29 July 2026

RRC0075 – Streamlining payment difficulty protections rule change
Australian Energy Market Commission
Submission made online at www.aemc.gov.au

Dear Sir/Madam

Subject: RRC0075 Draft Rule Determination – National Energy Retail Amendment (Streamlining payment difficulty protections) Rule

SA Power Networks welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC's) Draft Determination for the *Streamlining payment difficulty protections* rule change.

As South Australia's regulated energy distributor, serving 1.7 million South Australians, we play a critical role in the well-being of our community. SA Power Networks believes all customers deserve affordable and equitable energy supply and is committed to advocating for and supporting improvements that provide safeguards for all customers, and particularly those customers experiencing vulnerability.

SA Power Networks acknowledges the cost-of-living pressures facing customers and supports the AEMC's proposed rule change to help ensure customers are aware of available assistance and that the frameworks for delivering this support are clear and streamlined. We consider the proposed changes will improve outcomes for customers experiencing payment difficulties, particularly those in vulnerable circumstances, by supporting earlier access to assistance and strengthening customer protections.

Our submission supports the proposed amendments, which would:

- Clarify and strengthen disconnection protections to better serve customers, including requiring retailers to use at least two communication channels when contacting customers at risk of disconnection and applying the minimum disconnection amount to all customers;
- Streamline payment difficulty assistance categories and ensure customers who self-identify, or are identified by retailers, receive appropriate payment difficulty assistance and protections;
- Require retailers to publish clearer and more accessible information on payment difficulty assistance and government concessions on their websites; and
- Improve the information provided in reminder and disconnection warning notices, including details about payment difficulty assistance, hardship policies, and relevant government rebates and concessions.

This submission addresses the specific proposed changes in the Draft Determination that are relevant to SA Power Networks role and sets out our response.

3. Clarifying and strengthening disconnection protections to better serve customers (Theme 1)

3.1.1. Clarifying the time a retailer is taken to have arranged disconnection would support the principle of disconnection as a last resort

SA Power Networks recommends that clause 107(6) be amended to also explicitly include the metering provider and metering coordinator to reflect arrangements where de-energisation and re-energisation are undertaken via smart meters.

4. Streamlining and improving payment difficulty assistance information for customers (Theme 2)

4.2. Offering clearer and more accessible information

4.2.2. Providing assistance information on reminder and disconnection warning notices

SA Power Networks supports the proposed requirement to provide customers with information about available assistance and how to access it through reminder and disconnection warning notices.

As retailers have the primary account relationship with customers, they should remain responsible for providing disconnection warning notices when issuing a service order for disconnection due to non-payment. Accordingly, retailers should be responsible for including information about the assistance, hardship policies and support available to their customers.

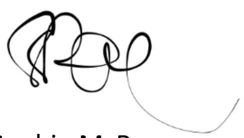
In the limited circumstances where a distributor is required to issue a disconnection warning notice, the obligation should extend to providing information about the assistance and support available from the distributor.

To clarify the respective roles of retailers and distributors, SA Power Networks recommends amending clause 110(2)(h) to refer to the '*retailer's or distributor's hardship policy, as applicable*.'

SA Power Networks does not consider it appropriate for distributors to include information about retailer-specific assistance programs or hardship policies in notices they issue. Consistent with the recommended amendment to clause 110(2)(h), retailers and distributors should each be required to provide information only about the assistance and hardship policies relevant to their respective roles.

We value the opportunity to make a submission to the AEMC's Draft Rule Determination – *National Energy Retail Amendment (Streamlining payment difficulty protections) Rule* and support improving customer and community outcomes. Should you wish to discuss this submission, please contact SA Power Networks Policy and Advocacy Lead, Rebecca Carter at rebecca.carter@sapowernetworks.com.au or on 0417 480 984.

Yours sincerely



Sophie McRae
Head of Customer Experience

GPO Box 77 Adelaide SA 5001 • 13 12 61
www.sapowernetworks.com.au