

Assessment of the Electricity Retail Corporation (t/a Synergy) Financial Hardship Policy

25 August 2011

Economic Regulation Authority

WESTERN AUSTRALIA

A full copy of this document is available from the
Economic Regulation Authority website at www.erawa.com.au.

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BACKGROUND

The *Code of Conduct for the Supply of Electricity to Small Use Customers (Code)* first came into operation on 1 January 2005.

Compliance with the Code is mandatory and is a condition of every electricity retail, distribution and integrated regional licence. The Authority is responsible for amending, monitoring and enforcing the Code.

Part 6 of the Code addresses payment difficulties and financial hardship. Amongst other things, Part 6 requires retailers to develop a financial hardship policy (**policy**) for residential customers. Clause 6.10(2) specifies the minimum contents of a policy.

The Authority first published the *Financial Hardship Policy Guidelines (Guidelines)* in 2008. The Guidelines provide retailers with guidance regarding good practice in the establishment and operation of these policies. The Guidelines are not a mandatory compliance requirement. There are 27 guidelines which cover good practice in policy areas such as:

- staff training;
- identification and engagement with customers in financial hardship;
- flexible payment arrangements;
- engagement with financial counsellors and consumer representative organisations; and
- transparency and accessibility.

The Code requires energy retailers to review their policies annually, have regard to the Guidelines when undertaking the review, and submit the reviewed policy to the Authority to enable the Authority to publish an assessment of the policy.

In 2010 the Authority undertook public consultation on the Guidelines to ensure that industry and consumer representative organisations had an opportunity to review the Guidelines prior to the Guidelines being used for the purpose of assessment. A number of minor changes were made as a result of this review. A copy of the Guidelines is available on the Authority's website.

The Guidelines require energy retailers to submit their reviewed policy to the Authority by 31 December each year. The Guidelines state that the Authority will endeavour to issue an assessment every second year, unless there are significant changes to the policy, in which case an assessment will be issued annually.

Electricity Retail Corporation (t/a **Synergy**) holds an electricity retail licence granted by the Authority. Synergy retails electricity in the South West Interconnected System and has around 850,000 residential customers.

Synergy also holds a gas trading licence. However, Synergy is precluded from supplying gas to customers who consume less than .18TJ of gas. Synergy does not supply gas to any residential customers and are therefore not required to produce a policy for gas customers.

Synergy submitted their reviewed policy before the deadline of 31 December 2010.

Synergy provided a copy of their policy (**Attachment 1**) and supplementary information (**Attachment 2**) regarding the review of the policy.

ASSESSMENT

It is important to note that the Authority issues an assessment of a retailer's policy and not an approval. Retailers are able to operate their policy regardless of the assessment by the Authority.

If the Authority identified possible Code non-compliance during the course of the assessment and this was not rectified by the retailer prior to the assessment being concluded, the Authority may determine that it is necessary to further investigate this possible non-compliance.

Code Compliance

The Authority reviewed the policy against the mandatory requirements of Part 6 of the Code.

Feedback was provided to Synergy regarding the need to:

- Clarify the difference between their 'keeping connected program' and the 'financial hardship policy'. The 'keeping connected program' is a Synergy initiative that relates to a relatively small number of customers classified as in 'acute financial hardship' and not all customers in financial hardship.
- Clarify the statement that Synergy "can disconnect power if payment has not been received 12 business days after the due date of an account" to ensure that customers understand the total period of time between the issuing of the bill and disconnection must be at least 24 days.
- Include a statement confirming that Synergy will advise a residential customer, on request, of the details of the assessment carried out (clause 6.1(3)).
- Correct the statement that the moratorium on action, when the customer has made an appointment with a financial counsellor, would be 14 days. This is incorrect as the Code specifies this period is 15 business days (clause 6.2(2)).
- Confirm that Synergy will give reasonable consideration to further requests for additional time to assess capacity to pay (clause 6.2(3)).
- Clarify arrangements and circumstances where payment in advance applies (clause 6.9(1) and (2)).
- Consider, in each case, a reduction and/or waiver of fees, charges and debt (clause 6.10(2)(d)(iv)).
- Clarify the assessment criteria and process.

These issues have now been clarified within the policy.

Following receipt of the Authority's feedback, Synergy submitted a final draft of the policy.

It is the Authority's assessment that the Synergy policy is now compliant with the Code requirements.

Guidelines

The Authority reviewed the policy against the Guidelines. The Guidelines represent good practice but are not mandatory.

After reviewing the first draft of the policy, feedback was provided to Synergy regarding consistency with the following guidelines:

- Involvement of financial counsellors in setting payment plans or the consideration of financial counsellor's assessments (guideline 4.3.1 and guideline 4.3.4).
- Provision of payment incentives (guideline 4.3.6).
- Consultation with relevant consumer representative organisations regarding the process for periodic review of the policy (guideline 4.4.4).
- Memorandums of understanding or inter-agency protocols between Synergy and consumer representative organisations (guideline 4.4.5).
- Provision of information for sight impaired or TTY requirements (guideline 4.5.3).

As a result of the feedback provided a number of improvements have been made. It is the Authority's assessment that the Synergy policy is consistent with the guidelines.

Conclusion

Synergy submitted their policy in a timely manner and assisted the Authority in undertaking the assessment by providing comprehensive information about the review of the policy.

Feedback was provided regarding compliance with a small number of Code requirements and consistency with the practice outlined in the Guidelines. As a result a number of improvements were made to the policy.

The Authority has found that the Synergy policy complies with the Code and is consistent with the Guidelines.

In addition to meeting the minimum Code requirements Synergy has their 'keeping connected' program which provides assistance such as individual case management and incentive payments for those experiencing what they refer to as 'acute financial hardship' such as 'life threatening illness' or 'long term unemployment'.

The Authority notes that this is an assessment of the written policy document and is not an examination of the application, implementation or adherence to the policy by Synergy.

LYNDON ROWE
CHAIRMAN


APPENDICES

Appendix 1: Synergy Financial Hardship Policy



Keeping your
electricity connected.

Synergy's Financial Hardship Policy

Do you need assistance in relation to this document?
Call the telephone interpreter service
(TIS National)  on 13 14 50 to arrange an interpreter.

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**هل أنت بحاجة إلى المساعدة بشأن هذه الوثيقة؟
اتصل بخدمات الترجمة الفورية الهاتفية (TIS National)
على الرقم ١٣ ١٤ ٥٠ لندير لك مترجما.**

ဤစာစောင်နှင့်စပ်လျဉ်း၍ သင်အခက်အခဲ ရင်ဆိုင်နေရသလား၊
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**آیا شما در رابطه با فهمیدن این نوشته ضرورت به کمک دارید؟
به تلفون ١٣ ١٤ ٥٠ به خدمات ترجمانی زنگ بزنید تا به شما
ترجمانی معرفی گردد.**

**Te ye yin kuöny duët wïc tenönj athör kenë?
Cöl thëlëpun dugër koc kuony (TIS Kutnhom) ten
13 14 50 tenönj ajuer ee dugër.**

**شما در مورد این مدرک به کمک نیاز دارید؟
به خدمات مترجم تلفنی (تیس ملی) با شماره ١٣ ١٤ ٥٠
زنگ بزنید تا یک مترجم شفاهی فراهم شود.**

**需要有人帮助翻译这份文件吗？
请拨打13 14 50联系电话口译服务处
(TIS National) 让我们为您安排一位翻译。**

**Je unahitaji usadizi kuhusu hati hii? Piga simu
kwa huduma ya mkalimani (TIS Taifa) kwa 13 14 50
kupanga mkalimani.**

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At Synergy we want to support you through difficult times.

We understand sometimes it's difficult to pay bills on time, for a variety of reasons.


That's why we've developed our financial hardship policy. This policy is designed to help you manage your electricity bills, avoid long term debt and keep your electricity connected.

Together, we can find an appropriate payment solution to help you through difficult times. All we ask is that you keep us informed of your circumstances, meet your agreed payment plan and consider the advice offered to you by other agencies.

We are committed to offering support in a commercially-responsible manner. We welcome feedback and continue to review the program annually, ensuring it remains fair and supportive of customers experiencing financial hardship.

We understand it can be difficult to ask for support, but we are here to help. We encourage you to contact us if you need to, and would like to assure you that you will always be treated with fairness, dignity and compassion.

Trevor James
Chief Executive Officer



You will always
be treated with
fairness, dignity
and compassion.

Our commitment to you.

This policy is designed to assist customers by offering a range of payment options, assistance to help save energy, and information on concessions and assistance programs.

It's important we continue to review and adapt our service to accommodate different circumstances. So, to improve our understanding of the complex issues surrounding financial difficulty, we work closely with organisations such as Western Australian Council of Social Service (WACOSS), the Office of Energy, the Energy Ombudsman, Economic Regulation Authority, Financial Counsellors Association of Western Australia (FCAWA) and consumer representative organisations such as Jacaranda, Consumer Legal Credit Service and Anglicare.

To understand the background of the principles and commitments we make in this policy you can also read our Standard Electricity Agreement, our Customer Charter and the Code of Conduct for the Supply of Electricity to Small Use Customers. These documents set out the general rights of customers and our obligations as a retailer for the supply of electricity and are available on our website, synergy.net.au



What is financial hardship?

Financial hardship is described as a state of more than immediate financial disadvantage, which means that you are unable to pay an outstanding amount required, without affecting your ability to meet basic living needs for you and your family.

We know that everyone's situation is different and there are lots of different types of payment difficulties. This is why we have different ways of helping. For example, if you are having short term financial problems we can help you set up a payment arrangement or give you more time to pay.

However, we know that some of our customers may be in acute hardship and are unable to improve their financial position and that's why we also offer our specialised 'Keeping Connected' program.

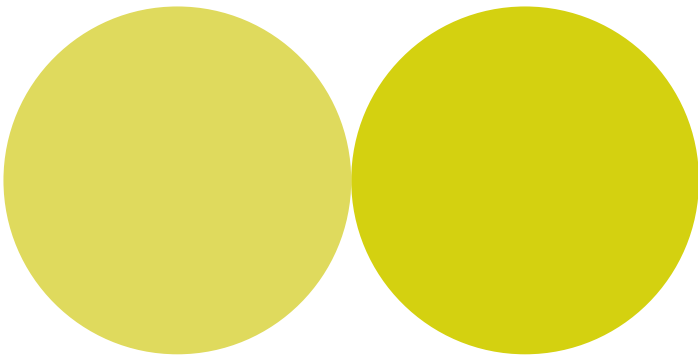
We can help.

If you are a residential customer and having difficulties paying your bill we want to help.

It's important you contact us as soon as you begin to experience any difficulties paying your bill, by calling us on 13 13 53. That way we can assess your circumstances and find the right level of assistance for you.

In order for us to assess your level of payment difficulty or hardship, we will need to ask you some personal and financial questions that may cover:

- your take home pay
- your financial commitments
- medical conditions or disabilities
- family circumstances




The ways we can help include:

- when assessing your financial situation we will take into account information provided by yourself or an independent financial counsellor
- setting up alternative payment options, such as a flexible payment plan
- setting up a payment plan based on information provided by a financial counsellor
- we will give reasonable consideration to further requests by you for additional time to assess you capacity to pay
- give you more time to pay your bill and suspending any activity on your account for 15 business days
- give consideration to reduce or waiver selected fees, charges or debt through our programs
- provide information on concessions, rebates and other government assistance programs
- if we assess you as experiencing acute financial hardship, we may provide you with additional hardship support through our *'Keeping Connected'* program
- when reviewing our hardship policy each year, we will consult with relevant financial counsellor representatives and organisations

Please contact us if you wish to discuss your hardship assessment undertaken by Synergy. You are also entitled to seek support from a customer representative group, like a financial counsellor if you would prefer.

And, of course you can trust that we will always assess your individual circumstances in confidence, with fairness, dignity and compassion.



Would you prefer to talk to someone over the phone about how we can help you if you are having trouble paying your bill?

Call us on 13 13 53

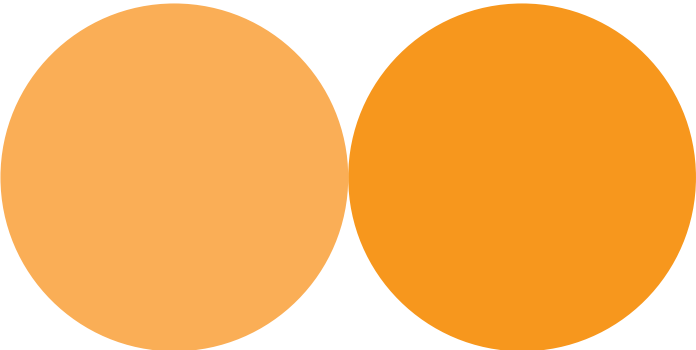
Your commitment to us

If you're facing financial difficulties we'll do our best to assist you. And in return, we ask that you:

- contact us on 13 13 53 as soon as you begin to experience financial difficulty
- if appropriate, provide us with your concession card details, to assist us in identifying the concession or rebates you may be entitled to receive
- agree on a reasonable payment arrangement and method
- seek the guidance from a financial counsellor
- contact us to request an alternative or revised payment arrangement if you are having difficulty meeting the agreed payment plan

It is important to note that if you do not make the agreed payments and can't agree to an alternative payment arrangement, your electricity may be disconnected and debt recovery costs incurred.

Remember, this can be easily avoided by keeping in contact with us and making the agreed payments.



It is important that you also meet with a person from a relevant consumer representative organisation like a financial counsellor, to discuss your financial situation and consider your options. In these instances we may temporarily suspend any debt recovery or disconnection action for at least 15 days, while we assess your capacity to pay.

Support

Our customer assistance team, including contact centre staff and contractors, are trained to be sensitive and supportive when assisting customers who may be experiencing financial difficulties. They are able to provide information about:

- services available to you
- Government funded concession and financial assistance schemes
- our legal responsibilities
- the ‘*Keeping Connected*’ program, and
- procedures relating to credit management practices

Please be assured that our team will always handle your calls in confidence, with fairness, dignity and compassion.

In addition our customer assistance team will give you the following assistance depending on whether you have been assessed as experiencing payment difficulties or financial hardship.

Payment difficulty

- additional time to pay a bill
- an interest free and fee free instalment plan or other arrangement where you are given additional time to pay a bill or pay arrears
- Synergy will accept payments in advance at no additional cost to enable you to receive a reduced bill. You can make advance payments using Centrepay/income management or by making arrangements for scheduled bill payment amounts through your bank’s BPAY facility.



Financial hardship

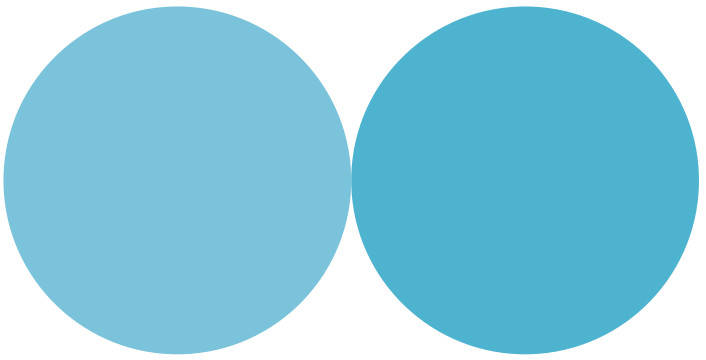
- consideration of a reduction in fees, charges and debt on request
- consideration of revision of alternative payment options
- the Power On Payment Program provides for Synergy to make financial contributions (debt reduction) to an eligible customer's electricity bills by Synergy, provided the customer maintains payment plan repayments
- provision of information in relation to your right to redirect your bill, payment methods, available concessions, meter options, energy efficiency information and energy audits, independent financial counselling and availability of financial assistance and grants
- interpreter services
- Hardship Utility Grant scheme eligibility (provided the customer agrees to visit an independent financial counsellor)

Keeping Connected

Customers who are assessed as experiencing acute financial hardship in circumstances such as life threatening illness or long term unemployment may also receive additional assistance through Synergy's 'Keeping Connected' program. Additional assistance may include:

- individual Case Manager assistance
- participation in the power on payment program

Please refer to page 8 for further details on the 'Keeping Connected' program.



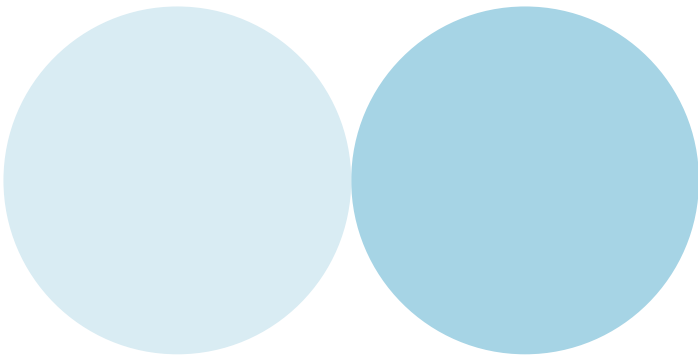
Our Keeping Connected program

Customers who are assessed as experiencing acute financial hardship may also receive additional assistance under our *'Keeping Connected'* program if the customer agrees to visit an independent financial counsellor.

As part of the *'Keeping Connected'* program our Case Managers will work individually with eligible customers to tailor assistance according to their individual needs. This assistance may include:

- guidance on helping customers manage their electricity bill and keeping their electricity connected
- providing additional incentives to help customers maintain agreed payment plans
- advice relating specifically to the customer's premises on how they can reduce their electricity consumption to lower future electricity

Our Case Managers will advise the eligible customer of further assistance available to them, such as how to apply for the Western Australian Government's Hardship Utility Grant Scheme (HUGS), and the Hardship Efficiency Program (HEP).



Energy efficiency

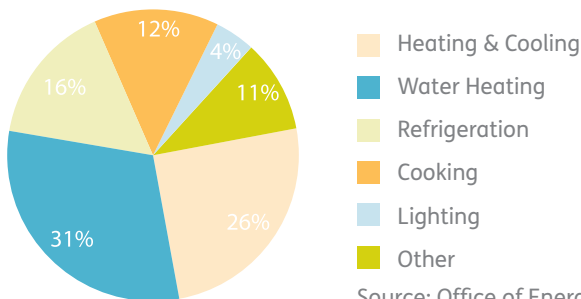
Being energy efficient around the home not only saves energy and the environment, but it can save you money too. You and your family can reduce the amount of money you spend on electricity just by making small changes around your home. Here are some great, simple ways to save energy:

- Remember to turn off computers and other electric devices at the wall when you're not using them
- When the sun's shining, use the clothes line or drying racks instead of the clothes dryer
- If you have a solar hot water system, remember to wait for the sun to do its work before having a shower
- Before using the washing machine, check to make sure it's fully loaded and switch to washing in cold water
- If you're using a heater in winter, remember to close doors to unused rooms or outdoor areas to prevent heat loss

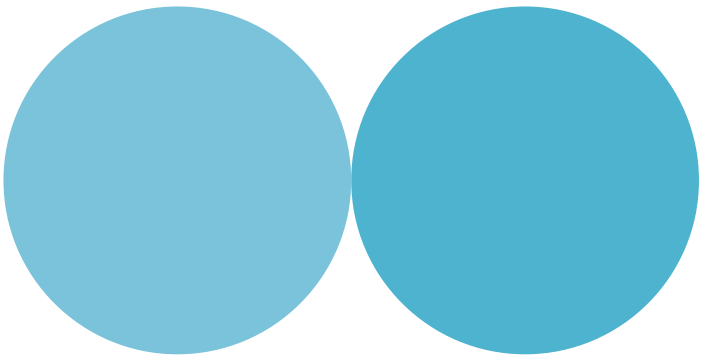
For more energy efficiency tips visit synergy.net.au/save

Energy usage within a typical WA household.

Did you know that water heating and general heating and cooling your home contributes the most to your electricity bill? By reducing the amount of energy used in these areas you can reduce the amount of your energy bill.



Source: Office of Energy



Questions and answers.

Q. What should I do if I experience payment difficulties or hardship?

A. If you are having problems paying your Synergy bill, please call us on 13 13 53 as soon as possible.

Q. How do I set up a payment plan?

A. Depending on your individual circumstances, we can set up a promise to pay agreement which works as a payment extension. If we enter into a payment agreement with you, we will send you an instalment plan outlining your revised payment dates and agreed payments.

Q. How does Synergy assess my capacity to pay under a payment plan

A. Consistent with the Code of Conduct, a payment arrangement plan which we offer to give you additional time to pay a bill or to pay arrears is based on your capacity to pay, payment history, usage needs, the size of the outstanding amount, information provided by you and/or a third party acting on your behalf such as a financial counsellor and whether you have been assessed as experiencing payment difficulties or financial hardship.

To assist us to develop a payment plan that reflects your electricity usage needs and capacity to pay, you (or your authorised representative) will need to provide us with all relevant information.

Once we have this information we will advise you of the period of the payment plan, the number of payments, the amount of the instalments needed to repay your outstanding debt, your estimated consumption during the period of the plan, how the payments are calculated and advise you of the impact of seasonality (e.g. summer and winter) on your payment plan.

In addition, if you experience further payment difficulties while complying with the payment plan and you tell us, we will look at ways to assist you further. During the life of the payment plan we will make provision for adjusting the payments if you are likely to become significantly in credit or debit at the end of the payment plan.

Q. How do I avoid disconnection?

A. We work in accordance with the guidelines stated in the Code of Conduct, which advises we can disconnect power if payment has not been received 24 business days after you were sent your bill. This is the minimum timescale we work to, and if you are experiencing payment difficulties we encourage you to contact us on 13 13 53 as soon as possible, so we can discuss your specific circumstances and come to a suitable payment arrangement.

Q. What are my payment options?

A. We have different payment options available such as paying online, over the phone, in person at Australia Post or at other authorised retailers. You can also apply to make regular payments on your electricity bill through Centrelink Centrepay. Centrepay is a free direct bill paying service you can make payment to your Synergy bill direct from your Centrelink payment. Please call or visit your nearest Centrelink office and ask for a centrepay deductions form. Simply complete part 'C' of the form with our service provider reference number 555015 0425.

We can help you to select the best payment option for you – simply visit synergy.net.au/payments or call us on 13 13 53.

Q. What if I have been disconnected?

A. If you have been disconnected, please call us on 13 13 53 immediately, so we can help you manage your electricity account and get your electricity reconnected as soon as possible.

Q. I've received an estimated bill. What does this mean and what do I do?

A. If for any reason the distributor, Western Power, is unable to obtain a meter reading, we'll provide you with an account based on an estimated reading from Western Power to determine the amount of your bill. To make sure you receive an accurate bill, please call us on 13 13 53 to request a suitable arrangement.

Q. I have a concession card, what can I receive and how can I apply?

A. Rebates are provided under the State Government Energy Rebate Scheme for various charges on your electricity account. Please see the table on the next page for the rebates you may be entitled to.

Rebate

Account Establishment Fee Rebate

Eligibility

- Centrelink Health Care Card, Pensioners Concession Card, and Commonwealth Seniors Health Card
- Veterans' Affairs Gold Card (War Widow, Dependent, Totally and Permanently Incapacitated) and Pensioner Concession Cards

Supply Charge Rebate

- Centrelink Health Care Card, Pensioners Concession Card or Commonwealth Seniors Health Card
- Veterans' Affairs Gold Card (War Widow, Dependent, Totally and Permanently Incapacitated) and Pensioner Concession Cards
- WA Seniors Card

Dependent Child Rebate

- Centrelink Health Care Card
- Veterans' Affairs Gold Cards (War Widow, Dependent, Totally and Permanently Incapacitated)
- Pensioner Concession Card (issued either by Centrelink or the Department of Veteran's Affairs)

Reduced Meter Test Fee

- Centrelink Health Care Card
- Commonwealth Seniors Health Card
- Veterans' Affairs Gold Card (War Widow, Dependent, Totally and Permanently Incapacitated)
- Pensioner Concession Card (issued either by Centrelink or the Department of Veteran's Affairs)

Late Payment Fee (late payment fee waived)

- Centrelink Health Care Card
- Veterans' Affairs Gold Card (War Widow, Dependent, Totally and Permanently Incapacitated)
- WA Seniors Card or Commonwealth Seniors Card
- Pensioner Concession Card

Seniors Air Conditioning Rebate

(available only to customers who reside in the towns listed in the table below)

- WA Seniors Card, and either a;
- Centrelink Pensioners Concession Card
- Commonwealth Seniors Health Card or a
- Veteran Affairs Gold Card with dependent children listed

Town/Area	Months	Period
Carnamah	3	Dec – Feb
Eneabba	3	Dec – Feb
Mingenew	3	Dec – Feb
Morawa	3	Dec – Feb
Mullewa	4	Dec – Mar
Nabawa	3	Dec – Feb
Perenjori	3	Dec – Feb
Three Springs	3	Dec – Feb

Merchant Service Fee (MSF) waiver

- Veterans' Affairs Gold Cards (War Widow, Dependent, Totally and Permanently Incapacitated)



To apply for a rebate off your electricity bill, please call us on 13 13 53 and we will take your application over the phone. If your circumstances change and you no longer hold a valid card, you are obliged to notify us.

Q. What if I become bankrupt?

A. If you're facing bankruptcy, you'll receive the same treatment as any other customer, remain on the same electricity tariff and receive the same billing and payment terms.

If you're bankrupt and are assessed as experiencing payment difficulties or financial hardship, we may consider cancelling debt incurred up to your date of bankruptcy in certain circumstances.

However we encourage you to call us on 13 13 53 and arrange an easier payment plan through the 'Keeping Connected' program.

Q. How can I get another copy of Synergy's Financial Hardship Policy?

A. Simply call 1800 208 254 (mobiles charged at applicable rates) or 13 13 53 (within Western Australia) and we will send one out to you.

The policy is also available on our website at synergy.net.au/hardship



We'd like to hear from you.

We encourage feedback from our customers, staff, stakeholders and associates. It's our way of ensuring our Financial Hardship Policy remains fair and supportive.

We also keep track of any financial hardship issues and initiatives occurring interstate and overseas.

If you'd like to offer your feedback or you would like more information about our Financial Hardship Policy, please contact us on either:

Phone

1800 208 254 (mobiles charged at applicable rates)

or

13 13 53 (within Western Australia)

For calls outside Western Australia (08) 6212 2222

TTY (for customers with hearing or speech difficulties)
(08) 9221 8608



If you don't speak English call the telephone interpreter service (TIS National) on 13 14 50

Sight impaired customers please call 13 13 53 for a large print copy of this policy.

Our business hours are 7am to 7pm (WST),
Monday to Friday

Mail

PO Box K851
Perth WA 6845

Fax

(08) 9221 4628

Internet

synergy.net.au/contactus

Visit synergy.net.au/residential
for more information on



My Account



Concessions and Rebates



How you can reduce your bill

Appendix 2: Supplementary Information

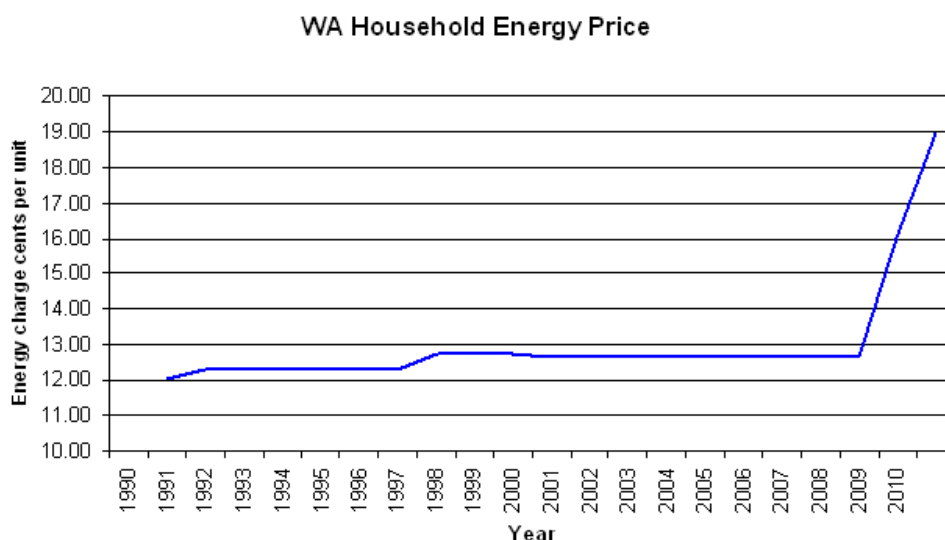
ANNUAL REVIEW OF SYNERGY'S HARDSHIP POLICY



1. Executive Summary

As part of its electricity retail licence obligations, Synergy is required to undertake an annual review of its financial hardship policy. The Economic Regulation Authority (ERA) published new financial hardship policy guidelines in August 2010 which Synergy is obliged to take into account.

In the last 18 months, Western Australia's residential customers experienced a significant increase in electricity prices as tariffs continued to transition towards cost reflective levels. The chart below illustrates the challenge faced by our customers in terms of managing rising energy costs.



Synergy's hardship policy is integral to assist customers experiencing financial hardship. Notwithstanding the tariff increases Synergy achieved a 34% reduction in the number of residential disconnections from 4,188 in 2008/09 to 2,744 in 2009/10.

A review of Synergy's financial hardship policy was undertaken during 2010 involving two key stages. Stage 1 involved a benchmarking study where Synergy's policy was compared against other Australian utilities. Stage 2 involved consultation with key community stakeholders.

This document details the results of Synergy's review of its hardship policy during 2010.

- **Section 2** provides an overview of the review process.
- **Section 3** provides an overview of the review process in terms of staff training.
- **Section 4** provides an overview of the review process in terms of identifying and engaging with customers in financial hardship.
- **Section 5** provides an overview of the review process in terms of flexible payment options.
- **Section 6** provides an overview of the review process in terms of engaging with consumer representative organisations.
- **Section 7** provides an overview of the review process in terms of hardship policy and transparency.

2. Hardship policy review process

Synergy's annual review of its hardship policy review was completed in September 2010. This included a benchmark review of Synergy's policy against seven Australian utilities. Synergy also invited relevant consumer representative organisations¹ to participate in its annual hardship policy review by providing feedback on policy content.

As with previous years, stakeholders involved in the consultation phase provided positive feedback about Synergy's approach to the management of customers in hardship, the Keeping Connected program and in particular the development of two new hardship documents for customers and consumer representative organisations.

Stakeholders took the opportunity to raise key issues impacting the Western Australian community, shared ideas for further improvements to Synergy's approach to hardship and suggested changes to the policy.

The key issue raised by all stakeholders was the rising cost of electricity and the challenge that this has posed for residents within the South West Interconnected System. The majority of clients of the consumer representative organisations are on limited budgets and are having difficulty meeting the increased costs of electricity notwithstanding the implementation of government programs such as HUGS. Improved energy efficiency through public education and closer alignment with community groups was identified as a key mechanism to help address this challenge on an ongoing basis.

Another key issue raised by stakeholders was the accessibility of services to customers from non-English speaking backgrounds. It was considered the provision of translated contact information in the published policy document required additional support to improve the accessibility of services to this group of customers who are often on limited incomes and unfamiliar with support services. Closer alignment with community groups as well as improved access to information was a suggested mechanism to address this emerging issue.

Key outcomes of the 2010 hardship policy review and associated initiatives were:

- **Policy Changes.** The majority of changes related to messaging and vocabulary used in the policy document. The definition of hardship was also updated to ensure clarity and alignment with ERA guidelines.
- **Communications.** Two new supporting documents were created to improve communications with hardship customers and Financial Counsellors following customer and consumer representative feedback.
- **Training and Development.** Ongoing focus to ensure Synergy has the appropriate skills to deal with customers from diverse backgrounds.
- **Energy Efficiency Solutions.** Continued focus on developing longer term energy efficiency solutions for customers in financial hardship.
- **Accessibility for non-English speaking customers.** Investigate opportunities for improving accessibility of services to customers of non-English speaking background including developing stronger links with community groups.

In addition to the hardship policy review, Synergy continued to work closely with state government on the development of a hardship tariff proposal.

¹ Refer section 6 for a list of organisations consulted as part of the 2010 review.

3. Staff training

Staff training is essential to the delivery of an effective hardship policy. Key facets of Synergy's hardship policy training program are:

- Board and executive endorsement of Synergy's hardship policy to reflect the importance of the policy throughout the organisation.
- On-going dialogue and engagement with key consumer representative organisations to assist Synergy to develop its hardship training content.
- Provide information to contact centre staff to enable them to educate and inform customers by providing energy advice, reasons for high bills, availability of rebates, concessions and government assistance programs etc.
- Provide training to all new staff dealing with residential customers and periodic refresher courses.
- Provide specialist training to credit management staff dealing with hardship customers on such matters as approaching financial hardship customers, financial counselling training, culturally and linguistically diversity training, communicating and connecting with aboriginal people and understanding poverty, hardship and disadvantage in Australia.

Key training outcomes in 2010 were:

- Training Synergy's field officers to focus on customers experiencing financial hardship to assist them to manage their account and providing customers with information on local financial counsellors who can negotiate payment of outstanding accounts within predefined payment guidelines on behalf of the affected customer.
- Synergy's case managers provided dedicated expertise, support and assistance to customers experiencing severe financial hardship. During 2009/10 our case managers assisted more than 790 customers on a one-on-one basis with many customers being helped to not incur further energy debts by undertaking a more appropriate payment pattern consistent with their energy usage.
- Training of customer facing staff occurred throughout the year to ensure all relevant staff are aware of the guidelines for assessing customers in financial hardship and assistance programs such as the HUG, HEP, Power Assist, Keeping Connected and the Fridge Replacement schemes.
- Synergy's credit management field operators have seen their daily activities focused on visiting customers with long outstanding accounts and discussing payment options that will assist them to reduce their outstanding debt and removing the risk of disconnection. The field officers also assess customers for suitability of customer assistance schemes or refer them to financial counselors within their areas that can assist customers with budgeting advice. Each field officer may visit anywhere up to 40 or more premises per day to provide assistance and discuss a customer's account and potential payment solutions.
- Use of Synergy's custom built on-line training facility with respect to its obligations under Part 6 of the Code of Conduct.

One of the hardship issues identified as part the 2010 policy review was the need to improve accessibility of hardship services to groups of customers from non-English speaking backgrounds. During 2011 Synergy's Credit Management will undertake a training needs assessment to identify potential learning and development requirements necessary to respond effectively to customers from diverse backgrounds.

4. Identifying and engaging with customers in financial hardship

In order to identify residential customers experiencing financial hardship Synergy has:

- Financial hardship assessment criteria. (Synergy also has assessment criteria with respect to payment difficulties and severe financial hardship).
- Processes to identify a customer in hardship as early as possible when they contact Synergy including processes to assist customers to self identify and request hardship assistance.
- Has a specialist team (credit management) that the contact centres can refer customers in financial hardship to.
- Empowered credit management to negotiate and agree on solutions for customers.
- Encourages customers in financial hardship to make early contact about outstanding arrears via the contact centre, bills, reminder notices, customer service charter, IVR, website and other customer communication channels.
- Facilitates self-identification by customers by ensuring credit management staff are trained to communicate sensitively with customers in hardship.
- Established processes to refer customers to consumer representative associations and government programs for further advice and assistance.

One of the key focuses in 2011 will be engaging hardship customers with respect to their energy consumption to identify high energy use through the hardship assessment process and providing solutions to reduce usage.

5. Flexible Payment Arrangements

Synergy has a range of payment initiatives, options and assistance to help customers experiencing payment difficulty and financial hardship. These include:

- Disconnection moratoriums during Christmas and Easter.
- New promise to pay guidelines to assist residential customers managing higher electricity prices.
- Introduction of new debt collection processes ensuring more customers were contacted earlier in the cycle of an outstanding debt.
- Introduction of SMS messaging 8 days after the due date of a customer's invoice reminding the customer of an outstanding account in addition to the standard reminder notice.
- Creation of a specialised outbound calling team focusing on early contacts with residential customers who have an outstanding account.
- Flexible payment arrangements have increased from \$1M in April 2009 to \$9M in July 2010 (this includes payment arrangements and payment extensions to all customers) as a result of more flexible guidelines to make arrangements. For example, contact centre staff can refer customers for HUGS if the customer is identified as being in financial hardship. The contact is not solely about collection but also facilitating assistance for the customer to be able to pay their account.
- Payment extensions increased from 68,158 in 2008/09 to over 83,223 in 2009/10 for customers assessed as experiencing payment difficulties and financial hardship under Part 6 of the Code of Conduct. Customers are able to arrange payment extensions automatically online, through our telephone IVR system, our contact centre or via Synergy's credit management team.
- The number of residential customers requesting payment instalments decreased by 38% from 21,314 in 2008/09 to 13,229 in 2009/10. Reasons for the reduction include customers making payment via direct debit, EvenPay and CentrePay and customers accessing HUGS payments.

In addition to the above, Synergy plays a pivotal role in the administration, management and promotion of its own and state government electricity customer assistance schemes including:

- Administration of state government concessions and energy rebates including the supply charge rebate, dependent child rebate, account establishment fee waivers, air conditioning subsidy, caravan park and park home subsidy. The value of these rebates and subsidies in 2009/10 was more than \$31M.
- Administration of HUGS on behalf of the state government. From July 2009 – June 2010 HUGS grants to the value of \$1.44M were provided. From January 2010 to the end of June 2010 more than 2,180 residential customers received a HUGS grant to assist them with payment of their electricity account and to avoid disconnection. This brings the total number of approved grants to 7,481 totaling \$2.4M since the commencement of HUGS on 4 August 2008.
- Administration of the HEP on behalf of the state government. In the first 12 months of HEP, 480 audits were undertaken by Synergy and its contractor.
- Maintenance of the PowerAssist scheme which involves an annual payment of \$75,000 to WACOSS. This is administered by St Vincent de Paul (previously Anglicare) through its emergency relief agencies, as individual grants to customers who contact these agencies.
- Synergy's power on payment program whereby Synergy makes financial contributions to an eligible hardship customer's electricity bill when the customer maintains payment plan repayments.

6. Engaging with Consumer Representative Organisations and Financial Counsellors

In recognition of the expertise and importance of consumer representative organisations Synergy continued to work closely with financial counselors and emergency relief agencies throughout the year to promote the hardship policy and to discuss the many issues impacting customers experiencing financial hardship.

Key stakeholders engaged as part of the 2010 hardship policy review were:

- Jacaranda
- Financial Counsellors Association of WA
- Western Australian Council of Social Services
- Relationships Australia
- Fremantle Multicultural Centre
- Metropolitan Migrant Resource Centre
- Multicultural Services Centre of WA
- Country Women's Association
- People With Disabilities WA Inc
- Anglicare
- Consumer Credit Legal Service.

As part of Synergy's Customer Advocacy Committee, consumer representatives and financial counsellors were engaged and feedback sought on the review process and associated timeframes with respect to:

- hardship research and benchmarking;
- stakeholders to be consulted;
- policy matters to be reviewed;
- stakeholder review of proposed policy changes; and
- policy launch.

Synergy staff also attended a familiarisation training course conducted by WACOSS to further develop empathy and understanding of hardship situations as well as developing ways to better communicate with those customers experiencing financial hardship.

Two new supporting documents were developed to improve communications with hardship customers and financial counsellors with stakeholder input:

- An information sheet for customers participating in the Keeping Connected program; and
- a consumer representative fact sheet explaining the Keeping Connected program.

Synergy has convened a new forum and invited financial counsellors and the Department of Child Protection to attend to:

- investigate, review and discuss specific hardship issues and incidents and where required, propose solutions;
- consider how hardship training content and delivery can be enhanced and improved;
- consider how communication channels between respective organisations can be enhanced and improved at both management and operational levels; and
- consider consistency of future disconnection moratorium periods across different utilities.

The first meeting is scheduled to occur in early February 2011.

7. Transparency and Accessibility

In order to make Synergy's hardship policy transparent and accessible, Synergy has:

- Published the hardship policy on its website.
- Promoted awareness of the hardship policy to customers, financial counsellors and other appropriate agencies.
- Produced an information sheet for customers participating in the Keeping Connected program.
- Added Arabic, Dinka, Dari, Farsi, Krio, Burmese, Karin, Somali, Swahili and Vietnamese to the list of languages contained in the hardship policy.
- Added the TIS symbol to the policy.

During 2011 Synergy seeks to collaborate with community groups to identify other options for improving communication and raising awareness of services and support for persons with non-English speaking backgrounds.