



18 October 2018

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Australian Energy Market Commission

Strengthening Protections for Customers in Hardship, Draft Rule Determination (6 September 2018)

Powershop Australia Pty Ltd (**Powershop**) thanks the Australian Energy Market Commission (**AEMC**) for the opportunity to provide comments on the Strengthening Protections for Customers in Hardship Draft Rule Determination.

Powershop maintains its support for the work in this area to progress consistency of approach across the industry. To maintain a consistent approach at a national level, Powershop encourages the AER, during the development of the Customer Hardship Policy Guideline, to consider the Essential Services Commission, Payment Difficulties Framework (**PDF**). Retailers have invested heavily in systems development to support customers under the PDF, so utilising these new systems has cost benefits for industry, and more importantly consistent customer outcomes.

Schedule 3, Part 10, item 3 (2) (a) – Transition period for existing retailers

Whilst Powershop understands the AEMC's intent, Powershop believes for consistency the period for new and existing retailers should be three months. The challenges faced by new and incumbent participants are quite often the same and should not be differentiated.

Schedule 3, Part 10, item 3, clause (2) (b) – Transition period for existing retailers

Consistent with sub-clause (a) the transition period should be set at three months. We note that depending on what changes are required, retailer system changes can take in excess of three months to implement, depending on their complexity. Powershop recommends that the AEMC allow for a staged implementation so retailers have sufficient time to build, test and remediate any system issues over a set time period.

Schedule 3, Part 10, item 4, clause (1) – AER approval for updated customer hardship policy

In line with the above, the period should be set at three months.

If you have any queries or would like to discuss any aspect of this submission please do not hesitate to contact me.

Yours sincerely,

Scott Begg
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Powershop Australia Pty Ltd