

Our Reference: DMS #3350618  
Enquiries: Simon Thackray  
Telephone: (08) 6212 1433



14 July 2010

Ms Lanie Chopping  
Assistant Director Customer Protection  
Economic Regulation Authority  
Level 6  
197 St Georges Terrace  
Perth WA 6849

Dear Lanie

### **FINANCIAL HARDSHIP POLICY GUIDELINES – JUNE 2010**

Synergy appreciates the opportunity provided by the Economic Regulation Authority (Authority) to comment on amendments to the Financial Hardship Policy Guidelines (guidelines). Synergy has reviewed the guidelines and makes the following comments.

#### **General**

Given recent electricity price increases Synergy has seen the number of customers experiencing both financial hardship and payment difficulties increase. Therefore the provision of tailored support to customers experiencing short term payment difficulties and longer term financial hardship will remain a priority for Synergy. While energy consumption remains the responsibility of the customer, Synergy seeks to work in partnership to promote energy efficiency and flexible payment arrangements to assist our customers to manage their energy bills.

Synergy supports the need for retailer hardship policies and we constantly endeavour to adopt best practice recommendations with respect to our policy.

#### **3.3 Annual Review**

Synergy has an annual review process in place that includes benchmarking its financial hardship policy against other utility retailers and seeking feedback from key Western Australian stakeholders. The findings from the periodic review are presented annually to the Synergy board for endorsement.

#### **4.1 Staff Training**

Synergy agrees with the best practice items highlighted in the guideline and continues to work toward continuous improvement in this important area.

#### **4.3.5 Flexible Payment Options**

While Synergy provides flexible payment options to manage accumulated debt, an increasing future focus will be ensuring customers are able to manage their consumption on an ongoing basis through the provision of energy efficiency advice and support as a means of assisting our customers to reduce their bill through lower energy consumption.

#### **4.5.2 Transparency and Accessibility**

The Keeping Connected brochure is available online and our customers are encouraged to call Synergy's contact centre to customers. However, further clarification regarding "pro-active" promotion within the guideline would be useful.

#### **Other matters**

It would assist Synergy if the Authority could adopt a practice of publishing proposed changes to regulatory instruments in tracked changes to enable ease of communication of those changes throughout the business.

Please do not hesitate to contact me should you wish to discuss any aspect of the above.

Yours sincerely

**SIMON THACKRAY**  
**MANAGER RETAIL REGULATORY AND COMPLIANCE**