

# National Customer Hardship Policy (2015)

## TABLE OF CONTENTS

Introduction	4
Defining Customer Hardship	4
Our Commitment	4
Our Guiding Principles	5
Informing Customers about our Hardship Program	6
Identifying Hardship Program Candidates	6
<b>Self Identification</b>	<b>6</b>
<b>Our Identification</b>	<b>7</b>
<b>Third Party Identification</b>	<b>7</b>
Qualification Process	7
Qualification requirements	7
Customer Obligations	8
Sustainable Affordability Plans	8
Sustainable Affordability Plan features	8
Leaving the Hardship Program	11
<b>Customers who will not work with us</b>	<b>12</b>
<b>Re-entry into the Hardship Program</b>	<b>12</b>
Program review and continuous improvement	12

## APPENDIX 1

Assistance Available in Victoria	12
Assistance Available in New South Wales	13
Assistance Available in South Australia	14
Assistance Available in QLD	15
Shortform Hardship Program flyer	16

## LANGUAGE ASSISTANCE



If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450 and ask to be connected to Commander Power & Gas on 1300 857 073 during normal business hours.

## CHINESE

如果您需要传译员, 请在正常营业时间内致电传译服务处: **131 450**, 然后请求转接到

**Commander: 1300 857 073**

## SPANISH

Si usted necesita un intérprete, por favor llame al Servicio de Interpretación y Traducción (TIS National) al **131 450** y pida que le conecten con Commander al **1300 857 073** durante el horario comercial normal

## VIETNAMESE

Nếu Bạn cần một thông dịch viên, xin vui lòng gọi cho Dịch Vụ Thông Phiên Dịch (TIS Quốc) **131 450** và yêu cầu được kết nối với Commander vào **1300 857 073** giờ trong thời gian kinh doanh bình thường

## ARABIC

**131 450 (TIS National)** فضلك اتصل بخط الترجمة  
ساعات العمل الرسمية إذا كنت بحاجة الى مترجم من  
و اطلب توصيلك ب **Commander** على **1300 857 073** خلال

## GERMAN

Wenn Sie einen Dolmetscher benötigen, wenden Sie sich bitte an der Übersetzungs-und Dolmetscher-Service (TIS National) auf **131 450** an und fragen Sie nach Commander auf **1300 857 073** während der normalen Geschäftszeiten.

## ITALIAN

Se avete bisogno di un interprete, si prega di chiamare il Servizio traduzioni e interpreti (TIS National) al numero **131 450** e chiedere di essere collegato a Commander su **1300 857 073** durante il normale orario di lavoro

## GREEK

Αν χρειάζεστε διερμηνέα, μπορείτε να καλέσετε την Υπηρεσία Μετάφρασης και Διερμηνείας (TIS National) στο **131 450** και να ζητήσετε συνδεσει με το Χορμανδερ στο **1300 857 073** όλες της εργάσιμες ώρες της ημερας

## HEARING IMPAIRED

Speak & Listen (SSR) **1300 555 727**. National Relay Service - TTY users phone **133 677** then ask for **1300 857 073**

## INTRODUCTION

The purpose of this document is to provide details of the Commander Power & Gas' Customer Hardship Policy ("Policy") and Hardship Program. The aim of the Policy is to provide customers who are having ongoing difficulty in paying their energy account with information about a program they can access to enable them to manage their payments, access government programs and undertake energy saving activities with the aim of achieving ongoing affordability of their energy use.

The supply of electricity and gas ("Energy") is essential to maintaining a minimum standard of living. Unfortunately, some people can find themselves in a position where they are unable to pay their Energy bills due to unexpected short-term financial situations, or ongoing financial difficulties.

Commander Power & Gas has developed products and services to help our business customers, being customers who purchase Energy services for business use, ("Customers") budget for their Energy expenses, and help them to manage any unexpected situations if they arise.

In addition to our normal product features and payment assistance processes, we have developed further process to help identify and assist Customers that may be in hardship to meet their obligations; these processes make up our Hardship Program.

The goal of our Hardship Program is to work with Customers to find a balance between the Energy they use and the payments they can afford to make. We refer to this goal as achieving "Sustainable Affordability".

We advise all Customers of the assistance that is available to them from the Australian State and Federal Governments ("Government") community welfare and support organisations and from Commander Power & Gas, and we work with our Customers to address their usage and structure their payments to a level they can manage.

This Policy applies to all our domestic Energy Customers throughout Australia.

## DEFINING CUSTOMER HARDSHIP

People can often find themselves in a position where they do not have the capacity to pay their power and gas bills within normal or agreed timeframes, but have the intention to do so. This could be due to unexpected short-term financial shortfalls, or ongoing financial problems.

These situations can be a form of hardship.

Customers in these situations will be identified and assessed against our qualification requirements for entry into our Hardship Program.

## OUR COMMITMENT

We are committed to helping Customers plan for, and meet their energy obligations, and we support Customers who are willing, but unable to meet their payments.

Our Hardship Program will support Customers, whether they have either short term, or longer term financial difficulties.

We are committed to providing advice on how to use appliances more efficiently and reduce usage, further assisting Customers in achieving Sustainable Affordability.

We are committed to working with our Customers to recommend the most appropriate rate plan and to develop tailored payment plans that meet their specific needs.

We are also committed to training our staff about this Policy, and identifying Customers who may be in difficulty or financial hardship, and sensitively engage with them to resolve any difficulties they may be encountering.

## **OUR GUIDING PRINCIPLES**

The following principles help guide us in our efforts to develop, implement and continuously improve our Customer Hardship Policy and the individual elements of individual Sustainable Affordability Plans.

- Make this Policy and the Hardship Program accessible to Customer's and community support agencies;
- Ensure staff are aware of this Policy and the community and Government assistance programs available to Customers within their region;
- Limit the opportunity for Energy debt to build for all Customers through proactive and effective use of payment plans;
- Provide Customers with information and assistance to reduce Energy consumption to levels they can afford;
- Treat all Customers in financial hardship with respect and fairness;
- Ensure that Commander Power & Gas staff are trained to recognise Customers in potential financial difficulty, and are able to offer assistance in an appropriate and sensitive manner;
- Suspend standard debt recovery activities and disconnection action whilst a Customer is participating in our Hardship Program;
- Agree with a Customer the most appropriate pricing plan that will be cost effective, relative to their overall usage, any dedicated off peak appliances they may have, and their ability to shift their usage to less expensive times.
- Agree with a Customer on an affordable payment plan based on their current situation, including community and Government assistance (where available), as part of the Sustainable Affordability Plan;

- Address all non-essential products (where supplied by Commander Power & Gas or M2 Commander Pty Ltd) when assessing and developing a payment plan, although this may not stop collection activity on non essential products and services;
- Assess a Customer's ongoing situation at agreed periods, with a view to progressing them out of the Hardship Program when they demonstrate sustainable capacity to pay for their Energy needs.
- Design processes to operate on a national basis within the constraints of each State; and
- Ensure ongoing compliance with all relevant jurisdiction hardship requirements.

## **INFORMING CUSTOMERS ABOUT OUR HARDSHIP PROGRAM**

Commander Power & Gas will provide information about our Hardship Program and how a Customer can access it by:

- Publishing this Policy on our website;
- Providing details about the Hardship Program in our Customer Charter; and
- Informing Customer's on their bills, notices and letters that we send out to them from time to time.

All letters relating to payment failure, payment irregularities and requests for payment include a statement regarding the availability of payment plans, government concessions and rebates and our Hardship program.

While Commander Power & Gas will inform customers of the existence of our hardship program and suggest that the program may assist them, entry into the program requires a customer to accept that it is appropriate for them, and agree to work with us (and others) to determine and achieve their individual program objectives.

## **IDENTIFYING HARDSHIP PROGRAM CANDIDATES**

One of the keys to a successful Hardship Program is to quickly identify, assess and act to help those Customers experiencing financial difficulties.

Candidates for our Hardship Program can come from the following sources:

### **Self Identification**

- Customers realising that they are not in a position to pay their instalments or account balance, can identify themselves to Commander Power & Gas by contacting us directly.

## Our Identification

- Our staff are trained to identify potential candidates for our Hardship Program through discreet enquiries when discussing payment difficulties, high bills or payment collection.

## Third Party Identification

- External parties such as Energy Ombudsman Schemes, Government welfare agencies, and financial counselling services may identify potential candidates to us.

## QUALIFICATION PROCESS

Where Customers identify themselves as potential Hardship Program candidates, or we or a third party identify a Customer as a suitable candidate to the Hardship Program, we will:

- communicate with the Customer by telephone, or letter;
- explain the purpose of the Hardship Program, and its benefits;
- assess their circumstances for entry into the Hardship Program;
- cease any collection action;
- start developing an individual Sustainable Affordability Plan with the Customer; and
- provide in writing details of the Hardship Program and the Customer's obligations.

## QUALIFICATION REQUIREMENTS

To qualify for entry into the Hardship Program, Customers must meet the following general requirements:

1. Be an existing, active Commander Power & Gas Energy Customer;
2. Use Energy in a home that is the primary domestic residence, but may include other account types as well (for example, domestic farms with water pump accounts).
3. Have a willingness to pay their bill, but can show an inability to pay some or all of that bill, or ongoing bills; and
4. Be willing to participate in the Sustainable Affordability Plan and reduce their debt or usage levels.

When reviewing a Customer for entry into the Hardship Program, we will attempt to develop an open and meaningful dialogue, addressing any concerns a Customer may have about existing debt, possible disconnection and the ongoing management of their payments.

## CUSTOMER OBLIGATIONS

Acceptance into our Hardship Program requires the Customer to agree to work with us, to create an individual Sustainable Affordability Plan. This plan may include the following:

- making ongoing affordable payments as agreed;
- committing to payment plan reviews and changes;
- working with us to meet grant application requirements ;
- working with us or our agents to understand their energy consumption behaviour and make changes to reduce their energy bills; and
- working with us, and others to arrange and attend appointments as may be reasonably required from time to time (for example, with financial counsellors).

## SUSTAINABLE AFFORDABILITY PLANS

The key goal of our Hardship Program is for participating Customers to achieve Sustainable Affordability through developing a number of activities and actions as a Sustainable Affordability Plan. We define Sustainable Affordability as a Customer who is able to make payments within their financial means that matches their regular level of Energy usage.

We will work with each Hardship Program member to develop a tailored Sustainable Affordability Plan. Our staff will work with the Customer, their advocates or financial counsellors, to identify affordability issues and to develop an action plan address these issues, and achieve Sustainable Affordability with the goal of exiting the Hardship Program.

Customers may be able to achieve Sustainable Affordability by reducing their Energy usage through increasing Energy efficiency, changing business habits, or the replacement of faulty or inefficient appliances.

Alternatively, they may be able to change their financial situation through better budgeting, reducing debts or restructuring their debt repayments.

Each plan will be different depending on the individual Customer's personal circumstances and the customer's agreement documented via voice recording.

## SUSTAINABLE AFFORDABILITY PLAN FEATURES

The Commander Power & Gas Hardship Program is flexible, and features a number of different elements that can be brought together to create an individual Sustainable Affordability Plan for each Customer.

Sustainable Affordability Program elements include:

### **Suspension of regulated debt recovery activities**

All regular actions related to debt recovery, such as notices, telephone demand calls, disconnection requests and legal action, are suspended while Customers participate in the Hardship Program<sup>1</sup>.

### **PRICING PLANS AND TARIFFS**

A review of a customer's rate plan to take into consideration the most price effective plan that may be available, bearing into consideration any dedicated off peak appliances, previous rate plans, previous usage and the customers ability to shift their energy use into less expensive time periods.

Where we agree with a customer that a particular price plan or contract change (that does not require a metering alteration) will be effective in improving a customer ability to achieve affordability, we will change free of charge.

Where we identify that a change to a customer's metering installation may result in a worthwhile cost reduction, we will review the costs associated and seek a cost sharing arrangement with Government Agencies Landlords and the customer.

### **Early Termination Fees**

Hardship Program customers will not be subject to an Early Termination or Exit Fee if they choose to cancel their contract. Payment plans and arrangements

A review of a Customer's current payment plans or arrangements. This review takes into account a Customer's financial situation, including a review of appropriate payment amounts, expected usage and current arrears, payment timing and payment methods to ensure they are fair and reasonable.

Customers will be able to make payments via Centrepay, Bpay, Australia Post Outlets, Credit Card and via Direct Debit. Payments can be scheduled each week, fortnight or month as required.

We will mutually agree on payment plans, and provide them to the Customer.

Where appropriate a Customer may be referred to a financial counsellor for further advice and to assist with assessing a customer's capacity to pay.

### **Information Provision**

We will provide Hardship customers with information on our terms conditions, charges, price plans and this policy, as well as information on how to use less energy, concession schemes and any other relevant information free of charge.

<sup>1</sup>Members of our hardship team will contact Customers who do not meet their obligations under the Hardship Program.

## Centrepay

Access to Centrepay, as an alternative payment method will be available to eligible Customers.

## Concessions, grants and other assistance

Assessment for eligibility of concessions or grants that may be available and assistance in any application process required.

A list of the concessions, grants and other assistance programs available in each state is included in Appendix 1 of this Policy.

## Detailed phone audits

Where appropriate, we work with Customers to do a thorough telephone audit of their home Energy use. This may identify opportunities to reduce Energy consumption to affordable levels.

We will help educate Customers on Energy efficiency by giving detailed tips and information about reducing Energy use.

## Field audits

If we are unable to understand a Customer's Energy use through our telephone audit, we may choose to do a home Energy audit, to find any problems and help the Customer to reduce their Energy use.

On a case-by-case basis, we may discount field audit costs for Hardship Program Customers or, where appropriate waive them.

## Regular review and contact

We schedule reviews of Sustainable Affordability Plans according to the Customer's circumstances. This allows us

to contact Customers, modify their Sustainable Affordability Plans, and offer further assistance to ensure they are on track to achieving Sustainable Affordability.

When a Customer has achieved Sustainable Affordability, we will work with them to successfully transition out of the Hardship Program.

## Appliance replacement

We will review the impact of a Customer's appliances on their Energy use when auditing their home.

Where a faulty or inefficient appliance is determined to be influencing a Customer's consumption, we will give Customers advice in purchasing replacement appliances, including referral to available Government assistance schemes.

Commander Power & Gas does not sell appliances to Customers.

## Financial counselling

When we identify Customers with financial difficulties, we will suggest that the Customer work with a financial counsellor, and assist them to find one. We do not believe that our team are appropriately skilled to provide advice on personal finance or legal issues to Customers.

## Dealing with languages other than English

We will make available telephone interpreter services (at the cost of a local call) when dealing with Customers who use a language other than English.

## Impact of other Commander products

We review all Energy products and other Commander products (such as telecommunication products) when we assess and develop a Sustainable Affordability Plan. We aim to reduce the impact of these other products on the Customers overall financial situation, however, products that are not an essential service may be subject to continued collection activity.

## **ACCESS TO OUR CUSTOMER COMPLAINT SYSTEM**

We value our customers and want to make sure that we are providing them with the best possible service.

Customers participating in our Hardship program will continue to have the same access to our complaints management system as all other customers.

Customers with a complaint or other feedback about our products, service or personnel should contact us immediately. We will do everything we can to make sure that the complaint is resolved to our mutual satisfaction. Customers can lodge a complaint using any of our contact methods available.

Where we are not able to resolve the matter immediately or where a customer is unhappy with our response, we will review the matter within the guidelines of our Complaints Management Policy.

We will contact the customers within five Business Days with a resolution or if we need to take further steps (e.g., where we have to refer the problem to a Distributor) we will endeavour to explain to the customers what is happening.

If at the end of the process the customer is not satisfied with our response, the customer can request that a complaint be raised to a senior person in our organisation.

If the customer is still not satisfied with our response, they may refer the complaint to the local energy Ombudsman in their state. They may also ask us to provide the reasons for our response in writing.

## **LEAVING THE HARDSHIP PROGRAM**

The aim of our Hardship Program is to help a Customer to get to a point where they are able to manage ongoing payments for their Energy bills.

We will mutually transition Customers out of the Hardship Program when they:

- achieve ongoing Sustainable Affordability; or
- finalise and pay off their account.

Customers may also choose to leave the Hardship Program at any time.

## Customers who will not work with us

Where a Customer will not work with welfare agencies, financial counsellors or Commander Power & Gas staff to improve their financial situation, we will attempt to contact the Customer so that we may understand their circumstances and overcome any issues that may be stopping them from participating in the Hardship Program.

If despite the above the Customer remains unwilling to work with welfare agencies, financial counsellors or us, we will take appropriate steps to recommence normal collection activity.

## Re-entry into the Hardship Program

If a Customer achieves Sustainable Affordability and leaves our Hardship Program, and then finds they need to re-enter the Hardship Program, they can do so, subject to our normal qualification requirements.

If a customer is removed from the program due to non- participation, then the customer can reapply for the program, but will have to provide adequate evidence of a willingness to comply with the program requirements (i.e. engaging with a financial counsellor, or the appropriate behavioural change).

## PROGRAM REVIEW AND CONTINUOUS IMPROVEMENT

Commander Power & Gas will review this Customer Hardship Policy on a periodic and regular basis to ensure that it is meeting the needs of our Customers and to identify new processes, techniques or information that could help our Customers achieve Sustainable Affordability.

## APPENDIX 1

### Assistance Available in Victoria

The following assistance programs are available to qualifying Customers living in Victoria.

Commander Power & Gas trains staff members to identify that eligible Customers are receiving all available assistance and to advise Customers of what additional assistance is available. Staff members also, as required, help Customers apply for any rebates or assistance schemes available.

## **Victorian State Government Concessions**

- Annual Electricity Concession
- Winter Energy Concession
- Off Peak Electricity Concession
- Transfer Fee Waiver Concession
- Service to Property Concession
- Group Homes Concession
- Life Support Concession
- Medical Cooling Concession

## **Victorian Special Assistance schemes**

- Utility Relief Grant Scheme (URGS)
- The Non-Mains Utility Relief Grant Scheme (NURGS)
- Home Wise: Appliance and Infrastructure Grant
- Gas Heater Rebate
- Gas Hot Water Rebate
- No Interest Loans Scheme (NILS)
- Moreland Energy Foundation Phoenix Fridge Project.

## **Commonwealth Schemes**

- Utilities Allowance

## **Assistance available in Australian Capital Territory**

The following assistance programs are available to qualifying Customers living in the Australian Capital Territory.

Commander Power & Gas trains staff members to identify that eligible Customers are receiving all available assistance and to advise Customers of what additional assistance is available. Staff members also, as required, help Customers apply for any rebates or assistance schemes available.

## **Australian Capital Territory Government Concessions**

- Summer Concession
- Winter Concession
- Life Support Rebate

## **Australian Capital Territory Special Assistance schemes**

- the ESCC hardship discharge policy

## Assistance Available in New South Wales

The following assistance programs are available to qualifying Customers living in New South Wales.

Commander Power & Gas trains staff members to identify that eligible Customers are receiving all available assistance and to advise Customers of what additional assistance is available. Staff members also, as required, help Customers apply for any rebates or assistance schemes available.

### **New South Wales State Government Concessions**

- Low Income Household Rebate
- Life Support Rebate
- Medical Energy Rebate (from January 2010)

### **New South Wales Special Assistance schemes**

- Energy Accounts Payment Assistance (EAPA) vouchers

## Assistance Available in South Australia

The following assistance programs are available to qualifying Customers living in South Australia.

Commander Power & Gas trains staff members to identify that eligible Customers are receiving all available assistance and to advise Customers of what additional assistance is available. Staff members also, as required, help Customers apply for any rebates or assistance schemes available.

### **South Australian State Government Concessions**

- Energy concession (pension)
- Energy Concession (beneficiaries)
- South Australian Special Assistance schemes
- Solar Hot Water Rebate

## Assistance available in QLD

The following assistance programs are available to qualifying Customers living in Queensland.

Commander Power & Gas trains staff members to identify that eligible Customers are receiving all available assistance and to advise Customers of what additional assistance is available. Staff members also, as required, help Customers apply for any rebates or assistance schemes available.

## **Queensland State Government Concessions**

- Electricity Concession
- Electricity Life Support Concession
- Pensioner Gas Rebate

## **Queensland Special Assistance schemes**

- Community Ambulance Cover Levy Exemptions
- Hot Water Rebate
- Stove Rebates
- Home Energy Emergency Assistance (HEEA) scheme

## **SHORTFORM HARDSHIP PROGRAM FLYER**

The following Hardship Flyer is a short form version of this policy that will be provided in our warning notices and other letters as appropriate. The purpose of this flyer is to make customers aware of the existence of the program and how to access it.

## Finding it Hard to pay your Bill?

People can often find themselves in a position where they want to pay their power and gas bills but are not able to do so by the due date.

### **Let us help you!**

If you find that you're having difficulty paying your installment or bill, please call our friendly staff on 1300 37 47 57 and ask about our Hardship Program.

Our program is designed to help you establish regular payments that you can afford, while we work with you to establish a plan of action focusing on reducing your energy usage, so that you can eventually stop worrying about the paying your Commander Power & Gas bills.

To enter our program you must:

- Be an existing Commander Power and Gas residential customer
- Contact us and ask to enter the program
- Be willing to work with us to establish an affordable regular payment schedule and to reduce your energy use.
- If you enter our program, we will:
  - Stop any collection action we are taking
  - Work with you to establish an affordable payment schedule
  - Assess your circumstances to see if you are eligible for any Government concessions or grants.
  - Provide you with specific information on how to reduce your energy use.
  - We will also review your current tariff and contract arrangements.

Once you enter our program, you must:

- Make your ongoing payments as agreed;
- Work with us to identify and reduce excess energy usage;
- Work with us to on any grant or concession applications;
- work with us, and others to arrange and attend appointments as required

## **Commander Power & Gas**

Level 10, 452 Flinders Street Melbourne VIC 3000

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