



Alinta Sales Pty Ltd

**Continuous Energy Program
(incorporating Hardship Policy)**

Residential Gas Customers

September 2009

Document Control Sheet

Record of Issues

Version No	Issue Date	Nature of Amendment
1.0	December 2007	New Documented Policy
2.0	September 2008	Minor updates and amendments to new policy
3.0	19 November 2008	WACOSS input based on 'Electricity Hardship Policy
4.0	June 2009	Inclusion of: <ul style="list-style-type: none">○ Definitions section○ Payment Difficulties○ HUGS○ State Government Energy Rebate Scheme
5.0	September 2009	<ul style="list-style-type: none">○ WACOSS Recommendations○ FCAWA Recommendations○ Program Options<ul style="list-style-type: none">○ Payment Difficulties & Financial Hardship

Contact for Enquiries and Proposed Changes

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1. Overview

Alinta values its relationship with its customers and recognises that there may be instances where individual customers experience payment difficulties or financial hardship, as a result of which the customer may be unable to pay an outstanding amount as ordinarily required by Alinta.

Alinta's Continuous Energy Program is available to those customers that are assessed as experiencing payment difficulties or financial hardship. The Continuous Energy Program incorporates Alinta's Hardship Policy, which is designed to assist customers in meeting their financial obligations to Alinta.

Definitions

For the purposes of Alinta's Continuous Energy Program, the following definitions of *payment difficulties* and *financial hardship* are used. These definitions are drawn from the Compendium of Gas Customer Licence Obligations, which is also known as the Gas Customer Code 2008.

- *Payment difficulties* are when a residential customer faces a state of **immediate financial disadvantage** that results in the customer being unable to pay an outstanding amount as required by a retailer by reason of a *change in personal circumstances*.

A *change in personal circumstances* is defined in the Gas Customer Code 2008 to include:

- sudden and unexpected disability, illness of or injury to the residential customer or a dependant of the residential customer;
 - loss of or damage to property of the residential customer; or
 - other similar unforeseeable circumstances arising as a result of events beyond the control of the residential customer.
- *Financial hardship* is defined in the Gas Customer Code as a state of **more than immediate financial disadvantage** which results when a residential customer is unable to pay an outstanding amount as required by a retailer without affecting the ability to meet the *basic living needs* of the residential customer or a dependant of the residential customer.

Basic living needs are defined in the Gas Customer Code 2008 to include:

- rent or mortgage;
- other utilities (e.g. electricity, phone and water);
- food and groceries;
- transport (including petrol and car expenses);
- childcare and school fees;
- clothing; and
- medical and dental expenses.
- other similar unforeseeable circumstances arising as a result of events beyond the control of the residential customer.

Who is the Policy for?

Alinta's Continuous Energy Program is available **only** to **residential gas customers** who consume not more than 1 terajoule (approximately \$26,500 per year) of gas per annum.

Access to the Policy

A copy of this policy may be obtained by:

- Phone ~ 9210 2001
- Email ~ customer.services@alinta.net.au

2. Consumer Representative Organisations

External Agencies / Financial Counsellors

Alinta recognises that customers who need one-on-one assistance, be given the option to contact one of the external agencies or financial counsellors. The service provided by the various Consumer Representative Organisations is vital for the community as they can provide financial support as well as support or guidance that is not necessarily related to financial matters. Alinta acknowledges their expertise in this area and as such will refer customers accordingly, when this level of support is required.

Most financial counselling services are situated within a community or church organisation or a local government authority. They are not linked with moneylenders and they provide a free service. A contact list of financial counsellors is provided in the table below.

EXTERNAL FINANCIAL COUNSELLORS AND DEBT COUNSELLORS		
CENTRELINK	Calling from anywhere in W.A.	13 10 21
ALBANY	Angilcare	08 9841 4244
ARMADALE	Armadale Information and Referral	08 9497 1406
ATWELL	Financial Counselling and Financial Service	08 9414 6302
BALGA	Salvation Army and Balga Church Community Services	08 9349 7488
BELMONT	Gowrie Financial Counselling	08 9478 7514
BELMONT	Jacaranda Community Centre	08 9477 4346
BUNBURY	Anglicare Financial Care	08 9791 2585
BUSSELTON	Financial Counselling and Financial Service	08 9754 1858
COOLBELLUP	Cockburn Financial Counselling Service	08 9331 1174
EAST VIC PARK	Sussex St Community Law Service	08 9470 2676
FORRESTFIELD	Foothills Information Referral Service	08 9359 1253
FREMANTLE	Fremantle Community Legal	08 9432 9790
FREMANTLE	Wesassist	08 9335 5258
GERALDTON	Geraldton Resource Centre	08 9964 3533
GOSNELLS	Gosnells Community Legal Centre	08 9398 1455

GOSNELLS	Maddington Outreach	08 9452 0617
HEATHRIDGE	Granny Spiers Community House	08 9401 2699
JOONDALUP	City of Joondalup Financial Counsellors	08 9400 4213
KALGOORLIE	Goldfields Centrecare Financial Services	08 9091 1833
KWINANA	Red Cross Financial Service	08 9419 4039
LANGFORD	Boogurlarri	08 9350 6236
LOCKRIDGE	Blue Sky Community Group	08 9376 9999
MANDURAH	Anglicare Financial Care	08 9581 3914
MANNING	Southcare	08 9313 2558
MAYLANDS	Uniting Care West	08 9212 1921
MELVILLE	City of Melville	08 9364 0666
MIDLAND	Midland Information Debt and Legal Services	08 9250 2123
MORELY	Salvation Army Morley Financial Service	08 9279 4500
PERTH	Uniting Care West (Perth)	08 9212 1921
PERTH	Youth Legal Centre	08 9202 1688
PORT KENNEDY	Anglicare Financial Care	08 9524 5184
ROCKINGHAM	St Nicholas Financial Counselling	08 9592 3653
STIRLING	Community Services	08 9345 8579
VICTORIA PARK	Mission Australia	08 9470 4080
WANNEROO	City of Wanneroo	08 9405 5606

If a customer is unable to meet with a financial counsellor, please direct them to the 'Financial Counselling Hotline 1800 889 364' where they will be assisted.

3. Continuous Energy Program

Alinta's Continuous Energy Program is available to residential gas customers that are assessed as experiencing payment difficulties or financial hardship, as a result of which the customer is unable to pay a bill or an outstanding amount as ordinarily required by Alinta's standard credit management policy.

Alinta's Continuous Energy Program Team is trained to assist customers experiencing payment difficulties or financial hardship, and will refer customers in financial hardship to a Consumer Representative Organisation, to determine if the customer is eligible to be managed under the Continuous Energy Program. Alinta undertakes to treat customers that are experiencing payment difficulties or financial hardship sensitively and respectfully.

The Process

The Continuous Energy Program assessment process may be initiated either by the customer direct to Alinta, or by the customer through an authorised third party. An authorised third party may be a Government or non-government agency such as government departments, financial counsellors, emergency relief providers, social workers, family members or a friend of the customer. The customer must provide verbal confirmation that nominated third party is

authorised to act on their behalf. The direct line to Alinta's Continuous Energy Program team is 9210 2001.

Where a customer, or an authorised third party, notifies Alinta that the customer is experiencing payment problems Alinta will temporarily suspend (moratorium) any disconnection and debt recovery procedures that may have been initiated against the customer.

The length of the temporary suspension (moratorium) will be for a period of 10 business days, but may be extended if requested by the customer, where an authorised Consumer Representative Organisation requires more time to assess the customer's capacity to pay.

The Continuous Energy Program assessment process involves the following steps:

1. Is the customer experiencing payment difficulties or financial hardship?

Where the customer directly contacts Alinta, and the information provided by the customer indicates that the customer is unable to pay a bill or an outstanding amount in accordance with Alinta's standard credit management policy due to **immediate financial disadvantage**, the customer will be assessed as experiencing payment difficulties.

Such a situation is most likely to arise as a result of a change in the customers *personal circumstances* that affect his or her income, and hence his or her ability to pay a bill or an outstanding amount in the **short term**.

If the information provided by the customer indicates that the customer is unable to pay a bill or an outstanding amount in accordance with Alinta's standard credit management policy, without affecting his or her ability (including dependants) to meet their **basic living needs**, the customer will be referred to an authorised Consumer Representative Organisation.

Given the range of expenses incurred by customers for basic living needs, Alinta will rely on the assessment of an authorised Consumer Representative Organisation to determine whether a customer is experiencing genuine personal and/or financial hardship.

2. Is the customer eligible for Alinta's Continuous Energy Program?

Where a customer is assessed by an authorised Consumer Representative Organisation as experiencing genuine personal and/or financial hardship, Alinta's Continuous Energy Program Team will then assess whether the customer is eligible to be managed under Alinta's Continuous Energy Program as outlined below.

In order to be **eligible** to participate in the Continuous Energy Program, a customer must meet the following criteria.

- The customer must demonstrate a willingness to pay their bill and/or outstanding amounts.
- The customer must not have an ongoing history of unauthorised reinstatement of the supply of gas at the address in question.
- The customer must not currently be on a shortened billing cycle (monthly).

4. Program Options

Customers that are eligible to participate in Alinta's Continuous Energy Program have access to one of several options depending on whether they are assessed as experiencing payment difficulties or financial hardship. These options are discussed in more detail below.

Payment difficulties

Customers that are assessed by Alinta as experiencing payment difficulties will be offered access to one of the following two alternative interest-free and fee-free arrangements:

- Additional time to pay and/or
- Instalment plan.

For residential customers facing a state of immediate financial disadvantage, Alinta will suspend any disconnection and debt recovery procedures to a date as agreed with the customer, providing the debt is paid in full and before the due date of the next gas account.

Financial Hardship

Customers that are assessed by a Consumer Representative Organisation, as experiencing genuine personal and/or financial hardship, will also be offered access to the two alternative payment arrangements outlined above.

In addition, customers assessed as experiencing genuine personal and/or financial hardship may also request that Alinta reduce the fees and charges that have been applied to the customer's account and/or the customer's outstanding amount.

Where the customer enters into a payment plan, Alinta encourages payment via a number of suitable options to the customer. Recipients of Centrelink benefits who initiate a Centrepay arrangement will have the overdue notice fee(s) that applied to the most recent account, waived, as will customers paying via Direct Debit. Where Alinta has applied an overdrawn fee on the customer account, this will also be waived.

Customer's are encouraged to contact Alinta should their circumstances change, requiring the customer to re-negotiate a new plan. This will ensure the initial plan is not terminated or cancelled prematurely. Alinta's process will also involve communication with our customers.

Customer's participating in the Continuous Energy Program who were unable to maintain their plan or a subsequent re-negotiated payment plan may benefit by being placed on a shortened billing cycle of 'monthly', if considered appropriate.

The customer will be returned to Alinta's standard quarterly billing cycle when three (3) consecutive bills, on the shortened billing cycle (monthly), have been paid by their respective due dates.

If in the preceding twelve (12) months, the customer has had two instalment plans under the Continuous Energy Program cancelled due to non-payment, the Continuous Energy Program Team Leader must be satisfied that the customer is committed and able to comply with the new instalment plan.

Who may negotiate alternative payment arrangements?

In addition to the account holder, the following parties may negotiate alternative payment arrangements with Alinta:

- A co-occupant listed on the customer's account; and/or
- An authorised third party.

5. Customer Rights & Responsibilities

Customer Rights

- Customers eligible for the Continuous Energy Program and who maintain their agreement with Alinta will be guaranteed Continuous Energy.
- Have their Energy account re-directed to a third person.
- Be advised of the instalment plan options to suit their circumstances
- Be offered an additional extension or re-negotiate a payment plan
- Negotiate a payment plan using a Telephone Typewriter (TTY).
- Use of the Interpreter service at no cost to the customer.
- Request large print accounts.
- Receive assistance via the bill reading service.
- Interest free and fee free instalment plans.
- Where a customer is not satisfied with a decision by an Alinta representative, they are entitled to raise a complaint to a higher level. Where, after raising the complaints to a higher level, the customer is not satisfied with the supplier's response, refer the complaint to the external resolution body, as appropriate.
- Be given the contact details of the Sustainable Energy Development Office (SEDO) who can provide information on how to reduce their energy consumption levels.
- Receive information regarding government concessions and assistance programs
- Receive information regarding appliance efficiency and in-home optimisation tips

Customer Responsibilities

- Customers should contact Alinta or a Consumer Representative Organisation, if they are unable to pay their gas account by the due date.
- When a customer is not able to maintain the payment plan, they are encouraged to contact Alinta to discuss their change of circumstances. Alinta can consider re-negotiating the payment plan providing there is sufficient information from the customer regarding their change in circumstances.
NB: Alinta will monitor all payment plans on a regular basis. This will also include communication with our customers.
- Customers on a plan must give Alinta at least 3 business days notice of when the customer intends to vacate the premises.

6. Government Assistance Schemes

The Hardship Utility Grant Scheme (HUGS)

The Hardship Utility Grant Scheme (HUGS) commenced on the 4th August 2008 as part of the State Government's commitment to improve the delivery of utility essential services to individuals and

families experiencing financial and/or social disadvantage. The Scheme provides financial assistance to people in genuine personal and/or financial hardship to pay their utility accounts so as to avoid being disconnected or restricted from supply.

HUGS is administered by the Department for Child Protection. For a person to be considered eligible to apply for a grant the customer must be assessed by a Consumer Representative Organisation as experiencing genuine personal and/or financial hardship.

State Government Energy Rebate Scheme

The State provides an energy subsidy to people who are financially disadvantaged. The subsidy is intended to assist with the costs of buying energy of all types (electricity, gas, fuel oil, wood, etc). However, for administrative simplicity, the subsidy is paid through Synergy and Horizon Power.

7. Disconnection and Reconnection

Disconnection of Energy Supply

Customer's who participate in the Continuous Energy Program and who adhere to the agreed payment plan will not face the risk of disconnection. If the gas is reconnected as a result of the customer participating in the Program, the reconnection fee will be waived.

Where a customer defaults on their instalment plan and no effort made to contact Alinta to request a review of their circumstances or renegotiate the arrangement (based on a change of circumstances), Alinta will initiate further communication with our customer accordingly.

Reconnection of Energy Supply

Customers who default on the payment plan under the Continuous Energy Program will revert to Alinta's standard credit management policy for the reconnection of their gas supply. Customers, who later contact Alinta, and where further extenuating circumstances exist, may have their plan options reviewed and re-negotiated.

8. Employee Training and Development

All Customer Service Representatives are aware of the Continuous Energy Program and the eligibility process.

Training is ongoing and falls in line with changes and reviews that occur as Alinta continues to improve the Program, throughout its lifetime. The team also respect the sensitive nature that surrounds some of the various issues that our customers face and as such treats each individual's circumstances on a case by case basis and with the utmost confidentiality.

9. Complaint Handling Process

Definition of a Complaint

A customer complaint is any expression of dissatisfaction made to Alinta related to its products or services, or the complaints-handling process itself where a response or resolution is explicitly or implicitly expected.

Alinta's Complaints Handling Process

Alinta's complaint handling procedure has been developed in accordance with the Australian Standard on Complaints Handling AS ISO 10002-2006, and the Gas Customer Code 2008.

All complaints are escalated to the appropriate person at Alinta. Complaints will be responded to immediately during the initial conversation. If Alinta is unable to resolve the complaint in the first instance, it will be escalated and responded to within 7 business days of receiving the escalated complaint or sooner depending upon the urgency of the matter.

All complaints regarding the Continuous Energy Program can be directed to 9210 2001 in the first instance and then escalated to the appropriate person.

If you are dissatisfied with any aspect of Alinta's products or services, you can have your say by contacting us: -

- **Telephone** Alinta on 1800 677 945 (free call from a land line). Normal charges apply for calls initiated from a mobile phone.
- **Mailing to:**
Alinta ~
Attention: Customer Complaints
Locked Bag 55,
Perth BC WA 6849
- **Faxing** to free fax 1800 651 161
- **E-mailing** to customer.complaints@alinta.net.au

If you are not satisfied with the resolution of your complaint and you would like the matter escalated further, you may contact the Energy Ombudsman, an independent external dispute resolution body which provides mediation, conciliation and arbitration services to resolve customer disputes. There is no charge for this service.

- **External Dispute Resolution Agency**
Energy Ombudsman
Level 12, 44 St George's Terrace, Perth
Freecall number: 1800 11 70 00

10. Energy Efficiency

Alinta can provide customers with information regarding energy efficiency tips for a variety of appliances and show how these savings can be achieved during both winter and summer. For more information, visit www.alinta.net.au/home/environmental-solutions/top-tips.php or ring us on 13 13 58.

Sustainable Energy Development Office (SEDO)

The Sustainable Energy Development Office provides advice and information on energy use, appliance selection, running costs and best-practice energy management. For more information, visit www.sedo.energy.wa.gov.au or ring the 'Energy Smart Line' on 1300 658 158.

11. Review

Alinta's Continuous Energy Program will be reviewed annually and in consultation with Consumer Representative Organisations.

The initial review of the Continuous Energy Program in July 2010 will assist Alinta in determining the effectiveness of the program, including the benefits to customers and the benefits and costs to the business.

Alinta will establish targets to monitor further opportunities to be gained by enhancing and improving on the overall results that this program delivers.