

From: [Christina Barlow](#)
To: [Kate Wild](#)
Cc: [Peter Meywes](#)
Subject: Feedback to the Draft Rule & Determination for Strengthening protection for customers in hardship
Date: Friday, 19 October 2018 5:36:49 PM

Kim Wild
Senior Advisor
Australian Energy Market Commission

Dear Kim,

Feedback to the Draft Rule & Determination for Strengthening protection for customers in hardship

Thank you for providing Pooled Energy with the opportunity to respond to the Draft National Energy Retail Amendment (Strengthening Protections for Customers in Hardship) Rule 2018. We have read both the draft Rule and associated Determination which was published on the AEMC website in September 2018. Pooled Energy agree that there is a need to have a consistent basis in which Hardship policies are documented, monitored and implemented by the retailer to a customer in hardship circumstances.

1. We note that as part of the draft rule, the AER must develop a set of Hardship Guidelines by **1 April 2019**. This includes:

- Standardised statements for inclusion into a retailer's hardship policy
- Providing a process, timeframe and requirements in relation to approval (or variation of hardship policies)
- Set out minimum requirements as noted in s44 of the National Energy Retail Law (NERL)
- Set out the principles in which the AER must apply when approving hardship policies as set out in s45 of the NERL
- Set out the purpose of hardship policies outlined in s 43 of the NERL.

2. We note that the proposed timeframe of existing Retailers who already have in place an approved hardship policy:

- By 1 June 2019 - Submit an updated customer hardship policy that must comply with the AER Hardship Guidelines.
- By 1 August 2019 – AER to approve the updated policies
- By 1 October 2019 – Retailer to implement their policies, once approved by the AER

We have reviewed the draft National Energy Retail Amendment (Strengthening protections for customers in hardship) Rule 2018 and the associated Determination and do not have any further comments in relation to the proposed Documents.

Yours sincerely,
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