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Wednesday, 23 October 2024

Email: energyconsumerpolicy@dcceew.gov.au

Dear Energy Consumer Policy team,

Re: Draft National Energy Equity Framework

We thank you for the opportunity to comment on the draft National Energy Equity Framework and supporting material published on 25 September 2024. The AER is pleased to see the release of the draft National Energy Equity Framework and congratulates the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCEEW), the Group of Energy Efficiency Researchers (GEER) and the interjurisdictional working group for reaching this important milestone in the Energy Equity Work Program.

In particular, we commend the framework's evidence-based approach, with models and principles built on a foundation of comprehensive research into consumers' lived experiences of vulnerability and hardship. As a result of this approach, we believe the framework can support the AER in its strategic objective to protect vulnerable consumers while enabling all consumers to participate in electricity and gas markets by using the consumer voice and lived experience to inform regulatory design and change.

We agree that the tools and research published alongside the framework will be useful for government officials in the development and evaluation of energy policies and programs. We also support the framework as the basis for a community of better practice, which could create further opportunities to improve equity in policy and program design. The AER recognises the need for cross-sector collaboration and systemic reform to improve outcomes for those at risk of or experiencing vulnerability. This recognition has been a key driver of our *Towards Energy Equity* strategy and related work programs,¹ including the Game Changer reform initiative and our Community of Practice on Consumer Vulnerability.

Our experience developing and implementing the *Towards Energy Equity* strategy has highlighted the value of pursuing a common framework and approach for improving energy equity outcomes across jurisdictions. For example, preliminary findings from the Energy Equity Work Program have already proven useful frameworks for considering systemic reform in the energy sector through our Game Changer initiative, with early versions of the framework's models utilised by members of the cross-sectoral Game Changer Design Group.² We have also referred to the Energy Equity Work Program as an example of

¹ AER, [Towards energy equity – a strategy for an inclusive energy market](#), 2022.

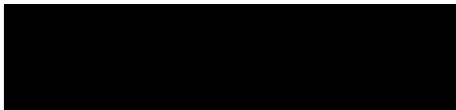
² AER, [Game changer reforms](#).

resources to support continuous learning and development for consumer-facing energy businesses in our *Customer Engagement Toolkit*.³ In the toolkit, we describe how integrating learnings about the drivers, indicators and outcomes of different states of energy hardship could greatly assist in improving processes for identifying and responding to consumers experiencing vulnerability. We suggest that overlaying research such as GEER's consumer journey mapping with a business's continuous improvement models, for example, could help customer-facing energy businesses analyse performance, identify potential problems or opportunities and improve product/service offerings, to drive better outcomes for consumers.

As such, we see the framework as a valuable tool for not only energy policymakers but also regulators and industry participants to draw on in the development and implementation of new or improved consumer programs and initiatives. A shared understanding of energy equity, hardship and vulnerability (supported by a community of better practice) could help the energy sector deliver a more coordinated and more equitable energy future. Our cross-sector Community of Practice on Consumer Vulnerability has highlighted the value of such forums for sharing knowledge and accelerating collaboration across boundaries. In creating a community of better practice for energy policymakers, we believe there would be value in an inclusive approach that allows all those involved in developing and implementing energy policy across jurisdictions and agencies to learn from each other and work together towards a more equitable energy future.

If you have any questions about this submission, please contact the AER's Consumer Policy team at ConsumerPolicy@aer.gov.au.

Yours sincerely,



Danielle Chifley
Acting General Manager, Policy
Consumers, Policy and Markets

Submitted online on: 23.10.2024

³ AER, [Customer engagement toolkit: Better practices for identifying and supporting consumers experiencing vulnerability](#), 2024.