

Improving the application of concessions to bills

Consultation on Draft Determination, RRC0063

About SAFCA

The South Australian Financial Counsellors Association (SAFCA) is the peak body for Financial Counsellors in South Australia and the Northern Territory. We support financial counsellors to achieve the best possible outcomes for people experiencing financial difficulty, and support the financial wellbeing sector to adopt and maintain best practice through professional development, advocacy and law reform within a social justice framework.

About Financial Counselling

Financial counselling services are mostly offered in not-for-profit community organisations and legal services. Financial counsellors provide free, confidential, non-judgmental and independent advice and services to help people experiencing, or at risk of, financial difficulty. Financial counsellors are qualified professionals who are specially trained to deal with complex financial issues such as mortgage arrears and foreclosures, financial abuse, bankruptcy, debts and fines. They also assist with bill payment arrears, accessing concessions, budgets and much more. The work of financial counsellors and others working in the financial wellbeing sector are vital to support people experiencing financial difficulties.

Feedback on Draft Determination

SAFCA supports the rule change: Improving the application of concessions to bills. This applies to the following changes as set out in the Draft determination and fact sheet.

- Ask consumers about their eligibility for concessions or rebates – prompting consideration and voluntary disclosure while being mindful of the sensitivities about requesting this information.
- Provide jurisdiction-specific information on concessions and rebates – helping consumers understand what is available and how to access it.

We believe that the requirement for the energy retailer to provide information about applicable government funded energy charge rebates, concessions or relief schemes available in the jurisdiction of the small customer; and ask the small customer about their eligibility of said schemes may:

- Encourage retailers to be fully informed and up to date about the rebates, concessions and relief schemes available in each jurisdiction.

- Increase the likelihood that retailers provide the correct information about rebates, concessions and relief schemes available in each jurisdiction.
- Increase the likelihood that retailers identify customers who are eligible for rebates, concessions and relief schemes available in each jurisdiction.
- increase applications for, and access to, rebates, concessions, and relief schemes available in each jurisdiction.
- Assist to increase community and energy consumer awareness around energy concessions, not to confuse it with other types of concessions or assistance available.
- Assist to increase the number of eligible energy customers know how and where to apply for energy concessions.
- Ideally, improve appropriate referrals to financial counsellors.

SA Concession Landscape

Each state and territory on the National Electricity Market (NEM) has their own method of applying for and paying the energy concession, and energy relief payments, to eligible recipients. In SA, energy concessions are one of up to four [Household Concessions](#), applied via one application form to the SA Government.

Although one application for four concession payments sounds like it would provide ease of process for applicants, SAFCA consider there may be benefits of energy concessions being managed in a different way. In some other states, energy concessions are applied directly by energy retailers. The process requires minimal effort for eligible recipients and possibly leads to an increase in uptake of concessions by eligible customers. SAFCA would welcome a similar process for concession schemes across jurisdictions to promote ease of access, providing that the process change did not reduce financial support available to eligible customers.

Issues Raised from the Financial Wellbeing Sector in SA

SAFCA has received feedback from members regarding issues in the way in which the energy concession and an additional energy support payment known as the 'Emergency Electricity Payment Scheme' (EEPS), are approached and understood by retailers operating in SA. SAFCA has engaged with retailers and SA Government to share experiences and learnings from our sector, and issues being raised by financial counsellors. Despite this, we still see a repetition of issues being raised over many years (wrong information being given to customers about the concessions or EEPS criteria, inappropriate referrals to financial counselling). The financial counselling sector in SA is not seeing significant change/improvement in information provision around concessions and EEPS from retailers as a result of these consultations.

SAFCA members have recently provided feedback that some energy retailers are “hard to contact”. They have indicated that it is becoming difficult to get bill/account information about a client to support an EEPs application and sometimes have to wait an extended period of time to get a response from the hardship teams. As a result, financial counsellors are getting the ‘run around’ taking extra time to complete application processes and more time for the client to have to wait to receive the financial assistance they need. Many financial counsellors are going to the energy hardship team managers to assist with an outcome. Financial counsellors have fed this information back to retailers but are not seeing improvement in processes and communication with some providers at this time.

AER retail data trends indicate higher levels of customer hardship. Most recently in Quarter 3, 2024/25 releases as interpreted and produced by the SA Council of Social Service (SACOSS):

- Average debt levels for residential customers not in a hardship program in South Australia have now reached a record high of \$1,825.
- Hardship customer debt is now the highest in the Nation increasing from \$2,178 last year to \$2,428 in Q3 2024/25, \$444 above the National Average.
- Average debt on entering a hardship program has increased from \$1,655 to \$1,950.
- Payment plan customer numbers are down from 14,965 last quarter to 14,554 in Q3 2024/25.
- Hardship customer numbers are down from 18,676 last quarter to 18,193 in Q3 2024/25¹.

SAFCA considers this draft rule change to be a step in the right direction toward supporting people in energy hardship and addressing some of the issues listed in this submission.

Emergency Electricity Payment Scheme (EEPS)

We understand that this rule change is directly relating to ongoing energy concessions, however we would hope that by improving information and access to concessions, it would also improve access and information regarding other hardship support payments available, such as the EEPs in SA.

The [Emergency Electricity Payment Scheme](#) (EEPS) provides financial assistance to South Australian households in hardship who are unable to pay their electricity debt and are at risk of disconnection². The EEPs payment in SA provides up to \$800 credit to the bill of a client and is available a maximum of once every two years.

¹ AER, [Quarterly Retail Performance Report January – March 2025](#), June 2025

² <https://www.energy.gov.au/rebates/emergency-electricity-payment-scheme>

- The EEPS is only available through an application made by a financial counsellor or financial capability worker (must be a member of SAFCA).
- EEPS guidelines were changed in July 2024, since then a number of retailers have seemingly not understood the new eligibility criteria and have made inappropriate referrals to a financial counsellor for an EEPS payment when their customer is not eligible for an EEPS.
- This has led to an increase in clients seeking financial counselling appointments for an EEPS, which has increased wait times for others seeking assistance and sometimes leads disappointment for the client when the referral made by the retailer was not within the guidelines for EEPS assistance.

Anecdotal evidence from financial counsellors practicing in South Australia

Financial counsellor managing a team in mid-north

The team operates sites across Port Augusta, Whyalla, Ceduna, Coober Pedy and Port Lincoln, provides outreach services to locations across rural, regional, and remote SA.

“Retailers are making inappropriate referrals to financial counsellors when their customers have as little as a \$200 debt. Instead of putting them on a hardship program and/or a payment plan, they are sending them to us.

These people aren’t eligible for an EEPS payment, and they aren’t always in need of financial counselling. They have the means to self-advocate but are being given incorrect information. It means our wait lists are much longer than we would like, and people are missing out on financial counselling when they are in crisis.”

If the rule change as outlined in this Draft determination were to be adopted, it would be anticipated that accurate information must be provided to clients at a variety of points of contact – including when retailers consider the customer to be in energy hardship and meets the eligibility criteria for other support programs like EEPS in SA. This will hopefully make it more likely for concessions and other hardship/financial support to be understood and communicated by the energy provider to the customer at appropriate times.

Other barriers

Financial Counsellors have identified other barriers to the uptake of energy concessions in SA. Whilst these may not sit under this rule change directly, there may be aspects to note:

- The onus is on the consumer to initiate the application for concessions, even when prompted, informed or reminded by the retailer.

- This process can be lengthy, and although it contains numerous other financial benefits, this time investment may lead to reduced applications.
- The consumer must have available or know their account details in order to apply. If being supported by a financial counsellor or other support person, and the customer doesn't have access to all required details, the customer either needs to complete the process themselves, or they need to make a further appointment with a financial counsellor to complete the application. This can potentially lead to an application not being made or a lengthier application process.
- Concessions 'dropping off' when an energy customer moves retailers or addresses. Customers have to reapply for concessions when they move or accommodation or retailer and they may not realise this.
- The requirement to provide the 'first bill' to apply for a concession means people must have been in the home/with a retailer for a minimum period of time before they can submit an application for concessions, as opposed to applying via their retailer at sign up.

Coverage in the Northern Territory

We understand the Northern Territory (NT) is under different energy laws, however, this difference in law and application of concessions potentially adds to inequality in protections and outcomes between residents of Australia and may lead to less support for vulnerable people and those in energy hardship in the NT.

SAFCA have long heard from members that the concessions scheme in the NT could benefit from a review to better meet the needs of the NT community with further information available on this matter here: www.safca.org.au/advocacy/nt-concessions/.

Whilst this rule change cannot address concerns with concessions schemes generally, it may improve the access to energy concessions with energy retailers in the NT.

The two suggested rule changes would be applicable and beneficial in full to Northern Territory energy consumers.

- Ask consumers about their eligibility for concessions or rebates – prompting consideration and voluntary disclosure.
The NT requires people eligible for concessions to renew their application for concessions every 12 months. Eligible NT residents are also required to contact both NT Concessions and the energy retailer in the process of applying energy concessions. These two processes can lead to a low rate

of renewal and contribute to both energy debt and low uptake of energy concessions in the NT.

- Provide jurisdiction-specific information on concessions and rebates – helping consumers understand what is available and how to access it. This would be suitable for energy retailers to ask. Providing information and reminders to people in a variety of formats may encourage uptake and renewal of concessions.

SAFCA would welcome the Northern Territory Government's engagement with this process and any cross jurisdictional working group established to look at concessions, consumer protections, energy payment difficulties, and hardship support.

Further contact welcomed

The South Australian Financial Counsellors Association (SAFCA) thanks you for the time in reading and considering our feedback. Please feel free to contact us at safca@safca.org.au or by calling us on (08)8337 0898 if you would like to discuss this further.