



Draft rule determination: National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025

August 2025



About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at:

<https://www.salvationarmy.org.au/>



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Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQA+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQA+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQA+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: <salvationarmy.org.au/about-us>





Executive summary

The Salvation Army welcomes the opportunity to provide this submission to the Australian Energy Market Commission (AEMC) in response to the Draft rule determination on Improving the application of concessions to bills (draft determination) and the *Draft National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025* (draft rule).

In this submission, The Salvation Army supports the enactment of the draft rule, highlights the need for, and importance of, the additional actions to be implemented, and expresses our interest in providing further consultation relating to the other actions and recommendations identified in the draft determination.

The Salvation Army has made **3** recommendations for the AEMC to consider. A summary of these recommendations follows on the next page.





Summary of recommendations

Recommendation 1

1.3 The Salvation Army recommends that the Draft National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025 be enacted.

Recommendation 2

1.9 The Salvation Army recommends that the AEMC consider if a rule requiring retailers to make reasonable inquiries to confirm concession eligibility may be appropriate in addition to Draft recommendation 7.

Recommendation 3

2.9 The Salvation Army recommends ongoing consultation with stakeholders to develop consistent and comprehensive guidance for the application of concessions to bills for non-account holders.



1 Draft National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025

- 1.1 The draft rule change facilitates an improvement to the information community members will receive about concessions when establishing an energy account. Requirements to both ask about concession eligibility and provide jurisdictionally specific information to community members will address two of the greatest barriers to concession application, awareness of concessions and disclosure of eligibility.
- 1.2 Although requiring retailers to contact all existing customers to ask about their eligibility when the rule comes into effect would certainly identify instances of unapplied concessions, we appreciate these benefits would be limited.

Recommendation 1

- 1.3 The Salvation Army recommends that the Draft National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025 be enacted.**

Opportunities for further clarity

- 1.4 In tandem with the rule change, implementation of the recommended other actions will be essential to maximising the application of concessions to bills. We note the limitations of the rule change, and the judgement exercised in determining what should be included as a rule versus recommended as a guideline.
- 1.5 As expressed in the draft rule determination, all retailers should provide this minimum level of assistance required by the rule changes. To ensure this minimum level of assistance is consistently and equitably delivered, there is opportunity for further clarity of the rules to specify that energy retailers must make reasonable enquiries to confirm concession eligibility if it is indicated by the customer.
- 1.6 As highlighted in our preceding submission, for varying reasons, community members can be unwilling or unable to be forthcoming with information about their concession eligibility. Although being directly asked can reduce this barrier, this question will often be met with vague answers that do not directly confirm concession eligibility.



- 1.7 Responses and contextual information that indicates the community member is likely eligible for a concession should also be acted upon. This may include:
- requesting payments are made through Centrepay;
 - indicating the energy account is for a home in social housing; and
 - advising a Centrelink income source.
- 1.8 The Salvation Army believes that it would be appropriate for this rule change to both:
- direct retailers to make reasonable inquiries to confirm the consumers' concession eligibility; and
 - apply all applicable concessions that can be directly applied by the retailer.
- 1.9 Retailer guidance from the Australian Energy Regulator (AER) and *Draft recommendation 7: Retailers should make it easy for customer to add concessions details* will contribute to reducing these barriers and can provide more detailed guidance. There is, however, benefit in elevating these additional requirements to rules.

Recommendation 2

- 1.10 The Salvation Army recommends that the AEMC consider if a rule requiring retailers to make reasonable inquiries to confirm concession eligibility may be appropriate in addition to Draft recommendation 7.**




2 Recommendations for additional actions

- 2.1 The draft recommendations for additional actions comprehensively address the concerns we see when supporting community members. Implementation of these recommendations would improve the application of concessions in ways that cannot be impacted by this rule change alone. The Salvation Army agrees that automation of concession application and verification would provide the most benefit to all consumers and understands that this would be an involved and lengthy process. Automation would enable more community members to access the concessions they are eligible for, regardless of their ability or willingness to engage with their energy provider or jurisdictional concession programs.
- 2.2 In the shorter term, we again stress the importance of the AER's role in providing guidance and updating the Better Bills Guideline to ensure the rule change delivers the desired outcomes. Coupling clearer and targeted communication from retailers with timely and relevant information from Services Australia will facilitate greater application of concessions to bills than from the rule change alone.

Eligibility rules for households

- 2.3 As acknowledged in the draft determination, where a concession eligible consumer is not the account holder, it may not always be appropriate or possible to add them as an account holder to facilitate this application of concessions. It is therefore important that both jurisdictions and retailers work to establish policies and administrative processes that enable those who need it most to access the concessions they are eligible for. The Salvation Army endorses *Draft recommendation 8: Resolving household eligibility challenges*.
- 2.4 In developing guidance on these issues, the AER must centre the wellbeing of the concession eligible consumer and ensure that concessions are not being inappropriately applied to accounts that would not provide a benefit to the concession holder. The AER must balance the competing needs of verifying that the concession is being appropriately applied and limiting the administrative burden placed on the account holder so as to not deter engagement through complexity.
- 2.5 Jurisdictions must consider the diverse circumstances of non-account holders when determining eligibility criteria for concessions and rebates. A balance must be struck between facilitating access to concessions for the non-account holder, and confirming eligibility and primary residence. Proof of address requirements must be sufficiently flexible to allow for non-account holder access in circumstances such as temporary accommodation and subletting.
- 2.6 Whilst facilitating access to concessions for non-account holders, responsibility for the account and any associated debt must be established to ensure that the application of the concession to the specific account is in the community member's best interest. Further enquiries must be made to determine the benefit the community member will receive from having their concession applied to the account. It must be assessed whether the community



member may have access to alternative options, including establishing a new energy account in their name.

Kelsey's Story*

Kelsey recently moved into a share house with one other person. Kelsey's flatmate advised that all bills were in the flatmate's name, and it was agreed that Kelsey would transfer \$150 each month to her flatmate as her contribution towards utilities including electricity and internet.

A month after Kelsey moved in, her flatmate advised that they would be moving out and Kelsey would need to transfer all bills into her own name. Kelsey received an email from her flatmate on the day they moved out which showed the electricity account had \$2,000 in arrears. Kelsey attempted to call the energy retailer and discuss the account, but she was unable to receive any information as she was not the account holder.

Kelsey came to The Salvation Army for support as she could not afford to pay the \$2,000 that was already overdue and was worried her electricity would be disconnected. Kelsey was referred to a financial counsellor who provided Kelsey with information about utility debts, confirmed that she was not responsible for repaying the arrears and suggested Kelsey establish a new energy account in her name.

Kelsey was able to set up a new electricity account in her name and did not have to pay her flatmate's arrears.

**Name changed.*

- 2.7 If a clear benefit to the community member from applying concessions cannot be established, the retailer or jurisdictional program should seek to establish whether the community member may be experiencing coercion. Information about, and referrals to, appropriate services including financial counselling and family and domestic violence support should be provided to these community members.
- 2.8 The Salvation Army would be supportive of, and willing to engage in, further consultation with the AEMC and the AER to develop these recommendations and guidelines, including through roundtable discussions with stakeholders.

Recommendation 3

- 2.9 The Salvation Army recommends ongoing consultation with stakeholders to develop consistent and comprehensive guidance for the application of concessions to bills for non-account holders.**



3 Conclusion

- 3.1 The Salvation Army thanks the Australian Energy Market Commission for the opportunity to provide a written submission.
- 3.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

August 2025

