30 July 2026

Australian Energy Market Commission
Submitted via online portal

Dear Commissioners,

RRC0074: Streamlining Payment Difficulty Protections

Aurora Energy welcomes the opportunity to make a submission to the Australian Energy Market Commission (AEMC) in relation to its streamlining payment difficulty protections Rule Change.

Aurora Energy is a customer-centric Tasmanian Government owned energy retailer providing energy services to the vast majority of Tasmania's electricity customers.

Aurora Energy wholeheartedly agrees with the principle of disconnection as a last resort and retailers being required to use every possible mechanism to attempt to get customers to make contact regarding overdue bills prior to disconnection.

However, Aurora Energy has concerns that the proposed drafting may inadvertently create poor customer outcomes in circumstances where customers have nominated post as their preferred communication channel. In these cases, the proposed requirements may result in multiple postal communications being issued over a short period without improving customer awareness or engagement.

Aurora Energy disconnection for non-payment – current process

Aurora Energy currently has a comprehensive process for managing customers at risk of disconnection for non-payment.

Prior to commencing the disconnection process, Aurora Energy makes several attempts to contact the customer through their preferred communication channel. These include multiple steps taken in addition to those required under the National Energy Retail Rules.

Where a customer has nominated post as their preferred method of communication, Aurora Energy will send at least three letters, including the bill, a reminder notice, and a disconnection warning notice. Aurora Energy will then make further attempts to engage the customer through alternative communication channels, including phone calls, SMS and email.

Once these avenues have been exhausted, Aurora Energy may commence the formal disconnection process. However, prior to disconnection, the Distribution Network Service Provider will typically try to engage with the customer in person through the Knock to Stay

Connected program, providing a further opportunity for the customer to contact their retailer and avoid disconnection.

Aurora Energy considers that this approach supports the objective of maximising customer engagement and avoiding disconnection wherever possible.

Proposed amendment to the rule

It is Aurora Energy's view that the draft rule may unintentionally create a poor customer experience for customers who have elected to receive communications by post and are billed monthly.

In these circumstances, a retailer may be required to issue a disconnection warning notice by post and then, immediately thereafter, issue a final disconnection notice before the commencement of the next billing cycle. This may result in multiple postal notices being received within a very short timeframe.

It is Aurora Energy's view that this outcome does not improve customer awareness or engagement. As such, Aurora Energy suggests the following amendment to the rule be considered by the AEMC.

> *Where the customer has nominated post as their preferred method of communication, the retailer is taken to have used its best endeavours to contact the customer if:*
>
> *(a) the retailer has sent at least two communications by post relating to the overdue bill, including a disconnection warning notice; and*
>
> *(b) the retailer has attempted to contact the customer using at least two other available methods of communication,*
>
> *regardless of whether the customer acknowledges receipt of those alternative communications.*

The proposed amendment preserves the intent of encouraging multi-channel contact while recognising that the retailer has already respected the customer's nominated communication preference and has made reasonable efforts to contact the customer regarding the overdue debt prior to disconnection.

Should you have any questions regarding this submission, please contact Sam Unsworth at sam.unsworth@auroraenergy.com.au.

Yours sincerely

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