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4 August 2022

Mr Benn Barr
Chief Executive Officer
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

Dear Mr Barr

**National Electricity Amendment (Protecting Customers Affected by Family Violence)
Rule 2022 – Draft Rule Determination**

Ergon Energy Queensland Pty Ltd (Ergon Energy Retail) welcomes the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) in response to the *National Electricity Amendment (Protecting Customers Affected by Family Violence) Rule - Draft Rule Determination*.

Ergon Energy Retail is committed to protecting the safety of our customers through the provision of effective assistance for customers, and particularly those in hardship and experiencing payment difficulties. We acknowledge that family violence is one of a range of factors that can lead to hardship, and support protections and assistance being made available in the National Energy Retail Rules (NERR) for customers affected by family violence. We also suggest that this complex matter is best addressed under existing Hardship policies to ensure continuity and consistency in vulnerable customer practices across the National Electricity Market.

Ergon Energy Retail prides itself on its accomplishments in driving culture, skills and practices to respond to customers impacted by illness or injury, reduced income and unemployment, natural disasters, drought, and living in rural and remote community locations. During 2021-22, our front line (contact centre) agents responded to more than 780,000 inbound calls. Our teams are well versed in engaging across a broad range of topics which can include personal and health matters, life support need, financial vulnerability and the inability to pay a bill due to the loss of employment or spouse. The skills development and training necessary to achieve these accomplishments has been extensive, and we would welcome the opportunity to further engage with the AEMC to discuss the practicalities of imposing new mandatory skill requirements on front line agents.

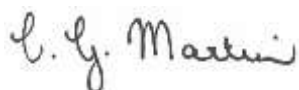
Ergon Energy Retail recognise the importance of protecting affected customer's personal information and prioritising their safety. We therefore seek confirmation that the Office of the Australian Information Commissioner has been engaged on issues related to privacy, and whether identifying a customer as an 'affected customer' causes issues related to express or implied consent to collect personal (and potentially sensitive) information.

Finally, we recognise the dedicated work a number of external family violence support services provide across Australia, and actively encourage customers to access these support groups when required. We support the publication of one or more external family violence support services on our digital channels which would include our website, and recommend that reasonable endeavours, as opposed to an obligation, are taken when providing information to affected customers purely due to the nature and sensitivity of these complex matters.

We acknowledge that progressing the Family Violence rule change is a challenging determination, and we congratulate the AEMC on its work to date.

Should the AEMC require additional information or wish to discuss any aspect of this submission, please contact me on 0438 021 254 or Andrea Wold on 0428 384 448.

Yours sincerely

A handwritten signature in black ink that reads "C. G. Martin". The signature is written in a cursive style.

Charmain Martin
Acting Manager Regulation

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