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30 July 2026

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: Streamlining payment difficulty protections - RRC0075

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to respond to the Australian Energy Market Commission's (the Commission's) draft determination on potential amendments to the National Energy Retail Rules (NERR). We support the Commission's commitment to strengthening protections for vulnerable consumers, including those experiencing payment difficulties. We also welcome the Commission's collaborative approach to consulting with the retail sector to develop practical and regulatory reforms.

We broadly support the Australian Energy Regulator's (AER) combined proposed rule changes. All consumers deserve appropriate protections,and the framework should provide stronger support for those facing financial hardship. Importantly, the draft rules, as currently drafted, largely align with our existing processes. However, we do encourage the Commission to make minor drafting changes to ensure the final determination delivers the intended policy outcomes and promotes consistent interpretation across the industry.

Clarifying Disconnection Protections

We support the proposal for retailers to use their best endeavours obligations and use multiple communication channels before initiating a disconnection for non-payment. This reduces the risk of wrongful disconnections for engaged consumers and aligns with our existing processes. It is appropriate that disconnection is strictly used as a last resort.

It would be appropriate for the Commission to explicitly include metering coordinators in addition to distribution networks, as both entities can perform disconnections. In doing so, it would address two key risks in the current drafting. Firstly, a retailer may mistakenly believe the protection rules do not apply when a metering coordinator is engaged. Secondly, a retailer might conclude that metering coordinators are barred from executing non-payment disconnections. This latter would expose consumers to higher service order fees from physical distributor deployments and significantly prolong the reconnection timeframe.

Simplifying the Eligibility Framework for Payment Difficulty

We strongly support this proposed rule change. All consumers should have access to comprehensive payment assistance when they face financial difficulty. In our view, the responsibility for identifying and addressing these challenges is shared. Consumers have the trust and awareness to reach out for assistance when they need it and retailers should be proactively offering assistance and support options, even in instances where a customer has not explicitly requested it. By normalising the provision of extra assistance, customers will receive the necessary support, regardless of their proactive engagement level.

Improving Payment Assistance Information

Red and Lumo strongly support this rule change, as consumers must have ready access to all available payment assistance information. We already provide customers with payment difficulty assistance when they contact us and within our communications to customers prior to them engaging with us. Requiring retailers to publish comprehensive payment assistance information—including a summary of their hardship policy, details on concessions, and de-energisation and re-energisation timeframes—ensures all consumers have equal access to vital support options. We also support the requirement that information is presented in simple, plain English and easy to find on a retailer’s websites.

We support the removal of the caveat requiring customers to agree to a repayment plan for the minimum disconnection threshold to apply. We believe it is an unnecessary provision that could theoretically permit disconnection for any amount of debt if a repayment agreement is not yet established and its removal further strengthens essential protections for consumers.

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 1.6 million customers. Red and Lumo thank the Commission for the opportunity to comment on the draft determination. 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

Geoff Hargreaves
Manager - Regulatory Affairs
Red Energy Pty Ltd
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