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14 August 2025

Ms Anna Collyer
Chairperson
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

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

Dear Ms Collyer,

Re: Improving the application of concessions to bills - Draft Determination (RRC0063)

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to make this submission to the Australian Energy Market Commission's (the Commission's) draft determination on a rule change proposal to improve the application of concessions to bills. We would also welcome the Commission to reach out and discuss our submission should they wish to clarify anything.

Generally speaking, Red and Lumo support the Commission's current draft determination. We have a shared interest in ensuring that all eligible consumers receive the concessions, rebates and other support to which they are entitled. We also agree that more needs to be done to ensure all who are eligible for an energy concession are receiving this on their bill.

Retailer Process

We consistently ask every customer if they hold a health care card, pensioner concession card or Department of Veterans' Affairs card at the point of sale. This means at initial sign-up and during the moving process. We also follow up with our customers if their concession fails the validation process, working with them to resolve any problems. This could be arranging to have their premises changed from business to a residential classification or

working to update the supply address to match their actual address to pass the Services Australia validation requirements.

There are some instances where the eligible cardholder is not the account holder. We will attempt to obtain explicit informed consent from both parties to have them added to the account but this is subject to their approval to proceed. This does not occur in every instance, which can explain why eligible residents in some households may not currently receive all entitlements.

Draft Rule Change

Red and Lumo recommend minor amendments to proposed rule change. The current iteration 19(1)(c) states *'information about all applicable government funded energy charge rebate, concession or relief schemes available in the jurisdiction of the small customer.'* We recommend the removal of 'all' as energy retailers cannot reasonably be aware of the complete list of all applicable rebates and how a consumer's eligibility might change over time.

There are numerous one-off rebates that we would not be in a position to advise customers of in advance. Examples include the three rounds of the Federal Energy Bill Relief Fund, where eligibility criteria changed over the course of the program, and the Queensland Government's Cost of Living Rebate of \$1000, where eligibility criteria differed again from the Federal Government program.

It is also not feasible to discuss rebates for emergency assistance during a sales interaction. A relevant example is the NSW Government's Energy Accounts Payment Assistance scheme, which is available for consumers who are experiencing a short-term financial hardship, crisis or emergency and are unable to pay their most recent energy bill.

Additional Reforms

Red and Lumo encourage the Commission to continue their work with Services Australia and jurisdictional governments. We can see vast potential for jurisdictions to better promote

all available concessions through additional channels. It can also extend beyond just the available energy concessions.

Another example is for retailers to be able to obtain and validate concessions in South Australia, which is not currently the case. At present, we must direct consumers to ConcessionsSA so they can inform them of their current retailer. This is an additional and unnecessary burden on consumers and an obstacle to the provision of support.

About Red and Lumo

We are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail electricity and gas in New South Wales, Queensland, South Australia, Victoria and the Australian Capital Territory to over 1.5 million customers.

Red and Lumo thank the Commission for the opportunity to comment on the consultation paper. Should you wish to discuss or have any further enquiries regarding this submission, please call Jordan Rigby, Regulatory Manager, on 0472 666 261.

Yours sincerely

A handwritten signature in black ink, appearing to read "G Hargreaves".

Geoff Hargreaves

Manager - Regulatory Affairs

Red Energy Pty Ltd

Lumo Energy (Australia) Pty Ltd