September 14th 2021 **Department for Energy and Mining**

dem.consultation@sa.gov.au

Submission in response to the Consultation on proposed amendments to customer payment under the South Australian Remote Area Energy Supply (RAES) Scheme (Issues Paper July 2021) by:

Brad Riley at the Australian National University's Centre for Aboriginal Economic Policy Research https://researchers.anu.edu.au/researchers/riley-b

Dr Lee White at the Australian National University's School of Regulation and Global Governance https://researchers.anu.edu.au/researchers/white-lx

Dr Thomas Longden at the Australian National University's Crawford School of Public Policy https://researchers.anu.edu.au/researchers/longden-t

Dr Simon Quilty at the Australian National University's Research School of Population Health https://researchers.anu.edu.au/researchers/quilty-s

Thank you for the opportunity to make a submission to the Consultation on proposed amendments to customer payment under the Remote Area Energy Supply (RAES) Scheme (July 2021).

White, Longden and Riley are researchers at the Australian National University's Zero Carbon Energy for the Asia-Pacific Grand Challenge. Dr Quilty is a Specialist Physician at Alice Springs Hospital. We are keen to engage in further discussions and our contact details are available above on our ANU websites.

As the Department makes clear and we acknowledge, the issues raised by the staged introduction of electricity charging for residents of the APY Lands, Yalata, Oak Valley and associated homelands are complex and the potential for unintended consequences numerous. The South Australian Government Department of Mining and Energy, relevant communities, stakeholders, SACOSS, ESCOSA and contractors each deserve recognition as there is much to commend the current approach, particularly the time taken to gain a better understanding of the realities facing remote communities in the years preceding the current issues paper.

Refraining from unilaterally implementing the full tariff for the proposed amendments repositions energy policy in a way that goes further than a narrow economic framework to consider the broader implications of the distribution of socio-economic risk and costs for off-grid residents, many of whom are disadvantaged by location, inadequate housing, low incomes and challenging access to thin labour markets[1]. This is significant, as like Indigenous peoples globally in the energy transition, First Nations peoples in South Australia have long been at greater risk of;

- Procedural injustices – including historic disparities in their legal rights and access to regulatory protections

- Recognition injustices – including their exclusion from decision-making affecting their lives and lands, including energy policy

- Distributive injustices – including systemic disparities related to a lack of access to energy efficient housing and appliances and less ability to shape energy systems policy, all while too-often bearing a disproportionate burden of environmental costs, for example the poisoning of Indigenous lands associated with atomic testing between 1955-1963 and its ongoing effects[2]

- Furthermore, First Nations are on the front-lines of damaging climate change as temperature extremes amplify the risk of energy insecurity, and harm to traditional lands and livelihoods[3]

Moreover, household energy insecurity has the capacity to undermine critical outcomes aligned to improving current inequities[4] in health, shelter, food-security and Indigenous wellbeing - commitments to which all state and Territory governments are agreed via the Agreement on Closing the Gap in Partnership[5].

In many ways (with some notable exceptions) the careful groundwork evident in the issues paper exceeds the standard set by previous efforts in most other jurisdictions in transitioning to a 'user-pays' model on remote communities, starting in the early 1990's. While we commend many of the approaches integrated by DEM, in our submission we detail areas of remaining risk, and areas where further improvements should be considered for customer wellbeing. In particular, we emphasise that there remains a potential for adverse health impacts, and that DEM's proposed monitoring will be key in understanding the extent and severity of these.

In particular we highlight the importance of informed consent.

Consultation Question 1

Are there any other benefits or risks that can be identified based on the above options?

Summary: The approach taken by DEM incorporates many elements of best practice, which we commend. With that said, we note the following risks remain:

- Burden of ameliorating energy hardship falls directly on residents via the prepay mechanism, and there is high potential for adverse impacts during summer and winter periods when extreme temperatures exacerbate financial stresses incurred from attempting to maintain safe temperatures within homes[6]

- Prepay meters by nature fail to position disconnection as a last resort, creating a higher burden for households on prepay to manage and monitor their electricity use on a day-to-day basis. This has a higher risk of adverse health impacts, as the costs of disconnection will fall most strongly on those already disadvantaged[7]; the monitoring built in by DEM will be key to understanding the extent and severity of this issue, and we urge that compliance and enforcement of monitoring remain at least as strong as outlined in the current plan

Prepayment metering has the practical effect of shifting the burden of ameliorating energy hardship away from retailers toward residents themselves; to those community-controlled organisations forced to step up to mitigate household energy insecurity within community, and finally to the heath sector who see the impacts of energy insecurity upon Indigenous health and wellbeing[89]. For prepayment customers when disconnection occurs following the end of prohibition conditions, residents experience a complete loss of access to the services that energy provides including refrigeration, connection to information technology, lighting at night and thermal comfort[9]. There is no failsafe -

disconnection is complete, meaning food and vital medicines spoil and housing is rendered inadequate[10]. These burdens impact upon already disadvantaged job-seekers, the young, the elderly and those seeking to use energy services for productive purposes in the home, such as cooking, studying, washing children, bedding and clothing. As the Consumer Action Law Centre observes 'if a customer solves their energy affordability problem by under-consuming, they still have a problem'[8], while:

> The constant necessity to 'top-up' can have a profound effect on the ability of low income PPM users to cover other household expenditures. Continually having to find the money to put in the meter, sometimes two or three times a week, clearly has a detrimental effect on the ability of PPM users to survive on a day-to-day basis let alone plan for the future[11].

Frequent disconnection associated with prepayment undermines the principle that disconnection is only ever a 'last-resort' in Australian energy markets. Post-pay customers typically receive weeks' or months' worth of warnings before disconnection occurs, whereas for prepay disconnection is typically same-day. Particularly within the context of poor quality and overcrowded housing, fixed high energy use appliances, low incomes and complex health needs the risk of homes involuntarily self-disconnecting from energy services are significant[12]. And these disadvantages are compounded by regional temperature extremes which multiply risk[13] and have been associated with a range of adverse health outcomes[14]. Housing is experienced by residents as very hot during summer and very cold during winter which increases the reliance of households upon the services that energy provides while simultaneously increasing energy use, and therefore the risk of those services being disconnected during inclement weather.

Moreover, remote communities will face these new challenges during a particularly difficult period for remote communities due to the COVID-19 crisis. During this time the COVID-19 income supplement was targeted at some of the poorest households within Indigenous communities across Australia, an additional payment that had significant positive effects[1]. For communities in the APY Lands, they will experience the introduction of a 'user-pays' model for access to energy coinciding with the cessation of the COVID supplement.

Despite the considerable lengths DEM has gone to, as is evidenced in the current issues paper, it remains hard to avoid the conclusion that over coming months, particularly winter and summer, many remote living Indigenous residents will likely experience involuntary self-disconnection from 'essential' services. Customers need to be well-informed of the risks of prepayment including anticipated or expected rates of disconnection upon non-payment based on those experiences from other jurisdictions.

Consultation Questions 2

The Department seeks stakeholders' views on the proposed fit for purpose consumer protection measures discussed below, as well as any suggestions for further protections

We note the following areas in the plan that are currently strong:

- Diversity of payment mechanisms
- Culturally relevant text and non-text based resources
- Energy education engagement through the Pawa Atunmankunytjaku

However, the following areas need improvement:

- Additional written translations to Pitjantjatjara
- Definitions of life support equipment could be broadened to include 'any equipment that a medical practitioner considers essential for their patient' in line with the AER's life-support registration guidelines. This might extend to medicines that need to be stored at specific temperatures and protections for conditions exacerbated by extreme temperatures (these include diabetes, high blood pressure, chronic kidney disease, heart conditions and respiratory conditions[15])
- Mechanisms for provision of information allowing customers to budget – including historical bills and ensuring that prepay meter displays are in an easily visible and accessible location so that running out of credit doesn't come as a surprise
- Immediate consideration of how solar can be integrated with pre-pay meters through structuring of PPM solar tariffs (even simply to allow zero-export, in the first instance), otherwise lock-out from this beneficial technology will occur

The greater diversity of payment mechanisms outlined in the issues paper is a very good outcome for remote living residents and we are pleased to note that payment options have been improved to include; in store purchases, website, Centrepay or direct debit, over the phone and through electronic funds transfer. So too, arrangements made with Department of Human Services whereby the South Australian Energy Bill Concession will be applied directly to the prepayment meter on a fortnightly basis, and efforts to have the Emergency Energy Payment Scheme similarly facilitated through DHS are each exemplary. We suggest advertising these innovations at the monthly utilities meeting as they merit wider application in other jurisdictions.

The use of culturally relevant text and non-text based resources is similarly a significant improvement over past efforts in other jurisdictions. Some customers may find spoken material much more accessible than written material and the production of materials in Pitjantjatjara is a practical step to overcoming these barriers. However, we do note that upon clicking the link to the proposed changes to customer payment, we could only find an English version of the issues paper - is there a Pitjantjatjara transcript of the issues paper that those on the Lands can refer to?

We note that while definitions of life support equipment[1] often allow flexibility in interpretation depending on the medical practitioner, aspects of these standards are routinely overlooked by clinicians. For example, the Code could benefit by being expanded to include any customer who is prescribed with a medication that needs to be stored within defined temperature ranges (for instance, salbutamol for asthma – 15-30 deg. C, insulin – 2-8 deg. C). There is also evidence that certain health vulnerabilities are exacerbated by extreme temperatures. Similarly, where specific vulnerabilities have been epidemiologically established (for instance, renal disease and extreme heat) and where there are specific climate-related vulnerabilities for a household, the protections outlined in the issues paper could benefit by being expanded to include climate control (air conditioning or heating). The protections could also benefit by describing how such life support equipment procedures are to be communicated to healthcare practitioners.

The Department should be commended on the energy engagement education relating to palya through the Pawa Atunmankunytjaku program and the use of MoneyMob Talkabout training resources, including the training of local 'Pawa Mulpa' Energy Education workers (who are fluent in local languages) for door-to-door education. As the impacts of the proposed changes are likely to be

[1] We note the Federal Government offers an Essential Medical Equipment payment while Victoria similarly offers a Life Support Concession

ongoing, continuation of those financial counselling and energy education services offered by Moneymob Talkabout should similarly extend beyond the implementation window.

The introduction of weekly monitoring and quarterly disconnection reports is critically important, as is transparency of monitoring results. We commend and support the proposal for sharing of monitoring data, preferably on the most granular basis practicable, with relevant bodies particularly ESCOSA and SACOSS as well as those local Aboriginal Community Controlled Health Organisations (for example Nganampa Health) with an interest in ameliorating energy hardship on the Lands. This is consistent with the Closing the Gap in Partnership: Priority Reform Four[16] which calls for the "greater sharing of, and access to, data and information at a regional level, noting that disaggregated data and information is most useful to Aboriginal and Torres Strait Islander organisations and communities to obtain a comprehensive picture of what is happening in their communities and to support decision making"[9].

In order to understand how much to budget for pre-pay customers would reasonably need access to their historical energy use and payment details. Consumers should be able to access their own historical electricity data usage easily and freely to the extent that this is tracked within retailer systems. Minimum requirements will vary with meter type. If a customer has a smart meter, then they should be able to access their hourly usage data for the time of their tenure at the property. For example, it is important for pre-pay consumers to be able to see how much credit remains on their meter from a display conveniently located and visible inside their home. We note that the use of the Pipit 500 in-home display will not be available in remote Aboriginal off-grid communities. Use of a robust, rugged real-time display in a location that is convenient, accessible but not intrusive would be most useful for remote living residents to better manage electricity costs and avoid instances of involuntary self-disconnection. This is consistent with the findings of the Bushlight[17] report (in relation to feedback) which found:

> payment will not solve the problem of feedback. Implementation of PPM in other jurisdictions has not addressed the need for timely and accessible energy consumption feedback in the home

Residents predominantly living in community housing are typically renters. They often have few options to make energy-efficient changes to housing without having to navigate complex regulatory burdens. Rooftop solar is almost wholly absent from community housing in the relevant communities and we note that there is currently no solar feed-in tariff structured for households utilizing prepayment metering - which risks locking-out PPM customers from the benefits of rooftop solar PV as a practical energy security protection[18]. Yet in South Australia:

> Rooftop solar provided an impressive 47.7 per cent of the state's generation mix in (the) three month period, and wind and solar overall provided 82.5 per cent of generation over the quarter[19]

Investing in rooftop photovoltaic systems, and community renewable energy projects where the benefits are *directly shared with residents* would seem an urgent first step in support of vulnerable community housing residents utilizing prepayment metering.[20] [18]

Consultation Question 3

The Department seeks stakeholder views on the proposed implementation pathway

We wish to highlight, with not a small amount of concern, that the current plan does not allow for the informed consent of relevant communities to prepayment. This mandatory prescription seems at odds with much that is good in the current approach, as well as with international norms in law relating to the rights of Indigenous peoples.

The 2021 review of the Prepayment Meter System Code (2005) prompted by the State Government roll-out of prepayment meters in remote and regional South Australia as part of its 'Future Sustainability Project' was welcome, and we were pleased to make a contribution to the Code Review (see attached in Appendix 1). It was therefore with surprise that we read the following in the current issues paper:

> It is considered that Option 2 – the prepayment method, should be the default payment method for residential customers in the relevant communities. It is proposed that **customer consent will not be required** for the payment method and the customer **will not have the option to opt out** of the default payment method for postpayment

It is necessary to point out that operation of the Code is predicated on the basis that participation in prepayment metering is voluntary - while the proposed or preferred implementation pathway outlined in the current issues paper is mandatory. This fundamentally undermines the requirements of the Code and by extension therefore the Code Review. Prescribing households be required at all times to pre-pay for energy in order to have it supplied, without the free, prior and informed consent of Indigenous community residents is inconsistent with best-practice. In particular we note the obligation for governments to engage with Indigenous peoples as recognized in international law, including in the United Nations Declaration of the Rights of Indigenous Peoples (UNDRIP) which Australia has supported since 2009. The UNDRIP affirms that States are to consult and cooperate in good faith with Indigenous peoples through their own representative institutions in order to obtain their free, prior and informed consent in relation to developments that may affect them (UNDRIP 2007[21]). Colchester defines FPIC thus:

> The right to participate in decision-making and to give, modify, withhold, or withdraw consent to an activity affecting the holder of this right. Consent must be freely given, obtained prior to implementation of such activities and be **founded upon an understanding of the full range of issues implicated by the activity or decision in question**; hence the formulation: free, prior and informed consent[22]

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Appendix 1:

Essential Service Commission of South Australia Prepayment Meter System Code Review

escosa@escosa.sa.gov.au

April 29th 2021
Submission in Response to Prepayment Meter System Code Review

Submission by:
Dr Thomas Longden at the Australian National University's Crawford School of Public Policy https://researchers.anu.edu.au/researchers/longden-t
Brad Riley at the Australian National University's Centre for Aboriginal Economic Policy Research https://researchers.anu.edu.au/researchers/riley-b
Dr Lee White at the Australian National University's School of Regulation and Global Governance https://researchers.anu.edu.au/researchers/white-lx
Dr Simon Quilty at the Australian National University's Research School of Population Health https://researchers.anu.edu.au/researchers/quilty-s

Thank you for the opportunity to make a submission to the ESCOSA Prepayment Meter System Code Review. Our submission offers a response to each of the Consultation Questions presented in the current Issues Paper. We are available for further discussions and our contact details are available on our ANU websites. Some of the issues raised are complex and we are keen to engage in further discussions.

Response to Consultation Questions:

1. **Is there a need for retailers to provide an emergency credit facility for customers? If so, how should the required amount of emergency credit for electricity and gas be set? And why?**

Emergency credit is commonly used in prepayment systems. So are disconnection prohibitions during certain times of day. But emergency credit and prohibitions from disconnection during set times (such as outside working hours, or during extreme weather events) do not solve the problem of accumulated debt. Further, when disconnection occurs following the end of prohibition conditions, residents still experience complete loss of access to the services that energy provides (such as refrigeration and lighting). Systemic changes would be needed to address the issues underlying challenges managing prepay that contribute to debt accumulation. For example, it is important for pre-pay consumers to be able to see how much credit remains on their meter, from a display conveniently located and visible inside their home. It is important that this does not rely on an internet connection which can be compromised when electricity is discontinued. This provision of information is critical for consumers to be able to manage electricity costs and avoid disconnection.

Moreover, the health implications associated with the complete loss of essential services provided by electricity are significant. Disconnections can mean that vital healthcare equipment no longer functions. This would impact oxygen concentrators, sleep apnoea machines, and other essential medical devices. Such events could result in notable harm. Emergency credit for pre-pay will only delay disconnection in such circumstances, unless additional protections are given to customers with medical conditions necessitating uninterrupted access to electricity.

The roll out of smart meters in other jurisdictions often removes ability to use 'token' or 'card' pre-paid 'powercards'. There are a number of important differences between 'powercards' and 'smart' prepayment metering. 'Smart' prepayment metering is increasingly used since the discontinuation of AMPY prepayment meter hardware in 2010. Previously 'powercards' could be stockpiled and then used by anyone in the household when a disconnection occurred. 'Smart' prepayment swipe-cards can mean that there is a limit on the number of cards in use by a household (often only one or two). The effect of this can be to limit the flexibility of 'topping up' energy credit, and to restrict the management of energy costs to the limited number of residents who retain the 'smart' prepayment

swipe-card. This especially becomes an issue when the household has many residents. If these 'smart' prepayment swipe-cards are lost, misplaced, or relocated when residents travel, it can be difficult or even impossible for residents to reconnect power without the barcode/smart meter ID number.

There is a need for a greater diversity of payment mechanisms. For example, disconnections will mean that home internet will stop working (if that service exists in the home), and so a reliance on web-based payment options is not always suitable. In the NT, smart meters offer the convenience of online credit 'top-up'. This requires a degree of digital literacy, infrastructure and Wi-Fi credit. The smart meters also offer the convenience of credit card purchase, however many residents using these meters are often restricted in their purchasing, to those items accessible on a Basics Card. The flexibility of old pre-paid 'powercards' has been lost, or changed, for many NT residents with the introduction of 'smart' metering.

Due to the complex issues detailed above, setting a specified amount of emergency credit is insufficient to address problems with disconnection. People in communities where prepay is offered as the dominant payment option should be directly engaged in the design of measures to alleviate the harms of disconnection, including emergency credit quantities and procedures.

More details at: https://www.powerwater.com.au/customers/power/power-meters/prepayment-power-meters

2. **Is there a need for retailers to actively monitor disconnection data as a way of identifying customers who may be experiencing payment difficulties? If so, what measures and metrics should be monitored?**

Yes, there is a critical need for retailers to monitor and report on disconnection data, and ideally for this data to be made available to 1) the residents and communities that the data pertain to, 2) community-controlled organisations that are increasingly on the frontline of mitigating energy hardship, and 3) to researchers such as those at universities who can provide analysis to inform future policy making in this key area.
Involuntary self-disconnection associated with prepayment metering is an indicator of multi-dimensional disadvantage and poverty. Energy insecurity undermines outcomes aligned to housing, health, and wellbeing. The timing, frequency, and duration of the complete de-energisation of the home should be considered to be a key metric of energy poverty and will indicate households who are having payment difficulties.

The timing, frequency, and duration of disconnections should be monitored and reported on the most granular basis practicable. This may be per week/month/quarter. It is likely that rates of same-day and multi-day disconnections will change based on underlying demand for energy, driven by seasonal changes and critical daily events (such as extreme temperatures that require electricity use for heating or cooling). Disconnection may also be impacted by other structural (poor-quality housing and fixed high energy use appliances) or socio-economic factors.
We note that disconnection rates among pre-pay customers have been high in international studies. In New Zealand, 53% of pre-pay customers experienced self-disconnection in a year (O'Sullivan et al. 2013). This is much higher than disconnection rates experienced by post-paid customers.

Reference:
O'Sullivan, K. C., Howden-Chapman, P. L., Fougere, G. M., Hales, S. & Stanley, J. Empowered? Examining self-disconnection in a postal survey of electricity prepayment meter consumers in New Zealand. Energy Policy 52, 277–287 (2013).

3. **Is there a need to require retailers to revert customers experiencing payment hardship back to post-pay arrangements without charge? Should any other assistance be provided?**

Disconnection is recognised as a significant health risk due to the negative impacts (both physical and psychological) of a loss of access to electricity (Hernández 2013). Many jurisdictions have introduced protections for customers. This includes more stringent protections for customers identified as being at high risk for energy poverty, customers with limited ability to pay (which overlaps with, but is not entirely synonymous with, energy poverty), and protections during conditions that would be harmful to customers (including during extreme temperatures, extreme weather events, and when customers rely on electricity to maintain health) (Dobbins 2019, Flaherty 2020).

Some jurisdictions, such as Texas in the U.S., prohibit vulnerable customers from being placed on pre-pay rates in the first place. This is tied to assessment of whether electricity is critical for a customer's health. For example, a Critical Care Residential Customer is a "residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as being dependent upon an electric-powered medical device to sustain life." A Chronic Condition Residential Customer is a "residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as having a serious medical condition that requires an electric-powered medical device or electric heating or cooling to prevent the impairment of a major life function through a significant deterioration or exacerbation of the person's medical condition." Neither of these types of customers may be enrolled in pre-pay in Texas.

More details at:
http://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.497/25.497ei.aspx
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4. **What information, if any, should retailers be required to report publicly on self-disconnections?**

1) Reporting information to consumers and the customer consultation groups
Greater diversity of languages is needed when communicating with consumers. This should include Aboriginal and Torres Strait Islander languages and other non-English language materials. Some customers may find spoken material much more accessible than written material.
The energy data that should be collected and made available to the customer consultation groups, residents, and their representative community-controlled organisations should include at a minimum: (1) average kWh usage; (2) average expenditure ($); (3) total number (frequency and start time) of completed self-disconnection events, and (4) average duration of completed self-disconnection events. Below is an example of minimum reporting for the Northern Territory.

	Smart Prepayment Meters (PPM) April-June 2019				
	PPMs	PPMs Disconnecting		Mean Duration	
	#	#	%	Minutes	Hours
Darwin	457	331	72%	454	8
Katherine	834	413	50%	460	8
Alice Springs	570	420	74%	455	8
Tennant Creek	513	316	62%	480	8
Total	2374	1480	62%		

Source: https://irp-cdn.multiscreensite.com/d440a6ac/files/uploaded/House%20of%20Representatives%20Inquiry%20into%20Homelessness%20in%20Australia%202020.pdf

2) Access to raw de-identified data by key groups and stakeholders

We note that the Commission acknowledges that "there is a lack of evidence and that can be drawn upon to assess the effectiveness of the code in its current form." Building evidence needs to start with the provision of access to de-identified data for key groups and stakeholders, to build the evidence base to better inform policy.

This points to the importance of data sharing, and is in line with the Council of Australian Governments 'Closing the Gap in Partnership: Priority Reform Four' (COAG 2019) which calls for the greater sharing of, and access to, data and information at a regional level, noting that "disaggregated data and information is most useful to Aboriginal and Torres Strait Islander organisations and communities to obtain a comprehensive picture of what is happening in their communities and to support decision making" (NACG 2020). Internationally the movement to secure local ownership and control of data relating to Indigenous peoples is known as Indigenous data sovereignty (Yu 2012, Kukatai and Taylor 2016). Greater capacity building and sharing of data with community-controlled organisations can do much to support community and service provider efforts to improve energy security within remote communities, many of whom are likely to be users of new 'smart' prepayment metering technology.

Other jurisdictions, such as California, have introduced regulatory requirements for the sharing of energy monitoring data for research purposes. The California Public Utilities Commission (Decision 14-05-016) requires that energy data be made accessible to local government entities, researchers, and state and federal agencies while providing appropriate protections for privacy of consumer data. Given the challenges identified by the ESC in the process of evaluating evidence-based protections for prepayment consumers this type of access should extend to self-disconnection data.

References:

Council of Australian Governments (2019) Partnership Agreement on Closing the Gap 2019-2029, https://www.coag.gov.au/sites/default/files/agreements/partnership-agreement-closing-the-gap_2.pdf

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NACG (2020) National Agreement on Closing the Gap in Partnership, Reform Priority 4: Shared access to data and information at a regional level https://www. closingthegap.gov.au/priority-reforms

Yu, P. (2012) The power of data in Aboriginal hands. Topical Issue 4. Centre for Aboriginal Policy Research, Australian National University.

5. **The Code requires retailers to establish a Prepayment System Customer Consultation Group: what should be the purpose and membership of the group and how should it best**

engage with and provide feedback to retailers and the Commission? Should there be a single group or should each retailer form its own group?

The number of groups depends on how the retailers are distributed. If one retailer is responsible for a certain type of group (such as Indigenous townships), then this should be considered.
In practice, prepayment is commonly used within many regional, remote, and very remote Aboriginal and Torres Strait Islander communities; in Western Australia, the Northern Territory, Queensland, and the Torres Strait Islands. Provision for First Nations representation on the Prepayment System Customer Consultation Group is one method for representing the voices of First Nations prepayment consumers. Aboriginal community-controlled health organisations (and wherever relevant, Aboriginal Prescribed Bodies Corporate and Native Title Representative Bodies or Community representative bodies), should be made aware of the purpose and functions of the PSCCG and considered for membership of the group, as they are often on the frontline of ameliorating energy hardship in community. Similarly, membership should include representative community-controlled organisations and organisations that focus on vulnerable groups (such as key health, social service and advocacy groups).

6. **Are the current information requirements on retailers appropriate and sufficient to enable customers to make an informed decision to enter a prepayment system appropriate and sufficient? If not, what other information should be provided by a retailer?**

There is a need to provide information about increased risk of disconnection on prepay to customers who are making decisions regarding entering these systems. Will an increased likelihood of immediate disconnection from energy services be explained as an issue that these customers may experience? Will this be compared to what other customers, such as those on post-pay, typically experience?
Also, in the Issues Paper the ESC reports that: “Price comparison reports from both Tasmania and New Zealand have found that energy costs are higher for customers using prepayment systems than they are for post-pay arrangements.” It could be considered that the risk of higher bills is information required for the decision-making process. While acknowledging that flat rate supply charges are discounted for prepayment customers, prepay customers often pay a higher per-kWh tariff that represents a premium over standard residential rates. Community expectations of prepaid metering have shaped a culture in many remote communities where residents are often unaware that there is any other means of purchasing power. This needs to be addressed at a broader community level with public education programs.
People with significant health issues who rely on stable power supply for vital equipment – oxygen concentrators, refrigerators for medication, and so on – should be provided information regarding the extent of their consumer rights with regards to the importance of an uninterrupted electricity service. Doctors and nurses treating these patients should also be educated about the policies and processes available for patients with such needs to better inform health care planning.

7. **What minimum information should retailers be required to provide to customers about their historical energy usage?**

Consumer data rights mean that consumers should be able to access their own historical electricity data usage easily and freely – to the extent that this is tracked within retailer systems. Minimum requirements will vary with meter type. If a customer has a smart meter, then they should be able to access their hourly usage data for the time of their tenure at the property. If they have a meter that does not collect this data, then minimally aggregated data on their own historical use should be provided.
Critically, information should be provided to address two core categories:

1. To allow customers to calculate their expected bills on various rates (if desired) based on their own historical usage data, and;
2. To allow customers to understand typical experiences of other customers on different rate types (such as average costs and disconnection rates for post-paid and pre-paid plans).

To understand how much to budget for pre-pay, customers would need access to their historical energy use and payment details. Without this information, it is difficult to see how they can make informed choices. Key data would allow customers to calculate expected electricity budgets. Data required for this calculation would include their historic total kWh usage during each season, and the per kWh tariff that they would pay on current or new rates.
We have addressed the second point above in terms of Australian and international comparators. However, retailers should provide disconnection and average bill information across their customer bases at an aggregated level. This information should be made available to current and potential customers. Basic analytics of whether disconnection is more common on certain days of the week (for example Monday, or the first 'allowable' disconnection day after a weekend or public holiday), month (season-summer/winter) or year would also be useful to customers enrolled in or considering pre-pay.