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Ms Cathryn Greville  
Assistant Director, Customer Protection  
PO Box 8469  
Perth BC WA 6849  
E: [publicsubmissions@erawa.com.au](mailto:publicsubmissions@erawa.com.au)

Dear Cathryn

**CONSULTATION ON PROPOSED FINANCIAL HARDSHIP POLICY GUIDELINES –  
ELECTRICITY & GAS LICENCES**

Synergy appreciates the opportunity to provide comment on the proposed amended financial hardship policy guidelines (**Guidelines**).

The only matter which Synergy considers should be amended to ensure consistency with the outcome based approach adopted under Code of Conduct as part of the last Code review relates to the exhaustive list of matters that need to be submitted to the Authority by a retailer following the conduct of a policy or procedural review to demonstrate compliance. The prescriptive list of requirements undermines the progress made by the ECCC in terms of adopting outcome based regulation of payment difficulty and financial hardship matters. In Synergy's view the benefits achieved by the ECCC in removing the procedural prescriptiveness under the Code in July 2014 has been lost as the level of prescriptiveness has simply been transferred from the Code to the Guidelines.

Synergy has consistently advocated the Authority adopts a cost benefit approach when seeking to implement new regulatory requirements with limited response to date. The Guidelines are a further example of well intended customer protections which lack quantitative analysis to support the new arrangements being in the public interest.

Notwithstanding our concerns in relation to the above, the changes to the Guidelines layout are positive, in particular the summarised tables to delineate the requirements of the hardship policy and the hardship procedures, which are a welcome addition and helpful when using the Guidelines as a reference tool for staff.

Yours sincerely,

**SIMON THACKRAY**  
**MANAGER, REGULATION AND COMPLIANCE**

