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26 June 2008

Mr Paul Kelly  
Executive Director  
Licensing, Monitoring & Customer Protection  
Economic Regulatory Authority  
Level 6, Governor Stirling Tower  
197 St Georges Terrace  
Perth WA 6000

Dear Paul

### **Release of Financial Hardship Policy Guidelines**

I refer to your recent correspondence in regard to the abovementioned and requesting interested persons to provide comment and submissions.

Alinta Sales Pty Ltd as an interested party has reviewed the Draft Guidelines and provides the following comments:

Alinta supports the concept of publishing a set of guidelines which will assist all parties in the formulation and management of Financial Hardship Policies and ensuring the requirements set out in the Code of Conduct for the Supply of Electricity to Small Use Customers (Code) are maintained and clearly understood.

The five financial hardship guidelines presented in the paper cover all areas and Alinta sees merit in the points outlined as good practice, to address each of these areas and be incorporated in the preparation of a Hardship Policy.

Our key comments at this time include:

#### **Payment Arrangements**

Energy Retailers have legitimate commercial objectives and whilst a hardship policy must ensure that disadvantaged residential customers are protected, customers and consumer representative organisations must be aware of the financial obligations to the Energy Retailer and that the development of a Hardship Policy should not be designed around minimising customers genuine financial obligations.

#### **Staff Training**

Alinta agrees with the statement re providing training to staff regarding the Retailers obligations to customers in financial hardship and what the Retailers obligations are in respect to the necessary actions and processes which must be followed.

The issue of working with relevant community groups to develop training packages is not supported in its entirety. Alinta agrees with working with community groups in a general sense; however has concerns in relation to staff being trained in issues such as cultural and social issues for customer groups, Centrelink benefits and budgeting.

We do not support this approach as it is our view that whilst staff can certainly be trained in identifying customers in financial difficulty or financial hardship, they are not qualified to enter into these other areas which require specialised training and an understanding of cultures, Government benefit schemes and financial counselling are not part of a retailer's core business. These are specialised fields and suitably trained staff should manage these sensitive areas.

Alinta does support the concept of referring customers to suitably qualified professionals to manage these areas and then provide assistance which is consistent with the Hardship Policy.

### **Transparency and Accessibility**

In order to ensure greater transparency and accessibility of financial hardship policies, it is our view that in order to maximise awareness, then working with financial counsellors and consumer representative organisations is the preferred forum. These groups are involved with the customers and are more likely to be working with them. This is considered to be a far more efficient method of familiarising the necessary people with the policy.

Alinta appreciates the opportunity to be invited to comment on this matter and is pleased to offer these comments in an effort to achieve an acceptable outcome for all parties involved.

Please contact Ray Myles on (08) 9486 3328 if you wish to discuss these matters further or seek clarification on any of the information provided.

Yours sincerely

**Ray Myles**  
**Customer Services Manager**  
**Alinta Sales Pty Ltd**