



National Energy Retail Amendment (Improving the application of concessions to bills) Rule

March 2025



About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at:

<https://www.salvationarmy.org.au/>





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Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQ+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQ+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQ+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: salvationarmy.org.au/about-us





Executive summary

The Salvation Army welcomes the opportunity to provide this submission to the Australian Energy Market Commission (AEMC) in relation to the National Energy Retail Amendment (Improving the application of concessions to bills) Rule (the rule change).

In this submission, The Salvation Army highlights our experience as a national provider of financial counselling and capability services. Our Moneycare services are embedded in local communities and have been supporting those experiencing, or at risk of experiencing, financial and social exclusion for over 35 years. Moneycare provides free and confidential advice and support nationally for managing debts and expenses, including energy bills, and assists consumers to gain access to eligible concessions, rebates and subsidies.

We have approached this submission from the perspective of our frontline services, providing insight into our experience supporting consumers to access concessions, rebates and subsidies. We highlight the barriers consumers seek our assistance with and suggest general improvements to sign-up, billing, communication and transfer processes.

The Salvation Army broadly support the proposed rule change, and this submission responds to questions 1, 3, 4, 5 and 7 of the consultation paper.

The Salvation Army has made **16** recommendations for the AEMC to consider. A summary of these recommendations is provided on the following pages.



Summary of recommendations

Recommendation 1

2.34 The Salvation Army recommends that the AEMC conducts active engagement with Aboriginal and Torres Strait Islander communities and organisations.

Recommendation 2

2.40 The Salvation Army recommends that the AEMC considers the additional barriers to accessing energy concessions, rebates and subsidies for:

- *Aboriginal and Torres Strait Islander people;*
- *Victim-survivors of family and domestic violence;*
- *CALD communities; and*
- *Young people.*

Recommendation 3

3.2 The Salvation Army recommends that the AEMC support the development of standardised scripts and processes for energy retailers to follow when opening a new energy account. This should include explaining concessions and requesting concession information from consumers.

Recommendation 4

3.4 The Salvation Army recommends that the AEMC's rule change set accessibility standards for all sign-up processes. This should include:

- *The usage of simple language;*
- *Availability of resources in languages other than English;*
- *Clear visual cues; and*
- *Use of images and videos.*

Recommendation 5

3.7 The Salvation Army recommends that the AEMC explore possibilities for developing a "basic" energy account type, to be offered by all retailers, that is targeted towards and promoted to concession eligible consumers.

Recommendation 6

3.9 The Salvation Army recommends that the AEMC's rule change include embedding a requirement for energy retailers to perform a CCeS check for customers who have consented as part of the sign-up process.

Recommendation 7

4.2 The Salvation Army recommends that the AEMC's rule change require energy retailers to guarantee the portability of accounts where the consumer is moving to another property serviced by the retailer.





Recommendation 8

4.5 The Salvation Army recommends that the AEMC's rule change seek to facilitate the incoming energy retailer's verification of consumer concessional eligibility directly with the outgoing retailer during a transfer.

Recommendation 9

4.8 The Salvation Army recommends that the AEMC's rule change provide scripted language that must be delivered to consumers when transferring retailers or closing an account. This script should include:

- *A summary of concessions applied on the account;*
- *Information of any concessions that the consumer may be eligible for but have not claimed;*
- *Guidance for how to access these concessions;*
- *Information on the risks and consequences closing this account will have on concessional eligibility; and*
- *Where the account is in arrears, information about financial counselling.*

Recommendation 10

5.4 The Salvation Army recommends that the AEMC's rule change set minimum accessibility standards for the design of and the language used within bills.

Recommendation 11

5.5 The Salvation Army recommends that the AEMC's rule change require energy retailers to provide periodic updates and communication to consumers regarding new concessions, subsidies or rebates they may be eligible for.

Recommendation 12

5.8 The Salvation Army recommends that AEMC's rule change require energy retailers to periodically review existing accounts for indications of potential missed concessions.

Recommendation 13

5.15 The Salvation Army recommends that energy retailers engage in proactive and ongoing outreach with consumers through collaborative place-based service delivery.

Recommendation 14

5.20 The Salvation Army recommends that AEMC's rule change consider requirements for accessible and trauma-informed service design and delivery. This should include scripting and guides for energy retailers and specialised staff training.

Recommendation 15

6.2 The Salvation Army recommends that the AEMC's rule change require energy retailers to administrate and deliver concessions, rebates and subsidies directly to consumers.





Recommendation 16

6.7 The Salvation Army recommends that the AEMC work with all governments to improve the concessions, subsidies, rebates and grant programs available to improve the energy efficiency of concession-eligible consumers' homes.





2 Question 1: Barriers to consumers receiving concessions or rebates at sign-up

- 2.1 Eligibility for most concessions or rebates is underpinned by factors such as age, disability and poverty.¹ The current systems and processes for learning about, applying for and receiving concessions and rebates relies on the consumer, as the stakeholder who already experiences significant barriers to access and affordability, being the most informed.
- 2.2 Application of and eligibility for concessions and rebates is a consistent underlying concern among community members presenting to Moneycare. Although the issue of unapplied concessions is more prevalent in some areas, community members experience harm across all jurisdictions from current processes.
- 2.3 Key barriers to consumers having their concessions or rebates applied during sign-up include not being asked about their eligibility, feeling ashamed to “ask for a discount”, not knowing about the existence of available programs, and being unaware of their eligibility for concessions or rebates.

Accessibility

- 2.4 Our experience shows that consumers who are eligible for concessions are more likely to have difficulty navigating sign-up processes. Compounding barriers including age, disability and financial stress that entitle consumers to concessions can exacerbate digital exclusion, and confusing and complex product offerings can overwhelm consumers.



“People can't make a good choice when they are stressed, they [energy retailers] give so many options and it confuses people.”



- Financial Counsellor, New South Wales

- 2.5 Phone sign-up processes can create additional barriers for consumers who experience limitations with verbal communication. Consumers with hearing difficulties, who have a disability or mental ill-health, or who are from culturally and linguistically diverse backgrounds may be less likely to reach out for additional support to clarify any questions during the sign-up process.
- 2.6 Where sign-up processes are complex and confusing, consumers are more likely to miss prompts for concession eligibility information.

¹ Services Australia. (2024). *Concession and health care cards*. <https://www.servicesaustralia.gov.au/concession-and-health-care-cards?context=60091>



Processes and documentation requirements

- 2.7 Another key barrier to receiving certain rebates at sign-up is the requirement of consumers to already have an electricity bill to access specific rebates. Many rebates are not provided directly by the retailer and require the consumer to engage with an external program in reaction to a bill.
- 2.8 Where the consumer is required to provide excessive documentation to evidence their concession eligibility, they may be dissuaded from claiming the concession.

Reluctance to provide concession eligibility information

- 2.9 As identified in the consultation paper, consumers can be apprehensive to be forthcoming with services of their eligibility for concessions for fear of repercussions, and this is consistent with our experience supporting community members. It is essential that the benefits and purpose of providing concession, rebate and subsidy eligibility information be clearly explained in addition to clearly requested.
- 2.10 Some community members also cite deeply held cultural and personal beliefs as a deterrent from claiming concessions.
- 2.11 Members of Culturally and Linguistically Diverse (CALD) communities have shared with The Salvation Army feeling embarrassed or ashamed to claim concessions, despite their entitlement. Ensuring that concessions are accessible to members of this community supports linguistic accessibility and cultural accessibility, including sensitivity to the diversity of CALD communities.



“For some of my community members, it’s their culture. They ask their family for help and that’s it. They don’t want to take assistance away from people who might need it more. Claiming concessions can be a last resort.”



- Financial Counsellor, Western Australia

- 2.12 Consumers must be informed of how providing their concession information may benefit them and concessions need to be presented as the consumer’s minimum entitlement. These barriers to disclosure of concession eligibility become greater when the consumer is not asked or prompted.

Additional barriers faced when not asked about concession eligibility at sign-up

Consumer knowledge

- 2.13 Concessions are unlikely to be top-of-mind for new customers as opening a utility account is typically accompanied by other major life changes, like moving house. New energy accounts can also be instigated by more stressful circumstances, such as escaping violence or the death of a spouse.

Evelyn's Story*

Following the unexpected death of her husband, Evelyn and her two young children were struck by grief. Among the many obligations following her husband's passing, Evelyn had the electricity for the family home transferred into a new account in her name.

At the time of the changeover, her retailer did not ask Evelyn if she was eligible for any concessions or rebates. This is despite Evelyn's payments coming from Centrepay, clearly indicating that she is likely eligible for a concession.

Later, while examining her finances, Evelyn engaged a Moneycare financial counsellor who noticed that no concessions were being applied. Evelyn's financial counsellor succeeded in having the concessions applied to Evelyn's electricity account, reducing her electricity costs by \$600 a year.

**Name changed.*

- 2.14 If concession information is not explicitly requested and explained at sign-up, and concessions are not applied to the account, the consumer is burdened with the full responsibility of researching, identifying and applying for these concessions. There is potential for the consumer to not know of the available concessions they may be eligible for.
- 2.15 Where the consumer is not prompted by the energy retailer that this information is required and in their best interest to provide, it is unfair to assume that all consumers have researched, or are able to research, supports and determine their own eligibility.

Complex and inaccessible bills

- 2.16 Post sign-up, there is potential for the only ongoing communication with a retailer to be through bills. Many community members report they find energy bills complex and incomprehensible.
- 2.17 Reading an energy bill is often the only way for consumers to identify whether a concession has been appropriately applied to their bill, and many bill formats do not highlight this key information.
- 2.18 Inaccessible bill formats create another barrier for consumers to apply for concessions. Where a bill cannot be easily understood, there is potential for a consumer to believe they are already receiving a concession or to not identify if a concession has not been correctly applied.



Timeframes, errors and backdating

- 2.19 Moneycare supports many consumers who have not been receiving the concessions, subsidies and rebates they are entitled to.
- 2.20 Where the consumer has not been asked of their eligibility at sign-up or there have been an error with applying the concession, it is common for the community member to have been repeatedly overcharged. Unfortunately, many of these supports cannot be backdated.

Rudy's Story*

Rudy had been accruing arrears on his energy bill for several years. As part of a payment plan for his very large arrears, his retailer established a \$200 per fortnight repayment.

Rudy contacted The Salvation Army's Moneycare Financial Counselling service to help him budget to repay this debt to his energy retailer.

Rudy's financial counsellor checked with the retailer to see if the eligible concessions had been applied to Rudy's account throughout his time as their customer; they had not.

Not only would this have sizably changed the nature of his arrears with the retailer, but the retailer was unable to apply the concessions retrospectively. This meant that Rudy could not access the concession he had historically be entitled to.

**Name changed.*

- 2.21 Where concessions can be backdated, this is often only for a limited historical period and can leave many years of concessions unclaimable. These time limits to claim concessions can leave the consumer hundreds or even thousands of dollars worse off.
- 2.22 The prevalence of this barrier would be drastically reduced if consumers were asked for their concession eligibility at sign-up.

Judy's Story*

Judy is a concession holder who had held an account with her energy retailer for three years.

At the end of the third year, Judy was experiencing financial hardship, called her energy retailer to discuss payment options, and discovered she was eligible for a rebate on her electricity bill. The electricity retailer was able to back date the rebate for the previous 12-month period, but not to the previous two years when Judy would still have been eligible.

Over the course of her account with the retailer, Judy overpaid for her electricity bill by as much as \$600, for which she has no recourse.

**Name changed.*





Closed accounts

- 2.23 Regardless of time passed, many concessions are often only eligible to be applied to active energy accounts. Where an account has been closed and concessions have gone unclaimed, in many jurisdictions there is unfortunately no recourse for consumers to retroactively claim these concessions.
- 2.24 We have seen circumstances where a community member has attempted to reduce their expenses by moving in with family or switching to a more affordable energy retailer prior to engaging with Moneycare for financial counselling. This can unfortunately leave the community member with a larger debt to repay and is another immovable barrier for consumers attempting to access their concessions.

Disjointed processes and additional requirements after sign-up

- 2.25 Many energy retailers have greater barriers to apply for or verify eligibility for concessions during the life of the energy account than at sign-up. Failure to effectively request this information during the sign-up process can burden consumers with additional verification requirements and create another barrier to access.
- 2.26 These verification requirements can include scanning documents, completing forms, emailing photographs and making phone calls – tasks that can be prohibitively complex for some consumers.

Lucy's Story*

Lucy signed up for an account with a major energy retailer. Upon discovering that she was eligible for an energy concession Lucy contacted her retailer and informed them. The energy retailer did not request or prompt Lucy to provide additional information to prove her eligibility.

During a period of financial hardship, Lucy was put in touch with a Moneycare Financial Capability Worker. As part of this, the Financial Capability Worker reached out to the energy retailer, where it became clear that Lucy's concession had not been being applied to her account.

What followed was a lengthy and onerous process of supplying the evidence the retailer said was necessary to qualify. Much of the information was in the form of scanned documents which Lucy would have been unable to provide without the assistance of the Financial Capability Worker.

Having made the mistake in not applying the concession, the energy retailer was unsympathetic and unaccommodating. This was deeply frustrating to Lucy who had attempted to do everything right but was unable to benefit from the concessions she was entitled to.

**Name changed.*





- 2.27 When setting up an energy account, the energy retailer may be the only service the consumer engages with. The energy retailer is best placed to enquire as to the consumer's eligibility for concessions, and failure to do this creates and exacerbates these barriers.
- 2.28 Where concessions are not applied at sign-up, the onus is entirely on the consumer to initiate contact to have their concessions applied. Consumers commonly report apprehension to contact energy providers due to personal fears or previous negative experiences.

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“Just the stress of making a phone call deters most of my community members.”

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- Financial Counsellor, Regional NSW & ACT

- 2.29 As identified in the consultation paper, the present systems and processes, where the onus is placed on the community member, are insufficient to meet the needs of many consumers eligible for concessions.
- 2.30 Whilst community programs like Moneycare provide vital services assisting energy retailers' customers, engagement with these services is reactive and presents as another task for the consumer, often when financial harm has already been experienced. These barriers could be reduced or negated by energy retailers pursuing concession information at sign-up.

Additional barriers for specific cohorts

- 2.31 Additional barriers that the AEMC must consider in their determination include:

Aboriginal and Torres Strait Islander people

- 2.32 The unique experience of Aboriginal and Torres Strait Islander communities, particularly those in highly remote locations, presents significant additional barriers to community members accessing concessions.
- 2.33 It would be appropriate that the AEMC directly seeks the experience of community leaders and Aboriginal and Torres Strait Islander organisations, such as the Central Land Council, to address any specific or disproportionate barriers to having concessions applied to bills.

Recommendation 1

- 2.34 The Salvation Army recommends that the AEMC conducts active engagement with Aboriginal and Torres Strait Islander communities and organisations.**





Victim-survivors of family and domestic violence

- 2.35 Where a consumer has an account established or altered due to their escape from family and domestic violence, the barriers to accessing all available concessions and rebates are clear. A victim-survivor's first thought when contacting an energy retailer is rarely about what concessions may be available.

Amy's Story*

Amy, a victim-survivor of family and domestic violence, lived in a private rental with her young daughter and violent partner. The electricity bill was in Amy's name, but changing this was not a priority when she and her daughter left the home fearing for their safety. After a period of time, the perpetrator was removed from the home and Amy and her daughter were supported to return.

Amy found that for the time she was not in the property, the perpetrator had not paid any bills.

Amy discussed her situation with the retailer, who flagged her account for additional security measures, but was dismissive and provided few options for how she could address the debt. Amy had applied to access energy concessions, but these protective security measures meant she was unable to have full visibility of her account to see if they had been applied. This experience, compounded with the experience of family and domestic violence, resulted in Amy losing confidence in her capacity to advocate for herself.

Amy engaged a Moneycare financial counsellor who advocated alongside her to the concessions provider and energy retailer. It was discovered that the retailer had incorrectly entered information on Amy's account which had caused the error in applying her concessions.

The energy retailer waived the full debt, and concessions were applied to Amy's future usage. Amy was very grateful for her financial counsellor's support, but described the experience as "another stress I didn't need".

**Name changed.*

- 2.36 Similarly, even long after escaping a violence, a victim-survivor may experience coercive and controlling behaviour. This can take the form of a perpetrator preventing a victim-survivor accessing critical documentation, which can prevent them accessing an entitlement, and forms of financial abuse like fraud through claiming the victim-survivor's concessions.

Young people

- 2.37 Young people who are new to independent living are often unaware of the availability of, or their eligibility for, energy concessions. This becomes more difficult in share house situations where a singular account for the house may prevent an occupant best utilising the available concessions and rebates. Bill accessibility is vital for new energy retail consumers to expand their understanding of their obligations and set them up for financial success.





Concession eligible consumers in diverse living arrangements

- 2.38 Concession eligible community members not listed as an account holder are generally unable to access any concessions they would be entitled to as an account holder. Share houses, house sitting, subletting and short-term rentals open community members to precarious circumstances where they can be held wholly or partly responsible by an individual for paying a bill without concessions applied.
- 2.39 Though these circumstances are clearly beyond the control of energy retailers, when considering improving access to concessions it is essential that community members in these circumstances be educated on their entitlements and options.

Recommendation 2

2.40 The Salvation Army recommends that the AEMC considers the additional barriers to accessing energy concessions, rebates and subsidies for:

- **Aboriginal and Torres Strait Islander people;**
- **Victim-survivors of family and domestic violence;**
- **CALD communities; and**
- **Young people.**

3 Question 3: Improving sign-up processes

- 3.1 Capturing concession eligibility information at sign-up must be a top priority for energy retailers and the entire process must be accessible to all consumers.

Recommendation 3

- 3.2 The Salvation Army recommends that the AEMC support the development of standardised scripts and processes for energy retailers to follow when opening a new energy account. This should include explaining concessions and requesting concession information from consumers.**

- 3.3 Accessibility improvements – including images of concession card types, explanatory videos and resources available in languages other than English – could greatly improve the rates of concession application at sign-up.

Recommendation 4

- 3.4 The Salvation Army recommends that the AEMC’s rule change set accessibility standards for all sign-up processes. This should include:**

- The usage of simple language;
- Availability of resources in languages other than English;
- Clear visual cues; and
- Use of images and videos.

- 3.5 In The Salvation Army’s experience, community members often express apprehension to claim concessions or apply rebates to their energy accounts due to stigma and deeply held cultural beliefs about help-seeking.
- 3.6 In the context of banking, basic accounts have increased concession uptake and reduced the financial burden on consumers.² Advertising and offering a basic energy account type could encourage uptake of concessions and reduce the complexity of the sign-up process for concession eligible consumers.

² ASIC. (2024). *REP 785 Better banking for Indigenous consumers*. <https://asic.gov.au/regulatory-resources/find-a-document/reports/rep-785-better-banking-for-indigenous-consumers/>



Recommendation 5

3.7 The Salvation Army recommends that the AEMC explore possibilities for developing a “basic” energy account type, to be offered by all retailers, that is targeted towards and promoted to concession eligible consumers.

3.8 The existing Centerlink Confirmation eServices (CCeS) system allows organisations, such as energy retailers, the ability to verify customer concession status with customer consent.³ This process reduces the administrative burden on consumers to provide evidence of their concession eligibility.

Recommendation 6

3.9 The Salvation Army recommends that the AEMC’s rule change include embedding a requirement for energy retailers to perform a CCeS check for customers who have consented as part of the sign-up process.

³ Services Australia. (2024). *Centrelink Confirmation eServices (CCeS) for businesses*. <https://www.servicesaustralia.gov.au/centrelink-confirmation-eservices-cces-for-businesses>

4 Question 4: Improving the transfer process

Transferring service delivery address

- 4.1 All energy accounts should be portable between premises serviced by the energy retailer. This requirement would likely reduce circumstances where consumers lose access to unclaimed concessions. In cases where the account is in arrears, this would also limit the number of debts burdening the consumer.

Recommendation 7

- 4.2 The Salvation Army recommends that the AEMC's rule change require energy retailers to guarantee the portability of accounts where the consumer is moving to another property serviced by the retailer.**

Transferring energy retailers

- 4.3 When transferring energy retailers, consumers should be given the option to consent to having their concession information verified with their outgoing retailer or to complete the standard sign-up process.
- 4.4 The incoming and outgoing energy retailers should have background systems that, with the consumer's consent, notify of any claimed or eligible concessions. These concessions should then be applied automatically by the incoming retailer.

Recommendation 8

- 4.5 The Salvation Army recommends that the AEMC's rule change seek to facilitate the incoming energy retailer's verification of consumer concessional eligibility directly with the outgoing retailer during a transfer.**

Notifying consumers of concessions, rebates and subsidies at account closure

- 4.6 During both a transfer between retailers and an account closure, it is essential that the outgoing energy retailer inform all customers of the risks of closing their account and how this may impact their ability to claim concessions, rebates or subsidies.
- 4.7 If a customer has an unpaid bill that is not yet due or arrears on their account, the retailer should discuss the consumers concessional eligibility and provide the consumer with information on the benefits of applying for these concessions. Energy retailers should also recommend all consumers with arrears obtain advice from a financial counselling service before closing the account.



Trudy's Story*

Trudy is a concession card holder and had been with an energy retailer for many years. During this time, Trudy had never had any concessions or rebates applied to her account and had accrued arrears of over \$3,000.

When Trudy's energy retailer merged with another provider, her old account was closed and a new account opened under the new retailer's name. This process was described to Trudy as a "technicality".

Trudy was able to afford her first bill with this new retailer but was being pressured to set up an arrangement to repay the arrears on her closed account. The new retailer suggested that she contact her jurisdiction's financial hardship assistance program for support, but as the account was now closed, Trudy's application was rejected. The financial hardship program referred Trudy to Moneycare for financial counselling.

Trudy's financial counsellor identified that no concessions were ever applied to her account and despite her clear financial hardship, Trudy was never told about available supports.

The energy retailer was unsympathetic to Trudy's circumstances and Moneycare supported Trudy to lodge a complaint with the jurisdiction's Ombudsman service.

**Name changed.*

Recommendation 9

4.8 The Salvation Army recommends that the AEMC's rule change provide scripted language that must be delivered to consumers when transferring retailers or closing an account. This script should include:

- **A summary of concessions applied on the account;**
- **Information of any concessions that the consumer may be eligible for but have not claimed;**
- **Guidance for how to access these concessions;**
- **Information on the risks and consequences closing this account will have on concessional eligibility; and**
- **Where the account is in arrears, information about financial counselling.**



5 Question 5: Informing current customers

Accessible bills

- 5.1 Consumers experiencing external stressors, or with limited literacy, are unlikely to read their full bill and, therefore, will only read the most pressing information – the amount due and the due date. Key information, as it relates to concessions applied to the bill or that may be available, must be presented in a way that is obvious and clear. Current “fine print” information about concession availability and eligibility is insufficient.

“

“If they can make “past due” big, why can’t they make the help more obvious too?”

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- Financial Capability Worker, South Australia

- 5.2 All communications with consumers must be designed in an accessible way. Where an account does not have concessions or rebates, this must be brought to the attention of the consumer. Bills should also contain information on available concessions that can be easily understood and actioned by the consumer. Energy retailers must take greater responsibility to communicate this vital information with their customers.
- 5.3 Through the life of a consumers account with an energy retailer, it is possible and common that their eligibility for concessions and rebates may change. It is for this reason that communication from retailers to consumers must be ongoing and serve as not only a backup for failed application of concessions at sign-up, but an ongoing enquiry as to the consumer’s circumstances.

Recommendation 10

- 5.4 The Salvation Army recommends that the AEMC’s rule change set minimum accessibility standards for the design of and the language used within bills.**

Recommendation 11

- 5.5 The Salvation Army recommends that the AEMC’s rule change require energy retailers to provide periodic updates and communication to consumers regarding new concessions, subsidies or rebates they may be eligible for.**



Review existing accounts for indications of concession eligibility

- 5.6 Particularly in circumstances where a customer is paying their usage or arrears via Centrepay, this should serve as a trigger for the retailer to make mandatory further inquiries as to the consumers concession eligibility.

Owen's Story*

Owen had accrued an \$8,000 arrears with his electricity retailer and was repaying \$100 a fortnight through Centrepay. Due to abnormally high ongoing costs, his continued energy usage was exceeding \$100 a fortnight and arrears were continuing to accrue.

Owen's energy retailer never told him about the possibility of energy concessions, despite knowing his payments were made through Centrepay.

Owen contacted a financial counsellor who assisted him to apply for an energy relief grant scheme, had Owen's concessions applied to his account and referred Owen's excessive usage and charges to the Ombudsman service in his state.

**Name changed.*

- 5.7 Additional circumstances that should serve as an indication of potential missed concessions should include any household accounts without concessions applied that:
- Have excessive arrears;
 - Are receiving or have recently received financial hardship support;
 - Have previously had concessions applied which have lapsed;
 - Indicated concessional eligibility but failed to provide requested evidence;
 - Are held by a customer over the age of 67; or
 - Have a history of late payment.

Recommendation 12

- 5.8 The Salvation Army recommends that AEMC's rule change require energy retailers to periodically review existing accounts for indications of potential missed concessions.**

Clear and safe communication

- 5.9 In addition to designing bills in a more accessible way, to optimise consumer understanding of concessions retailers could present generic concession information on the front of envelopes, send separate mail correspondence, and include an additional brochure with mailed bills. Digital communications could include clear banners on websites and online customer portals, and emailed bills should display concession information equally to bill amount and due date.





5.10 It is essential that communications of concession availability be presented and provided in a way that is consistent with current retailer communications. Scams are a prolific concern for all people, but are particularly harmful and often directed toward cohorts that are more likely to be eligible for concessions.⁴ It is imperative that these communications are designed in a way that differentiates them from scams and not request actions from the customer that could leave them more vulnerable to future scam attempts – for example, sending a vague text message directing to the customer to click a link to save money.

Proactive and place-based consumer outreach

5.11 Unapplied concessions are a wide-spread and enduring issue harming consumers.⁵ To correct this and endeavour to have all people receive the concessions they are entitled to, energy retailers must make extra efforts to reach these consumers.

Bring Your Bills events

The Salvation Army attend and facilitate Bring Your Bills events in partnership with other community services, local governments, and utility providers nationally.

Bring Your Bills events are designed as an approachable and accessible way for community members to engage with financial counsellors and capability workers, and to receive confidential advice without the pressure of booking an appointment.

Community members are encouraged to bring any bill they would like to discuss, including energy bills. Whilst the bills community members seek assistance with can be overdue, many community member concerns relate to understanding the content of the bill and having their bill reviewed to ensure all eligible concessions have been applied.

When attended by a representative from a community member's energy retailer, Bring Your Bills events provide a unique opportunity for financial counsellors and capability workers to support the community member to talk directly with their retailer, reducing barriers to support.

5.12 Many energy retailers already engage in proactive community outreach and participate in community service events.⁶ When these events are attended and supported by energy retailers, the benefits for the consumer are multiplied. Bring Your Bills events present an opportunity for retailers to build rapport with their customers and lead consumers to feel empowered to contact their energy retailer in the future.

⁴ National Anti-Scam Centre. (2024). *Targeting scams: Report of the National Anti-Scam Centre on scam activity in 2023* <https://www.accc.gov.au/system/files/targeting-scams-report-activity-2023.pdf>

⁵ Consumer Policy Research Centre. (2022). *Mind the Gap - Identifying the gap between energy concession eligibility and concessions received*. <https://cprc.org.au/report/mind-the-gap/>

⁶ Energy and Water Ombudsman NSW (2025). *Bring Your Bills - Nowra* <https://www.ewon.com.au/page/media-center/events/bring-your-bills-days/bring-your-bills-nowra>





- 5.13 In-person contact with energy retailers has great benefits for consumers with accessibility needs such as lower literacy, language barriers and hearing impairments. For these consumers, Bring You Bills Days provide a unique opportunity to truly communicate with their retailer and have issues understood.
- 5.14 Community Days, hosted by The Salvation Army corps nationally, are also sometimes attended by energy retailers and provide similar benefits and opportunities for consumers to connect with their retailers.

Corps and Community Days

The Salvation Army's corps (churches) serve as both places of worship, and a welcoming hub of support for anyone in the local community. A diverse and extensive range of faith activities, services and connections are available to people.

Many corps host a Community Day, sometimes multiple times per week, with a cooked lunch, and staple items available through partnership with local supermarkets and other providers.

The Salvation Army's diverse range of services, from our Doorways Emergency Relief and Moneycare Financial Counselling attend, alongside external service providers, including community legal, housing services and utility retailers.

These services all form part of the community and make the Community Days an accessible point of entry to many Salvation Army, and other essential supports and services.

Recommendation 13

- 5.15 The Salvation Army recommends that energy retailers engage in proactive and ongoing outreach with consumers through collaborative place-based service delivery.**

Accessible and trauma-informed processes

- 5.16 It is essential that all efforts from energy retailers to discuss concession eligibility with existing customers be accessible and trauma-informed.
- 5.17 In our experience, concession eligible consumers have often had negative experiences with service providers and are reluctant to initiate or participate in interactions with energy retailers. Community members being supported by Moneycare report negative experiences associated with collection processes for overdue accounts, inadequate handling of complaints and feeling judged by contact centre staff. These negative past experiences can compound and lead to consumers feeling disempowered and avoiding calls.





- 5.18 In our experience, concession eligible consumers are more likely to have experienced trauma, mental ill-health or disability. When seeking to engage with these consumers, processes must be optimised for their needs and staff must be appropriately trained. Consumers would benefit from contact in simple English and languages other than English, with no jargon and a focus on confirming understanding. Consumers with hearing impairments must also be considered.
- 5.19 When engaging with an essential service, consumer autonomy must be facilitated and prioritised. Long phone hold times, automated messages and multiple menu options can be significant barriers for consumers who are hard of hearing, are using a translation or relay service, have a disability or are experiencing mental ill-health. These cohorts represent a significant portion of concession eligible consumers and must be considered in service design and delivery.

Recommendation 14

- 5.20 The Salvation Army recommends that AEMC’s rule change consider requirements for accessible and trauma-informed service design and delivery. This should include scripting and guides for energy retailers and specialised staff training.**

6 Question 7: Other ways to improve the application of concessions

Energy retailers as the central administrator of concessions and rebates

- 6.1 Application of concessions must be as simple for the consumer as possible. All rebates and subsidies, including those that are jurisdictionally specific, should be able to be applied for directly with the energy retailer.
- 6.3 Where energy retailers are responsible for the communication and administration of subsidies, consumers should experience a streamlined process with lower administrative burden. If an energy retailer does not uphold their obligations to inform customers of, or correctly apply these concessions, the consumer could resolve this directly with the retailer with no need to approach multiple external services.

Recommendation 15

- 6.2 The Salvation Army recommends that the AEMC's rule change require energy retailers to administrate and deliver concessions, rebates and subsidies directly to consumers.**

Concessions to address energy efficiency

- 6.4 Another systemic improvement that could increase concession effectiveness would be further investment and expansion of energy efficiency upgrade programs.
- 6.5 Unaffordable energy bills are a persistent issue community members present with to Moneycare. Although many of these bills do not have concessions applied (and this can be addressed through the aforementioned recommendations), where concessions are applied, the bills often remain excessively high. In these circumstances, the concessions received by the consumer can be ineffective and not substantively reduce the financial burden of energy costs.

“

“This issue has blown up in the last 5-10 years. People used to be able to manage their bills themselves and now they physically can't. Concessions are a much needed band-aid, but it's not solving the problem.”

”

- Financial Counsellor, Regional NSW



“Money needs to be spent to actually solve the problem of [energy inefficient] houses. Insulation, double-glazing, etcetera, would save [concession eligible] people the most money.”

- Financial Counsellor, Western Australia

6.6 A central intent of concessions is to reduce the burden placed on the people in our society who are least able to afford their essential expenses. Failure to address excessive energy costs and energy inefficient homes - in tandem with the application of concessions and the other rule change initiatives – will not result in the best outcomes for consumers.

Recommendation 16

6.7 The Salvation Army recommends that the AEMC work with all governments to improve the concessions, subsidies, rebates and grant programs available to improve the energy efficiency of concession-eligible consumers' homes.

7 Conclusion

- 7.1 The Salvation Army thanks the AEMC for the opportunity to provide a written submission.
- 7.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

March 2025



