

From: [REDACTED]
To: [Consumer Policy](#)
Cc: [REDACTED]
Subject: RE: Consultation now open on the AER's consumer vulnerability identification and engagement toolkit [SEC=OFFICIAL] [ACCC-ACCCANDAER.FID3268040]
Date: Tuesday, 9 April 2024 3:36:47 PM
Attachments: [image002.png](#)
[image004.jpg](#)
[image005.png](#)

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Hi [REDACTED]
[REDACTED]
[REDACTED]

If it's not too late, please note our feedback below:

Question 1: How appropriate and effective are the 6 better practice principles?

They're great! I think they cover both the immediate and more systematic responses needed by businesses. They are also achievable and practical which will enable implementation. While it's noted that the principles are designed to work together, it would be beneficial to make this clearer so that principles are not prioritised over each other.

Question 2: How appropriate and effective are the consumer stories used to illustrate the better practice principles in action?

Cohort identification at the start of each story can look 'blaming' / 'stereotyping' – it looks as though their personal circumstances are the reason for their experiences of vulnerability rather than these being a potential strength (they are illustrated as weaknesses) or that the energy market itself is compounding their experience of vulnerability. Given this toolkit is aimed at consumer-facing businesses, can the intro to the stories be their experience of the energy market and then the cohort's experience be weaved into the story – it currently reads the other way.

The note above is also relevant to some of the scenario content.

This is also inconsistent with the way vulnerability has been defined in the TEE noting the market complexity is noted before individual circumstances which is an agreed strengths-based and human centred approach.

Also see response to Question 4 please.

Question 3: How appropriate and effective are the industry case studies used to illustrate implementation of the better practice principles?

It would be beneficial if implementation of the principles was clearer. In the introduction it should be outlined how to use this toolkit (this would work well alongside the instruction that this is not a

compliance tool). And within each principle, the Principles in Practice section could read more as the call-to-actions and 'what you can do' points. Currently they look like a summary of the findings, could they be highlighted earlier in the principle sections as the 'tools' you need as a business – will help take the guess work out for them.

There is also a missed opportunity to make clear what businesses can do in the scenarios from page 17-20 – this section would benefit from a clear outline of business tools and opportunities.

Question 4: Are any aspects of the toolkit inconsistent with the needs of consumers experiencing vulnerability?

Not inconsistent but noting the growth of those new to energy hardship (or any financial hardship) is on the increase, there could be value in showing stories / scenarios for this potentially invisible, under-the-radar group where there maybe double-incomes or no mortgage yet unable to keep up with the growing cost-of-living.

Also our recent findings from Melb University, Taking the Pulse of the Nation results (to be presented to AER in April) are showing the concerning ways people are trying to pay their energy bills, over 30% of those eligible for concessions are using Buy Now Pay Later, other notable numbers releasing their superannuation or managing their payments through other behaviours such as:

- Not heating, cooking or skipping meals
- Not heating or cooling their homes
- Not paying for medical expenses / prescriptions
- Not allowing visitors

While some of these factors are illustrated in 2.6, the impact on health/wellbeing from energy hardship could be further illustrated across all principles specifically showing how energy hardship further compounds experiences of vulnerability, examples we are seeing from the results could be included such as:

- disconnection power and defrosted / ruined refrigerated foods or
- families not eating hot meals or parents skipping meals to feed children or
- consumers with lived experience of health conditions reducing their health care and costs to pay for their energy bills or
- customers who are unwell or those who are elderly not heating or cooling their home (this is a growing cohort!).

Question 5: Would additional information and resources help consumer-facing energy businesses and their staff implement the toolkit or better practice principles?

See note to Question 3 – essentially the toolkit needs more of a roadmap or guide for businesses – the content is all there it's just how it currently reads more as a report on insights rather than a guide on what businesses can do.

Question 6: Do you have any other feedback on the draft toolkit?

- Remove references that promote English above other languages – instead of non-English or limited English recommend ‘speaks a language or languages other than English’
- In the introduction under Understanding Vulnerability - could it be made clearer that experiences of energy vulnerability are expected to increase building in more cost-of-living narrative and how energy hardship is impacted by rising and lowering costs-of-living, hence the critical need for this toolkit now. To further illustrate this, expected rising cost of energy narrative may also be useful from other AER sources.
- Case studies are good as they make clear what is working well right now, inspires and shows the principles can be actualised.
- The different ways each principle is explained is great – helps get the message across to different audiences / learning styles. As suggested, moving/highlighting the Principles in Practice sections as the key points for businesses would be a good benefit of this toolkit – even a summary of what better practice of all principles looks like up front and early in the toolkit with findings and insights as further reading should businesses chose to do so.
- Additional references section is great and adds weight and support to the content within this toolkit.
- Great job all involved!

Happy to discuss any of the feedback above if this is easier too.

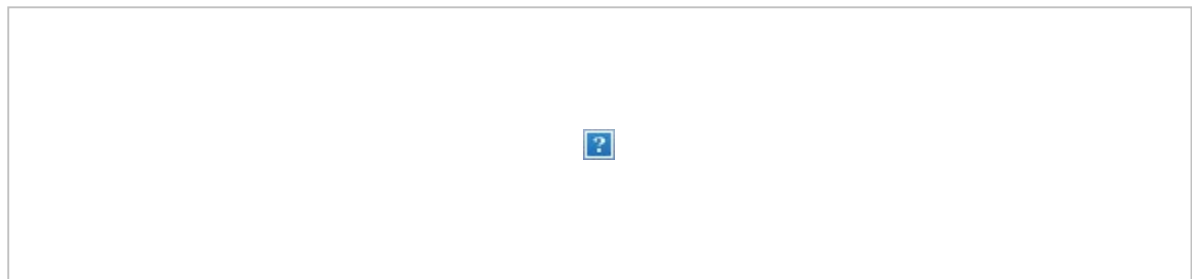
Thanks again,



W: [The Energy Charter](#)



Turrbal and Jagera lands of Meanjin



I proudly acknowledge and pay my respects to the Traditional Custodians of the Land upon which I live and work, the Turrbal and Jagera People, and recognise their continuing connection to land, waters and culture.

From: Consumer Policy <ConsumerPolicy@aer.gov.au>

Sent: Wednesday, April 3, 2024 11:40 AM

To: