



EnergyAustralia

LIGHT THE WAY

4 August 2022

Ms Anna Collyer
Ms Allison Warburton
Mr Charles Popple
Ms Michelle Shepherd
Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2001

EnergyAustralia Pty Ltd
ABN 99 086 014 968

Level 19
Two Melbourne Quarter
697 Collins Street
Docklands Victoria 3008

Phone +61 3 9060 0000
Facsimile +61 3 9060 0006

enq@energyaustralia.com.au
energyaustralia.com.au

Submitted electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Commissioners

Protecting customers impacted by family violence

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory, of which around 22k customers are supported under our hardship program (EnergyAssist). EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise 4,500MW of generation capacity.

EnergyAustralia appreciates the opportunity to participate in the AEMC's consultation, protecting customers impacted by family violence (*the draft determination*). We are supportive of the draft determination and grateful the AEMC has considered our feedback in response to the consultation paper; in particular, that the protections should be available to small business customers, and that it is reasonable for retailers to have a system that minimise the need for a customer affected by family violence to repeatedly disclose details of their experience.

While our preference remains for a nationally consistent regulatory framework, we accept and support where the draft determination has diverged from the Victorian regulation, as the additional protections are justified via clear examples and evidence.

The draft determination recommends that breach reporting and civil penalties commence on the implementation date of the framework, we are concerned that this may inhibit retailers from developing systems and processes that appropriately cater for the diverse needs of customers impacted by family violence.

Civil penalties are an appropriate deterrent for negligent action taken by retailers, particularly when dealing with customers impacted by family violence, but as the processes and interaction required by retailers in dealing with family violence situations are nuanced, we believe any penalty should be established based on a clearer understanding of real-world expectations and evidenced examples following implementation of the framework. We therefore believe it is reasonable and appropriate to consider the application of civil penalties a minimum of 12-months after implementation of the framework.

If you would like to discuss this submission, please contact me on 03 9060 1361 or Travis.Worsteling@energyaustralia.com.au.

Regards

Travis Worsteling

Regulatory Affairs Lead