

Diamond Energy Pty Ltd

Victorian Residential Customer Hardship Policy & Charter

Our Social Responsibilities and Customer Values

As an electricity retailer, we consider that we have a responsibility to give special consideration to the interests of residential customers who are experiencing financial pressure and are having difficulty in paying their energy bills.

At Diamond Energy, we treat all customers respectfully and take a compassionate and sensitive approach to discussing a customer's financial hardship matters. We are committed to both prevention and intervention as a means of mitigating energy related financial hardship.

Diamond Energy recognises that any customer may experience times of genuine financial hardship. Customers can experience genuine financial hardship when they intend to pay, but are unable to, because of circumstances beyond their control.

Diamond Energy believes that a customer in these circumstances should not be subject to the additional burden and stress of being threatened with disconnection and collection action.

Definition of Customers in Financial Hardship

Diamond Energy defines customers in financial hardship as customers who have the intention to pay their energy bills but are not able to at this time.

There are two classifications of financial hardship, namely short term financial hardship and long term financial hardship. Short term financial hardship is the case of a customer in financial difficulty due to a temporary change in circumstances. Some circumstances that can lead to short term financial hardship are:

- If a customer has received a number of bills at the same time.
- If the customer has incurred an unexpected or emergency one-off expense.
- If a customer has had their income drastically reduced i.e. if the customer works casually and has been forced to reduce their hours.

Long term financial hardship arises when the customer has difficulty meeting the cost of energy use on an ongoing basis due to a range of ongoing circumstances that have been advised to us that may be unlikely to change, such as customer moving to a low fixed income or prolonged illness.

Our Hardship Policy

Diamond Energy's Hardship Policy outlines the commitments that we give for assisting residential customers who are experiencing genuine financial hardship. Our Hardship Policy is based upon principles of fairness, understanding, compassion, dignity and privacy.

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Identification of Customers with Financial Hardship

Diamond Energy assists with the early identification of customers in financial hardship by:

- Encouraging customers who are experiencing financial difficulties to contact Diamond Energy. We advise customers of our financial hardship program through our written communications such as information on bills, information on reminder notices, newsletters, leaflets and information readily accessible on website. Communications cover the company's willingness to assist and help in relation to financial difficulties.
- Encouraging customers in financial hardship to identify themselves to Diamond Energy.
- Enabling customers to be identified by financial counsellors to Diamond Energy.
- Training of frontline and debtor management staff responsible for inbound and outbound calls in the identification of financial hardship related indicators and circumstances.
- Inclusion of scripted questions designed to invite customers calling regarding late payment to self identify if experiencing financial hardship.

Diamond Energy also monitors customer payments and outstanding balances through internal payment reconciliation systems, reporting and processes. The key financial triggers for identification of potential financial hardship customers include situations where:

- Customer appears on outstanding debtor reports for Final Reminder Notice non-payment.
- Customer fails to meet obligations under an agreed payment instalment plan.
- Customer is in arrears of an agreed payment plan.

Diamond Energy Hardship Program

Customers categorised as facing financial hardship are offered a range of customer support services within our Hardship Program. These support services can include payment plans as well as services to help customers pro-actively manage their bills and reduce their energy usage.

Customer support services within our Hardship Program can include:

- Review and recommend most appropriate tariff structure (where applicable).
- Access to Telephone Interpreter Services (if required).
- Individual Case Management.
- Provision of Information, regarding government energy concessions, rebates and grants to which they are entitled.
- Facilitation of Centrepay Payment Option for hardship customers who are receiving a pensions or benefits.
- Referral to Welfare Services and Financial Counselling.
- Energy Efficiency Advice over the phone.
- Energy Efficiency Advice through field energy audits.
- Appliance Assistance.

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Payment plans can consist of both Standard Assistance and Tailored Assistance;

- Standard Assistance, includes a number of flexible payment options and payment plans.
- Tailored Assistance, provides additional flexible payment options and payment plans and customer support services relative to Standard Assistance.

In attempting to provide assistance to customers, Diamond Energy will always have regard to any customer circumstances that it has been made aware of such as:

- Family Violence
- Family and/or relationship breakdown
- A customer who has a representative or advocate acting on their behalf
- Diagnosis of serious medical condition of a spouse or immediate family member
- Disability/care provider
- Whether the customer has limited or no English skills.
- Whether the customer has access to electronic communication channels such as email or the internet.
- Serious illness or medical condition (including mental health) that impacts a customer's ability to engage or communicate with their retailer (e.g. having sight or hearing impairment)
- Loss of employment or regular source of income.
- Variable income such as seasonal or casual work.
- Recipient of government assistance (Centrelink payments, particularly Newstart).
- Concession card holder.
- Unexpected and essential cost of living expenses (urgent house repairs, car repairs, medical expenses, schooling or child care expenses, etc.).
- Debt on another energy account/s with the same retailer.
- Acute financial or personal hardship.
- Being temporarily uncontactable (e.g. due to hospitalisation or disconnected telephone (including mobile) or internet services).
- Low literacy and/or numeracy, or lack of confidence in speaking to service providers (often necessitating a role for community service providers).

Standard Assistance

Before entering into the Hardship Program customers are entitled to take up Standard Assistance to help with their electricity accounts. Customers who are participating in the Hardship Program are also entitled to Standard Assistance as well as Tailored Assistance.

Standard Assistance can include the following:

- (a) Making payments of an equal amount over a specified period –the customer may select monthly, fortnightly and monthly payment plans.
- (b) Options for making payments at different intervals.
- (c) Extending by a specified period the *pay-by date* for at least one billing cycle in the any 12 month period.
- (d) Paying for Energy Use in Advance

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Information about Assistance Available

Diamond Energy will provide information about assistance available to any residential customer who has not paid a bill by its pay-by date and who contacts Diamond Energy.

For a residential customer who has not paid a bill by its pay-by date and who has arrears of more than \$55 (inclusive of GST) Diamond Energy will attempt to contact within 21 business days after that pay-by-date, and provide information about the assistance to which the customer is entitled to access.

Diamond Energy will allow the customer no less than 6 business days to consider the information given, request further information, and put forward a payment proposal that meets with the minimum requirements.

Review and Recommend Most Appropriate Tariff Structure

For customers facing long term financial hardship, Diamond Energy reviews customer tariff structure and recommends the most appropriate structure at the time of entry to the long term hardship program.

The customer tariff review includes consideration of:

- cost effectiveness; and
- whether the customer has dedicated off peak appliances; and
- the customer's previous tariff structure (including network charge); and
- the customer's overall power usage; and
- the customer's previous bills, if available; and
- any other relevant information provided by the customer

Diamond Energy also monitors customers' consumption during their participation in the financial hardship program to ensure that they continue on the most appropriate tariff structure and facilitate a change if necessary and available.

Access to Telephone Interpreter Services

If required, Diamond Energy will offer non-English speaking customers in circumstances of financial hardship access to telephone interpreter service. Information in a number of community languages (including Arabic, Cantonese, Vietnamese, Italian, Greek and Spanish) is available through contacting Translation and Interpreter Service on 13 14 50.

Documentation may not be available in all languages.

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Individual Case Management

Individual Case Management includes ongoing monitoring of payments in line with the payment plan and monitoring of consumption. Monitoring is undertaken via customer contact, regular reviews and payment default notification.

Provision of Energy Concession & Payment Assistance Programs Information

Diamond Energy informs customers about government energy concessions and government energy payment assistance programs that are available and they may be eligible for.

Diamond Energy refers hardship customers to government and non-government avenues of support that are appropriate to their needs.

Diamond Energy will actively engage with these government and community agencies, welfare organisations and financial counsellors for the benefit of Hardship Program customers.

Facilitation of Centrepay Payment Option

As a component of the customer Hardship Program, if appropriate, Diamond Energy will offer to facilitate Centrepay Payment option.

Referral to Welfare Services and Financial Counselling

Diamond Energy refers customers in circumstances of financial hardship to accredited financial counselling agencies that offer a free and confidential financial counselling service. Where possible, Diamond Energy customers will also be referred to other government and non-government avenues of support that are appropriate to their needs.

Tailored Assistance

- 1- Customers who are more in arrears of their payment plan or account balance (\$55 including GST or more) or who require further assistance due to their individual circumstances can also be entitled to Tailored Assistance. Tailored Assistance can consist of any of the following measures;
 - (a) repayment of arrears over not more than 2 years by payments at regular intervals of up to one month;
 - (b) advice from the *retailer* about payment options that would enable a *customer* to repay their arrears over not more than 2 years;
 - (c) specific advice about the likely cost of a *customer's* future *energy* use and how this cost may be lowered;
 - (d) specific advice about any government and non-government assistance (including Utility Relief Grants and *energy* concessions) available to help a *customer* meet their *energy* costs;
 - (e) practical assistance to help a *customer* lower their *energy* costs including, but not limited to:

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- the tariff that is most likely to minimise the *customer's energy* costs, based on the *retailer's* knowledge of the *customer's* pattern of *energy* use and payment history; and
 - practical assistance to help the *customer* reduce their use of *energy*, based on the *customer's* pattern of *energy* use and on the circumstances of where the *customer* lives, provided there is scope for action to be taken for that purpose; and
 - information about how the *customer* is progressing towards lowering their *energy* costs given at sufficient intervals for the *customer* to be able to adequately assess that progress;
- (f) an initial period of at least 6 months during which:
- repayment of the *customer's* arrears is put on hold; and
 - the *customer* pays less than the full cost of their on-going *energy* use while working to lower that cost;
- 2- Customers may access the assistance mentioned in subclause (1)(a) to (d), while continuing to pay the full cost of their on-going energy use.
 - 3- Customers may access the assistance mentioned in subclause (1)(c) to (f) if they cannot pay the full cost of their on-going energy use.
 - 4- Diamond Energy may extend the assistance mentioned in subclause (1)(f) for a further period or periods if the extension would assist the customer to continue to lower the cost of their energy use.
 - 5- A customer who has exercised an entitlement to the assistance mentioned in subclause (1)(f) may, at the end of the period during which that assistance is provided (including that period as extended under subclause (4)), exercise an entitlement mentioned in subclause (2).

Payment Arrangements

Diamond Energy is committed to making sure that customers are put on payment plans and can accept a range of options put forward by a customer that complies with the following;

- (a) provides for the making of payments of equal amounts at regular intervals of up to one month; and
- (b) would result in the residential customer's arrears being fully paid in no more than 2 years after the first payment; and
- (c) provides for payments for energy use being made together with payments to reduce arrears; and
- (d) is based on a reasonable forecast of the customer's energy use over the next 12 months.

However Diamond Energy may also accept a payment proposal or revised proposal that does any or all of the following:

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- (a) provides for payments of different amounts at different intervals;
- (b) would result in the arrears being fully paid by a date later than 2 years after the first payment;
- (c) provides for payments for energy use being made separately from payments for arrears.

Upon accepting the above payment proposal or revised proposal Diamond Energy will provide the customer a written schedule of payments showing

- (a) the total number of payments to be made to pay the arrears; and
- (b) the period over which the payments are to be made; and
- (c) the date by which each payment is required to be made; and
- (d) the amount of each payment.

If a customer receiving assistance fails to make a payment by the date on which it was payable, Diamond Energy will attempt to contact the customer to discuss their putting forward a revised proposal.

Non-payment of Amounts Towards On-going Energy Use

If the customer fails to make a payment towards the cost of their on-going energy use by the date on which it was payable, Diamond Energy will attempt to contact the customer to discuss varying the amount payable, or the frequency of those payments, or both, to give the customer more time to lower their energy costs.

If a customer is not meeting their responsibility to implement practical assistance provided Diamond Energy will attempt contact the customer and work with them to identify an implementation timeframe.

Diamond Energy may add any amount unpaid for energy use to the customer's arrears.

Energy Efficiency Advice – Phone Audits

Diamond Energy will carry out detailed phone audits of a customer's home energy use. This may identify opportunities to reduce the customer's electricity consumption. Diamond will also seek to educate customers on energy efficiency to help them make informed decisions about their energy consumption, associated costs and ways to save.

Energy Efficiency Advice – Field Energy Audits

Field Energy Audits are offered to customers in long term financial hardship. Field Energy Audits aim to assist the customer to improve energy efficiency and decrease energy consumption. Diamond Energy offers field audits to customers in financial hardship where:

- Information provided by the customer indicates there may be opportunities for reduction in consumption and/or improved energy efficiency within the customer's household.

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- Information provided by the customer, the customer's bills or a telephone audit indicates a higher than average consumption within the customer's household with no identified reasonable cause.
- Information provided by the customer indicates there may be energy consumption issues in relation to the customer's premises or appliances
- Assessment by staff or the customer's personal self assessment indicates the customer may benefit from an audit.

Field Energy Audits may include:

- Assessment of personal finances and commitments, appliance energy efficiency, the property and physical surroundings, energy usage and efficiency.
- Minor retrofitting with CFC bulbs and draught stoppers.
- Application for URGS and/or capital grant (from the Victorian state government to assist with energy efficiency).
- Referrals to community services.
- Implementation of follow up recommendations and actions.

It is Diamond Energy's preference for Field Energy Audits to be offered to the customer at the cost of the customer. However, Diamond Energy will assess customers on a case by case basis and is open to considering subsidising costs (partially or fully) of Field Energy Audits. Circumstances that may arise that lead to Diamond Energy subsidising costs (partially or fully) of Field Energy Audits include:

- Where information from the customer indicates:
 1. They have an unusually high consumption, and
 2. Diamond Energy believes there may be opportunities for reduction in customer consumption, and
 3. Despite the customer reasonably investigating, they have not been able to identify the reason for the high consumption, and
 4. Diamond Energy believes that the potential reduction in consumption identified will support the customer transitioning from financial hardship to a non-financial hardship situation.
- In cases where in Diamond Energy may view that the customer is a "long term & valued" customer.

Any subsidies (partially or fully) offered for Field Energy Audits will require prior authorisation by an Authorised Diamond Energy Representative.

Appliance Assistance

Appliance assistance is be available for customers in financial hardship based on a needs assessment by Diamond Energy staff and/or based on information provided by a field audit.

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Assistance will be considered when information provided and/or an audit indicates that the use of or efficiency of an identified appliance may be contributing significantly to high energy consumption and/or that the replacement or upgrade of a more effective or more energy efficient appliance may reduce the customer's consumption and costs.

If assistance with the purchase of energy efficient appliances will assist in improved energy efficiency and reduces energy consumption, Diamond Energy will consider offering one of the following options to the customer:

- Referral to the Victorian Capital Grants Scheme.
- Referral to an accredited No Interest Loans Scheme (NILS).
- Assisted purchase of energy efficient appliances.

The level of assistance will be determined on a case by case basis depending on the needs of the customer. Assistance will be offered in the form of a grant and goods will be provided by a contracted third party supplier the supply of this appliance assistance will include flexible options for the purchase or supply of replacement electrical equipment designed for domestic use. Supply capacity control products will not be offered by Diamond Energy to residential customers for credit management purposes.

Protection from Disconnection

Diamond Energy customers are protected from debt recovery action initiated by Diamond Energy while participating in the Hardship Program, provided they are meeting their payment plan.

Diamond Energy will not disconnect any residential customer while they are actively participating in our Diamond Energy Hardship Program.

Diamond Energy will outline customers' rights and obligations in respect to their agreement in relation to the Hardship Program through:

- Verbal advice provided by staff.
- Telephone calls from Diamond Energy staff.
- Written communications through letter and email as required.

Customers are required to contact Diamond Energy when they experience a change in circumstance or are unable to make payments according to the agreed payment plan.

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Continued Provision of Assistance

Diamond Energy will continue to provide assistance to customers unless:

- 1- the customer has refused or failed to take reasonable action towards paying for their on-going energy use and repaying their arrears; or
- 2- the customer has refused or failed to take reasonable action towards making payments towards the cost of their on-going energy use; or
- 3- the customer is not facing payment difficulties.

Complaint Handling

Customers participating in the Hardship Program continue to have the same rights in relation to their accounts as customers outside of the program.

If there are concerns or complaints, all customers have the right to refer that complaint through to the business.

Concerns can initially be raised directly with a Diamond Energy specialist for resolution or if required, the issue can be escalated internally.

As per the process for all escalations and complaints, Diamond Energy will attempt to resolve the complaint immediately. If it is not able to be resolved, the customer has a right to escalate their issues internally, and can also request support from the relevant state Ombudsman scheme for additional independent advice free of charge.

Information about this Hardship Policy

Information about the Diamond Energy Hardship Program is available by telephoning Diamond Energy on 1300 838 009, through Diamond Energy's website, on invoices and is made available to the relevant Ombudsman and any inquiring support groups in the relevant jurisdiction.

Staff Training and Resourcing to respond to Financial Hardship

Diamond Energy continues to educate staff to identify and work sensitively and empathetically with customers in financial hardship. Training includes:

- All frontline and debtor management staff are provided with overview of identification of financial hardship related indicators and circumstances and an overview of the Hardship Policy and components of Hardship Programs.
- Staff with direct responsibility for managing customers in financial hardship will be provided with additional internal and / or external training, including:
 - Flexible Payment Options and Payment Plans.

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- Individual case management process.
- Government energy concession, rebate and grant options.
- Centrepay payment options.
- Information on telephone interpreter services, welfare services and financial counselling services.
- Energy efficiency, energy audits and appliance assistance options.

Training needs and status of training are captured in Diamond Energy's training register.

Diamond Energy will maintain a minimum of one representative that includes duties for managing customers in financial hardship. The associated duties are included in documented position description(s). Resourcing to adequately service customers in financial hardship is to continually monitored, with extra resources and back up staff allocated at discretion of Senior Management, as required.

Diamond Energy recognises that roles dealing with financial hardship customers may be demanding and stressful. A high level of focus and ongoing support is provided by management to monitor quality of service and internal stress levels associated with servicing financial hardship related customers. Where appropriate, management has flexibility and discretion to provide additional work breaks, additional leave, internal / external counselling and support to these roles.

Review and Continuous Improvement of Hardship Policy, Hardship Programs and Responses

We regularly review our Hardship Policy and Hardship Programs in the context of our operational experience and statutory, market, customer and external feedback to ensure that we continuously improve our financial hardship responses.

Effective 1st January 2019

Disclaimer: The Energy Retail Code, which sets out retailers' obligations and minimum customer entitlements, takes precedence over this hardship policy in all circumstances.