

9 November 2015

Sarah Proudfoot
General Manager - Retail Markets
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001
Email: AERExemptions@aer.gov.au

Dear Ms Proudfoot,

Re: 2015 Review of Australian Energy Regulator (AER) Exempt Seller Guideline

Thank you for the opportunity to provide this short submission into the AER's Review of the Exempt Seller Guideline. In making this submission, Queensland Council of Social Service Ltd (QCOSS) is representing the interests of residential low income and disadvantaged customers of exempt sellers in Queensland.

Customers of exempt sellers commonly reside in low-cost, restricted, or unsecure accommodations, such as caravan parks, boarding houses, retirement villages, apartment complexes, social housing and supported care homes. While there is limited information on the total number of residential customers of exempt sellers and their specific arrangements, we can gather from the types of accommodation that many of these customers are likely to be low income or disadvantaged, and many would be eligible for government concessions to assist with their energy affordability.

We are aware that there are a number of exempt sellers in Queensland who had previously claimed the Queensland Government Electricity Rebate on behalf of their residents, but who have recently stopped doing so. At present, the use of the term "best endeavours" in the AER's Guideline allows this to occur as it provides insufficient clarity for both exempt sellers and their customers on what their rights and responsibilities are.

QCOSS therefore strongly supports the AER's proposal to make the requirement to claim government rebates on behalf of exempt customers a positive obligation.

QCOSS also considers that proactive and clear communication of the updated Guideline to exempt sellers and their customers will be critical to ensure the changes are understood and implemented, and ensure that the Guideline achieves its intended outcomes. QCOSS encourages the AER to work closely with the relevant state government departments, consumer groups, exempt sellers and other stakeholders in each state to ensure clear information is available and actively promoted to communicate the changes to the guideline to both exempt sellers and their customers.

Yours sincerely,



Mark Henley
Chief Executive Officer