financial & Consumer Rights Council Inc.



About the Financial and Consumer Rights Council

The Financial and Consumer Rights Council Inc (FCRC) is the peak body for over 180 financial counsellors in Victoria.

It is a non-profit organisation whose purpose is to:

- advocate for vulnerable Victorian consumers who are experiencing financial difficulty;
- support the financial counselling sector through its casework, advocacy and law reform; and
- adopt and maintain best industry practice.

Financial counsellors provide free and independent advice and advocacy for people on low-incomes, in debt, or when financial circumstances change, putting individuals and families in financial hardship. Loss of employment, marriage breakdown, natural disasters and the easy availability of credit are some of the common reasons people seek assistance.

Financial counsellors provide information, support and advocacy to enable their clients to gain control of their financial situation. The focus for financial counsellors is always on the needs of their clients and services are free, confidential and impartial. Most workers are located in not-for-profit welfare organisations and are primarily funded by state or federal governments.

FCRC supports financial counsellors by providing training and professional development and sets the standards for the profession in Victoria. FCRC also provides a voice for Victorians in financial hardship and works across a range of industries, including banking, utilities and telecommunication companies.

Acknowledgments

This project was made possible through a grant from the Consumer Advocacy Panel.*

The preparation of this research and report represents a true team effort and FCRC wishes to acknowledge the following people for their valuable support and advice

- All financial counsellors who piloted and provided feedback on the survey instrument and the 111 financial counsellors who undertook the survey
- Research and Project Coordinator: Louise Hicks
- Project Reference Group: Jo Benvenuti, Sue Fraser, Tracey Grinter, Colin Harte, Rene Ploegmakers and Catherine Thwaite
- Consumer advocates and organisations who provided advice and consumer insight

Disclaimer

*This project was funded by the Consumer Advocacy Panel (www.advocacypanel.com.au) as part of its grants process for consumer advocacy projects and research projects for the benefit of consumers of electricity and natural gas. The views expressed in this document do not necessarily reflect the views of the Consumer Advocacy Panel or the Australian Energy Market Commission.

This report is based on a survey of financial counsellors. It does not represent the attitudes or opinions of other third parties, including FCRC funding bodies.



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Foreword

Australia now has some of the highest power prices in the developed world¹. The problem of energy affordability is getting worse for low income and financially vulnerable households, and is beginning to affect customers higher on the income scale with energy costs rising faster than household disposable income². Electricity has been surveyed as the most concerning cost-of-living pressure for Australian households³. In this context it is unsurprising that more people are participating in energy retailers' financial hardship programs than ever before. What is startling is the average debt on exit from a hardship program has increased from debt on entry, and the rate of disconnections continues to rise⁴. It is undeniable that low-income and financially vulnerable energy consumer issues have reached crisis point.

The Financial and Consumer Rights Council (FCRC) receives daily feedback from financial counsellors across Victoria on how the policies and practices of industries and institutions impact on the lives of their clients. As trusted professionals who provide free and independent assistance to consumers, financial counsellors are perfectly placed to act as barometers of what is happening for hardship customers across a number of industries. At the 2013 FCRC statewide conference, financial counsellors identified the high cost of energy and its subsequent impact on clients experiencing financial hardship as the single most critical issue in their casework. The 'Rank the Energy Retailer' survey is FCRC's first step in providing insight and analysis into the efficacy of Victorian energy retailer practices when dealing with customers experiencing financial hardship.

Consumer protection needs to be taken seriously, and the sobering results of the Rank the Energy Retailer survey show that in the opinion of financial counsellors, energy retailers in Victoria aren't meeting their moral or statutory obligations to customers who are struggling to pay their bills. FCRC calls on energy retailers to use the results of this survey as a catalyst for change and to work closely with financial counsellors and consumer groups to prioritise improvements to their hardship responses into the future. This work will not only benefit the clients of financial counsellors, but all energy consumers.

While the aim of this survey was to highlight areas where industry has performed well, in addition to identifying opportunities for improvement when dealing with hardship customers, it is not enough for consumers to rely on energy retailers to lift their game. The State Government and Essential Services Commission must urgently address what are serious gaps in energy consumer protections.

Those in our community who are already doing it tough are falling through the cracks, and it is the collective responsibility of consumer advocates, the energy retail industry and government to tackle this issue. FCRC looks forward to working with these parties to achieve the quantum shift that is needed.



Peter Gartlan

Executive Officer, Financial and Consumer Rights Council (FCRC)

¹ Energy Users Association of Australia (2012) 'Australian Electricity Prices: an International Comparison' <http://www.euaa.com.au/wp-content/uploads/2012/04/FINAL-INTERNATIONAL-PRICE-COMPARISON-FOR-PUBLIC-RELEASE-19-MARCH-2012.pdf>

² Australian Energy Regulator (2013) 'State of the Energy Market' <http://www.aer.gov.au/sites/default/files/Chapter%205%20-%20Energy%20retail%20markets%20A4.pdf>

³ CHOICE, Brotherhood of St Laurence and Energy Efficiency Council (2013) 'Survey of Community Views on Energy Affordability - Australia' <http://www.bsl.org.au/pdfs/Summary%20of%20survey%20results%20National.pdf>

⁴ Essential Services Commission (2014) 'Energy Retailers Comparative Performance Report - Customer Service 2012-2013 (Revised)' at <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>

Executive Summary

On a daily basis, community-based financial counsellors deal with electricity and gas providers on behalf of customers who are struggling financially, and witness first-hand the efficacy or otherwise of hardship practices across different industries. The 2014 Rank the Energy Retailer survey provided an opportunity for Victorian financial counsellors to rank the policies and practices of energy retailers for customers experiencing financial hardship. 111 financial counsellors contributed to the survey, representing 62% of the sector.

With a 70% market share, the 'big three' energy retailers – Origin Energy, AGL and EnergyAustralia - service the largest proportion of energy consumers in financial hardship⁵ and were therefore the primary focus of the survey. The survey also captured selective data on the second and third tier retailers. Survey questions covered financial counsellors' and customers' interactions with energy retailers in relation to financial hardship matters and rated them on communication, processes, attitudes and outcomes for the customer.

This report summarises the results of the survey and increases the transparency of how energy retailers treat small to medium energy consumers in financial hardship.

The 'big three'

Overall, financial counsellors clearly ranked Origin Energy as the current industry leader in handling customer's financial hardship issues, followed by AGL then EnergyAustralia.

The overall rankings – on a scale of one to ten (where ten indicates excellent practice) - for the quality of financial hardship practices achieved by the 'big three' energy retailers were as follows:

1. Origin 5.56/10	2. AGL 4.18/10	3. EnergyAustralia 3.63/10
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- Origin Energy received the highest ratings across almost all performance indicators
- EnergyAustralia received the lowest ratings across almost all performance indicators
- Only small margins exist between the best and worst performers across performance indicators
- The 'big three' rated particularly poorly in relation to aiding customer awareness of internal dispute resolution processes and the Energy and Water Ombudsman Victoria

Smaller retailers

- All second and third tier energy retailers ranked poorly across all measures, with a small margin between best and worst performers
- Of the second tier retailers, Lumo Energy achieved the highest overall rating and Australian Power & Gas the lowest
- Of the third tier retailers, Momentum Energy achieved the highest overall rating and Dodo Power & Gas the lowest



Origin



AGL



EnergyAustralia

Figure 1: Overall ranking of energy retailer financial hardship practices

⁵ for 2012-2013, Essential Services Commission (2014) 'Energy Retailers Comparative Performance Report - Customer Service 2012-2013 (Revised)' at <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>; and AER (2013) 'State of the Energy Market' <http://www.aer.gov.au/sites/default/files/Chapter%205%20-%20Energy%20Retail%20Markets%20A4.pdf>

Conclusions

The results of the Rank the Energy Retailer survey show there is significant room for improvement across all surveyed energy retailers in their hardship processes. Issues highlighted by the survey include:

- ➔ a lack of understanding of the short and long-term impact of financial hardship on customers;

- ➔ poor internal processes and lack of staff training resulting in difficulty for customers and financial counsellors to access and communicate effectively with hardship teams;

- ➔ poor attitudes towards customers and limited opportunity for customer self-advocacy causing delays in resolution of issues;

- ➔ unrealistic payment plans and less than acceptable debt collection practices contributing to unfair outcomes for customers in financial hardship; and

- ➔ room for improvement in all communication from first contact through to raising awareness of external assistance, internal dispute resolution and escalation to Energy and Water Ombudsman.

Next steps

In order for improvements to occur in hardship policies and practices, energy retailers need to prioritise early intervention, training and communication. Information needs to be available to customers to manage their bills and clear processes need to be in place to support those customers who do experience hardship. Specifically, the survey findings point to the following changes that need to be introduced by all surveyed energy retailers:

Programs - prioritise the development of pro-active hardship programs that focus on early intervention with engagement across all levels of the organization

Processes - establish clear internal/external processes for dealing with hardship customers and financial counsellors that:

- promote early identification of hardship issues to reduce the likelihood of unnecessary disconnection or dispute resolution;
- enable consumers to access and receive assistance from their energy retailer's hardship team;
- facilitate customer self-advocacy where possible;
- assist with timely and effective dispute resolution;
- ensure concessions and billings are accurate; and
- address issues relating to current debt collection practices.

Staff training - significantly improve all customer service staff training relating to hardship customers to ensure:

- consistency of responses;
- a better understanding of the issue of financial hardship and the impact of long-term hardship on individuals and families;
- a greater understanding of the role of financial counsellors in the hardship process;
- awareness of the existence and role of the hardship teams and points of contact within those teams; and
- concessions and billings are accurate and appropriate referrals are made.

Communication – develop new communication models relating to financial hardship, to ensure:

- information is made available to all customers about how to manage and reduce energy bills;
- early intervention and proactive support for those identified as at risk of hardship issues; and
- options for internal and external dispute resolution are clearly accessible for customers through all forms of communication.

FCRC calls on all Victorian energy retailers to use these survey results as an opportunity to fulfill their corporate social responsibility by making the changes that are urgently needed to significantly improve hardship practices and to better support Victorians in financial difficulty.

1. Background

➔ *'Financial hardship' or 'financial difficulty' occurs when a customer wants to pay their debts as they fall due, but is unable due to unemployment, illness or other cause of reduced income.*

➔ *Energy is an essential service that is necessary for social and economic participation. When the access and affordability of energy is compromised, the flow-on effects are significant.*

1.1. Why rank the energy retailers?

As the peak body for financial counsellors in Victoria, FCRC regularly receives feedback from Victorian financial counsellors about the current financial hardship policies and practices of various industries and sectors. Whilst this feedback assists in the policy and advocacy work of FCRC, there was a need to develop a more formal process for collecting members' opinions in order to obtain a more accurate picture of financial hardship in Victoria.

Accordingly, FCRC committed to survey financial counsellors' opinions of the financial hardship policies of a number of sectors, starting with the 'big four' banks. This resulted in a 'Rank the Bank' report for Victorian banks, released in July 2012 and a subsequent national report (conducted by Financial Counselling Australia) in May 2013.

The current survey looks at the hardship practices of Victorian energy retailers in order to provide a more accurate and comprehensive picture of financial hardship experienced by Victorian energy consumers.

The evidence of high energy costs and the impact on consumers is clear. Over the past five years or so, electricity prices in Australia have risen by 91%, and gas prices have risen by 62%⁶. In 2012-2013, over 40,000 residential gas and electricity customers were disconnected in Victoria⁷ and there were over 70,000 energy related complaints to the Energy and Water Ombudsman (EWOV) - the Ombudsman concluding that energy companies are not effectively engaging in early resolution of customer issues⁸.

With a 70% market share, the 'big three' energy retailers service the largest proportion of energy consumers in financial hardship. These retailers - Origin Energy, AGL and EnergyAustralia - were therefore the focus of the survey⁹. The survey also included some questions about second and third tier retailers in order to provide a more rounded picture of the performance of the energy retail industry with regards to their financial hardship practices. Selection of second and third tier retailers was again based on market share and the general awareness of retailers amongst financial counsellors (particularly in the case of smaller, newer or little-known retailers).

When energy consumers want to pay their bills and debts as they fall due, but are unable to do so, the term that is used to describe their situation is 'financial hardship' or 'financial difficulty'. Considering the Australian Energy Market Commission (AEMC) is forecasting the continued rise in residential electricity prices across Australia in the next three years¹⁰, the ability of consumers to continue to afford energy will be diminished, potentially resulting in more individuals being unable to pay their bills as they fall due.

Uncertain economic times and community expectations demand that major institutions such as the 'big three', as well as the smaller energy retailers, have appropriate policies in place to support customers that experience financial hardship.

⁶ Australian Energy Regulator (2012) 'State of the Energy Market' <http://www.aer.gov.au/sites/default/files/State%20of%20the%20Energy%20market%202012%20-%20Complete%20report%20%28A4%29.pdf>

⁷ Essential Services Commission (2014) 'Energy Retailers Comparative Performance Report - Customer Service 2012-2013 (Revised)' at <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>

⁸ Energy and Water Ombudsman Victoria (2013) 'Res Online No. 5' <http://www.ewov.com.au/publications-and-media/res-online-no.7-may-2014/res-online-archive/res-online-no.6-february-2014/res-online-archive/res-online-no2.4.-2013/from-the-ombudsman>

⁹ For 2012-2013, Essential Services Commission (2014) 'Energy Retailers Comparative Performance Report - Customer Service 2012-2013 (Revised)' at <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>; and AER (2013) 'State of the Energy Market' <http://www.aer.gov.au/sites/default/files/Chapter%205%20-%20Energy%20retail%20markets%20A4.pdf> for more detailed market share information.

¹⁰ Australian Energy Market Commission (2013) 'Household Electricity Price Trends' <http://www.aemc.gov.au/media/docs/2013-Residential-Electricity-Price-Trends-Final-Report-723596d1-fe66-43da-aeb6-1ee16770391e-0.PDF>

As outlined in the Energy Retail Code, Energy Retail Law and through their corporate social responsibility, energy retailers have contractual, legal and moral obligations to work with their customers to help address their financial difficulties. This survey rates how well the 'big three' energy retailers are meeting these responsibilities in the opinion of Victorian financial counsellors.

1.2. Methodology

➔ *Comment sections captured qualitative feedback and case study material. The survey received over 500 comments from financial counsellors. This qualitative data is highlighted in this column of the report.*

Rank the Energy Retailer data was gathered via the SurveyMonkey online survey platform during April and May 2014. The survey was only available to FCRC's 180 members and contained a combination ranking style questions and multiple choice response options. Comment sections captured qualitative feedback and case study material. High-level, principles-based questions were utilised to draw on the general casework experience of financial counsellors for the previous 12 months. (See Appendix 1 for the survey instrument).

Data analysis of this survey was a mix of statistical and thematic inquiry. The survey used rating scale questions that calculated a weighted average as well as percentages for each answer choice. A weighted average is used as a descriptive statistic that helps to summarize data or measure what value most represents a sample. The percentages in this report relate to the percentages of respondents that answered a specific question, not the percentage of total survey respondents.

1.3. Reach and respondent profile

There are 180 financial counsellors who are members of FCRC, 111 of whom undertook the survey. This represents a total response rate of 62%. The response rate based on survey completion was 58% (105 responses).

"In comparison to other sectors, like the banks, (energy) hardship takes an onerous amount of work. Often getting hardship on a \$1K utility bill will be as hard as, if not harder, than getting hardship on a home loan of \$400K"

A slightly larger proportion of respondents were working in metropolitan regions (55%) as opposed to rural or regional areas. The majority of respondents had been working as a financial counsellor for a significant number of years: 41% for four to nine years and 30% for ten or more years. Less than a third of respondents had worked as a financial counsellor for three or less years (29%).

Survey respondents were asked what percentage of their casework is energy-related and whether there had been any changes to the volume of their energy-related casework in the last 12 months. Respondents reported that energy issues are present in a significant proportion of their casework.

72% of financial counsellors reported that their energy-related casework has increased in the last 12 months, with a quarter of respondents responding that it had 'increased significantly'.

2. Results

2.1. Overall rank

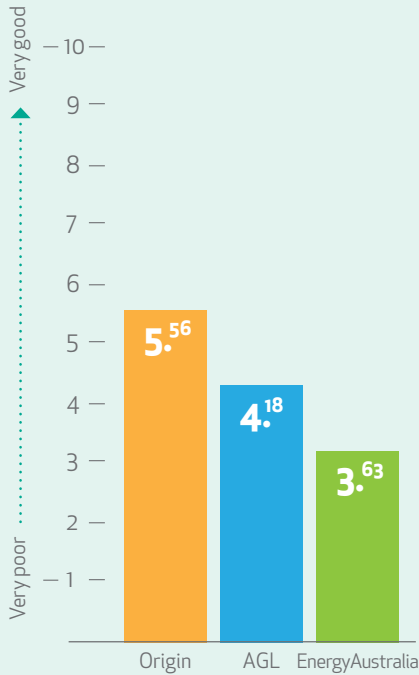


Figure 2: Overall ranking of 'big three' energy retailer financial hardship practices

Respondents were asked to provide an overall score out of ten for the 'big three' energy retailers in terms of their hardship policies and practices (one being the lowest, 'very poor' practice rating, and ten being the highest, 'excellent practice' rating). Respondents were asked to consider all of their survey answers in relation to communication with the energy retailer, attitudes and processes and customer outcomes when determining an overall score for each retailer.

Figure 1 shows the overall scores. Origin Energy was the leader overall with a score of 5.56. AGL was second with 4.18. EnergyAustralia was rated the lowest of the 'big three' with a score of 3.63.

Overall rankings mask some of the variability in responses. Origin Energy ranked the highest overall but was given very low rankings by a number of financial counsellors. Conversely, EnergyAustralia received the lowest score overall, however received some very high ratings by some financial counsellors.

These results confirm, amongst other things, anecdotal evidence received by FCRC that the consolidation of EnergyAustralia's customer information and billing systems had resulted in significant negative impacts on customers in the form of late or inaccurate bills containing high amounts.

Results also support informal reports to FCRC suggesting that AGL has fallen behind in recent times, after once being considered an industry leader in supporting customers that experience financial hardship.

2.2. Best performing, lowest performing, most improved

Respondents were asked which of the 'big three' energy retailers was the best performer, the lowest performer and the most improved¹¹ in terms of customer hardship. This data is in Figure 3 below.

Retailer	Best performer	Lowest performer	Most improved*
Origin Energy	62%	7%	14%
AGL	19%	35%	8%
EnergyAustralia	19%	58%	11%
Not sure			38%
No retailer improved			29%

Figure 3: Best performing, lowest performing and most improved financial hardship practices

"AGL has really gone downhill. They used to have such a fantastic 'Staying Connected' program...and now the same program basically functions as soft debt collection"

¹¹ * Respondents were asked to consider which energy retailer was the most improved in the last six months. For this question respondents were also given the opportunity to select "Not sure" and "No retailer improved".

Not surprisingly, the rankings for best performing and lowest performing retailer mirrored the overall ranking, with Origin Energy overall seen as the best performing energy retailer and EnergyAustralia seen as the lowest performing energy retailer. Respondents were asked to provide a brief explanation for their selection of best and lowest performing 'big three' retailers, examples of which are below.

While Origin Energy was rated as the energy retailer that had most improved in terms of hardship policies and practices over the last six months, this rating only represents 14% of all responses (AGL came in a close second with 11% responding they had most improved).

"Marketing on the internet looks good - practice needs to catch up"

Interestingly, the vast majority of financial counsellors surveyed (73 of 109 respondents) said that they either weren't sure if any of the 'big three' energy retailers had improved, or that no retailer had improved.

■ ORIGIN ENERGY

"Much more willing to work with the client's situation and employ people in their community liaison team that know what empathy is and can use it"

"Accessibility. Consistency in approach. Long serving staff members. Turnover seems to be minimal"

"Best understanding of financial hardship. Willing to work with customers and offer a range of solutions"

■ AGL

"I can never get through to the AGL hardship team"

"I have to go through credit management or resolutions before I can access the hardship team"

"More clients present to our service having been disconnected without notice from services provided by AGL. Their reconnection process can be so problematic. Their hardship area can be difficult to access and their assistance team members frequently provide conflicting information"

■ ENERGYAUSTRALIA

"Misinformation given by reps on the front line"

"On several occasions some of the hardship team members have told my clients that they themselves are on a low income and they have to pay their bills. They have also told clients that their hardship issues are no worse than the staff member's life and they should pay their bills"

"Accessing the hardship teams across the utility sector is becoming more challenging. I find a great deal of obstacles being placed in the way, requiring the Energy and Water Ombudsman to become involved just to be able to talk to someone who is in a position to make decisions"

"My clients have very little success with being directed to the Origin hardship team and I am always given the third degree before demanding to be put through to hardship"

"EnergyAustralia does not seem to have enough workers and are unsure of their company's policies"

"Both AGL and EnergyAustralia can be difficult to get on the phone while the client is present"

"Responses to hardship can vary enormously. Variation occurs regardless of client situation"

2.3. Communication

Effective communication channels are vital to developing positive relationships between financial counsellors, customers and energy retailer financial hardship team staff. Effective communication is also imperative to achieving a satisfactory outcome for all parties. It is a continuous source of frustration for financial counsellors that their advocacy work is hampered by difficulty in communicating with the right energy retailer staff.

Respondents were asked to assess their experience of the quality of communication with each of the 'big three' energy retailer hardship teams in the following four ways:

1. First contact (accessibility)
2. Consistency
3. Subsequent communication
4. Accuracy of billing, notices and other correspondence

These aspects reflect the typical communication a financial counsellor has with an energy retailer.

In the communication section of the survey, respondents were asked to rate each energy retailer on the following scales, depending on the question:

- 'very poor', 'poor', 'acceptable', 'good', 'very good' or 'not sure'; and
- 'no-very inconsistent', 'no-somewhat inconsistent', 'yes-somewhat consistent', 'yes-very consistent' or 'not sure'.

2.3.1. Accessibility of hardship teams

Respondents were asked to rate the accessibility of each retailer's hardship team. Origin Energy had the highest rating with 31% responding that accessibility of their hardship team is 'acceptable' and 21% responding that they had 'good' accessibility. EnergyAustralia and AGL both had low hardship team accessibility ratings. Both retailers fell short of the 'acceptable' grade, most frequently being rated as 'poor'.

A number of respondents indicated that EnergyAustralia has become difficult to access, being forced to leave a message on an answering machine rather than being able to speak with a member of their hardship team.

A number of respondents reported having ongoing issues working with EnergyAustralia as a result of the company's operations between Victoria and New South Wales. One commented, "A lot of our clients have been transferred from Victoria to NSW without understanding these are operating as two separate entities. The hardship areas are not very good at assisting in these matters."

"The level of training each hardship team member has undergone appears to directly relate to their capacity to resolve issues"

"Clients say they often do not receive the 'same' quick response I do"

2.3.2. Consistency of hardship teams

Respondents were asked to rate the consistency of service received from members within energy retailer hardship teams. Origin Energy rated the highest of the 'big three', with 44% of respondents saying that service from their hardship team is 'somewhat consistent'. AGL and EnergyAustralia both received ratings showing that overall, respondents found they did not receive consistent service from their hardship teams.

2.3.3. Communication subsequent to initial contact

Respondents were asked to rate each of the 'big three' retailers on their communication following initial contact, considering various forms of subsequent contact such as reliability of returned calls, timely responses to requests and confirmation of agreements. Origin Energy rated the highest with 41% of respondents rating them as 'acceptable' in their subsequent communication, while over 40% of respondents rated both EnergyAustralia and AGL's subsequent communication practices as 'poor'.

70% of respondents rated the accuracy of EnergyAustralia's billing, notices and other correspondence as 'very poor' or 'poor'.

2.3.4. Accuracy of billing and other notices

“Incorrect billing is driving a lot of consumer problems”

“EnergyAustralia has consistently sent out multiple incorrect bills to customers. This has caused the client high levels of stress. EnergyAustralia has not seemed to care about the stress that they have caused their customers”

“EnergyAustralia does not play an active role in trying to resolve these disputes and the onus is on the customer (or financial counsellor) to spend hours of their own time to sort out the issue. Unacceptable service.”

Almost 40,000 energy customers raised billing as their main issue when making a complaint to the Energy and Water Ombudsman (EWOV) in 2012-2013, with the most common energy billing issues being reported as high bills (up 52% for electricity and 76% for gas), billing delay (up 27% for electricity and 170% for gas) and billing error (up 47% for gas).¹²

We asked financial counsellors to rate each of the ‘big three’ energy retailers on the consistency and accuracy of their billing, notices and other correspondence with their customers. 70% of respondents rated the accuracy of EnergyAustralia’s billing, notices and other correspondence as ‘very poor’ or ‘poor’. This result is unsurprising considering the large increase in complaints EnergyAustralia reported for 2012-2013 due to problems with the introduction of a new billing system¹³. The highest responses for Origin Energy and AGL were in the ‘acceptable’ category (39% and 38% respectively).

The separate operations of EnergyAustralia in Victoria and New South Wales was previously cited as a cause of significant issues for clients accessing the correct hardship team. This experience, coupled with delayed and incorrect bills, compounds the stress on the customer and pressure on the financial counsellor.

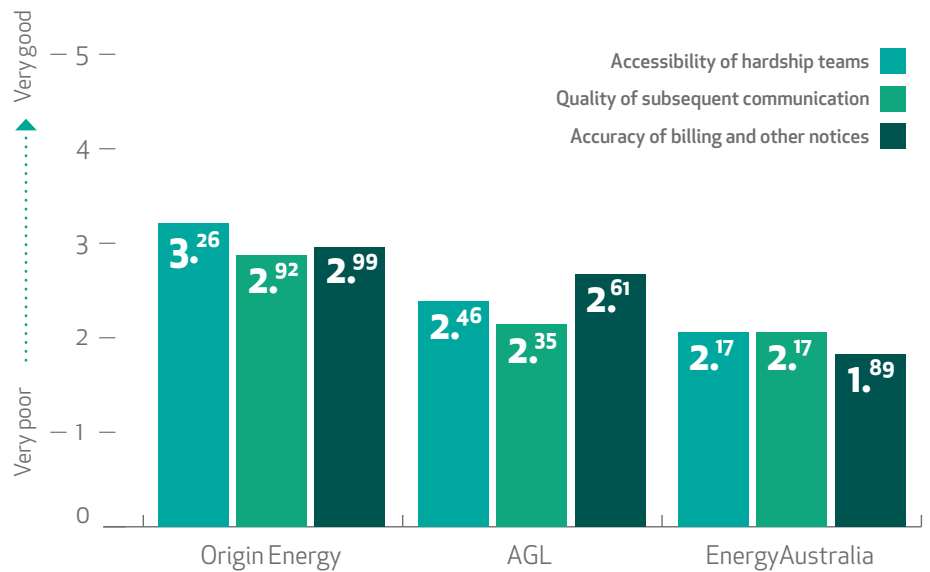


Figure 4: Accessibility of hardship teams, quality of subsequent communication and accuracy of billing and other notices

¹² Energy and Water Ombudsman Victoria (2013) ‘2013 Annual Report 2013’ http://www.ewov.com.au/_data/assets/pdf_file/0019/9640/1-EWOV-2103-Annual-Report.pdf

¹³ Essential Services Commission (2014) ‘Energy Retailers Comparative Performance Report – Customer service 2012-2013 (Revised)’ <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>

2.4. Attitude and process

2.4.1. Attitude

"They very much seem to forget that they supply an essential service"

"The universal attitude seems to very much be geared toward debt collection, not financial hardship. They demand that customers make regular payments that are neither realistic nor affordable. No concern for customers, just collect their money and don't care about the customers' ability to pay or future welfare"

"EnergyAustralia has no compassion and little understanding of a client's circumstances and not willing to entertain the idea that a client just doesn't have enough money"

"As an experienced financial counsellor, I receive good service, but the fact that I need to get involved demonstrates that hardship is not working for consumers"

"I feel like I am having to bully hardship teams to try and get a half reasonable outcome for my client that they can afford"

"From a marketing perspective, energy retailer websites promote that they have understanding... the culture of staff and overall training appears different"

Survey questions on attitude addressed the relationship between the energy retailer hardship team members, customers and the financial counsellors. Respondents were again asked to rate each energy retailer as 'very poor', 'poor', 'acceptable', 'good' or 'very good'. Results are shown in Figure 5 below.

Origin Energy was the only retailer with an average rating of 'acceptable' or above, achieved in both hardship team members' attitude toward clients and toward financial counsellors. None of the 'big three' retailers were considered 'acceptable' in relation to their understanding of the impact of long-term financial hardship.

Attitude toward client

Respondents were asked to rate each of the 'big three' energy retailers in terms of their general attitude towards customers experiencing financial difficulty. Origin Energy rated the highest, having an 'acceptable' attitude towards their customers experiencing financial difficulty. The results for AGL and EnergyAustralia are cause for concern, with over 50% of financial counsellors surveyed rating AGL as 'very poor' or 'poor', and almost 70% of responses also rating EnergyAustralia 'poor' or 'very poor' in terms of their attitude towards customers in financial hardship.

This result is interesting in light of Essential Services Commission data showing that the number of customers denied access to a retailer's hardship program increased by 93% in 2012-2013.¹⁴

Attitude toward financial counsellor

Each of the 'big three' energy retailer's hardship teams were rated in terms of their general attitude towards financial counsellors. Respondents were asked to rate each retailer hardship team, considering their willingness to accept respondent's authority¹⁵ as a financial counsellor and the level of trust between financial counsellors and members of the hardship teams. The results were slightly higher overall than in relation to attitudes towards clients.

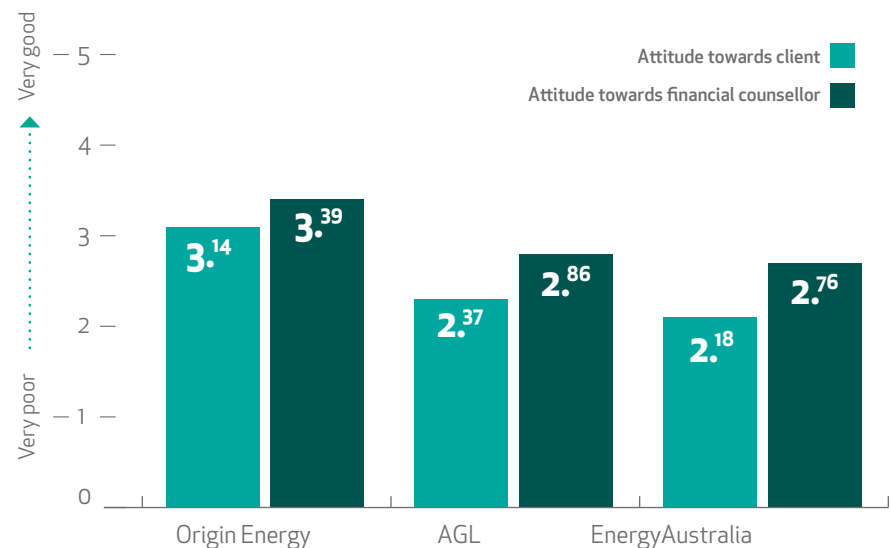


Figure 5: Hardship team attitude toward clients and financial counsellors

¹⁴ Essential Services Commission (2014) 'Energy Retailers Comparative Performance Report – Customer service 2012-2013 (Revised)' <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>

¹⁵ In order to act as a representative of an energy retail customer experiencing financial hardship, financial counsellors are required to provide the energy retailer with a letter of authority permitting them to act on the customer's behalf.

“Long term financial hardship appears to be a foreign concept to hardship teams in general. Hardship seems to be an approach that simply softens up the debt collection process rather than being a mechanism that responds to critical situations”

“Basic human rights for these clients are overlooked”

“Early identification is an issue that energy companies are still coming to terms with. Most clients have bills in the thousands before they say an energy company has referred them for assistance”

“I work closely with Horn of Africa clients who present large bills that have accumulated over 12 months to upwards of \$1000... I hear from the client when they have been disconnected. I always ask the retailer, is there not a way to flag accounts to stop this?”

“I believe the vast majority of consumers have the ability to self-advocate if they are talking to competent hardship team members. I also believe that a consumer should not need an advocate to navigate the hardship process. If an advocate is required, that hardship process is not effective”.

“The service provider tells the customer what they have to pay. There is no negotiation, so self-advocacy is a farce”

“The client is usually bullied into an arrangement that is unsustainable”

“The call centres will transfer the customers to credit management and often not disclose that there is a hardship area”

“Customers appear to always be passed to the collections team and the collections team have little or no knowledge or interest around hardship”

Understanding of the impact of long-term financial hardship

Respondents were asked to rate the ‘big three’ retailers on their understanding of the impact of long-term financial hardship on clients¹⁶. All ‘big three’ energy retailers received low ratings on this measure. Origin Energy and AGL were both rated ‘poor’ and EnergyAustralia was rated ‘very poor’.

2.4.2. Process

Proactive assistance and early intervention

Respondents were asked to rate the ‘big three’ energy retailers on whether their hardship teams actively assist their customers in managing current or future bills, such as making clients aware of flexible payment options, providing energy efficiency advice and early identification and assistance with debt. Respondents were given a choice of ‘no-never’, ‘no-rarely’, ‘yes-somewhat’, ‘yes-definitely’ or ‘not sure’.

All three retailers rated in the same range between ‘no-rarely’ and ‘yes-somewhat’. Again, Origin Energy received the highest rating with 43% of surveyed financial counsellors indicating that their hardship team is ‘somewhat’ assisting customers in managing future and current bills.

Customer self-advocacy

In the context of this report, self-advocacy relates to a client in financial hardship and their ability to liaise directly with their energy retailer to achieve positive outcomes for themselves. Respondents were asked to rate the retailers on whether customers who have the capacity to self-advocate are given the opportunity to negotiate arrangements directly with their energy retailer’s hardship team.

Response options were ‘no - retailer requires financial counselling appointment before providing assistance’, ‘no - retailer requests financial counselling appointment before providing assistance’, ‘yes - customer has the opportunity to self-advocate’, ‘yes - self-advocacy is encouraged and facilitated’ and ‘none of these/ not sure’.

All ‘big three’ retailers received low to mid-range ratings. While the highest percentage of responses for Origin Energy and AGL was in the category ‘yes - customer has the opportunity to self-advocate’ (32% and 29% respectively), their average scores indicate they are both more likely to request or require a financial counselling appointment before providing assistance for customers who have the capacity to self-advocate.

¹⁶We defined long-term hardship as applying to clients who are unlikely to get back on top of their financial situation in the foreseeable future.

"Retailers do not advertise they have a hardship team. Usually clients don't know about them until they have seen a financial counsellor"

"Clients generally don't get put through to the hardship team from the customer service staff without a financial counsellor intervening"

"Usually where an affordable repayment is requested by the client, particularly with EnergyAustralia, the company has required the client to see a financial counsellor. This is time wasting for clients and financial counsellor staff"

Financial counsellors resolving matters that should be dealt with by hardship teams

Respondents were asked how frequently they are engaged by clients to resolve matters that could and should be dealt with by the 'big three' energy retailer hardship teams. Ratings for AGL and EnergyAustralia are cause for concern, with financial counsellors indicating that 'most of the time' or 'all of the time', matters that could and should have been resolved by the hardship teams are being dealt with by financial counsellors. Just under half of respondents indicated the same problem occurs for Origin Energy customers.

It is also worth noting that just under one third of respondents indicated that EnergyAustralia customers who engage financial counsellors are engaged 'all of the time' for assistance with matters that could be dealt with by their hardship team. The data for this question is outlined in Figure 6 below.

FCRC included this survey question on the back of informal feedback from financial counsellors that a significant number of clients were being referred from energy retailers for issues that could have been readily resolved between the retailer and the customer. These reports are concerning in light of significant financial counselling appointment wait lists. The result of inappropriate referrals to financial counsellors can mean customers go weeks without the hardship assistance available through their energy retailer or government assistance scheme.

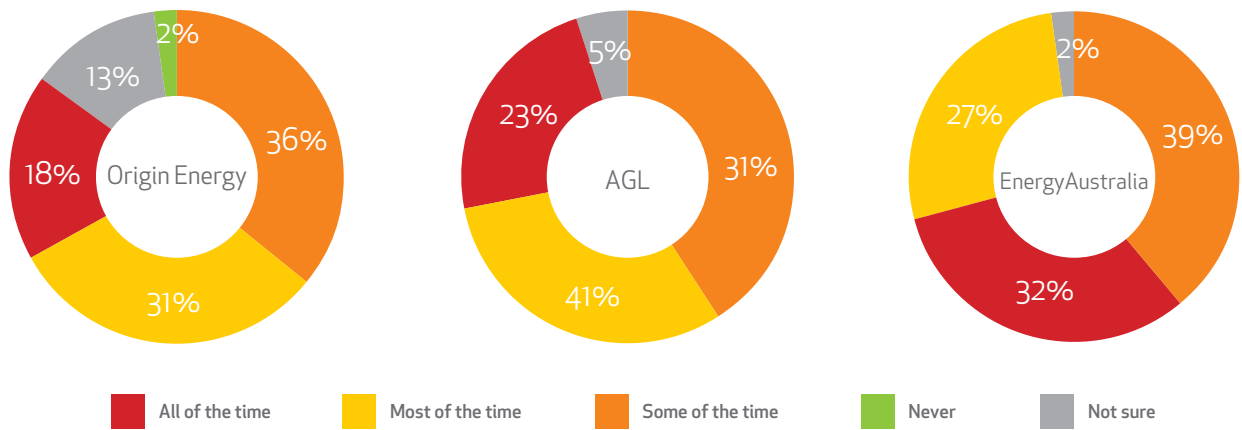


Figure 6: Frequency that financial counsellors are engaged to resolve matters that could and should be dealt with by retailer hardship teams

2.5. Client outcomes

Financial counsellors work to achieve fair outcomes for customers in financial hardship. This survey considers customer outcomes and captures the experience of financial counsellors in dealing with the energy retailers in several areas, including:

- repayment affordability;
- appropriate application of concession entitlements;
- use and referral to assistance external to the retailer;
- debt collection practices;
- disconnection; and
- the use of dispute resolution mechanisms.

2.5.1. Repayment affordability

“Origin is the only one that is in any way realistic”

Respondents were asked if the payment plans offered by the ‘big three’ energy retailers were realistic in terms of the customer’s capacity to pay. The majority of respondents indicated that this occurs ‘some of the time’ across all three retailers.

Almost a third of respondents indicated that the Origin Energy hardship team offers realistic payment plans in terms of the customer’s capacity to pay ‘most of the time’. Worryingly, ‘none of the time’ was the second most common rating that respondents selected for both AGL and EnergyAustralia (25% and 30% of responses respectively).

“Payment plans are only short term. They don’t address the client’s long term ability to meet usage costs and this results in accumulated debt”.

Many respondents expressed concern at the situation of consumers who cannot afford to pay for basic energy usage (i.e. less retail costs), and whose financial situation is unlikely to change. The gap between low-income and financially vulnerable consumer’s capacity to pay and the costs retailers are willing to accept can sometimes be bridged through accessing concessions, grants and other assistance.

2.5.2. Concessions entitlements

Energy concessions are an important government tool to ensure people on low incomes can meet their basic needs by remaining connected to energy supply. While low incomes and the adequacy of government income support isn’t the responsibility of the energy retailer, the manner in which available concessions are applied to energy accounts is.

“There is no onus on the retailer to follow this up. There seems to be no service on the part of the admin team of the retailers. Vulnerable consumers slip through the net”

Respondents indicated all ‘big three’ energy retailers’ are ‘acceptable’ at applying concession entitlements to customer accounts. Respondents were vocal, however, about the ad hoc nature in which concessions were applied to customer accounts. There was significant reporting of concession details being supplied to retailers, but not being applied to bills, or concessions being registered with the retailer, but not being renewed or maintained on the retailer’s system where the customer has access to a permanent benefit (such as age or disability pensions).

The failure of retailers to address this issue is far reaching, with 71% of the average 11,142 customers that participated in a hardship program every month of 2012-2013 being concession card holders¹⁷.

¹⁷ Essential Services Commission (2014) ‘Energy Retailers Comparative Performance Report – Customer service 2012-2013 (Revised)’ <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>

While results indicate room for improvement in the retailers' application of concessions, it is notable that this was the only question in the survey that all 'big three' energy retailers achieved an average rating of 'acceptable' from financial counsellors.

2.5.3. Other assistance

"Staff training is very poor in this area"

"Customers should be made aware of these services before they are at crisis point"

Respondents were asked to rate each of the 'big three' energy retailer hardship teams in terms of how effective they are at providing information about assistance external to their hardship program (for instance, the Victorian Utility Relief Grant and energy audits). While results indicate that Origin Energy is the highest performer, all three retailers hardship teams were rated as being 'poor' in providing information about assistance and services available outside of their hardship program.

This data reinforces informal feedback FCRC has received regarding energy retailers' reluctance to provide the paperwork required for the processing of a Utility Relief Grant. Utility Relief Grants are approved under a scheme of the Victorian Department of Human Services, designed to provide assistance for eligible concession card holders or low-income customers registered with an energy retailer hardship program, and who are unable to pay for a current utility account and are at risk of disconnection.

Despite the financial advantage to both the customer and the retailer under this scheme, financial counsellors report resistant or combative hardship team staff behaviour when the Utility Relief Grant paperwork is requested from the retailer.

2.5.4. Debt collection

Respondents were asked to rate the 'big three' energy retailers on their debt collection practices. 63% of respondents rated Origin Energy as having between 'poor' and 'acceptable' debt collection practices. Over 40% of respondents rated both AGL and EnergyAustralia as having 'poor' debt collection practices.

Reasons financial counsellors cited in explanation of their ratings included the "ruthless" approach in debt collection practices by the retailers, and external agencies employed by the retailers, resulting in having clients "in tears and in fear". Our findings underscore the Energy and Water Ombudsman's recent report showing rising debt collection. In the January – March 2014 quarter, 62% more electricity customers and 103% more gas customers raised debt collection as their main issue of complaint (compared to the January – March 2013 quarter).

"They are all very quick to on sell debts to debt collection agencies as they don't wish to carry these debts themselves and have customers pay them off on payment plans"

Our data supports the Ombudsman's findings that complaints are being made about low arrears (under \$100) being referred for debt collection; debt collection action being undertaken for old debts; debt collection activity occurring without prior notification and/or after the customer had indicated they were experiencing payment difficulties¹⁸.

¹⁸Energy and Water Ombudsman Victoria (2014) 'Res Online No. 7' <http://www.ewov.com.au/publications-and-media/res-online-no.7-may-2014>

"A lot of work needs to be carried out on hardship. We are close to a third class of people who will have no utilities"

"Hardship arrangements don't help clients on a low income with high usage who are going to face challenges throughout their usage life"

2.5.5. Fair, reasonable and appropriate outcomes

Respondents were asked on balance, whether the financial hardship arrangements offered by the 'big three' energy retailers result in fair, reasonable and appropriate outcomes for customers. Response options were 'never', 'some of the time', 'most of the time', 'all of the time' or 'not sure'.

Financial counsellors indicated that final hardship arrangements offered by Origin Energy deliver fair, reasonable and appropriate outcomes for their clients more often than AGL and EnergyAustralia, with 83% of respondents indicating Origin Energy's final hardship arrangements result in fair and reasonable outcomes for customers 'most of the time' or 'some of the time' (38% and 44% respectively).

Between 76-81% of financial counsellors indicated AGL and EnergyAustralia offer final hardship arrangements that result in fair, reasonable and appropriate outcomes for their clients 'never' or 'some of the time'.

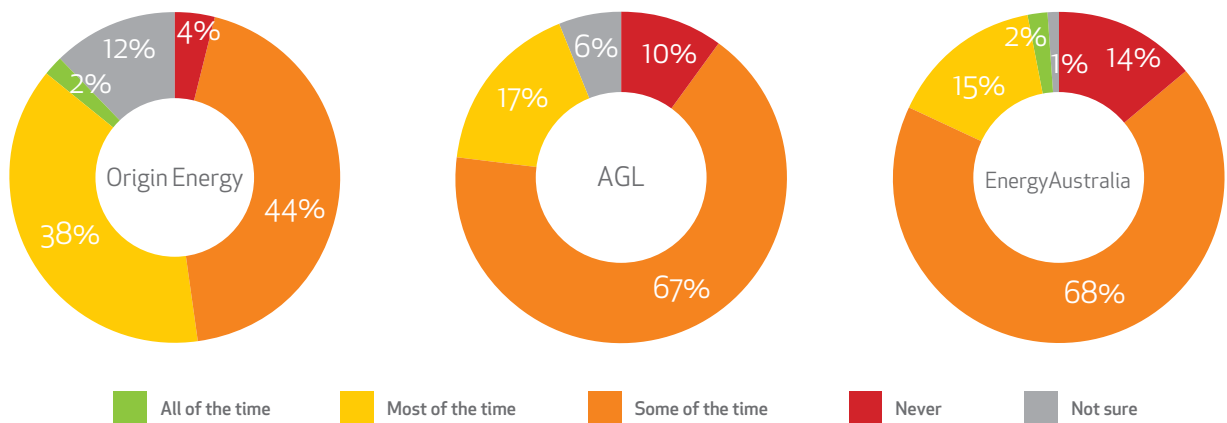


Figure 7: Do the final hardship arrangements offered by the retailers result in fair, reasonable and appropriate outcomes for clients?

"Mostly retailers send out disconnection notices - never call to ask how the client is going - just threat of disconnection to prompt client to make contact"

"EnergyAustralia has regressed in its hardship processes... often clients are sent disconnection notices before any meaningful hardship options are presented to help them manage their bill payments"

2.5.6. Disconnection

Our data suggests a considerable number of instances where 'big three' energy retailers are not fulfilling their obligations under the Energy Retail Code to proactively contact customers to offer relevant assistance before disconnection.

Financial counsellors were asked how frequently the 'big three' energy retailers take appropriate steps to contact customers and offer support before disconnection. Response options were 'never', 'some of the time', 'most of the time', 'all of the time' or 'not sure'.

Origin received the highest rating, with over one quarter of financial counsellors indicating Origin Energy takes steps to make contact with their customers and offer support before disconnection 'some of the time', and one quarter indicating this happens 'most of the time'. Around 40% of respondents indicated that both AGL and EnergyAustralia attempt to contact and provide assistance before disconnection 'some of the time'. Between 18-29% surveyed financial counsellors indicated that all three retailers 'never' take appropriate steps to contact the customer and provide support prior to disconnection.

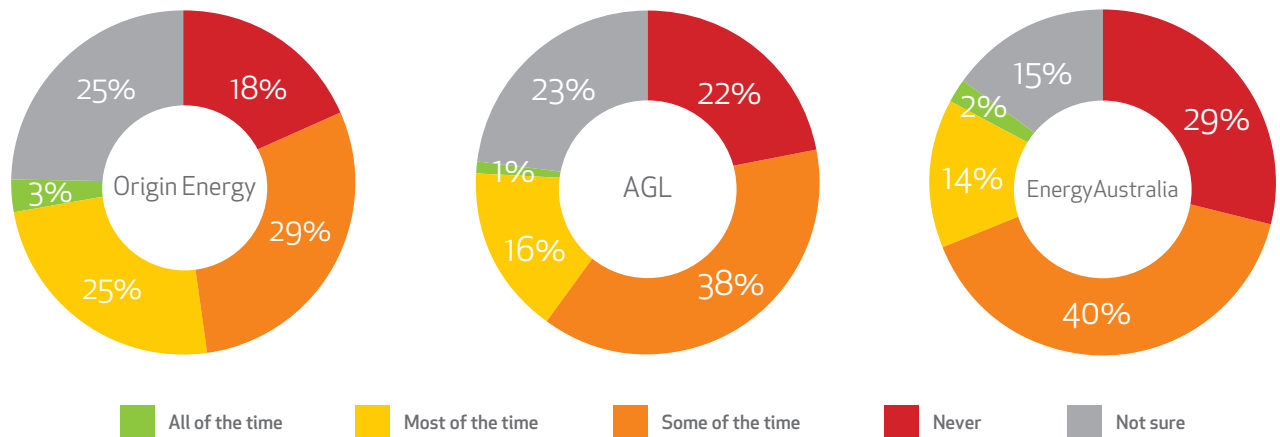


Figure 8: Does the retailer take appropriate steps to contact customers to offer support before disconnection?

➔ *“Facing rising industry cost pressures, some energy retailers have increased their use of disconnection, or threat of disconnection, as a means of collecting debt. Others are on-selling debt” – EWOV 2013 Annual Report*

This practice by the ‘big three’ could be contributing to the increasing rates of disconnection in Victoria. The increase in disconnections and wrongful disconnections has a number of potential causes, however on the basis of this data it is reasonable to suggest that effective support is not being broadly provided to customers through the hardship programs of the ‘big three’ energy retailers.

One example of the concerning use of disconnection can be seen in the trend of retailers disconnecting concession card holders which increased 24% for electricity and 28% for gas consumers in 2012-2013¹⁹.

2.5.7. Internal Dispute Resolution

“Why do we have to go to EWOV to get some sort of satisfaction?”

The majority of financial counsellors believe that the ‘big three’ energy retailers don’t make customers aware of their complaints and internal dispute resolution processes when appropriate.

“It just shouldn’t be this hard. To have to ask for a supervisor or go directly to a manager to satisfy a client’s rights means poor training”

Respondents who had formally complained to one or more of the ‘big three’ were asked if they were satisfied about how their or their client’s issue was handled. 37% of respondents indicated they were ‘somewhat satisfied’ with Origin’s complaint handling, 34% also answered they were ‘somewhat satisfied’ with AGL and 28% with EnergyAustralia.

“Unlike the finance industry, none of the retailers make their dispute resolution freely accessible to consumers”

A large number of financial counsellors selected the ‘N/A / not sure’ option for this question (41% for Origin Energy, 31% for AGL and 24% for EnergyAustralia). The qualitative data suggests financial counsellors are not utilising energy retailer internal dispute resolution because taking complaints to the Energy and Water Ombudsman is more likely to achieve a timely resolution.

“This is a real problem. There are promises that the client will be contacted by the energy retailer upon lodging of a complaint, however the clients come back to me complaining that they’ve not had any response. Hence we then take the matter to EWOV. What worries me is how many clients aren’t bothering - laden with apathy - to follow up on a complaint”

¹⁹Essential Services Commission (2014) ‘Energy Retailers Comparative Performance Report – Customer service 2012-2013 (Revised)’ <http://www.esc.vic.gov.au/getattachment/983c8101-90be-4173-b57e-73ec365f2648/Energy-Retailers-Comparative-Performance-Report-Cu.pdf>

2.5.8. Escalation to the Energy and Water Ombudsman (EWOV)

EWOV is an industry-based external dispute resolution scheme set up to provide free and accessible services to consumers unable to resolve disputes with their energy and water providers. All energy retailers in Victoria are members of EWOV.

Respondents were asked whether the 'big three' energy retailers make customers aware of EWOV where appropriate, and how frequently respondents escalate client issues to EWOV because they were unable to negotiate an appropriate arrangement.

Respondents indicated that the frequency at which the three energy retailers make clients aware of EWOV ranged from 'never' to 'some of the time'. This question yielded the lowest-performing scores for the 'big three' retailers in the entire survey. Approximately 20% of respondents were unsure whether the 'big three' had made their clients aware of EWOV, presumably because they had insufficient casework examples to draw on (see Figure 9 below). These results suggest that communication with customers on the existence and role of EWOV is an area that energy retailers can focus on improving.

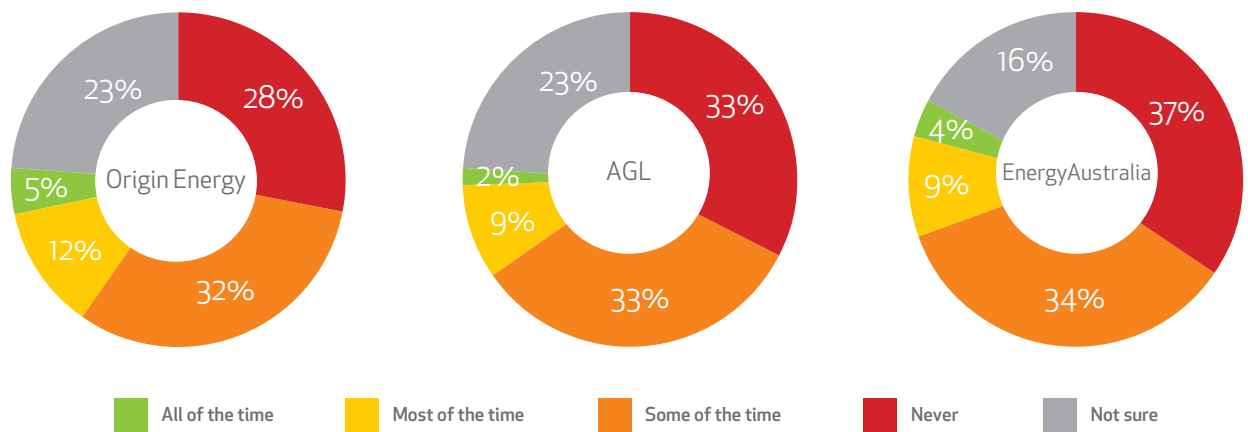


Figure 9: When appropriate, do retailers make clients aware of EWOV?

When asked how frequently client issues were escalated to EWOV because appropriate hardship arrangements were unable to be negotiated with the retailer, respondents were given the response options 'rarely', 'sometimes', 'frequently' and 'in most cases'. As Figure 10 shows, financial counsellors believe escalation of Origin Energy cases to EWOV in these circumstances occurs 'rarely' or 'sometimes'. Financial counsellors indicated that clients with EnergyAustralia more frequently have their issue escalated to EWOV because appropriate hardship arrangements are unable to be negotiated.

	Rarely	Sometimes	Frequently	In most cases	Not sure
Origin Energy	30%	34%	17%	6%	13%
AGL	20%	37%	26%	6%	11%
Energy Australia	17%	34%	37%	8%	4%

Figure 10: Frequency with which client issues escalated to EWOV because appropriate hardship arrangements are unable to be negotiated



3. Second and third tier energy retailers

Respondents were given the opportunity to rate second tier energy retailers Australian Power & Gas, Lumo Energy, Red Energy and Simply Energy, as well as several other third tier retailers. The second and third tier retailers were included in the survey as they are commonly a part of the day-to-day casework of financial counsellors. Some second and third tier energy retailers also have a significant localised presence in some regions and it was important to capture data about this segment of the energy retail industry.

3.1. Second tier energy retailers

"Simply Energy...literally cannot be contacted by phone, or by email. Rarely able to speak to them"

"Some staff at Red Energy are consistently aggressive and combative"

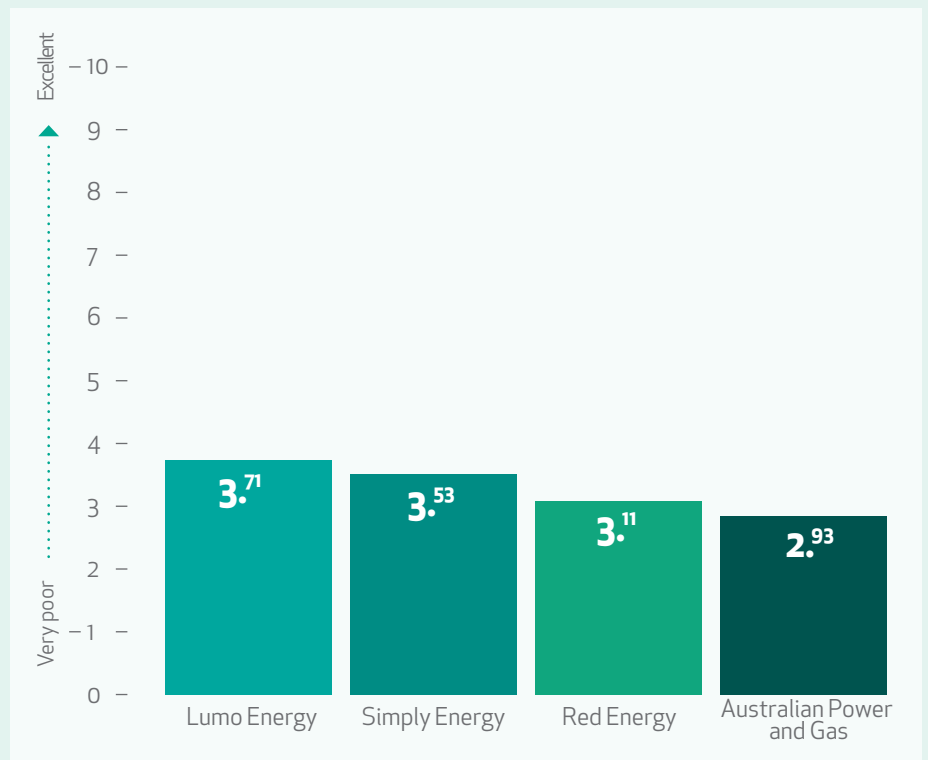
"I'm not sure these companies understand they have a hardship team! Nor do they understand what financial counsellors do"

Respondents were asked to provide an overall ranking of the second tier energy retailers, as well as provide ratings on some key areas that were also asked of the 'big three' retailers in terms of client self-advocacy, debt collection practices, assistance before disconnection and fair and reasonable hardship arrangement outcomes.

Overall ranking

Respondents were asked to provide an overall ranking of second tier energy retailers in terms of their customer financial hardship policies and practices. As with the overall rating for the 'big three' energy retailers, second tier retailers were rated from 1 (indicating very poor practice) to 10 (indicating excellent practice).

Figure 11: Overall ranking of second tier energy retailer financial hardship practices



Overall, second tier energy retailers as a group ranked slightly lower than the 'big three'. A concerning result was for the lowest ranked second tier energy retailer, Australian Power & Gas, which almost one quarter of financial counsellors gave a rating of one out of ten, indicating very poor practice. Lumo Energy was the highest ranked second tier retailer, however their rating also indicated poor practice.

Attitude toward financial counsellors

The survey did not ask respondents to rate the second tier energy retailers on their general attitude towards financial counsellors, as was done for the 'big three'. However, we received a large number of responses concerned with second tier hardship teams' willingness to accept the authority of financial counsellors and the level of trust between their hardship teams and financial counsellors.

Some respondents reported that the consent forms of clients (allowing financial counsellors to act on their behalf) were not being accepted by Australian Power & Gas in the absence of personal information of the financial counsellor. One financial counsellor expressed frustration at this practice from an efficiency point of view, but was doubly concerned about the use and storage of their personal information with the retailer.

Respondents also reported a high instance of Red Energy "disagreeing" with client expenses as well as the assessments and advice of their financial counsellor. For example, one financial counsellor reports "[T]he worker at Red Energy kept us on the phone for over an hour. . .He would not consider that I had done a financial assessment and that the client was genuinely in financial hardship due to a decrease in income as a result of illness"

Customer self-advocacy

As the data in Figure 12 shows, for all of the second tier energy retailers, most customers with the capacity to self-advocate were not given the opportunity to negotiate arrangements directly with the hardship team. Instead, retailers requested customers attend a financial counselling appointment before providing hardship assistance.

"Even though Red Energy forces customers to see a financial counsellor, they won't take the advice of the financial counsellor - they challenge the information provided. . .how much someone is spending on food!!! They have even said things such as 'but you're getting Rent Assistance aren't you?'"

One quarter of respondents indicated that clients with Simply Energy were given the opportunity to self-advocate arrangements with their hardship team. At the other end of the scale, almost half of respondents indicated that Australian Power & Gas customers with the capacity to self-advocate were either requested or required to attend a financial counselling appointment before being provided assistance from their hardship team.

	No - retailer requires financial counselling appointment before providing assistance	No - retailer requests financial counselling appointment before providing assistance	Yes - the customer has the opportunity to self-advocate	Yes - self-advocacy is encouraged and facilitated	None of these / Not sure
Simply Energy	12%	25%	26%	3%	34%
Lumo Energy	13%	26%	18%	3%	40%
Red Energy	21%	21%	17%	4%	37%
Australian Power & Gas	20%	30%	12%	2%	36%

Figure 12: Are customers with capacity to self-advocate given the opportunity to negotiate arrangements directly with the hardship team?

“Clients with Red Energy cannot get a Utility Relief Grant sent to them unless the financial counsellor calls them with the client present. This puts the client at risk of disconnection due to financial counselling appointment waiting times and rural travel. I do an automatic complaint to EWOV, but Red Energy continues to treat their customers this way”

“The majority of our clients find it difficult to be able to wait on their pre paid mobile phones to speak with a human”

“I find that it is customer service not identifying hardship and not referring accordingly”

“They request large amounts of money over short periods of time. This is completely unachievable by most customer standards”

Notably, between 34-40% of respondents answered ‘none of these/not sure’ when asked whether customers with the capacity to self-advocate are given the opportunity to negotiate arrangements directly with their retailer. This potentially indicates a large portion of respondents either not being aware or not having good recollection of attempts at self-advocacy in their casework. It could also be the case that respondents have comparatively less interaction with the second tier retailers, thereby limiting their ability to accurately provide opinion in this regard.

Respondents were also asked how often they were engaged by clients to resolve matters that could and should be dealt with by the second tier retailer hardship teams. Lumo Energy received the most positive rating, with one third of respondents saying this occurs ‘some of the time’. The remaining three second tier retailers all received ratings indicating that the majority of respondents are engaged by their customers for matters that should and could be dealt with by their hardship teams ‘most of the time’ or ‘all of the time’.

	Never	Some of the time	Most of the time	All of the time	Not sure
Simply Energy	1%	37%	38%	17%	7%
Lumo Energy	6%	33%	32%	17%	12%
Red Energy	2%	29%	34%	19%	16%
Australian Power & Gas	3%	28%	36%	23%	10%

Figure 13: Are financial counsellors engaged by clients to resolve matters that could and should be dealt with by the retailer’s hardship team?

Debt collection

Over one third of all respondents rated each second tier energy retailer as having poor debt collection practices. The majority of respondents rated debt collection practices across the second tier energy retailers as either ‘poor’ or ‘very poor’, with almost no responses in either the ‘good’ or ‘very good’ categories. Respondents indicated that instances of poor debt collection practice occur on the part of the energy retailers themselves, as well as external debt collection agencies contracted by retailers.

Examples of poor debt collection practice provided by respondents ranged from debts being transferred over to credit departments or external agencies too quickly - and therefore bypassing the process of assisting the customer to address their debt and access support - through to customers being harassed and intimidated.

Fair, reasonable and appropriate outcomes

In the opinion of financial counsellors, the frequency with which second tier energy retailers offer final hardship arrangements that result in fair, reasonable and appropriate outcomes ranges between ‘never’ to ‘some of the time’.

“Red hides EWOV details on the back of the disconnection notices. I have raised this with the Essential Services Commissioner who advised that it meets the requirements of the code. But I would argue it does not meet the intention of the code”

“A client who is a single mum had been disconnected by Australian Power & Gas for three months before she was referred... we lodged a complaint with EWOV. \$2K compensation was granted for wrongful disconnection. She is now receiving letters demanding an unaffordable payment plan for arrears amounting to far less than \$2K. On contacting AP&G, their team knows nothing about the letters of demand, payment plan demands or anything else. We are back to EWOV.”

Disconnection

Respondents were asked if each of the second tier retailers take appropriate steps to contact customers and offer support before disconnection. All four second tier energy retailers received a rating indicating that appropriate steps are taken to contact customers and offer support before disconnection only ‘some of the time’.

While results across the four are very poor and cause for concern, the lowest performer in this category was Australian Power & Gas and the highest performer Lumo Energy.

Whilst energy retailers may intend to comply with their legislative and regulatory requirements, financial counsellors make it clear there is more that can be done to ensure customers are provided with clear, easily accessible information and assistance prior to disconnection.

3.2. Third tier energy retailers

An optional question enabled financial counsellors to rank the hardship policies and practices of some smaller energy retailers operating in Victoria. The retailers rated were Alinta Energy, Dodo Power and Gas, Click Energy, Momentum Energy, Neighbourhood Energy and People Energy.

Respondents were asked to provide a rating for the retailers only if they had interacted with them in the past 12 months. Again, the question used the rating scale of one to 10, where one was the lowest rating (indicating very poor practice) and 10 was the highest rating (indicating excellent practice). The ratings for each retailer are shown in Figure 14 below, together with the number of respondents (as expected, there were smaller numbers of respondents for smaller retailers).

Company	Rating	Sample size
Momentum Energy	3.49	35
People Energy	3.14	14
Neighbourhood Energy	3.08	36
Click Energy	3.00	22
Alinta Energy	2.97	35
Dodo Power & Gas	2.42	24

Figure 14: Overall ranking of third tier energy retailer financial hardship practices

4. Conclusions and next steps

FCRC receives considerable ongoing feedback from its Victorian members about how energy retailers are responding to customers in financial hardship. Building on similar 2012 and 2013 surveys of the banking sector, this is the first survey that captures these experiences as a whole. As with the 'Rank the Bank' surveys, the 'Rank the Energy Retailer' survey's significance is that it makes the step from anecdote to evidence, providing a comprehensive and robust snapshot about what is happening in and around the hardship teams of the energy retail sector in Victoria.

The results of the Rank the Energy Retailer survey show that there is significant room for improvement by all surveyed energy retailers in Victoria in relation to their dealings with hardship customers. It is most concerning that financial counsellors indicated that all surveyed energy retailers failed to achieve an acceptable standard of practice across almost all performance indicators. There is therefore a clear need for financial hardship policies and practices to change across every area including communication, attitude, process and client outcomes.

Although one of the 'big three' energy retailers outranked the others overall and across all attributes, no retailer achieved consistently acceptable ratings, let alone ratings that could be held as a positive benchmark for other retailers on which to model their hardship practices. The combination of quantitative and qualitative data shows that there is a lot of variability both within, and between, energy retailers.

The survey findings highlight changes that need to be introduced by all surveyed energy retailers, including:

Programs - prioritise the development of pro-active hardship programs that focus on early intervention with engagement across all levels of the organization

Processes - establish clear internal/external processes for dealing with hardship customers and financial counsellors that:

- promote early identification of hardship issues to reduce the likelihood of unnecessary disconnection or dispute resolution being required;
- allow consumers to access and receive assistance from their energy retailer's hardship team;
- facilitate customer self-advocacy where possible;
- assist with timely and effective dispute resolution;
- ensure concessions and billings are accurate; and
- address issues relating to current debt collection practices.

Staff training - significantly improve all customer service staff training relating to hardship customers to ensure:

- consistency of responses;
- a better understanding of the issue of financial hardship and the impact of long-term hardship on individuals and families;
- a greater understanding of the role of financial counsellors in the hardship process;
- awareness of the existence and role of the hardship teams and points of contact within those teams; and
- concessions and billings are accurate and appropriate referrals are made .

Communication – develop new communication models relating to financial hardship, to ensure:

- information is made available to all customers about how to manage and reduce energy bills;
- early intervention and proactive support for those identified as at risk of hardship; and
- options for internal and external dispute resolution are clearly accessible for customers through all forms of communication.

Given their dominance, this survey has focused on the 'big three' energy retailers. It is evident that the financial counselling sector also needs to focus on the smaller energy retailers, which received similar, if not poorer ratings than the 'big three'.

As the energy retailers operating in Victoria also operate in other jurisdictions, these results have national relevance and implications. They will raise awareness of hardship protections and options available to consumers, as well as provide a voice for consumers in relation to their experiences with energy company hardship practices and quality of customer service.

With energy prices forecast to continue to rise, the issue of people facing financial hardship will only continue to grow. It is the corporate social responsibility of companies providing essential services such as electricity and gas to help those in need and it is in the best interest of energy retailers to keep their customers connected, including those experiencing financial hardship.

FCRC calls on all energy retailers to use the results of this survey as a catalyst for change and to work with financial counsellors and consumer groups to make the significant shift to prioritise the improvement of their hardship responses into the future. This work will not only benefit the clients of financial counsellors, but all energy customers who may be doing it tough.

5. Appendix 1 - Survey instrument

ABOUT THIS SURVEY

This survey is designed to measure the efficacy of energy retailer hardship practices based on the casework experiences of Victorian financial counsellors over the last 12 months.

Your responses will provide the Financial and Consumer Rights Council (FCRC) with the evidence base to produce a public report and identify opportunities to work with industry to improve responses to energy consumers experiencing financial difficulty.

The survey takes about 20-30 minutes to complete and is anonymous.

TIPS FOR COMPLETING THE SURVEY:

1. Read the heading on each page. The survey breaks the energy retailers into three categories, or tiers, based on their market share and our knowledge of issues across the industry.
2. When answering questions, consider your casework as a whole rather than focusing on any single case. The purpose of the survey is to gauge how the energy retailers are generally performing in the majority of cases.
3. Providing information in the "comments" sections is appreciated, but optional. Name the energy retailer in the comments where possible. This information will be valuable for the report and engagement with the individual energy retailers.

ABOUT YOU

*1. How many years have you worked in financial counselling?

- 0-3 years
- 4-9 years
- 10+ years

*2. Do you mostly work in a metropolitan or regional/rural area?

- Metropolitan
- Regional/Rural

ENERGY RETAILER CASEWORK

Please select the statement that most closely describes your experience over the LAST 12 MONTHS.

*3. The percentage of my casework that has an energy-related element is:

- Less than 10%
- 10-30%
- 30-50%
- 50-70%
- 70-90%
- 90-100%
- Not sure

*4. Over the past 12 months, my casework in relation to energy retailers has:

- Reduced significantly
- Reduced moderately
- Remained consistent
- Increased moderately
- Increased significantly
- Not sure

THE "BIG THREE" RETAILERS: COMMUNICATION

The questions in this section relate to the "big three" energy retailers: Origin Energy, AGL and Energy Australia.

*5. Rate the accessibility of each retailer's hardship team.

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***6. Do you receive consistent service from all members within the hardship team?**

	No - very inconsistent	No - somewhat inconsistent	Yes - somewhat consistent	Yes - very consistent	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***7. Following initial contact, rate each retailer on the quality of their subsequent communication with you (reliability of returned calls, timely responses to requests, confirmation of agreements, etc).**

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***8. Rate the retailer on the accuracy and consistency of their billing, notices and other correspondence with their customers.**

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

PROCESS AND ATTITUDE

***9. Rate the retailer in terms of their general attitude towards clients experiencing financial difficulty.**

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***10. Rate each retailer on their understanding of the impact of long-term financial hardship on clients (long-term hardship applies to clients who are unlikely to get back on top of their financial situation in the foreseeable future).**

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***11. What is the general attitude of the hardship staff towards you? Rate each retailer in terms of their willingness to accept your authority as a financial counsellor and the level of trust between you and members of the hardship team.**

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 12. Does the hardship team actively assist customers in managing current and future bills? (flexible payment options, energy efficiency advice, early identification and assistance with debt, etc)**

	No - never	No - rarely	Yes - somewhat	Yes - definitely	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 13. Are customers with the capacity to self-advocate given the opportunity to negotiate arrangements directly with the hardship team?**

	No - retailer REQUIRES financial counselling appointment before providing assistance	No - retailer requests financial counselling appointment before providing assistance	Yes - customer has the opportunity to self-advocate	Yes - self-advocacy is encouraged and facilitated	None of these/ Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 14. Are you engaged by clients to resolve matters that could and should be dealt with by the retailer's hardship team?**

	Never	Some of the time	Most of the time	All of the time	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

CLIENT OUTCOMES

***15. Are the payment plans offered by the hardship team realistic in terms of the customer's capacity to pay?**

	None of the time	Some of the time	Most of the time	All of the time	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***16. Rate each of the retailers on their appropriate application of concession entitlements.**

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***17. Rate the effectiveness of the hardship team in providing information about assistance and services available outside of their hardship program (Utility Relief Grant, energy audits, etc).**

	Very poor	Poor	Acceptable	Good	Very Good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

*** 18. Rate the retailer on their debt collection practices.**

	Very poor	Poor	Acceptable	Good	Very good	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 19. Does the retailer take appropriate steps to contact customers and offer support before disconnection?**

	Never	Some of the time	Most of the time	All of the time	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 20. On balance, do the final hardship arrangements offered by the retailers result in fair, reasonable and appropriate outcomes for clients?**

	Never	Some of the time	Most of the time	All of the time	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 21. When appropriate, do the retailers make customers aware of their complaints and internal dispute resolution processes?**

	No - not at all	No - not really	Yes - somewhat	Yes - definitely	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***22. If you have formally complained to one or more of the “big three” retailers about how they handled you or your client’s issue, were you satisfied with how they handled it?**

	No - It was handled badly	No - I wasn't satisfied	Yes - Somewhat satisfied	Yes - Very satisfied	N/A / Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***23. When appropriate, do retailers make clients aware of the Energy and Water Ombudsman Victoria (EWOV)?**

	Never	Some of the time	Most of the time	All of the time	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***24. How frequently do you escalate client issues to EWOV because appropriate hardship arrangements are unable to be negotiated?**

	Rarely	Sometimes	Frequently	In most cases	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

OVERALL RATING

***25. In light of your previous answers, rank each of the retailers out of 10 in terms of the quality of their financial hardship policies and practices (1 indicating very poor practice and 10 indicating excellent practice).**

	1 (very poor)	2	3	4	5	6	7	8	9	10 (excellent)	Not sure
Origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
AGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Australia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***26. Which of the retailers do you think is the BEST performer in terms of their customer financial hardship practices, and why?**

- Origin
- AGL
- Energy Australia

Comments:

***27. Which retailer do you think is the LOWEST performer in terms of their customer financial hardship practices, and why?**

- Origin
- AGL
- Energy Australia

Comments:

***28. Which retailer has MOST IMPROVED their customer financial hardship practices in the LAST 6 MONTHS, and why?**

- Origin
- AGL
- Energy Australia
- No retailer improved
- Not sure

Comments:

29. Additional comments:

"SECOND TIER" RETAILERS

The questions in this section relate to the "second tier" energy retailers: Australian Power and Gas; Lumo Energy; Red Energy; and Simply Energy

***30. Are customers with the capacity to self-advocate given the opportunity to negotiate arrangements directly with the hardship team?**

	No - retailer REQUIRES financial counselling appointment before providing assistance	No - retailer requests financial counselling appointment before providing assistance	Yes - customer has the opportunity to self-advocate	Yes - self-advocacy is encouraged and facilitated	None of these/ Not sure
Australian Power and Gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lumo Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Red Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simply Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***31. Are you engaged by clients to resolve matters that could and should be dealt with by the retailer's hardship team?**

	Never	Some of the time	Most of the time	All of the time	Not sure
Australian Power and Gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lumo Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Red Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simply Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***32. Rate the retailer on their debt collection practices.**

	Very poor	Poor	Acceptable	Good	Very good	Not sure
Australian Power and Gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lumo Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Red Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simply Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

***33. Does the retailer take appropriate steps to contact customers and offer support before disconnection?**

	Never	Some of the time	Most of the time	All of the time	Not sure
Australian Power and Gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lumo Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Red Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simply Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 34. On balance, do the final hardship arrangements offered by the retailers result in fair, reasonable and appropriate outcomes for clients?**

	Never	Some of the time	Most of the time	All of the time	Not sure
Australian Power and Gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lumo Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Red Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simply Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

*** 35. Rank the "second tier" retailers overall in terms of their customer financial hardship policies and practices (1 indicating very poor practice and 10 indicating excellent practice).**

	1 (very poor)	2	3	4	5	6	7	8	9	10 (excellent)	Not sure
Australian Power and Gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lumo Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Red Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simply Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

"THIRD TIER" RETAILERS

36. Optional question: Rank the "third tier" energy retailers overall in terms of their customer financial hardship policies and practices (only provide a rating for an energy retailer if you've had some interaction with them in the past 12 months).

	1 (very poor)	2	3	4	5	6	7	8	9	10 (excellent)	Not sure
Alinta Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dodo Power & Gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Click Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Momentum Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbourhood Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments:

“Do not wait until the client sees us to believe that he/she is in financial hardship. Let’s empower people to take control of their financial situation and feel proud of themselves.”

Published by:

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