



ACOSS submission to ACCC Retail
Electricity Price Inquiry: preliminary report

December 2017



Who we are

ACOSS is a national voice for the needs of people experiencing poverty, disadvantage and inequality and the peak body for the community services and welfare sector.

Our vision is for a fair, inclusive and sustainable Australia where all individuals and communities can participate in and benefit from social and economic life.

What we do

ACOSS leads and supports initiatives within the community services and welfare sector and acts as an independent non-party political voice.

By drawing on the direct experiences of people affected by poverty and inequality and the expertise of its diverse member base, ACOSS develops and promotes socially and economically responsible public policy and action by government, community and business.

ACOSS would like to thank members of the ACOSS Climate and Energy Policy Network for input and guidance into this submission. ACOSS takes responsibility for final views and recommendations.

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1 Introduction

ACOSS welcomes the ACCC's preliminary report on retail electricity pricing inquiry. ACOSS is participating in this inquiry representing the interests of people on low-incomes and those experiencing the impacts of poverty and disadvantage in Australia, as well as our role as the peak body for the community services sector. We also acknowledge the great work by other community organisations engaging in the ACCC's inquiry.

ACOSS welcomes the depth of analysis and focus on problems outlined in the Preliminary Report. In particular we welcome the analysis and acknowledgement by the ACCC that vulnerable consumers face particular barriers to engaging in the retail market.

As the ACCC report found, while there may be evidence that some at risk households actively engage in the energy market to try to find the best deals, there is also a significant proportion of vulnerable households who do not access the same low cost offers, and are being further penalised as a result of their vulnerability, whether it be through lack of access to the internet, language and literacy skills, time, trust, and understanding of the complicated practices of electricity retailers.

ACOSS and its members are concerned that retail competition has resulted in retailers maximising their profits from disengaged customers in order to subsidise discounts and special offers for more engaged customers. This price discrimination is unfair as it disproportionately affects those most in need of affordable energy.

At the heart of the problem is the nature of electricity as an essential service. Unlike other goods and services offered in a market, we can't choose not to consume electricity, it is fundamental to our daily lives, economic participation, and our health and wellbeing.

The latest ACOSS figures identify 3 million people, including over 731,000 children, already living in poverty in Australia. The number of people struggling with energy stress is likely to be much higher. While we know how many households have been disconnected or are on hardship programs due to challenges paying energy bills, we have no real way of knowing how many people are going without

Figure 1: Factors influencing electricity price and total costs of securing energy



heating, cooling, food, and other essential items to the detriment of themselves and family in order to pay bills.

As depicted in figure 1, it's not only the price of electricity that causes energy poverty, it's also the size of the bill and a household's capacity to pay. Factors such as energy efficiency of your home, whether you rent, your level of income, access to concessions, medical needs, size of household, and other financial stressors such as housing costs, all contribute to create energy stress.

ACOSS welcomed the ACCC's acknowledgement of some of these issues and the preliminary reports discussion on disconnections, hardship policies, concessions, energy efficiency and renters.

On pages 154 to 155, the ACCC has flagged key areas of focus for the remainder of the inquiry which go the heart of improving competition and engagement in the retail market. ACOSS urges the ACCC to also focus on what is to be done to support the millions of people who face barriers to engagement in the market and/or where other circumstances outside the market are drivers for unaffordable electricity bills. For these people the system is failing.

Delivering affordable clean energy will require non-energy market solutions as well as solutions across the whole supply chain, and federal and state government leadership recognising that people cannot be left behind. In the report *Empowering disadvantaged households to access affordable, clean energy*, by ACOSS, BSL and TCI, a framework was developed that identified five core areas of focus to support low-income and disadvantaged households access affordable clean energy. We encourage the ACCC to explore further each of the elements of the framework outlined in figure 2.

Figure 2: Five outcomes to provide clean, affordable electricity for all



2 Improving market competition

ACOSS welcomed the 16 commitments (as outlined in appendix 1), the Prime Minister and the eight major energy retailers have negotiated, and welcomes the ACCC's proposal to monitor the implementation of these commitments and their success, including whether they should be rolled out or expanded.

Given the initial findings in the ACCC Report, ACOSS believes further reform will be needed.

2.1 Customer focus

The ACCC preliminary report discussed briefly the approach of the United Kingdoms in setting enforceable Standards of Conducts in their energy sector that require suppliers to treat consumers "fairly". The Report noted the UK recently made a change to the definition of "fairness test", as shown in figure 3, which shifted the focus of the fairness test to put customers at the heart of their business and treat them fairly. This change was supported by a number of community sector organisations. For example Christians Against Poverty argued:

“Due to the essential nature of energy and the imbalance of power in the energy market between suppliers and consumers, it is important to be clear that acting in a way that creates or fails to prevent consumer detriment is unacceptable, irrespective of whether the supplier has explicitly favoured their own interests or has also suffered a net loss.”¹

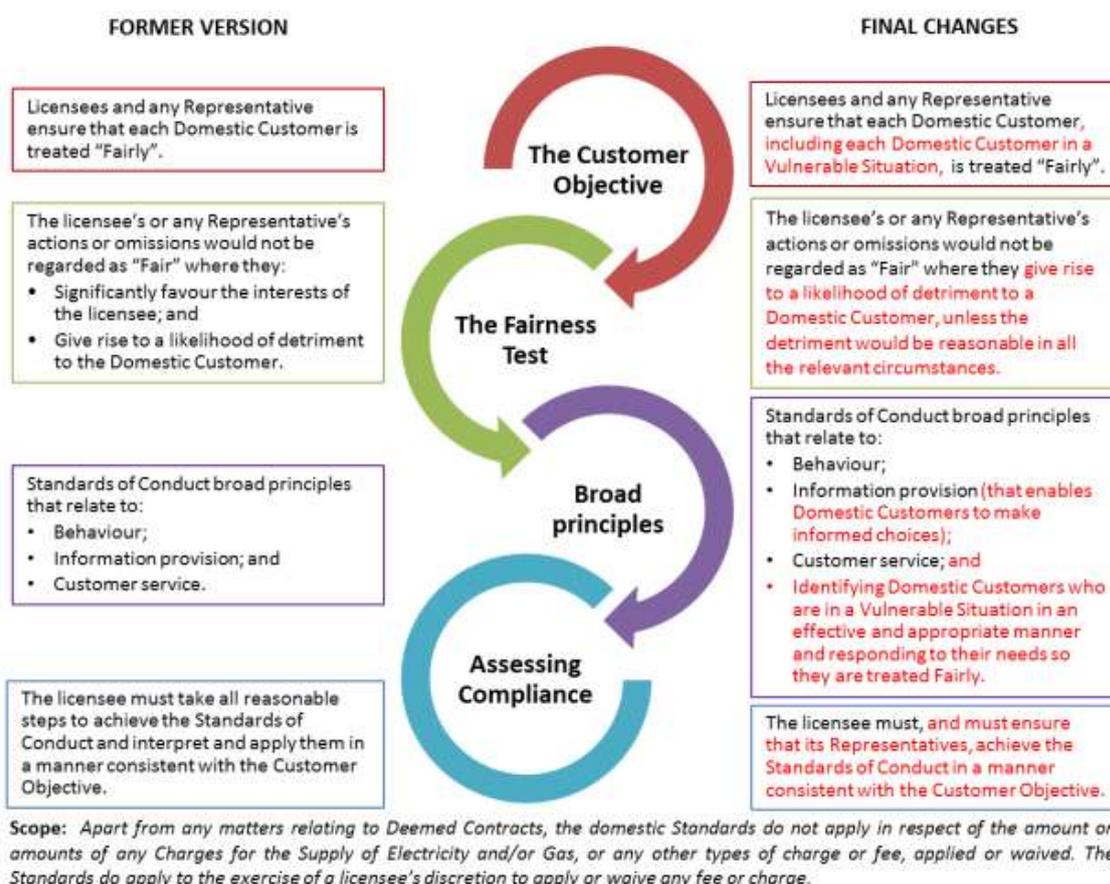
ACOSS believes such as fairness test would prevent detrimental practices like ‘pay on time discounts’, which are particularly detrimental to people on low income or experiencing disadvantage that prevents them paying on time.

Another important change made was to include a broad vulnerability principle in the domestic Standards of Conduct. As shown in figure 3 below, a reference to vulnerable customers was included in the ‘customer objective’ as well as the ‘broad principles’. Importantly the principle puts the onus on retailers to make an effort to ‘identify’ customers in a vulnerable situation. Again the inclusion of broad vulnerability principles was supported by the community sector.

ACOSS notes in Australian energy sector there is no standards of conduct for retailers or fairness test would welcome further consideration by the ACCC of the benefits.

¹ Christians Against Poverty (2017) Standards of Conduct for suppliers in the retail energy market: CAPS’ official response to ofgem’s consultation.
https://www.ofgem.gov.uk/system/files/docs/2017/06/christians_against_poverty_response.pdf

Figure 3: Changes to the United Kingdom’s domestic Standards of Conduct for the energy market²



Recommendation 1: The ACCC further considers amending the National Energy Retail Law (NERL) to include an enforceable Code of Conduct that puts customers at the heart of retail business, and ensures retailers conduct does not give rise to detriment of customers.

Recommendation 2: The ACCC propose improving the AER’s powers to investigate possible breaches of energy regulation.

2.2 Improve comparability and tools to support meaningful choice

ACOSS welcomes the discussion in the ACCC Report regarding comparability and tools to help consumers compare retail offerings.

² Ofgem (2017) Decision to modify the domestic and non-domestic Standards of Conduct https://www.ofgem.gov.uk/system/files/docs/2017/08/final_decision_-_standards_of_conduct_for_suppliers_in_the_retail_energy_market.pdf

The preliminary report notes the one of the action items from the meeting between the Prime Minister and electricity retailers was the development of simple, plain English fact sheets with understandable comparison rates, and the AER is developing an issues paper. ACOSS notes the challenges experienced in the UK of providing per unit basis for a period of time and average usage, and notes the complexity of electricity compared to say a mortgage loan where consumers compare interest rates. However we agree with the ACCC that the complexity is not insurmountable, and given the essential nature of electricity it is critical there is greater standardised language, standardised comparison rates and limit on terms and conditions, to ensure transparency and enable consumers to compare apples with apples.

Recommendation 3: Regulate standardised language, standardised comparison rates and limits on terms and conditions to ensure transparency and enable consumers to compare apples with apples.

ACOSS supports access to government operated price comparator website, if recommendation 3 - to regulate standardised language, standardise comparison rates and limits on use of terms and conditions - is implemented. ACOSS agrees with the ACCC's assessment of what is needed to improve and better promote the current AER site *Energy Made Easy*. In addition ACOSS recommends the following improvements be made:

Recommendation 4: Improve *Energy Made Easy* website to provide recommendations of at least the three best offers for the user's circumstances.

Recommendation 5: Expand *Energy Made Easy* Service to allow people who don't have access to the website or have difficulties using the site, to contact a person for advice.

2.3 Improve communications/outreach

ACOSS welcomes the agreement between the Prime Minister and electricity retailers for retailers to write to all standing offer tariff customers by the end of 2017, reminding them they are on a standing offer and informing them that alternative offers are available on the market.

ACOSS however is concerned that contacting customers through a letter only may not be sufficient, especially for people with low literacy, non-english speaking and low trust, and urge retailers to use at least two methods of communications to reach customers. In addition ACOSS believes that it should become standard that customers are contacted via two methods when there is a price increase or change, and after a defined period on a standing offer.

Recommendation 6: Requirement for retailers to use their best endeavours to contact people which should include at least two methods, including writing, phoning or texting:

- When, their current contract or benefit period is due to end (one month's notice) setting out specifically the estimated cost of them not doing anything to renew or renegotiate their offer;
- If they have been a customer for more than 2 years and are not on the retailer's best offer;
- When there is a price increase/change.

ACOSS notes that ultimately retailers should be making more effort to be more customer focused and contacting all customers and providing information, advice and best offers based on the customer's actual profile.

2.4 Address pay on time discounts

The ACCC noted that pay on time discounts arose in popularity after late payment fees were banned in Victoria and capped in other jurisdictions, observing that:

"...pay on time discounts, which have the same or greater impact as a late payment fee for those unable to pay on time, are not subject to any controls.....the size of pay on time discounts is significant, and can often amount to hundreds of dollars each year."

And:

"Should consumers fail to meet the requirement for on time payment, the effect of the conditional discount and in some cases the added late payment fees result in consumers incurring a bill either equal or above the standing offer. For those consumers with a limited capacity to pay, this presents a clear barrier to benefitting from the competitive options in the market."

ACOSS strongly recommends some form of regulation limiting pay on time discounts, and ensuring vulnerable people are exempt from incurring late fees.

Recommendation 7: cap the costs incurred by customers for failing to meet offer conditions such as pay-on-time discounts, and for this cap to not be higher than the reasonable costs to the retailer of non-compliance

Recommendation 8: the cost incurred from pay on time discounts are not applicable to vulnerable people on payment plans, hardship schemes or in receipt of rebate support.

2.5 Targeted support

Even with improved comparability, tools to assist engagement and outreach, there will be a significant portion of households who experience disadvantage or financial hardship that would benefit from tailored, trusted, ongoing support to engage with their energy use and with the energy market.

Support should cover a variety of issues, based on the customer's needs. Customers struggling to pay their energy bills are likely to need financial counselling and energy-related advice. This should be available prior to customers getting into substantial debt as well as in response to debt and disconnection. Many households are also likely to need support engaging in retail markets and in

gaining trusted information to assist in accessing solar and other distributed energy resources. Current programs are often curtailed by a severe lack of resources relative to the level of need.

Recently the Queensland Council of Social Service (QCOSS) ran a grants program called *Switched on Communities* providing community organisations with funding to implement tailored approaches to target specific customer groups to help their clients better understand their bills, compare electricity plans and access the support options available if they experience financial difficulty. Community awareness of the electricity market prior to the *Switched on Communities* activities was low to very low, with many participants not able to name their retailer or the type of offer they were currently on. Each organisation was able to give feed-back on specific barriers to market participation that their clients encountered, and provide innovative solutions to address them.

Recommendation 9: Federal, state, local councils, and retailers to cooperatively co-fund ongoing assistance programs, delivered by local place based social support services to inform and enable at risk households to engage with the energy market, and access other support programs such as concessions, energy efficiency subsidies, etc.

3 Beyond Competition – Supporting Low-income and disadvantaged households

As noted earlier unlike other goods and services offered in a market, we can't choose not to consume electricity, it is fundamental to our daily lives, economic participation, and our health and wellbeing.

Given the entrenched barriers and disadvantage that face many households, engaging with the energy market is a low priority or an impossibility.

For example, the AEMC's 2016 Retail Competition Report found that one-third of customers who were not interested in switching were significantly more likely to be from lower socio-economic backgrounds, have smaller energy bills, be more risk-averse and/or not technology-proficient by nature.

Consumers on low-income or experience disadvantage often lack choice and control, especially those who rent.

It is likely energy will remain a difficult service for most people to understand, and likely to become even more complex as the energy market transitions. ACOSS believe specific energy and non-energy market policies and programs will be important to ensure low-income and disadvantaged households are not worse off and are not left behind as the energy market transitions further.

3.1 Low cost/basic offer

The ACCC preliminary report clearly showed the current 'competitive' retail market is broken and major reform is needed. It is ACOSS's view that competitive market policies have not and will not meet the "essential service" needs of those people on low income or experiencing disadvantage who struggle to engage in the energy market. A very targeted policy tool is needed.

The Thwaites Review for Victoria Government has recommended a basic service offer to be set by the Essential Service Commission:

“Key to the reforms is the implementation of a basic service offer. This would require each retailer to provide a ‘no frills’ offer that does not exceed a regulated price. Consumers only interested in a basic ‘no frills’ service would have the option to select the Basic Service Offer and remain protected from the existing failures of the market. Retailers would be free to continue to offer additional offers at different prices which, may be lower than the ‘no frills’ option, or higher, to give consumers the choice to pay for any additional value offered by retailers. However, this Basic Service Offer would be available to all consumers and would represent a reasonable price of energy in the market. It would provide an option for consumers who just want affordable energy without the fuss.”

ACOSS believes a form of price regulation is necessary and there is merit in the Thwaites recommend Basic Service Offer. Concerns have been raised that a Basic Service Offer would reduce ability of tier 2 and 3 electricity retailers to compete (assuming the prices is based on efficiencies of tier 1 retailers), stifle innovation, and eliminate the cheap offers some consumers are currently resulting in some consumers being worse off. The benefits may outweigh the costs, and ultimately benefit the majority of people.

An alternate tool, could be a regulated low-priced energy offer targeted to low-income and disadvantaged households. The challenge would be setting an eligibility criteria that is implementable but doesn't exclude energy stressed or vulnerable households who don't qualify for concession cards or are not in hardship programs. The other risk, is it could exacerbate marketing behaviours that seek to maximise 'high value' customers and minimise potentially 'low value' customers.

ACOSS urges the ACCC to consider a range of price regulation measures, including a Basic Service Offer, and the distributional impact of the measures.

ACOSS notes, implementation of a regulated price would likely render some of the other recommendations in this submission unnecessary (such as comparator sites and third party switching services), but given regulated price reform would take some time, other recommendations could be implemented as a stop gap measure.

Recommendation 10: ACCC to consider a range of price regulation measures, including a Basic Service Offer, and the distributional impact of the measures, with a focus on low-income and disadvantaged households.

3.2 Third Party Services

VCOSS in their submission to ACCC Electricity Supply and Prices inquiry Issues Paper recommended the introduction of an independent brokering services for residential customers³ and in its recent submission to the ACCC preliminary report recommended the ACCC to investigate further an independent, government-backed automated switching service.⁴

A potential example is the Choice POWERUP, a switching service where customers provide prior consent, and are switched when any offer that provides a saving greater than \$150 becomes available.

In the absence of price regulation, like a Basic Service Offer, ACOSS believes there would be significant benefits for low-income and disadvantaged households in the establishment of an independent, not-for-profit brokering and switching service. Trust will be critical.

Recommendation 11: Explore further opportunities for customers to effectively 'outsource' their engagement to a trusted, independent, not-for-profit third party acting in their interests.

3.3 Energy Efficiency and productivity

Investment in energy efficiency can provide significant energy and bill savings. For example, raising a home from a 2-star to 5-star can result in a 54 per cent reduction in energy, which is equivalent to 32 per cent total energy saving, or up to \$600 in savings a year.⁵ There are other co-benefits as well including improved health and wellbeing, economic participation and emissions reductions.

The ACCC report notes

“The National Energy Productivity Plan has identified opportunities for more personally meaningful information and tools for consumers to promote greater energy efficiency, for example mobile applications that help households reduce energy use.”

While the National Energy Productivity Plan is welcome significant barriers remain, especially for low-income and disadvantaged households, including costs, renting, and information barriers.

Forty nine per cent of people on low incomes are living in rental properties, with 74% of low income renters renting from a private landlord. Private renters are significantly more likely to enter energy hardship programs than owner occupiers. A recent QCOSS report ‘Choice and Control?’ found that even

³ VCOSS (2017) Retail Electricity Supply and Pricing: submission to the ACCC inquiry

<https://www.accc.gov.au/system/files/Victorian%20Council%20of%20Social%20Service.pdf>

⁴ VCOSS (2017) VCOSS response to ACCC Retail Electricity Pricing Inquiry: Preliminary Report.

https://www.accc.gov.au/system/files/Victorian%20Council%20of%20Social%20Service_0.pdf

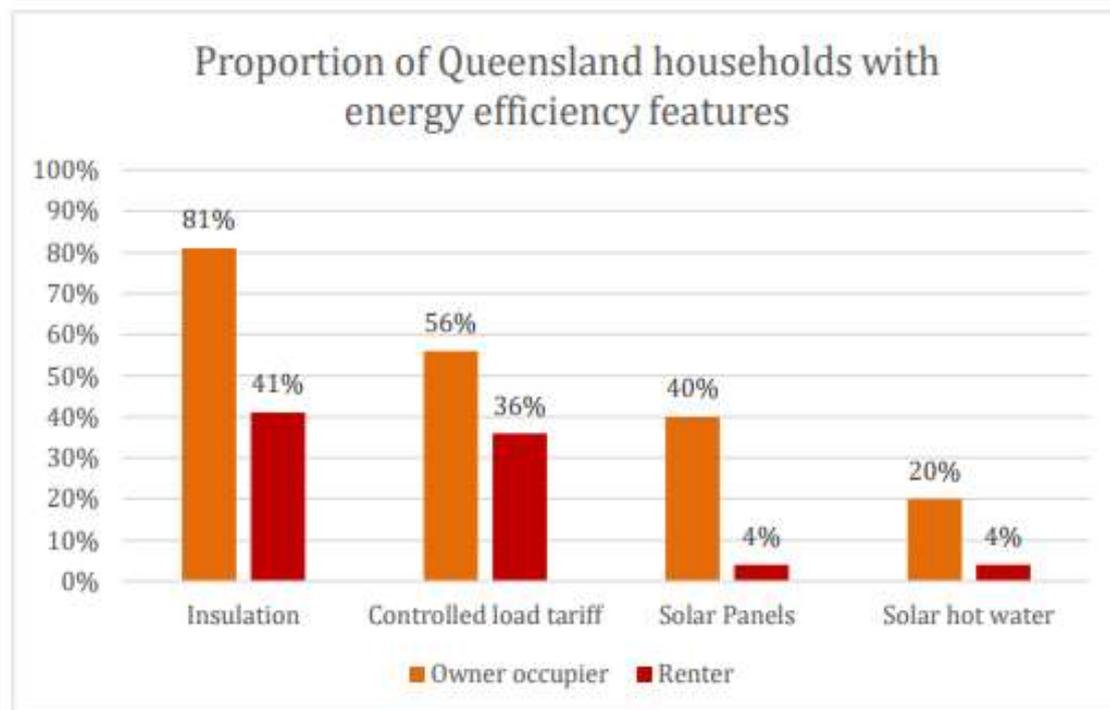
⁵ QCOSS (2017) Choice and Control? The experience of renters in the energy market.

<https://www.qcoss.org.au/sites/default/files/QCOSS%20Choice%20and%20Control%20%20the%20experience%20of%20renters%20in%20the%20energy%20market.pdf>

if energy efficiency programs were free or of no cost to the landlord, the landlord rarely took up the energy efficiency measures.⁶

Figure 4 demonstrates that renters have significantly less energy efficiency features than owner occupiers.

Figure 4: Comparison of owner occupied and rented Queensland households with energy efficiency features.⁷



ACOSS recommends a targeted strategies to overcome and renter landlord split and targeted support programs, especially for the most vulnerable households.

Recommendation 12: State and territory governments adopt and implement mandatory energy efficiency standards for rental properties.

Recommendation 13: Federal government review taxation policy with a view to designing and implementing landlord tax incentives for energy efficiency measures.

Recommendation 14: Raise minimum energy efficiency standards for all new builds.

Recommendation 15: Federal and state governments invest in best practice energy efficiency for all new builds and provide additional support to upgrade public and community housing stock in each state.

⁶ QCOSS (2017) Choice and Control? The experience of renters in the energy market. <https://www.qcoss.org.au/sites/default/files/QCOSS%20Choice%20and%20Control%20%20the%20experience%20of%20renters%20in%20the%20energy%20market.pdf>

⁷ Ibid.

Recommendation 16: Federal, state, local councils and energy retailers work cooperatively together to co-fund ongoing programs for low-income and disadvantaged households including access to energy efficient improvements (insulation, hot water systems, draught proof), solar PV and batteries. Higher levels of support should be provided to the most vulnerable households.

3.4 Improve capacity to pay

Energy concessions provide an important buffer against high prices, but they vary in amount, coverage and eligibility from jurisdiction to jurisdiction. Some of the lowest income households – such as those on the woefully inadequate Newstart – miss out on the Commonwealth utility support (pension supplement or utility allowance). Those on Newstart also miss out on state energy concessions in some jurisdictions. Refugees are ineligible eligible for concessions. Householders who are working but on relatively low, or variable incomes, may also miss out on concessions altogether.

A comprehensive report by KPMG for Energy Consumers Australia estimates that the total cost to governments of energy concession schemes (electricity and gas) is forecast to be \$875m in the 2016/17 Financial Year. Total GST receipts from residential electricity and gas expenditure is estimated at approximately \$1,600m. Concession schemes can therefore be considered to return around 55 per cent of the GST revenue raised. More targeted, percentage-based schemes could provide additional savings, especially if a concerted effort is made to improve energy efficiency in residential homes.

ACOSS supports the ACCC's clear recommendation for state and territory governments to review concessions policy to ensure that consumers are aware of their entitlements to concessions, that concessions are well targeted and structured to benefit those most in need and, where appropriate, that there is consistency between policies. ACOSS would like to see specific consideration given to the benefits of percentage-based scheme, delivered in a way where no-one is worse off.

Recommendation 17 – Support ACCC for state and territory governments to review concessions policy to ensure that consumers are aware of their entitlements to concessions, that concessions are well targeted and structured to benefit those most in need and, where appropriate, that there is consistency between policies. With specific consideration given to the benefits of a percentage-based scheme, delivered in a way where no-one is worse off.

According to the ACOSS report *Poverty in Australia 2016*,⁸ roughly three million people lived below the poverty line in 2013-14. Of those people, 57.3 per cent relied on income support payments as their main source of income.

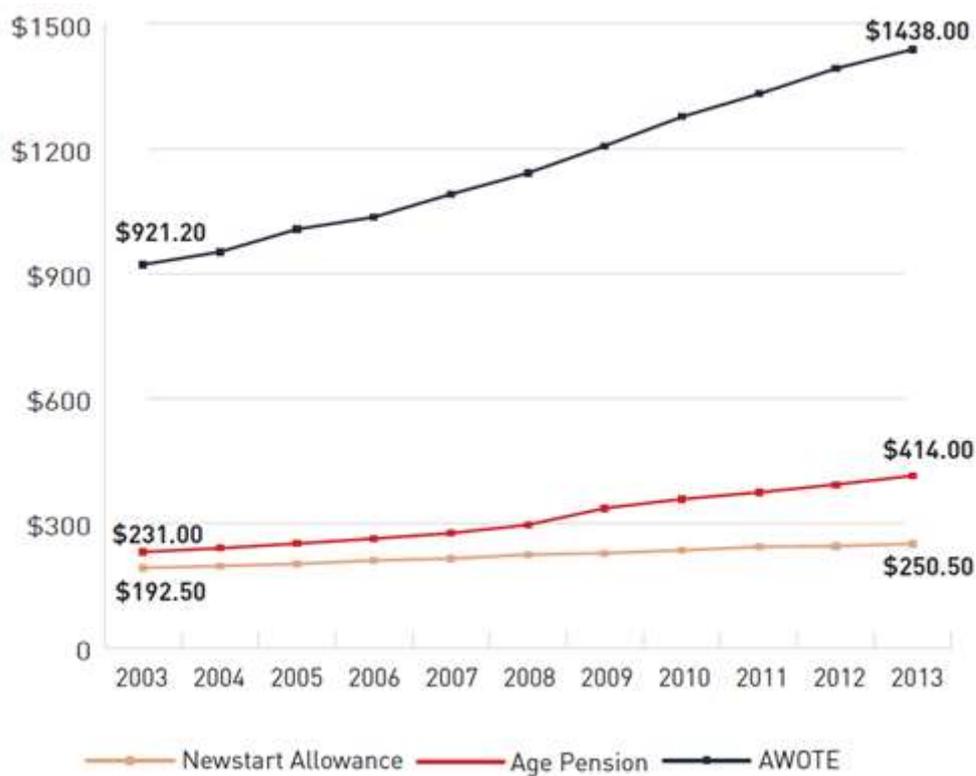
Social security reforms over the last few years have meant there is a growing number of people shifting off other payments to receive lower-rate social security payments (mainly Newstart), which increases the likelihood they will live in poverty. At the same time, a larger proportion of people receiving Newstart have a partial work capacity due to illness or disability or because they are primary carers of children. These groups have more difficulty finding suitable employment and remain on unemployment payments for extended periods of time.

⁸ The poverty line is drawn at 50 per cent of median after-tax income.

Those on Newstart Allowance are at least \$100 per week below the poverty line, and those on Youth Allowance are at least \$150 per week below the poverty line. These are untenable situations given increases in energy costs sustained over the last decade.

Further, most income support payments are indexed to price inflation rather than wage inflation. And some payments have recently had increases frozen for the next three years. People on allowances such as Newstart, for example, are particularly vulnerable because their allowances have not increased in real terms since 1994 (see figure 5). However, while electricity prices from 1984 to 2007 roughly matched inflation, after 2007 electricity prices accelerated ahead of inflation, increasing 83 per cent between 2008 and 2013.

Figure 5: Trends in payment rates compared with average wages (Source: ACOSS 2016 Poverty in Australia Figure 18)



There is a real need to lift the safety net of social security payments in Australia in line with the increasing costs of living, including housing affordability and energy prices. The most critical of these is Newstart.

Recommendation 18: ACCC supports calls for an immediate increase in Newstart benchmarked to essential costs of living.

4 Other

ACOSS supports other consideration raised by the ACCC, including:

- Boosting competition of wholesale market as discussed on pages 151 to 152. ACOSS encourages the ACCC to engage in the design of the National Energy Obligation (NEG) to ensure the final design does not lead to greater market concentration.
- Lowering network costs as discussed on pages 152 to 153.
- Ensuring cost effective and equitable environmental schemes as discussed on pages 153 and 154. ACOSS encourages the ACCC to engage in the design of the National Energy Obligation (NEG) to ensure the final design does not result in smearing costs across energy bills.

The ACCC report notes the changing nature of the energy system, including the uptake of solar PV, batteries, smart meters and other devices, and argues this presents challenges as well as opportunities.⁹ It's likely we will see more innovation in retail offerings for example in this space, but we could also see low-income and disadvantaged households be left further behind because of costs and access. There is a major policy gap emerging with no clear remit for anyone to develop policies and programs to ensure low-income and disadvantaged households are not left behind.

ACOSS believes there is a need to establish a review – like the Gas Market Reform Group (GMRG) – to lead the design, development and implementation of policies and programs to overcome challenges and maximise benefits of distributive energy with specific focus on ensuring the growth of distributive energy is inclusive and equitable and benefits low-income and disadvantaged households.

Recommendation 19: ACCC recommends establish a process – like the Gas Market Reform Group (GMRG) – to lead the design, development and implementation of policies and programs to overcome challenges and maximise benefits of distributive energy with specific focus on ensuring the growth of distributive energy is inclusive and equitable and benefits low-income and disadvantaged households.

⁹ ACCC (2017) Retail Electricity Pricing Inquiry: Preliminary Report. Pg 153
<https://www.accc.gov.au/publications/accc-retail-electricity-pricing-inquiry-preliminary-report>

Appendix 1 - Summary of Outcomes from Prime Ministers Meetings with Energy Retailers

Outcomes from 30 August 2017 meeting

1. Write to all standing offer tariff customers by the end of 2017, reminding them they are on a standing offer and informing them that alternative offers are available on the market.
 - a. Report back in 6 weeks with a proposal on the provision of more tailored information to customers in dollar terms based on past consumption, with a view to communicating this information to customers in 2018.
2. Work on marketing offers in dollar terms, rather than as percentage discounts. This will be part of the work already underway with the Australian Energy Regulator (AER) to develop a comparator rate and factsheets.
3. Provide customer data to the Australian Energy Market Commission (AEMC) to inform the socio-economic analysis of offers and locations. Data as at 30 June 2017 is to be provided to the AEMC for reporting by end of 2017 and data as at 31 March 2018 is to be provided for reporting by June 2018.
4. Retailers to outline how they will provide better emergency assistance for small and medium businesses.
5. Work with the Australian Government Behavioural Economics Team (BETA), the Department of the Environment and Energy and the AER on a trial to test different approaches to promoting consumer engagement.
6. The Government will work with the Australian Competition and Consumer Commission (ACCC) to examine the role of comparator websites and the information they provide to consumers.
7. Where appropriate metering exists, move as soon as practicable to implement monthly billing as the default arrangement for new market offers and work with Government to examine a rule change to enable monthly billing for standing offer customers.
8. Improve the pace of the customer transfer/switching process by ensuring customers with smart meters are switched two days after the cooling off period. In addition, work with the Government and the AER on the implementation of information technology to assist in third party engagement for customers and agree to improve standardised consent and verification forms as part of the switching process.
9. Work with the AER to identify and share best practice elements in hardship programs.
10. Support an expedited rule change to ban discounting off prices inflated above a retailer's standing offer.

11. Work with Government to review available concessions to ensure the neediest customers get the best market offer for them.

Outcomes from 9 August 2017 meeting

1. To write to customers who have **reached the end of their discount benefit** period and outline in plain English alternative offers available.
2. Outline to the Government and the ACCC the steps retailers are taking as individual companies to help customers get on to better offers, particularly what you are doing for families and individuals under a hardship program, including a commitment that these people will **not lose any benefit or discount for late** payment.
3. To produce clear, **user-friendly fact sheets** on terms, late payment penalties, early termination payments and to work with Government and the AER on key components such as comparator rate.
4. Regular **reporting to the AER of how many customers are on offers where the discount period** has expired.
5. To support expediting a rule change under the national electricity law **requiring a clear disclosure at the end of the benefit period of the dollar impact of not doing anything**, based on past consumption.