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Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Sir/Madam

Draft rule determination - Strengthening protections for customers in hardship

Ergon Energy Queensland welcomes the opportunity to provide comment to the Australian Energy Market Commission on its Strengthening protections for customers in hardship - draft determination and rule (draft rule).

Ergon Energy Queensland acknowledges the importance of a strong customer protection regime to give all customers confidence that they will be treated fairly. As a community focused retailer, Ergon Energy Queensland is proud of its long record of providing support to customers in regional Queensland experiencing hardship and notes that Ergon Energy Queensland established its Hardship Program in 2006, nine years prior to the commencement of the National Energy Customer Framework in Queensland in 2015. As such, Ergon Energy Queensland broadly supports enhancements to protections for hardship customers and expects that this change will enable greater consistency across the industry.

Ergon Energy Queensland notes that the draft rule proposes a new requirement for the Australian Energy Regulator (AER) to develop a customer hardship policy guideline. Ergon Energy Queensland anticipates the obligations under the proposed guideline will present more issues for the business than the draft rule and a more detailed analysis of the effect of these changes will only be possible once the AER's draft guideline is published. As such, Ergon Energy Queensland will provide more substantive comments at this stage of the consultation process. However, Ergon Energy Queensland acknowledge the AER's efforts to provide a draft of the standard statements during the rule change consultation process.

In relation to the proposed changes to customer hardship policies, as a retailer with a current AER-approved customer hardship policy which largely aligns with the draft rule, the three month notice period is adequate.

Should you require additional information or wish to discuss any aspect of this submission, please contact me on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jenny Doyle'.

Jenny Doyle
General Manager - Regulation and Pricing

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