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Getting to fair: consumer vulnerability strategy  
Essential Services Commission  
Level 8, 570 Bourke Street  
Melbourne, Victoria 3000

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### **Getting to fair: breaking down barriers to essential services - strategy draft Paper**

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (**MEA Group or Powershop**) thanks the Essential Services Commission (**ESC**) for the opportunity to provide comments on the ESC's Getting to fair: breaking down barriers to essential services - strategy draft (the **Paper**).

#### **Background on the MEA Group**

The MEA Group is a vertically integrated generator and retailer, with a focus on renewable generation. Through our investment in new generation, we have continued to support Australia's transition to renewable energy. Powershop is an innovative retailer committed to providing lower prices for customers and recognises the benefits to customers in transitioning to a more distributed and renewable-based energy system. Powershop has introduced numerous new, innovative, and customer-centric initiatives into the market.

#### **Statement**

Powershop strongly supports the ESC's initiative to break down barriers to essential services. It is vitally important to further our collective understanding of how consumers can access better access essential services from a position of vulnerability. Powershop recognise that this issue has remained difficult to resolve, including through various regulatory changes. Powershop also support any policy and actions that assist improvement within the ESC's engagement and processes to address consumer vulnerability.

Powershop believes greater consultation with regulated entities such as retailers will improve understanding and allow a more complete view of the various interactions that vulnerable customers face. This consultation may assist the ESC with potential new understandings of vulnerable customers to effectively define consumer vulnerability. Such consultation can also assist with inclusive communication, concerns about the digital divide and information awareness, items raised in the Paper.

#### **Goals**

Understanding that goal 1 is ESC-centric, Powershop believe that goals 2, 3 and 5, with references to a review of the effectiveness of the Payment Difficulty Framework (**PDF**), is a review Powershop broadly support. Any initiative that encourages engagement between customer and retailer and reduces the barriers for customers to engage would be welcome. Additional regulation without a review of the efficacy of the existing PDF could introduce challenges to consumers and retailers alike.

Goal 4 refers to highlighting business innovations and better practice in identifying consumer vulnerability. Powershop encourages the ESC to effectively engage stakeholders who deliver such innovations to better understand the barriers those stakeholders may also confront to assist such consumers faster and more effectively.

Powershop consider that the greatest change of success for the ESCs proposed strategy is to explore industry education in a collaborative fashion with retailers and distributors. Retailers are exposed to the challenges vulnerable customers face daily and have a considerable understanding of vulnerability in practice. Powershop believes the ESC should engage and work with retailers to collectively provide this education to all ESC stakeholders. A consistent understanding of vulnerability will benefit the entire sector in ensuring vulnerable customers receive the support they need.

Powershop strongly support Goal 7 for the ESC to pursue improved government and community partnerships. For example, we would like the ESC to work with the Victorian Government and the Department of Families, Fairness and Health to streamline access to concessions such as the Utilities Relief Grant Scheme and Life Support. The current processes that require multiple parties to deliver lengthy processes on multiple, manually unintuitive forms for consumers should be reviewed and amended. Powershop would like to participate in further consultation with the ESC to assist with achieving this goal.

### **Conclusion**

Trying to solve this issue in Victoria over several years has borne significant costs on all consumers and industry. The ESC must consider that any outcomes of this strategy that result in further initiatives to alter the regulatory framework in Victoria are likely to bear additional costs to retailers and ultimately consumers. Powershop are supportive of doing more for vulnerable customers and commends the ESC for developing a strategy to look at the best ways to achieve that across essential services.

The draft strategy also recognises that there are external factors that can impact a consumer's vulnerability. Powershop strongly agree that these external factors be considered and understood. Vulnerability is not only an issue for energy as an essential service, but across many sectors.

If you have any queries or would like to discuss any aspect of this submission, please do not hesitate to contact me.

Yours sincerely,



**James Ell**  
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