

27 July 2026

Mr Geoffrey Rutledge
Chief Executive Officer
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000
Online via: www.aemc.gov.au

Dear Geoffrey

Streamlining payment difficulty protections – Draft determination

Thank you for the opportunity to comment on this draft determination.

The comments contained in this submission reflect the feedback of the Energy & Water Ombudsman NSW (EWON), Energy & Water Ombudsman South Australia (EWOSA), and Energy and Water Ombudsman Queensland (EWOQ).

We are the industry-based external dispute resolution schemes for the energy and water industries in New South Wales, South Australia, and Queensland.

We have collectively reviewed the draft determination, and we broadly support the proposed changes to the National Energy Retail Rules (NERR) to:

- clarify the time when a retailer has disconnected a customer's premises, to support assessment of whether the retailer has complied with its obligations
- improve best endeavours standards by requiring retailer engagement through at least two communication channels for customers at risk of disconnection
- apply the minimum disconnection amount to all customers by removing the requirement that the customer has agreed to repay an amount that is less than the minimum
- strengthen the NERR by more clearly capturing the National Energy Retail Law (NERL) obligation on retailers to identify payment difficulties
- require clearer and more accessible information on retailer websites
- require retailers to include information on reminder and disconnection warning notices about assistance the customer is entitled to and all relevant rebate, concession and relief schemes.

These are common-sense improvements, but we view them as initial steps. The payment difficulty framework requires bolder changes to ensure it is fit for purpose to support people who are struggling to afford energy. We have provided substantive comments and recommendations in this regard in our response to the *Strengthening standards for payment difficulty assistance Consultation Paper*.

If you require any further information regarding our submission, please contact Bryce Purches, EWON Manager Policy & Systemic Issues (brycep@ewon.com.au).

Yours sincerely



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