Australian Energy Market Commission

RULE

Rule determination

National Energy Retail Amendment (Streamlining payment difficulty protections) Rule

Proponent

Australian Energy Regulator

10 September 2026

Enquiries

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About the AEMC

The AEMC reports to the energy ministers. We have two functions. We make and amend the national electricity, gas and energy retail rules and conduct independent reviews for the energy ministers.

Acknowledgement of Country

The AEMC acknowledges and shows respect for the Traditional Custodians of the many different lands across Australia on which we live and work. The AEMC office is located on the land of the Gadigal people of the Eora nation. We pay respect to all Elders past and present, and to the enduring connection of Aboriginal and Torres Strait Islander peoples to Country.

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Summary

1 The Australian Energy Market Commission (AEMC, or the Commission) has made a more preferable final retail rule (final rule) in response to four rule change requests submitted by the Australian Energy Regulator (AER) (the proponent) on 19 December 2025.

2 This final determination relates to four of five rule change requests submitted by the AER that together sought changes to the National Energy Retail Rules (NERR) to improve and enhance existing requirements, so customers experiencing payment difficulties are engaged early, and supported effectively with assistance that is tailored to their individual circumstances.

3 The four rule change requests progressed together in this streamlining payment difficulty protections package and final determination are:

- *Clarifying disconnection protections.*
- *Simplifying the eligibility framework for payment difficulty protections.*
- *Improving payment assistance information.*
- *Strengthening minimum disconnection protections.*

4 The Commission decided to fast-track these requests on the basis that the rule changes were developed through extensive consultation by a market body (the AER). The requests have also been consolidated into a single rule change request. This allowed the Commission to consider the AER's proposed changes holistically and through one process.

5 The remaining fifth rule change *Strengthening standards for payment difficulty assistance*, is being progressed through the standard rule making process and can be found here.

6 These rule change requests stem from the AER's Review of payment difficulty protections in the National Energy Customer Framework (the AER Review). The AER final report was published 15 May 2025 and was presented to the Energy and Climate Change Ministerial Council (ECMC), outlining 13 identified opportunities for reform.[1]

7 While the final rule is a more preferable rule, it incorporates many of the elements proposed in the rule change requests that considered the retail rules do not:

- adequately reflect current retailer practices, creating gaps between regulatory requirements and how processes operate in practice, such as:
  - when disconnection is taken to be arranged
  - the application of the minimum disconnection amount as the main protection for all consumers.
- ensure flexible, tailored engagement, limiting the effectiveness of communications across different consumers.

8 The Commission's final rule recognises that it is critical consumers are aware of available assistance, and the frameworks for delivering this support are clear and streamlined. The changes also highlight findings from the AER Review and Energy and Water Ombudsman NSW (EWON) that having a clearer framework can better protect customers experiencing challenges from having their circumstances worsened by disconnection, and disconnection should be considered a last resort.[2]

9 Recent data from the AER indicates that around 2.3 per cent of residential customers have energy

1 AER, Review of payment difficulty protections in the National Energy Customer Framework, Findings Report, 15 May 2025.

2 Energy and Water Ombudsman NSW, Spotlight on, Systematic issues report - The harms of disconnection, April 2026.

debt of 90 days or more, reaching the highest levels in five years.[3] This is accompanied by an assistance gap, with approximately one-third of customers in energy debt not receiving support through a payment plan or hardship program.[4] This suggests there are customers experiencing payment difficulties who are not receiving adequate assistance or may not be aware of the assistance available to support them.

10 In summary, the changes and final rule seek to:

- clarify when de-energisation (disconnection) is officially requested by a retailer
- require retailer engagement through at least two channels of communication for customers at risk of disconnection
- ensure the minimum disconnection amount applies, regardless of whether customers have agreed to repay outstanding debts, to address the inconsistent customer experiences
- address inconsistent wording between the Retail Law and Retail Rules, to ensure customers receive payment assistance regardless of whether they self-identify or are identified by their retailer
- require retailers to provide more accessible assistance information on websites and reminder and disconnection warning notices so that customers can access, understand and act on it.

11 This final determination and final rule contribute to our vision for a consumer-focused net zero energy system, that seeks to inform, empower and protect consumers individually and as a collective. This final rule seeks to address potential barriers for payment difficulty assistance and improve transparency around processes, assistance and communications to ensure protections are applied as consistently as possible for customers experiencing payment difficulties.

12 The ECMC, led by the Department of Climate Change, Energy, the Environment and Water (DCCEEW), is progressing the Better Energy Customer Experiences (BECE) reforms to consider whether the existing energy customer protection framework is fit for purpose for consumers through the energy transition and beyond. As part of this work program, ECMC is also considering the AER payment difficulty review recommendation to adopt a single, consistent definition for customers experiencing payment difficulty. The Commission has had regard to these reforms for the five rule change requests from the AER.[5]

The final rule seeks to improve outcomes for consumers experiencing payment difficulties

13 The Commission has considered the issues raised in the rule change request, stakeholder views expressed during the AER Review, submissions and feedback on the draft determination and draft rule. We also had regard to our assessment criteria outlined below and in chapter 2.

14 Overall, stakeholder submissions were largely supportive of the draft policy positions in the draft determination/draft rule.[6] They generally agreed payment difficulty protections should be simpler, more accessible and provide stronger measures against disconnection. We note some stakeholder submissions and feedback suggested refinements to some of the draft proposals for implementation and clarity. Further details on stakeholder views are covered in chapter 3 and chapter 4 of this determination.

15 This final determination covers two themes. These are:

3 AER, Quarterly retail performance update January to March 2026, June 2026. Note: this excludes hardship customers.
4 AER, Annual retail markets report 2024-25, 1 December 2025.
5 ECMC, Meeting Communique, 16 December 2025.
6 AEMC, Draft rule determination National Energy Retail Amendment (Streamlining payment difficulty protections) Rule, 18 June 2026.

- Theme 1: Clarifying and strengthening disconnection protections to better serve customers.
  - clarifying the time when a retailer is taken to have disconnected a customer
  - requiring retailer engagement for those at risk of disconnection through at least two channels of communication
  - application of the minimum disconnection amount to all customers.
- Theme 2: Streamlining and improving payment difficulty assistance information for customers.
  - streamlining payment difficulty assistance eligibility categories
  - offering clearer and more accessible information on retailer websites
  - providing assistance information on reminder and disconnection warning notices.

16 Our final rule is largely consistent with the draft rule. We note there are some clarifications to the drafting, as identified throughout the determination, to improve the workability of the final rule.

The final rule ensures disconnection requirements reflect current retailer practice and the intent of the rules (Theme 1)

17 The current rules do not clearly specify when a retailer is taken to have disconnected a customer. The AER proposed clarifying the time that a retailer is taken to have disconnected a customer in the NERR so it is clear when disconnection is confirmed to have occurred.

18 The final rule clarifies that a retailer is taken to have arranged de-energisation (disconnection) of a customer's premises at the time it makes a request for de-energisation to the distributor or metering coordinator (MC). The Commission considers this clarity builds upon the principle of disconnection as a last resort and aims to assist the AER in determining whether a retailer has met its last resort obligation, including the minimum disconnection protections set out in the NERR. The final rule makes an amendment to the draft rule to include reference to MCs. The Commission considers this change to capture other participants who can arrange de-energisation.

19 The final rule also builds upon the principle of disconnection as a last resort by requiring retailers to try to engage with customers at risk of disconnection through more than one communication channel. This is based on the AER's proposal to require retailers to engage with customers at risk of disconnection using at least two channels. Under the final rule:

- Retailers will be required to try to contact customers at risk of disconnection through at least two channels. Where a customer acknowledges receipt of the first communication attempt, the retailer will not be required to follow up with an additional method of contact. The final rule is not an exhaustive list of potential communication methods; instead, the aim is to allow retailers to contact the customer in a way that suits the customer's needs.
- The reference to facsimile is removed to reflect current methods of communication.
- The existing family violence provision supersedes the requirement in the final rule for retailers to use at least two communication methods.[7] Accordingly, where a customer is affected by family violence, retailers would not be required to comply with these requirements.

20 The Commission considers this will ensure engagement is more thorough at a critical time for those experiencing payment difficulties, whilst also allowing retailers to engage with customers in a more flexible way that meets their needs.

21 The last aspect of this theme is ensuring the minimum disconnection amount applies to all customers and not just those who have explicitly agreed to repay their debt, as proposed by the

7 Rule 76H of the NERR, Final rule, rule 111(3A).

AER in its rule change request.

22 The Commission has adopted the AER's proposal and considers this recognises the original intent of the minimum disconnection amount, a baseline payment difficulty protection for all consumers. This approach reflects the need to uphold equitable outcomes for all consumers, whilst ensuring the rules clarify the intent of these protections and align with current practice.

23 Further details on the final rule and the Commission's reasoning for Theme 1 are outlined in chapter 3.

The final rule seeks to improve the delivery of assistance to customers experiencing payment difficulties (Theme 2)

24 The National Energy Retail Law (NERL) references three categories of customers i.e., hardship customers,[8] customers who self-identify as experiencing payment difficulty and customers who are identified by their retailer as experiencing payment difficulty.[9]

25 The NERR, however, does not refer to customers experiencing payment difficulties who are identified by their retailer. The rules regarding payment difficulty are set out in Parts 2, 3, 5 and 6 of the NERR, with guidance to retailers outlined in the AER retail performance and reporting procedures and guidelines.

26 The AER proposed adopting the wording in the NERL for the NERR to ensure customers receive assistance regardless of whether they self-identify or are identified by their retailer as experiencing payment difficulties.

27 The final rule adopts the AER's proposal to streamline the payment difficulty assistance eligibility categories. Importantly, under the final rule, customers will receive the same assistance items under the NERR regardless of whether they self-identify or are identified by their retailer as experiencing payment difficulties.

28 The Commission considers this will ensure there is a consistent application of payment difficulty assistance and support the broader definitions of payment difficulty sought by the AER through the ECMC.

29 The AER Review found that retailer websites rarely provide assistance information tailored to customers' needs, in a manner that is both easy to access and understand. The review also found that many customers are not aware of available assistance at key points in the disconnection process. The AER proposed to require retailers to publish accessible information about assistance on their website, and provide assistance information on reminder and disconnection warning notices.

30 The final rule builds upon the aim of improving the delivery of assistance to customers experiencing payment difficulties by requiring retailers to provide information about available payment difficulty assistance, a summary of the hardship policy, and information about concessions on their website. This information will need to be easily accessible and expressed in plain language.

31 The Commission considers retailers should provide accessible and easy to understand information about protections and assistance on their websites, as this will support consistent and transparent information about payment assistance options available to consumers.

8 Section 2(1), 43 and 44(a) of the NERL.

9 Section 50(1)(b) of the NERL; The AER's Review recommended a single, consistent definition for customers experiencing payment difficulty be introduced. This is being considered by ECMC.

Acknowledging some customers may not have internet access, the Commission notes retailers must provide customers with a summary of their rights and entitlements at the customer's request.

32 We note this approach is also largely consistent with the final rule for Improving the application of concessions to bills[10] and the final rule for Improving life support processes[11], which seek that distributors make easy and accessible information on life support protections available.

33 The final rule also requires retailers to include information on payment difficulty assistance, access to hardship policies, and available government rebates and concessions on reminder and disconnection warning notices. The Commission considers this will provide information at a crucial time when those facing payment difficulty may need it most while promoting transparency of payment assistance available.

34 The overall final rule includes minor clarification to recognise customers experiencing payment difficulty may not be in hardship and clearly distinguish between information relevant to hardship customers and that relevant to those experiencing payment difficulty.

35 Further details on the final rule and the Commission's analysis for Theme 2 are outlined in chapter 4.

We assessed our final rule against four assessment criteria and the National Energy Retail Objective (NERO)

36 The Commission has considered the National Energy Retail Objective (NERO),[12] the issues raised in the rule change request, and assessed the final rule against the four assessment criteria outlined below.

37 The final rule will contribute to achieving the NERO by:

- **Improving outcomes for consumers.** The final rule will strengthen existing protections by improving clarity, accessibility and consistency of payment assistance. It supports more tailored engagement and reduces barriers to assistance, helping customers access support and avoid disconnection.
- **Upholding principles of market efficiency.** The final rule will promote more consistent application of obligations and reduce ambiguity in key areas such as disconnection processes and the minimum disconnection threshold. This supports standardised retailer practices, clearer allocation of responsibilities, and more efficient engagement with customers.
- **Enabling practical and efficient implementation.** The final rule largely reflects existing retailer practices, limiting implementation complexity and system changes. We expect impacts to be manageable, with flexibility retained in the legal drafting where necessary to support efficient application alongside broader reforms.
- **Aligning with principles of good regulatory practice.** The final rule will improve clarity and consistency across the framework by reducing reliance on interpretation and supporting predictable outcomes. It applies prescription where needed while maintaining flexibility, and is designed to align with related reforms and minimise regulatory burden.

10 AEMC, National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025 No. *5, 25 September 2025.*

11 Final National Energy Retail Amendment (Improving life support processes) Rule 2026, 25 June 2026.

12 Section 13 of the NERL.

The final rule will come into effect on 30 March 2027

38 The final rule has a commencement date of 30 March 2027. This applies across all components of the final rule.

39 The Commission considers this timeframe is appropriate, as many of these changes are minor in nature and reflect alignment with current retailer practices. The Commission considers the commencement date allows time for:

- retailers to update internal systems and guidance
- retailers to update their websites, reminder and disconnection warning notices templates to reflect new information requirements
- the AER to finalise its Retail guidelines review and any potential updates to related guidelines.

Contents

1 The Commission has made a final determination

The Australian Energy Market Commission (AEMC, or the Commission) has made a final more preferable retail rule (final rule) in response to the rule change request submitted by the proponent on 19 December 2025.

Five rule change requests were submitted by the Australian Energy Regulator (AER) following its *Review of payment difficulty protections in the National Energy Customer Framework* (the AER Review), which identified a range of issues affecting how customers experiencing payment difficulties are identified, supported and protected under the current framework.

The five requests are:

- Clarifying disconnection protections.
- Simplifying the eligibility framework for payment difficulty protections.
- Strengthening standards for payment difficulty assistance.
- Improving payment assistance information.
- Strengthening minimum disconnection protections.

Together, these rule changes sought to address customer access to assistance, payment plan settings, information about assistance and disconnection protections through amendments to the National Energy Retail Rules (NERR).

The four rule change requests covered by this final determination are:

- Clarifying disconnection protections. The current rules do not clearly specify when a retailer is taken to have disconnected a customer, resulting in uncertainty around when a retailer has fulfilled their obligations, specifically the principle of disconnection as a last resort. Retailers also do not always engage with customers at risk of disconnection through multiple communication channels, limiting effective engagement and support.
- Strengthening minimum disconnection protections. Minimum disconnection protections do not apply to all customers, resulting in different levels of protection and potential barriers to engagement.
- Simplifying the eligibility framework for payment difficulty protections. The eligibility framework for payment difficulty assistance is complex and applied unevenly.
- Improving payment assistance information. Customers may not receive clear and accessible information about available payment assistance. Accessible information about payment assistance is also not required to be provided on reminder and disconnection warning notices, limiting opportunities to engage customers before disconnection.

The Commission considered the four rule change requests above in a fast-track process. The Strengthening standards for payment difficulty assistance rule change request is being considered under the AEMC's standard rule-making process, with a draft determination and draft rule published on 10 September 2026.

This final determination and the final rule contribute to our vision for a consumer-focused net zero energy system, specifically our consumer priority that seeks to inform, empower and protect consumers individually and as a collective. The final rule seeks to improve the accessibility of assistance information while maintaining low barriers for customers facing payment difficulty to access support and ensuring the eligibility framework is streamlined and reflects current practice. See chapter 2 for an outline of our assessment considerations for this rule change.

The timeline for implementation is around six months from the final rule, with a commencement date of 30 March 2027, as set out in the final rule.

For more detailed information on:

- our assessment framework and how the Commission considers the final rule will contribute to achieving the National Energy Retail Objective (NERO), refer to chapter 2
- how our final rule will work and how it seeks to improve outcomes for consumers, refer to chapter 3 and chapter 4
- the rule-making process, legal requirements to make a rule and abbreviations refer to appendix A and appendix B.

1.1 Our final rule will improve assistance for customers experiencing payment difficulties

This final determination covers two themes. These are:

- Theme 1: Clarifying and strengthening disconnection protections to better serve customers. The final rule:
  - clarifies the time when a retailer is taken to have disconnected a customer
  - requires retailer engagement through at least two channels of communication for customers at risk of disconnection
  - applies the minimum disconnection amount to all customers.
- Theme 2: Streamlining and improving payment difficulty assistance information for customers. The final rule:
  - streamlines payment difficulty assistance eligibility categories
  - requires clearer and more accessible information on retailer websites
  - requires assistance information on reminder and disconnection warning notices.

Our final rule is largely consistent with the draft rule. We note there are some clarifications, as noted throughout the determination, to improve the workability of the final rule. A summary of the changes under each theme is provided below and in the relevant chapters.

Theme 1: Clarifying and strengthening disconnection protections to better serve customers

This theme covers changes that aim to:

- clarify retailer obligations to sufficiently uphold the principle of disconnection as a last resort
- improve retailer engagement with customers at risk of disconnection
- ensure the minimum disconnection amount applies to all customers and not just those who have explicitly agreed to repay their debt.

There are no substantive changes in this theme between the draft and final rule. The final rule includes minor clarifications, which are:

- to capture metering coordinators (MCs) as a party to whom a retailer may make a request for de-energisation or re-energisation
- that the existing family violence provisions (rule 76H of the NERR) override the final rule requirements for retailers to use at least two communication methods for customers at risk of disconnection, as intended.[13]

13 Final rule, rule 111(3A)(d).

Theme 2: Streamlining and improving payment difficulty assistance information for customers

This theme covers changes that aim to improve customer access and awareness of payment difficulty assistance by requiring clearer and more accessible information about available payment difficulty assistance, retailers' hardship policies, and information about government rebates and concessions.

There are no substantive changes in this theme between the draft and final rule. There is a minor clarification in the final rule that separates references to a summary of the retailer's hardship policy and assistance available to customers experiencing payment difficulty (and how to access such assistance). This is to recognise customers experiencing payment difficulty may not be in hardship, and clearly distinguish between information relevant to hardship customers and that relevant to those experiencing payment difficulty.

Chapter 3 and chapter 4 outline further details of the final rule and the Commission's reasoning.

1.2 Stakeholder feedback has shaped our final determination

Stakeholder input and feedback helped shape the Commission's considerations and final determination.

We received 13 stakeholder submissions to the draft determination, from a range of stakeholders including consumer groups, retailers, distributors and ombudsmen. These submissions provided a range of views on each of the two themes and issues, with some supportive of the changes, and others raising implementation considerations.

We also held a number of bilateral stakeholder meetings, including briefings with consumer groups, retailers and the AER. We have taken this feedback into account for the final determination and final rule.

Overarching feedback to the draft determination considered the proposed changes would improve clarity, consistency and customer access to payment difficulty assistance.

Some retailers, distributors and the AER also raised refinements to the draft rule for implementation, particularly around:

- disconnection arranged by other parties
- operation of existing family violence provisions with the proposed communication requirements
- assistance information available to customers experiencing payment difficulty versus available to those in hardship.

Consumer groups provided additional feedback to further strengthen protections, particularly around meaningful customer engagement tailored to their needs and circumstances.

The final rule aims to strengthen and clarify existing disconnection protections, ensuring the rules sufficiently capture their intent and uphold the principle of disconnection as a last resort. Further, the changes will improve the clarity, accessibility and consistency of payment difficulty assistance information, supporting earlier and more effective engagement with customers experiencing payment difficulties.

Most stakeholders supported clarifying the time when a retailer has arranged disconnection of a consumer's premises

Many stakeholders supported clarifying that a retailer is taken to have arranged a disconnection when it sends the de-energisation request to the distributor. It was generally considered the change would improve legal certainty and ensure protections are applied consistently.[14]

Some retailers and SA Power Networks (SAPN) also suggested that the final rule include other parties who can arrange disconnections (specifically, MCs). They generally noted this refinement would better reflect current practice and avoid creating a gap in the final rule.[15]

Considering stakeholder feedback, the Commission has made a minor change to the final rule to include MCs. This is because retailers may request de-energisation or re-energisation from a MC rather than the distributor. This change will sufficiently capture remote de-energisation where these parties may be involved in the process and accurately reflect how de-energisation or re-energisation can be arranged in practice.

Stakeholders broadly supported requiring retailers to engage with customers through at least two communication channels

Stakeholder submissions supported the Commission's draft policy position in the draft determination, with no stakeholder opposing the removal of the reference to facsimile.[16] Consumer groups and ombudsmen considered it an important safeguard to ensure retailers make genuine efforts to reach customers before proceeding to disconnection.[17] Some retailers also sought further guidance on how it should be applied in practice (eg, what constitutes customer acknowledgement of retailer communication).[18]

The Commission considered these views for this final determination. Section 3.2.1 provides further guidance on how retailers are expected to engage with customers and apply the final rule in practice.

Most stakeholders supported applying the minimum disconnection amount to all customers

Stakeholders broadly supported applying the minimum disconnection amount to all customers, regardless of whether they have agreed to repay their debt.[19]

One stakeholder opposed the change, with the view it could have unintended consequences of increasing retailer debt.[20]

The Commission has considered these positions for the final determination. There is no change from the draft rule in this respect. The Commission considers the responsibility for supporting customers experiencing payment difficulty should primarily rest with retailers, who are best placed to proactively identify customers in need and offer assistance at an early stage. We also expect retailers to take reasonable steps to engage with customers and provide access to payment difficulty assistance before debts escalate to levels that increase the risk of disconnection.

14 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 2; JEC, SACOSS - joint submission, p. 3; ActewAGL, p. 4; Alinta, p. 2; Red/Lumo, p. 1; SA Power Networks, p. 1; AGL, pp. 2, 3.

15 Submissions to the draft determination: Alinta, p. 2; Red/Lumo, p. 1; SA Power Networks, p. 1; AGL, pp. 2, 3.

16 Submissions to the draft determination: EWON, EWOQ and EWQSA, p. 1; ECA, p. 4; JEC, SACOSS - joint submission, p. 4; Origin, p. 1; AGL, p. 5; ActewAGL, p. 4.

17 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p, 1; ECA, p. 4; JEC, SACOSS - joint submission, p. 4.

18 Submissions to the draft determination: AGL, p. 5; ActewAGL, p. 4; Origin, p. 1; Aurora, p. 13.

19 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p, 1 ECA, p. 2; AGL, p. 6; Red/Lumo, p. 2; JEC, SACOSS - joint submission, pp, 4, 5; ActewAGL, p. 5.

20 Powershop, submission to the draft determination, p. 2.

Stakeholder submissions broadly supported clearer and more accessible information on retailer websites and assistance information on reminder and disconnection warning notices

Overall, stakeholders broadly supported improving the information available on retailer websites. They agreed better website information could encourage earlier engagement and make it easier for customers to understand the support available.[21]

A few stakeholders sought clarification on the information that must be provided to customers, including those without internet access.[22]

Most stakeholder submissions also supported requiring payment difficulty assistance information on reminder and disconnection warning notices. They viewed it as a practical way to improve awareness of assistance, promote earlier customer engagement and help prevent avoidable disconnection.[23]

Similar to above, a few stakeholders sought clarification about how information should be presented to customers, communications issued by distributors and the protections customers are entitled to (payment difficulty versus hardship).[24]

One stakeholder considered the changes to reminder and disconnection warning notices unnecessary, with the view it undervalues the protections and customer support mechanisms already in place.[25]

The Commission considers improving the accessibility and clarity of assistance information will support more consistent and transparent communication of payment assistance options. This will make it easier for customers to understand what support is available and how to access it. The Commission notes under existing arrangements, retailers must provide customers a summary of their rights and entitlements at the customer's request for this information. This includes customers without internet access.[26]

The final rule includes a minor clarification to clearly distinguish between information relevant to hardship customers and that relevant to those experiencing payment difficulty.

Stakeholder submissions broadly supported streamlining payment difficulty assistance eligibility categories

Overall, stakeholders broadly supported the proposal customers receive the same minimum assistance, regardless of whether they self-identify as experiencing payment difficulty or are identified by their retailer.[27]

Two retailers sought clarification on the draft rule for when retailers should identify customers experiencing payment difficulties.[28]

The Commission noted these positions for the final determination. There are no changes for the final rule. The Commission notes retailers should continue to comply with existing requirements in

21 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 2; AGL, p. 1; SA Power Networks, p. 1; Red/Lumo, p. 1; JEC, SACOSS - joint submission, p. 1; ActewAGL, p. 1; Origin, p. 1.

22 Submissions to the draft determination: JEC, SACOSS - joint submission, p. 6; Origin, p. 2.

23 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 2; AGL, p. 7 SA Power Networks, pp, 1, 2; Red/Lumo, p. 2; JEC, SACOSS - joint submission, p. 7; ActewAGL, p. 5.

24 Submissions to the draft determination: ActewAGL, p. 5; SA Power Networks, p. 2. Bilateral discussions with the AER.

25 Energy Queensland, submission to the draft determination, pp, 1, 2.

26 Rule 56(2) of the NERR.

27 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 2; AGL, p. 7; SA Power Networks, p. 1; Red/Lumo, p. 1; JEC, SACOSS - joint submission, p. 6; Origin, p. 2.

28 Submissions to the draft determination: ActewAGL, p. 2; Powershop, p. 2.

the NERL and use their judgment based on customer information and history, such as missed payments, to identify customers experiencing difficulties.

1.3 The final rule has also been shaped by the AER's review of payment difficulty protections in the NECF

The AER published its Review of payment difficulty protections in the National Energy Customer Framework on 15 May 2025.[29]

The AER's Review considered whether there is a case for change to strengthen protections for customers experiencing payment difficulties to ensure that they are proactively identified, engaged early and supported appropriately with assistance that is tailored to their individual circumstances.

The review identified 13 opportunities for improving the current framework, specifically to improve how customers experiencing payment difficulties are identified, engaged and supported. These opportunities were centred around the following key aims, making:

- it easier to know who should be receiving assistance and for customers to know what assistance is available
- assistance available to customers more effective and easier to access
- sure disconnection is only used as a last resort and reducing the harm it causes.[30]

The AER's Review identified opportunities related to:

- The definition of payment difficulty and strengthening the principle for disconnection, outlining some of the changes proposed will require legislative reform.
- Strengthening protections on retailer assistance and information provision, outlining some of these changes proposed would require changes to the NERR.
- Alternatives to disconnection, which would require further analysis and consultation to address them.

The AER stated that together these changes, if implemented, would:

- improve protections and outcomes for customers experiencing payment difficulty
- make customer experiences more consistent and support greater awareness
- simplify regulatory compliance for retailers by having a simpler eligibility framework, clearer minimum standards and greater consistency across jurisdictions
- reduce debt burden by better ensuring retailers engage with customers experiencing payment difficulty proactively and effectively.

The AER's Review found that there is a persistent assistance gap that means some customers are missing out on help, and retailer practices and their hardship policies vary, which can lead to different customer experiences depending on the retailer.[31] In addition, the AER identified concerns that some customers may face barriers to assistance, with many experiencing inconsistent engagement during the disconnection process. For many consumers, this may place the onus of receiving support solely on them, potentially delaying or discouraging access to help. For retailers, it raises questions about the consistency of practice and the operational design of assistance processes.[32]

29 AER, Review of Payment difficulty protections in the National Energy Customer Framework, Final report, 15 May 2025.
30 AER, Review of Payment difficulty protections in the National Energy Customer Framework, Final report, 15 May 2025, p. 1.
31 AER, Review of Payment difficulty protections in the National Energy Customer Framework, Final report, 15 May 2025, pp. 6-9.
32 AER, Review of Payment difficulty protections in the National Energy Customer Framework, Final report, 15 May 2025, p. 8.

The rule changes considered in this final determination most closely align with recommendations 1, 2, 9, 10 and 11 of the review, which identified opportunities to:

- introduce a single, consistent definition for customers experiencing payment difficulty
- require retailers to provide generally available information about assistance that is easy for all customers to access, understand and act on
- strengthen minimum disconnection protections, including increasing the minimum disconnection amount
- strengthen requirements for communication in the disconnection process
- strengthen the principle that disconnection is a last resort option, including introducing financial penalties for retailers who fail to uphold the principle.

1.4 Current protections for payment difficulty and hardship customers

Under the National Energy Customer Framework (NECF), there are a range of provisions that aim to protect and assist consumers when they are experiencing payment difficulties with their energy bills or are in financial difficulty due to hardship.[33]

Under the NERR and NERL, hardship and payment difficulty are referred to as follows:

- Hardship - a residential customer of a retailer who is identified as a customer experiencing financial payment difficulties due to hardship, in accordance with the retailer's customer hardship policy.[34]
- Payment difficulty - other residential customers experiencing payment difficulties.[35]

For customers experiencing payment difficulties, the rules rely more heavily on retailer engagement and general payment support arrangements. The current framework provides stronger and more specific protections for hardship customers than for other customers experiencing payment difficulties. This distinction is relevant to the rule change proposals because the AER considers that some customers may face barriers to assistance even before they enter a formal hardship program. The AER Review recommended a single, consistent definition for customers experiencing payment difficulty be introduced. This is to make it easier to know who should be receiving assistance. This proposal is currently under consideration by the Energy and Climate Change Ministerial Council (ECMC), as it requires changes to the NERL.

Victoria has its own payment difficulty framework and consumers in Victoria are protected under the Victorian Energy Retail Code of Practice. We have liaised with the Essential Services Commission of Victoria (ESC VIC) as part of this rule change and have aligned the final rule with the Victorian retail code where suitable.

1.5 Broader reforms that intersect with this final rule

The ECMC, led by the Department of Climate Change, Energy, the Environment and Water (DCCEEW), is progressing the Better Energy Customer Experiences (BECE) reforms to consider if the existing energy customer protection framework is fit for purpose for consumers through the energy transition and beyond.

33 These provisions are in the NERL, the NERR, the National Energy Retail Regulations, the AER's Customer Hardship Policy Guideline (2019) and the AER's Sustainable Payment Plans Framework (2016). Note that these instruments do not apply in all jurisdictions. The NECF applies in the Australian Capital Territory, New South Wales, South Australia, Queensland and Tasmania, and partially in Victoria.

34 NERL sections 2(1) and 43.

35 NERL section 50(1)(b), NERR rules 33(1)(b) and 111(2).

The key focus of the review is the NECF, given it is the primary national regulatory framework providing energy-specific protections to consumers. However, consideration will also be given to other related legislation, frameworks and policy settings, including the Australian Consumer Law, state and territory-based legislation, and the New Energy Tech Consumer Code.

We note that ECMC has submitted a rule change request that seeks to uplift the information and communication provisions of the NERR to an outcome-based provision, which would require retailers and distribution networks to engage with customers in a way that meets their needs. The AEMC expects to initiate this rule change in November 2026.[36]

The AER is also considering related changes proposed in this final determination as part of its Retail guidelines review. We have engaged with the AER to ensure alignment and minimise duplication arising from an additional review of relevant guidelines to these requests. The AER expects to publish a final version of the combined guidelines in September 2026.

The Commission has had regard to these broader reforms for this final determination and ECMC's consideration of the broader payment difficulty reforms set out in the AER's final report.[37]

1.6 Our final rule will come into effect on 30 March 2027

The final rule will commence on 30 March 2027, as proposed in the draft determination and draft rule. This applies across all components of the final rule. ENGIE was comfortable with the proposed implementation date.[38] However, Alinta and Origin preferred a longer period of 12 months, to allow further time for system updates and staff training.[39]

The Commission considers the proposed timeframe is appropriate, as many of these changes are minor in nature and reflect alignment with current retailer practices. The Commission considers the six-month implementation period allows time for:

- retailers to update internal systems and guidance
- retailers to update their websites, reminder and disconnection warning notices templates to reflect new information requirements
- the AER to finalise their Retail guidelines review and any potential updates to related guidelines.

36 AEMC, Requiring retailers and distributors to engage with customers in a way that meets their needs, 2026.

37 ECMC, Meeting Communique, 16 December 2025.

38 ENGIE, submission to the draft determination, p. 2.

39 Submissions to the draft determination: Alinta, p. 1; Origin, p. 3.

2 The final rule contributes to the energy objectives

2.1 The Commission must act in the long-term interests of energy consumers

The Commission can only make a rule if it is satisfied that the rule will or is likely to contribute to the achievement of the relevant energy objectives.[40]

For this rule change, the relevant energy objective is the NERO:

The NERO is:[41]

> to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to—
>
> (a) price, quality, safety, reliability and security of supply of energy; and
>
> (b) the achievement of targets set by a participating jurisdiction—
>
> (i) for reducing Australia's greenhouse gas emissions; or
>
> (ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.

The targets statement, available on the AEMC website, lists the emissions reduction targets to be considered, as a minimum, in having regard to the NERO.[42]

2.2 We must also take these factors into account

2.2.1 We have considered whether to make a more preferable rule

The Commission may make a rule that is different, including materially different, to a proposed rule (a more preferable rule) if it is satisfied that, having regard to the issue or issues raised in the rule change request, the more preferable rule is likely to better contribute to the achievement of the NERO.[43]

For this rule change, the Commission made a more preferable final rule. The reasons are set out in section 2.3 below.

2.2.2 We have considered the consumer protections test for this rule change

In addition to applying the NERO, the Commission must, where relevant, satisfy itself that the rule is "compatible with the development and application of consumer protections for small customers, including (but not limited to) protections relating to hardship customers" (the consumer protections test).[44] Where the consumer protections test is relevant in making a rule, the Commission must be satisfied that both the NERO test and the consumer protections test have been met.[45] If the Commission is satisfied that one test, but not the other, has been met, the rule cannot be made (noting that there may be some overlap in the application of the two tests).

The Commission is also satisfied that the final more preferable rule meets the consumer protection test, as per the reasons set out in section 2.3.

40 Section 236(1) of the NERL.

41 Section 13 of the NERL.

42 Section 224A(5) of the NERL.

43 Section 244 of the NERL.

44 Section 236(2)(b) of the NERL.

45 That is, the legal tests set out on sections 236(1) and (2)(b) of the NERL.

2.3 How we have applied the legal framework to our decision

The Commission has:

- considered the NERO
- considered the issues raised in the rule change request
- considered the consumer protections test
- assessed the final rule against the four assessment criteria outlined in its draft determination and below.

We identified the following criteria to assess whether the proposed rule change, no change to the rules (business-as-usual), or other viable, rule-based options are likely to better contribute to achieving the NERO. The Commission also considered equity and the impacts on and barriers to participation for consumers as part of our assessment criteria.

The AEMC has developed guidance to ensure issues of equity are consistently and transparently addressed in a structured way when we are making rule changes and delivering recommendations — that is, putting a consistent focus on accounting for the diversity of consumer needs, experiences and preferences; removing structural barriers to participation; and avoiding creating or exacerbating vulnerability.[46]

- **Outcomes for consumers.** We considered whether the final rule will:
  - be compatible with or strengthen existing consumer protections, including any interactions
  - better uphold consumer needs and preferences, through more tailored accessible engagement and information
  - promote equity, so that customers experiencing payment difficulties receive support and protections needed to access assistance, particularly those who may face barriers to engaging with their retailer.
- **Principles of market efficiency.** We considered the impact of changes to:
  - current retailer processes to engage with customers in a way that suits their needs
  - current risk allocation between retailers and customers experiencing payment difficulties
  - transparency of information and information-sharing around retailer website, reminder and disconnection warning notice requirements
  - structural barriers enabling all consumers to access assistance relating to payment difficulty.
- **Implementation considerations.** We considered the:
  - cost and complexity for retailers to implement changes to websites, reminder and disconnection warning notices, ensuring sufficient implementation flexibility is provided
  - interaction with existing processes, including the AER Retail guideline review currently underway, BECE reforms and broader changes being sought through the ECMC
  - impact on market bodies or jurisdictions and across different groups of consumers.
- **Principles of good regulatory practice.** We considered principles of good regulatory practice, including:
  - whether it will promote simplicity and transparency of information and assistance

46 See AEMC guidance on How the national energy objectives shape our decisions.

- how this rule will interact with recommendations made under the AER's Review of payment difficulty protections in the NECF being sought through the ECMC and through the standard rule change
- how prescriptive or outcomes-based the rules in the NERR need to be, in order to uphold the long term interests of consumers.

These assessment criteria reflect the key potential impacts – costs and benefits – of the rule change request, for impacts within the scope of the NERO. The Commission has evaluated the impacts of the various policy options against the assessment criteria, taking into account stakeholder submissions to the AER Review and the draft determination and draft rule.

2.3.1 The final rule will support consumer outcomes by making payment assistance more consistent and easily accessible

The final rule will support outcomes for consumers by:

- **Strengthening existing consumer protections and improving consistency.** The final rule clarifies and strengthens existing protections by improving how information is provided and ensuring customers are better able to access assistance, including addressing gaps and inconsistencies in current arrangements.
- **Better supporting consumer needs and preferences.** The final rule promotes more tailored and accessible communication, including improving website information and notices, so customers can more easily understand their options. The final rule also allows retailers to engage with customers in a way that suits customers' needs and circumstances.
- **Promoting equity and reducing barriers to assistance.** The final rule seeks to ensure customers experiencing payment difficulties, particularly those facing vulnerability or barriers to engagement, can access and navigate assistance, reducing the risk of disengagement from available protections. By applying protections more consistently, including the universal application of minimum disconnection amounts, the final rule supports customers experiencing payment difficulty to access assistance and avoid unintended exclusion from it.

2.3.2 The final rule will promote market efficiency by improving consistency and reducing ambiguity in retailer obligations

The final rule will promote market efficiency by:

- **Improving consistency in how obligations are applied.** The final rule clarifies key aspects of the framework, including how de-energisation provisions should operate, aligning wording between the NERR and NERL, and applying minimum disconnection thresholds consistently. These changes reduce ambiguity in the rules and support more standardised processes across retailers, by bringing the rules in line with most retailers' current practice.
- **Clarifying the allocation of risks and responsibilities.** By clarifying obligations, including those around de-energisation and the application of disconnection thresholds, the final rule reduces ambiguity in how risks are shared between retailers and customers.
- **Enhancing transparency of information and communication.** The final rule improves the clarity and consistency of information provided to customers, including across websites, reminder and disconnection warning notices, supporting more efficient and thorough engagement.
- **Reducing structural barriers to accessing assistance.** The final rule aligns the NERR with current retailer practice and supports more timely engagement between retailers and customers. This may reduce costs associated with disengagement and escalation through disconnection.

2.3.3 The final rule builds on current practice and complements broader reforms

The final rule will complement existing protections and broader reforms by:

- **Limiting implementation complexity by building on current practice.** To the extent the final rule reflects practices already adopted by most retailers, implementation is expected to be straightforward and require fewer fundamental changes to systems and processes.
- **Using prescription where needed.** The primary implementation impacts relate to website updates and reminder and disconnection warning notices, with flexibility provided to support efficient implementation.
- **Aligning with existing and upcoming reforms.** The final rule is designed to operate alongside the AER Retail guideline review and broader changes being progressed through the ECMC, reducing duplication and supporting a more coherent framework.
- **Considering impacts across stakeholders and consumer groups.** The Commission has considered impacts on market bodies, jurisdictions and different consumers, focusing on how changes will affect customers experiencing payment difficulties.

2.3.4 The final rule will support good regulatory practice by improving clarity, consistency and proportional regulation

The final rule supports principles of good regulatory practice by:

- **Promoting clarity and consistency across the framework.** Aligning the wording of the NERR with the NERL and clarifying key obligations, including around de-energisation and the minimum disconnection threshold, supports a more coherent regulatory framework.
- **Reducing ambiguity and reliance on interpretation.** By clarifying expectations that are already reflected in compliant retailer practices, the final rule reduces uncertainty and supports more predictable regulatory outcomes.
- **Applying an appropriate level of prescription.** The final rule introduces prescription where needed to ensure consistent application of protections, while maintaining flexibility where outcomes-based approaches better support efficient delivery (i.e. information requirements for retailer websites, reminder and disconnection warning notices).
- **Supporting interaction with broader reforms.** The final rule is designed to complement the related standard rule change request, Strengthening standards for payment difficulty assistance, broader changes being considered by ECMC, and further alignment with Victoria, where possible, supporting a more integrated regulatory approach.
- **Minimising costs over time.** By clarifying obligations and aligning with existing practices, the final rule is intended to reduce complexity, avoid unnecessary system changes, and support more efficient compliance.

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

This chapter sets out the Commission's final rule and reasoning for Theme 1, covering changes to:

- clarifying the time when it is taken that a retailer disconnects a customer
- requiring retailer engagement through at least two channels of communication for customers at risk of disconnection
- applying the minimum disconnection amount to all customers.

In summary, the Commission has made a final rule that:

- clarifies the time when a retailer disconnects a customer:
  - The final rule clarifies that a retailer is taken to have arranged de-energisation or re-energisation of a customer's premises when they submit the request to do so to the distributor or MC. The AER would use this timing to assess whether a retailer has met its obligations, specifically disconnection as a last resort obligations.[47]
  - The final rule includes a minor clarification to include MCs. This is to capture them as parties who may arrange de-energisation or re-energisation, consistent with current practice.
- requires retailer engagement through at least two channels of communication for customers at risk of disconnection:
  - Retailers will be required to contact customers at risk of disconnection through at least two channels. Where a customer acknowledges receipt of the first communication attempt, the retailer will not be required to follow up with an additional method of contact. The final rule is not an exhaustive list of potential communication methods. Instead, the aim is to allow retailers to contact the customer in a way that suits the customer's needs.[48]
  - Removes the reference to facsimile to ensure the rules reflect current methods of communication.[49]
  - Clarifies existing family violence provision will supersede the requirement in the final rule for retailers to use at least two communication methods.[50] Accordingly, where a customer is affected by family violence, retailers would not be required to comply with these requirements.
- applies the minimum disconnection amount to all customers:
  - The final rule applies the minimum disconnection amount to all customers, rather than solely those who agree to repay their debt.[51]

The Commission considers these changes strengthen and clarify existing disconnection protections, ensure the rules sufficiently capture their intent and uphold and build on the principle of disconnection as a last resort.

47 Final rule, rule 107(6).

48 Final rule, rule 111(1)(e), (3), (3A).

49 ibid.

50 Rule 76H of the NERR, Final rule, rule 111(3A)(d).

51 Final rule, rule 116(1)(g).

3.1 Clarifying the time when a retailer is taken as disconnecting a customer's premises

The Commission has made a final rule clarifying the time a retailer is taken to have arranged disconnection (or reconnection) of a consumer's premises is when it requests the distributor or MC to do so. This is largely consistent with the draft rule, with a minor change to include MCs.

There are specific requirements in the NERR for when a retailer can and cannot arrange for a customer to be disconnected, including customers experiencing payment difficulties and/or hardship customers.[52] These requirements are classified as a tier 1 civil penalty provision.

Despite the NERR stepping out in detail the instances when retailers can and cannot arrange for a customer to be disconnected, it does not clarify the time a retailer is considered to have arranged disconnection of a customer experiencing payment difficulty.

The draft determination proposed clarifying the time a retailer is taken to have arranged disconnection (or reconnection) of a consumer's premises is when it requests the distributor to do so.

Stakeholders largely supported clarifying the time when a retailer has arranged disconnection of a consumer's premises

Most submissions supported the Commission's draft policy position in the draft determination.[53]

Consumer groups viewed the change as an important clarification that would strengthen oversight of retailer conduct and support the principle that disconnection should only occur as a last resort.[54]

Retailers generally viewed the change as a practical clarification that largely reflects existing operational processes.[55]

A few submissions raised the final rule should include other parties who may arrange de-energisation or re-energisation of a customer's premises (specifically MCs). They considered this refinement important to capture who may arrange de-energisation or re-energisation in practice.[56]

Powershop sought clarification on retailer compliance where a retailer revokes a de-energisation request, and de-energisation does not occur. For example, where a de-energisation request was submitted in error or where a customer's circumstances or engagement with the retailer changed after the request was submitted.[57]

If a retailer submitted a disconnect request in error, the Commission notes this would likely be a breach of the final rule. The Commission notes retailers and distributors are currently required to issue customers disconnection warning notices before a customer is disconnected. This supports retailers to respond to a customer's change in circumstances before they finalise or confirm a disconnection request.[58]

52 NERR, Part 6.

53 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 4; JEC and SACOSS, p. 3; AGL, pp. 2, 3; SA Power Networks, p. 1; Red/Lumo, p. 1; Alinta, p. 2.

54 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 4; JEC and SACOSS - joint submission, p. 3.

55 Submissions to the draft determination: AGL, pp. 2, 3; Red/Lumo, p. 1; Alinta, p. 2.

56 Submissions to the draft determination: AGL, pp, 2, 3; SA Power Networks, p. 1; Red/Lumo, p. 1; Alinta, p. 2.

57 Powershop, submission to the draft determination, p. 1.

58 Rule 110 of the NERR.

Origin, AGL and Powershop highlighted there may be unintended implications of deterring retailers from further engaging with customers after disconnection is arranged, including under the Knock to Stay Connected code.[59]

The Commission notes that the Knock to Stay Connected is a voluntary industry code (supported by Energy Charter) to provide a doorstep visit (or letter drop) and information on support available to customers at risk of disconnection.[60] The Commission notes the Knock to Stay Connected code is an important initiative, and the final rule should not deter retailers from working with distributors and other relevant parties under the Knock to Stay Connected code.

3.1.1 The final rule clarifies when a retailer is taken to have arranged disconnection

The Commission considers clarity around when a retailer is taken to have arranged disconnection of a customer in the NERR is important, such that there is no ambiguity for retailers and for consumers around the disconnection process. This is particularly important given the principle of disconnection as a last resort.

The Commission considers the change to the NERR will:

- improve clarity for retailers around their obligations and processes for disconnections (i.e., when disconnection can occur)
- assist the AER in determining whether a retailer has met its obligations
- have limited operational and cost impacts on retailers, given it largely aligns with current practice.

We noted in the draft determination current practice is not to disconnect a customer until after a service order (business-to-business transaction)[61] is raised with either a distributor or MC[62] and generally only post a follow-up letter advising of the disconnection set to occur on a specified date. However, there are jurisdictional differences as to who may carry out a disconnection or reconnection.[63] In NSW, for instance, remote disconnection or reconnection (re-energisation) of a residential customer for non-payment can only be carried out by a metering provider (MP) (MC in the instance of embedded networks), upon request from the retailer.[64] In practice, most MC businesses are also registered and accredited as MPs.[65]

Considering stakeholder feedback, the Commission has made a minor change to the final rule to include MCs. This is because retailers may request de-energisation or re-energisation from a MC rather than the distributor. This change will sufficiently capture remote de-energisation where these parties may be involved in the process and accurately reflect how de-energisation or re-energisation can be arranged in practice.

3.2 Requiring retailer engagement through at least two channels for customers at risk of disconnection

The Commission has made a final rule requiring retailers to use at least two communication channels to engage with customers at risk of disconnection for non-payment. The final rule also

59 Submissions to the draft determination: Origin, p. 1; AGL, 4; Powershop, p. 1.

60 The Energy Charter, Knock to Stay Connected.

61 Business-to-business transaction (B2B transaction) is a digital communication between participants for workflows.

62 MC is a term not currently used in the specific rules this proposal relates to.

63 See AEMO, B2B guide, 2 April 2025.

64 Electricity Supply (General) Regulation 2014 - Division 3.

65 Any person can perform the metering role of a MP, provided they are registered and accredited by AEMO.

removed the reference to facsimile. This is largely consistent with the draft rule, with a minor change.[66]

The specific payment difficulty provisions in the NERR currently require retailers to engage with customers at risk of disconnection using one of the listed methods in the NERR.[67] However, research from the Justice and Equity Centre (JEC) found that 47 per cent of customers who had been disconnected did not recall having any contact with their retailer prior to the disconnection.[68]

Stakeholders broadly supported additional communication channels to best suit customer needs

Stakeholder submissions supported the Commission's draft policy position in the draft determination, with no stakeholder opposing the removal of the reference to facsimile.[69]

Consumer groups and ombudsmen considered relying on a single communication method can result in customers missing important notices and support opportunities, particularly customers experiencing vulnerability or payment difficulty. They viewed multi-channel engagement as a practical way to strengthen the principle that disconnection should be a last resort.[70]

Retailers generally agreed using more than one communication channel increases the likelihood that customers at risk of disconnection become aware of their situation and the available support options before disconnection occurs.[71]

Some stakeholders raised some suggestions on the application of the draft rule:

- JEC and the South Australian Council of Social Services (SACOSS), in a joint submission, considered it could be strengthened by requiring retailers to demonstrate their customer engagement was informed by customer needs and circumstances via an overarching principle.[72] The Commission notes AER's proposed draft retail guidelines require retailers to include in their customer hardship policy how they will effectively communicate their customer hardship policy with customers with diverse communication and other needs, e.g., low English literacy.[73]
- Energy Consumers Australia (ECA) suggested the proposed draft amendments to Rule 111 be reflected in Rule 113. That is, to require retailers to use at least two communication channels to engage with customers at risk of disconnection for denying access to the meter.[74] The Commission considers this change is not warranted by this rule change, as not all customers who deny access to the meter may be experiencing payment difficulty. This change may be considered as part of the BECE reforms and broader changes being sought through the ECMC.
- AGL sought clarification on whether family violence provisions would override the draft rule requirements.[75] The Commission considers rule 76H would supersede the requirement in the draft rule for retailers to use at least two communication methods.[76] Accordingly, where a customer is affected by family violence, retailers would not be required to comply with these requirements. This is clarified in the final rule to avoid doubt.

66 Final rule, rule 111(3A).

67 NERR, rule 111(1)(e) and (3).

68 Justice and Equity Centre, Powerless: Debt and disconnection, Overview report, 24 June 2024, p. 62.

69 Submissions to the draft determination: EWON, EWOQ and EWQSA, p. 1; ECA, p. 4; JEC, SACOSS - joint submission, p. 4; Origin, p. 1; AGL, p. 5; ActewAGL, p. 4.

70 Submissions to the draft determination: EWON, EWOQ and EWOSA, p. 1; ECA, p. 4; JEC, SACOSS - joint submission, p. 4.

71 Submissions to the draft determination: Origin, p. 1; AGL, p. 5; ActewAGL, p. 4; Alinta, p. 3; ENGIE, p. 1; Powershop, pp. 1, 2.

72 JEC, SACOSS - joint submission, submission to the draft determination, p. 4.

73 AER, Draft retail guidelines, June 2026.

74 ECA, submission to the draft determination, p. 4.

75 AGL, submission to the draft determination, p. 6.

76 Final rule, rule 111(3A).

- A few retailers sought clarification about how retailers should apply the new requirements in practice, including:
  - whether multi-channel engagement is required if the customer provided only one contact method, particularly if post is the only available contact method.[77]
  - what constitutes customer acknowledgement of retailer communication, including where customers do not engage or respond to retailer communications.[78]

The Commission notes the final rule sets out that if the customer acknowledges receipt of the first contact attempt the retailer is not required to contact them via a second method, as outlined below.[79]

3.2.1 The final rule requires additional communication channels to best suit customer needs

The Commission considers the final rule aligns with consumer needs and preferences and retailers' current practices. Further, the NERR should require retailers to try to engage with customers using more than one channel of engagement where possible.

We consider the final rule will:

- provide clarity around retailer flexibility/obligations for compliance
- potentially prevent disconnections of customers in payment difficulty due to improved retailer engagement options
- move closer to alignment with the Victorian Energy Retail Code of Practice.

For clarity, the Commission notes that under the final rule, retailers are required to use their best endeavours to contact the customer. This requirement will be satisfied where the customer acknowledges contact, whether that is by the first or second attempted communication channel. The final rule clarifies if the retailer attempts to contact the customer by telephone or electronic means, contact is taken to have occurred only if the customer:

- answers the telephone, or
- acknowledges receipt of a message by telephone or electronic means.[80]

Alternatively, where the customer does not acknowledge any attempts at communication, the final rule provides the retailer is taken to have used its best endeavours to contact the customer if it has attempted to contact the customer by at least 2 methods of communication.[81]

The Commission expects retailers to make reasonable attempts to contact customers. That is, in a way that is honest and fair, in line with the objective of AER's design principles for communications for customers.[82]

Where a customer responds to or engages with retailer communications, the Commission considers that retailers are responsible for maintaining a record of customer acknowledgement, in whatever form it is provided. The final rule aims to ensure thorough engagement takes place, while not placing onerous communication requirements on retailers.

77 Submissions to the draft determination: Origin, p. 1; AGL, p. 5.
78 ActewAGL, submission to the draft determination, p. 4.
79 Final rule, rule 111(3A).
80 Final rule, rule 111(3A)(a).
81 Final rule, rule 111(3A)(b).
82 AER, Draft retail guidelines, June 2026.

3.3 The final rule applies the minimum disconnection amount to all customers

The Commission has made a final rule to apply the minimum disconnection amount to all customers, regardless of whether they explicitly agree to repay outstanding debts.[83] There is no change from the draft rule in this respect.

Currently, the NERR prohibits disconnection for non-payment of a bill where a customer has accumulated debt below the minimum disconnection amount[84] and has explicitly agreed to repay their debt.[85]

Therefore, customers who have not agreed to repay their debt are not afforded the same protections even where their debt is below the minimum disconnection amount.

Recent data from the AER indicates that around 2.3 per cent of residential customers have energy debt of 90 days or more, reaching the highest levels in five years.[86] This is accompanied by an assistance gap, with approximately one-third of customers in energy debt not receiving support through a payment plan or hardship program.[87] This suggests there are customers experiencing payment difficulties who are not receiving adequate assistance or may not be aware of the assistance available to support them.

The Commission acknowledges many First Nations households have prepayment meters and experience frequent payment difficulties and electricity disconnections. As reported by the First Nations Clean Energy Network and Original Power, First Nations households on prepayment meters often experience energy affordability challenges. This leads to regular disconnections, with almost 9,000 households experiencing around 440,000 disconnection events in a single year across three States and Territories.[88]

The Commission notes prepayment meter arrangements are outside of the regulatory scope of the National Energy Customer Framework (NECF). As a result, the consumer protections discussed in this final determination often do not apply to, or are incompatible with, prepayment arrangements. This can lead to inconsistent experiences in the assistance provided and received by these communities.

The Commission supports recommendations in The right to power - keeping First Nations' communities on prepayment connected report, which seek to minimise disconnection and improve energy security for First Nations communities.[89]

Most stakeholders supported applying the minimum disconnection amount to all customers

Stakeholders broadly supported applying the minimum disconnection amount to all customers, regardless of whether they have agreed to repay their debt.[90]

JEC and SACOSS, in a joint submission, viewed the proposal as an important measure to ensure protections apply consistently, regardless of a customer's engagement.[91]

83 Final rule, rule 116(1)(g).

84 The amount increased from $300 to $500 effective from 1 July 2026, following the AER's minimum disconnection amount review 2025.

85 NERR, rule 116(1)(g).

86 AER, Quarterly retail performance update January to March 2026, June 2026. Note: this excludes hardship customers.

87 AER, Annual retail markets report 2024-25, 1 December 2025.

88 First Nations Clean Energy Network and Original Power, The right to power – keeping First Nations' communities on prepayment connected, November 2025.

89 Ibid.

90 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 4; AGL, p. 6; Red/Lumo, p. 2; JEC, SACOSS - joint submission, pp, 4, 5; ActewAGL, p. 5.

91 JEC, SACOSS - joint submission, submission to the draft determination, pp, 4, 5.

Powershop opposed the proposal, as it considered it would cause retailers to accumulate more unpaid debt, increasing costs and affordability issues for other customers from cross-subsidisation.[92]

3.3.1 The final rule applies the minimum disconnection amount to all customers to avoid disproportionate costs and harm from small debts

The Commission considers the minimum disconnection amount should apply to all customers, rather than being limited to those who agree to repay their debt. While disconnections are relatively uncommon, they can have significant consequences for affected customers.

Disconnections in the third quarter of 2025-26 affected around 0.12 per cent of residential electricity customers and 0.07 per cent of residential gas customers across the National Electricity Market.[93] The Commission considers that, regardless of their prevalence, the impacts and costs of disconnection can be significant and disproportionate to relatively small levels of debt under a universal $500 minimum disconnection amount.

The Commission considers the responsibility for supporting customers experiencing payment difficulty should primarily rest with retailers, who are best placed to proactively identify customers in need and offer assistance at an early stage. The Commission expects retailers to take reasonable steps to engage with customers and provide access to payment difficulty assistance before debts escalate to levels that increase the risk of disconnection.

92 Powershop, submission to the draft determination, p. 2.

93 AER, Schedule 3 - Quarter 3 2025-26 retail performance data, 24 June 2026.

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

This chapter sets out the Commission's final rule and reasoning covering Theme 2 and changes to:

- streamlining payment difficulty assistance eligibility categories
- offering clearer and more accessible information on retailer websites
- providing assistance information on reminder and disconnection warning notices.

In summary, the Commission has made a final rule that:

- Streamlines payment difficulty assistance eligibility categories:
  - The final rule will ensure that customers who self identify and those who are identified by their retailer as experiencing payment difficulty are offered the same assistance protections. This will align payment difficulty eligibility categories under the NERR with those currently under the NERL.[94]
- Requires retailers to offer clearer, more accessible information on their websites:
  - Retailers will be required to provide information about available payment difficulty assistance, a summary of the hardship policy and information about concessions on their website. This information will need to be easily accessible and expressed in plain language.[95] The final rule includes a minor clarification to clearly distinguish between information relevant to hardship customers and that relevant to those experiencing payment difficulty.
- Provides assistance information on reminder and disconnection warning notices:
  - Retailers will be required to include information on payment difficulty assistance, access to hardship policies, and available government rebates and concessions on reminder and disconnection warning notices.[96] Similar to the above requirement, the final rule includes a minor clarification to clearly distinguish between information relevant to hardship customers and that relevant to those experiencing payment difficulty.

The Commission considers these changes will improve the clarity, accessibility and consistency of payment difficulty assistance information, supporting earlier and more effective engagement with customers experiencing payment difficulties.

4.1 Streamlining payment difficulty assistance eligibility categories

The Commission has made a final rule aligning the NERR with the NERL so that customers receive the same payment difficulty assistance regardless of whether they self-identify or are identified by their retailer.[97] There is no change from the draft rule in this respect.

Currently, the eligibility framework in the NERR is not aligned with the eligibility framework in the NERL. The NERL eligibility categories apply to customers experiencing payment difficulty who self-identify or are identified by their retailer. In contrast, the NERR category only captures customers experiencing payment difficulty who self-identify. As a result, customers who are identified by their

94 Final rule, rule 33(1)(b) and 111(2).

95 Final rule, rule 56(1)(d) and (e), 56(5).

96 Final rule, rule 109(2)(d), 110(2)(f)(iii) and (iv). This aims to build on the AEMC's Concessions rule change published 25 September 2025 that requires retailers to provide relevant jurisdiction-specific information on concessions, rebates and relief schemes.

97 Final rule, rules 33(1)(b) and 111(2).

retailer as experiencing payment difficulty are not necessarily afforded the same protections as those who self-identify. This lack of alignment creates multiple different eligibility categories, with differing assistance obligations for retailers.

Stakeholder submissions broadly supported streamlining payment difficulty assistance eligibility categories

Overall, stakeholders supported the draft policy position in the draft determination.[98]

Consumer groups strongly supported the proposal to strengthen protections and ensure customers receive assistance when experiencing payment difficulties.[99]

Retailers and SAPN agreed all customers facing payment difficulty should have access to comprehensive payment assistance, regardless of whether they proactively seek help.[100]

Two retailers sought greater clarity about how retailers should identify payment difficulty in practice.[101] For example, identification from a combination of sustained missed payments, failed payments and increasing debt levels.[102]

The Commission notes retailers should continue to comply with existing requirements in the NERL[103] and use their judgement based on customer information and history, such as missed payments, to identify customers experiencing difficulties.

4.1.1 The final rule seeks to streamline payment difficulty assistance eligibility categories

The Commission considers aligning the NERR with the NERL will ensure that all customers experiencing payment difficulty, whether they self-identify or are identified by their retailer, are entitled to the same assistance and protections. Further, the change will support the consistent application of payment difficulty assistance across the eligibility categories and clarify retailer obligations between the NERL and NERR.

The Commission notes the change is not expected to substantially affect or alter current retailer reporting metrics and will align with the single definition of customers experiencing payment difficulty sought by the AER through the ECMC.[104]

The change will also align the NERR more closely with the Victorian Framework, with assistance items under the Energy Retail Code of Practice being offered to all customers, regardless of how the retailer's belief of payment difficulty arises.

4.2 Offering clearer and more accessible information

The Commission has made a final rule requiring retailers to:

- publish a summary of information about available assistance customers experiencing payment difficulties are entitled to on their website. This includes the retailer's hardship policy and relevant government support schemes.[105]

98 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 4; JEC, SACOSS - joint submission, p. 6; AGL, p. 7; Red/Lumo, p. 1; ActewAGL, p. 2; Origin, p. 2; Powershop, p. 2; SA Power Networks, p. 1.

99 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 4; JEC, SACOSS - joint submission.

100 Submissions to the draft determination: AGL, p. 7; Red/Lumo, p. 1; ActewAGL, p. 2; Origin, p. 2; Powershop, p. 2; SA Power Networks, p. 1.

101 Submissions to the draft determination: ActewAGL, p. 2; Powershop, p. 2.

102 Submissions to the draft determination: ActewAGL, p. 2; Powershop, p. 2.

103 NERL s 50(1)(b).

104 AER, Simplifying the eligibility framework, rule change request, p. 1.

105 Final rule, rule 56(1)(d) and (e), 56(5).

- include a summary of available assistance customers are entitled to and how to access it in reminder and disconnection warning notices. This includes the retailer's hardship policy and the relevant government-funded support schemes available in the customer's jurisdiction.[106]

For both of these requirements, the final rule:

- explicitly references the assistance that customers experiencing payment difficulty are entitled to. The Commission considers this provides clarity that the required summary of information should include not only a summary of the hardship policy, but also any additional assistance available to customers experiencing payment difficulties.[107] This is not a change from the draft rule.
- is largely consistent with the draft rule, with a minor change to ensure it correctly captures differences in assistance between payment difficulty and hardship customers in the NERR.

Currently, the NERR does not require retailers to publish information about available payment difficulty assistance, including a summary of their hardship policy or information about concessions, on their website.[108] The NERR also does not require retailers to include information on how to access assistance on reminder and disconnection warning notices.

Stakeholder submissions broadly supported clearer and more accessible information on retailer websites and assistance information on reminder and disconnection warning notices

Overall, stakeholder submissions supported retailers offering clearer, more accessible assistance information online. They generally considered better website information an important way to reduce barriers to assistance, improve awareness of support options, and encourage earlier engagement by customers experiencing payment difficulty.[109]

A few stakeholders raised some suggestions on the application of the draft rule:

- JEC and SACOSS, in a joint submission, also noted many customers do not have access to the internet, to help them understand the support available to them. They proposed stronger requirements by requiring information to be available through the same preferred channels consumers use to manage their accounts, whilst prominent and translated where appropriate.[110] The Commission notes under existing arrangements, retailers must provide customers a summary of their rights and entitlements at the customer's request for this information. This includes customers without internet access.[111]
- Origin considered it would be more practical for retailers to provide customers with assistance tailored to their circumstances and preferences, rather than all relevant support information.[112] The Commission recognises that customers may be entitled to government-funded energy rebates, concession or relief schemes, without experiencing payment difficulty. The final rule, therefore, references these separately to ensure the rules accurately reflect the different types of assistance available to different groups of customers.[113]

Most stakeholder submissions also supported requiring payment difficulty assistance information on reminder and disconnection warning notices. They viewed it as a practical way to improve

106 Final rule, rule 109(2)(d), 110(2)(f)(iii) and (iv).
107 Final rule, rule 56(1)(d) and (e), 56(5); rule 109(2)(d) and 110(2)(f)(iii)and (iv).
108 Rule 56 (1) of the NERR.
109 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 4; AGL, p. 7; SA Power Networks, p. 1; Red/Lumo, p. 2; JEC, SACOSS - joint submission, p. 6; ActewAGL, p. 5; Origin, p. 2.
110 JEC, SACOSS - joint submission, submission to the draft determination, p. 6.
111 Rule 56(2) and (3) of the NERR.
112 Origin, submission to the draft determination, p. 2.
113 Final rule, rule 56(1)(e)(i), 109(2)(d)(iii)(1), 110(2)(f)(iv)(1).

awareness of assistance, promote earlier customer engagement and help prevent avoidable disconnection.[114]

Energy Queensland considered the changes to reminder and disconnection warning notices unnecessary, with the view it undervalues the protections and customer support mechanisms already in place.[115]

A few stakeholders suggested considerations for the implementation or a minor change to the draft rule:

- ActewAGL emphasised information on the notices should be concise, with the action required from the customers and its deadline prominent.[116]
- SA Power Networks considered it inappropriate for distributors to include information about retailer-specific assistance programs or hardship policies on notices DNSPs issue to customers.[117] The final rule clarifies only retailers (ie, not including distributors) are required to provide customers with relevant assistance information, including a retailer's hardship policy, in reminder and disconnection notices. Distributors may advise customers to contact their retailer for their retailer's hardship policy and other assistance information in distributor disconnection warning notices.[118]
- In bilateral discussions, the AER suggested a minor refinement to the draft rule so that it correctly captures what protections payment difficulty customers versus hardship customers are entitled to. The Commission recognises that customers experiencing payment difficulty may not be in hardship. As such, the final rule references a summary of the retailer's hardship policy separately to assistance available to customers experiencing payment difficulty and how to access such assistance.

4.2.1 The final rule seeks to offer clearer and more accessible information on retailer websites

The Commission considers improving the accessibility and clarity of assistance information will support more consistent and transparent communication of payment assistance options. This will make it easier for customers to understand what support is available and how to access it.

This approach is also largely consistent with the broader direction of recent reforms, including the AEMC's Assisting hardship customers final rule,[119] final rule for Improving the application of concessions to bills[120] and our recent Improving life support processes final rule.[121]

The Commission does not intend for retailers to meet the final rule by providing lengthy or difficult to navigate documents. Retailers should present communications with customers in line with the AER's Retail guidelines. We note the level of detail expected for the 'summary of the retailer's hardship policy' could vary depending on the medium and NERR requirements. This approach would support customer awareness, while ensuring that the level of detail is appropriate for the relevant communication type.

We note the AER has released draft Retail guidelines as part of its Retail guideline review. This guideline outlines that key information on available assistance must be presented in plain

114 Submissions to the draft determination: EWON, EWOQ, EWOSA - joint submission, p. 1; ECA, p. 2; AGL, p. 7 SA Power Networks, pp, 1, 2; Red/Lumo, p. 2; JEC, SACOSS - joint submission, p. 7; ActewAGL, p. 5.

115 Energy Queensland, submission to the draft determination, pp, 1, 2.

116 ActewAGL, submission to the draft determination, p. 5.

117 SA Power Networks, submission to the draft position, p. 2.

118 Under rule 119(3) of the NERR, distributors are required to issue disconnection warning notices in certain circumstances.

119 AEMC, National Energy Retail Amendment (Assisting Hardship Customers) Rule 2025 No 2, 19 June 2025.

120 AEMC, National Energy Retail Amendment (Improving the application of concessions to bills) Rule 2025 No. 5, 25 September 2025.

121 Final National Energy Retail Amendment (Improving life support processes) Rule 2026, 25 June 2026.

language and is readily accessible for customers. That is, key information that is easy to find, clear and understandable for customers with different needs (e.g., language barriers).[122]

4.2.2 The final rule requires assistance information on reminder and disconnection warning notices

The Commission considers this change will complement the final rule to require more accessible information about assistance on retailer websites, ensuring customers are provided with relevant assistance information at key points in the disconnection process before disconnection occurs. Providing this information at these critical stages will improve awareness of available support and how to access it.

122 AER, Draft retail guidelines, June 2026.

A Rule making process

A fast track rule change request includes the following stages:

- a proponent submits a rule change request
- the Commission initiates the rule change process by publishing a draft determination and draft rule (if relevant) and seeking stakeholder feedback
- stakeholders lodge submissions on the draft determination and engage through other channels to make their views known to the AEMC project team
- the Commission publishes a final determination and final rule (if relevant).

You can find more information on the rule change process on our website.[123]

A.1 The process to date

On 21 May 2026, the Commission published a notice advising of its intention to initiate the rule making process in respect of the rule change request.[124] The Commission decided to fast-track this rule change request. This is because it concluded that the consultation carried out by the AER was adequate for the nature and content of the request.[125]

Accordingly, the Commission published a draft rule determination on 18 June 2026 without first consulting on a consultation paper. The Commission received 13 submissions on the draft rule determination. Issues raised in submissions are discussed and responded to throughout this final rule determination.

123 See our website for more information on the rule change process: https://www.aemc.gov.au/our-work/changing-energy-rules

124 This notice was published under section 251 of the NERL.

125 The decision to fast-track the rule change request was made under section 253(1)(a) of the NERL.

B Legal requirements to make a rule

This appendix sets out the relevant legal requirements under the NERL for the Commission to make a draft rule determination.

B.1 Final rule determination and final rule

In accordance with section 259 of the NERL, the Commission has made this final rule determination, for a more preferable final rule in relation to the rule proposed by the AER.

The Commission's reasons for making this final rule determination are set out in chapter 3 and chapter 4.

A copy of the more preferable final rule is attached to and published with this final determination. Its key features are described in chapter 3 and chapter 4.

B.2 Power to make the rule

The Commission is satisfied that the more preferable final rule falls within the subject matter about which the Commission may make rules.

The more preferable final rule falls within:

- section 237(1)(a)(i) of the NERL as it relates to the provision of energy services to customers, including customer retail services and customer connection services
- section 237(1)(a)(ii) of the NERL as it relates to the activities of persons involved in the sale and supply of energy to customers.

B.3 Commission's considerations

In assessing the rule change request the Commission considered:

- its powers under the NERL to make the final rule
- the rule change requests
- stakeholder input to the AER's Review of payment difficulty protections in the National Energy Customer Framework
- stakeholder submissions to the draft determination and draft rule
- the Commission's analysis as to the ways in which the final rule will or is likely to contribute to the achievement of the NERO
- the extent to which the rule is compatible with the development and application of consumer protections for small customers.

There is no relevant Ministerial Council on Energy (MCE) statement of policy principles for this rule change request.[126]

126 Under s. 225 of the NERL the AEMC must have regard to any relevant MCE statement of policy principles in making a rule. The MCE is referenced in the AEMC's governing legislation and is a legally enduring body comprising the Federal, State and Territory Ministers responsible for energy. On 1 July 2011, the MCE was amalgamated with the Ministerial Council on Mineral and Petroleum Resources. In December 2013, it became known as the Council of Australian Government (COAG) Energy Council. In May 2020, the Energy National Cabinet Reform Committee and the Energy Ministers' Meeting were established to replace the former COAG Energy Council.

B.4 Civil penalty provisions and conduct provisions

The Commission cannot create new civil penalty provisions or conduct provisions. However, it may recommend to the energy ministers that new or existing provisions of the NERL be classified as civil penalty provisions or conduct provisions.

Where the final rule amends provisions that are currently classified as civil penalty provisions, the Commission does not propose to recommend to the energy ministers any changes to the classification of those provisions. The Commission has consulted with the AER on the changes to NERR rule 56 and the AER supports this decision.

Table B.1: Civil penalty provision recommendation

Rule	Description of rule	Current classification	Reason to retain classification
56	Rule 56 sets out general requirements on retailers to provide information to small customers. The final rule would require: • retailers to provide further information about the assistance that customers experiencing payment difficulties may be entitled to, including a summary of the retailer's hardship policy and information about all relevant government funded energy charge rebate, concession or relief schemes • all information to be provided by a retailer under rule 56(1) to be easily accessible on the retailer's website and expressed in plain language.	Tier 2	As the final rule would extend the obligation on retailers to provide information to small customers, no change to the civil penalty tiering is recommended.

Abbreviations and defined terms

AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
BECE	Better Energy Customer Experiences
Commission	See AEMC
DCCEEW	Department of Climate Change, Energy, the Environment and Water
ECA	Energy Consumers Australia
ECMC	Energy and Climate Change Ministerial Council
ESC VIC	Essential Services Commission of Victoria
EWON	Energy and Water Ombudsman New South Wales
EWOQ	Energy & Water Ombudsman Queensland
EWOSA	Energy & Water Ombudsman South Australia
JEC	Justice and Equity Centre
MC	Metering Coordinator
MCE	Ministerial Council on Energy
MP	Metering Provider
NECF	National Energy Customer Framework
NERL	National Energy Retail Law
NERO	National Energy Retail Objective
NERR	National Energy Retail Rules
Proponent	The individual / organisation who submitted the rule change request to the Commission
SACOSS	South Australian Council of Social Service
SAPN	SA Power Networks
The AER Review	The AER Review of payment difficulty protections in the National Energy Customer Framework