

ENERGY ACCOUNTS PAYMENT ASSISTANCE (EAPA) REFORM

SUBMISSION

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ACKNOWLEDGEMENTS

Community Industry Group (CI Group) acknowledges the traditional custodians of this land, and their Elders past, present and future. We acknowledge and respect their continuing culture, the world's oldest living culture, and the contribution they make to the life of this region and our country.

We recognise the strength, resilience, and capacity of Aboriginal people.

Community Industry Group extends our gratitude and heartfelt thanks to our members and other service providers who openly shared their experiences of homelessness and housing instability with us through surveys, consultations, or other methods. Your perspectives are invaluable in identifying the impact of the ongoing housing and homelessness crisis on individuals, families and communities experiencing vulnerability and disadvantage.

ABOUT COMMUNITY INDUSTRY GROUP

CI Group is the peak body working for community services and organisations in southern NSW. We support community organisations, promote expertise and innovation in community development, foster industry development and advocate for social justice.

For 30 years, CI Group has taken a leadership role in the local community services sector. We regularly engage with those organisations, services, and individuals who work with individuals, families, and communities experiencing disadvantage and vulnerability. We also advocate on behalf of community organisations and vulnerable communities to raise awareness of the issues which are impacting service delivery and affecting the lives and outcomes of individuals, families and communities experiencing disadvantage.

Our members include not for profit service providers who deliver:

- Homelessness Supports
- Women's and Domestic Violence Support Services
- Child and Family Services
- Youth Services
- Aged Care
- Disability Services
- Generalist Community / Neighbourhood Centres

Community Industry Group consults with its members in the composition of policy submissions.

INTRODUCTION

Community Industry group is highly supportive of the Energy Accounts Payment Assistance (EAPA) program in New South Wales (NSW) which is a lifeline for households facing acute financial challenges in meeting their energy expenses. This vital support system, which is accessible through a range of community providers, plays an increasingly important role in ensuring households facing short-term financial hardships, crises, or emergencies are not disconnected from essential energy services. Although the level of financial support provided is relatively low, this intervention can prevent disconnection, eviction, and homelessness.

The EAPA program is of significant importance in southern NSW, which is home to some of the most disadvantaged locations in NSW. Areas such as Port Kembla-Warrawong, Berkeley, Cringila, and Windang have some of the lowest SEIFA indexes in the state and disadvantage is severe with entrenched intergenerational poverty.

In the lower south coast, communities are still recovering from the impacts of bushfires, flooding, and the Covid-19 pandemic. In areas of significant locational disadvantage such as Nowra, the Bay & Basin, Ulladulla and Eden, families are dealing with financial vulnerability and the post-traumatic impacts of natural disasters.

The current cost of living crisis is having a disproportionate impact on much of the southern NSW region, which has been affected by increases in house prices well above the national average, a rise in the short-term rental market particularly in coastal and alpine regions and increases in rental prices at a rate which exceeds most of the rest of the country. Add to that the reduction in housing stock due to bushfires and flooding, and it is clear that people who were already struggling to meet the cost of living are finding themselves in dire circumstances.

For people lucky enough to obtain a home, the rising cost of energy is causing stress and energy poverty which is impacting quality of life. Many people on low incomes, including older people, are choosing to live without heating, cooling, and light in order to save on power bills, but this is having significant detrimental impacts on their health and mental health.

One of the primary mechanisms through which the EAPA aids households experiencing vulnerability or disadvantage is by providing Financial Assistance Programs. This direct financial aid acts as an immediate intervention, allowing eligible households to meet their energy bill obligations during periods of financial strain. By doing so, the EAPA program helps ensure uninterrupted access to crucial energy services. However, when individuals and families access EAPA financial assistance through non-government community organisation, they are also able to be referred to additional supports and interventions. This EAPA also opens the door to a range of support programs which can help address the underlying causes of vulnerability or disadvantage.

The cost of living crisis is having impacts across the community, and members report new cohorts seeking support from EAPA. These emerging cohorts include those who have never

needed support in the past, such a people in stable employment who are now experiencing financial hardships.

EAPA providers constantly advise there are insufficient vouchers to meet demand, and we urge increased investment in the program. Investing more in the EAPA program is crucial to prevent more families falling into poverty and homelessness. With a clear and consistent pattern of demand for assistance through EAPA consistently surpassing the available resources, many households are left struggling with energy affordability challenges without adequate assistance.

Flexible Payment Plans are a crucial aspect of the EAPA's support framework. These plans offer practical solutions by allowing households experiencing financial stress to spread their energy bill payments over manageable periods. This approach significantly alleviates the immediate financial pressure experienced by families in temporary financial constraint.

The education and awareness initiatives spearheaded by EAPA are useful in empowering households with the knowledge and tools necessary for long-term sustainability. By educating families on energy-efficient practices, available support programs, and efficient energy usage, the EAPA program can equip them to make informed choices that can help reduce energy costs in the long run. This education and awareness is best targeted at households before they descend into financial hardship, and should be promoted more widely to enable more households to reduce their energy costs before bills become unmanageable.

Collaboration with community organisations remains instrumental in extending the reach and impact of EAPA initiatives. By partnering with local community groups, charities, and support services, the EAPA program can identify households in need and offer comprehensive assistance that goes beyond mere bill payment support but can aid in referrals to a range of support services.

Community Industry Group recognises that, during times of crises, such as extreme weather events or unexpected financial setbacks, the EAPA program's crisis response mechanisms can play a pivotal role. These mechanisms are can swiftly aid affected households, ensuring timely support to mitigate the impact of such emergencies on energy services.

We commend the EAPA program's commitment to targeted assistance for vulnerable groups. Customising support programs to cater specifically to vulnerable demographics, such as low-income families, the elderly, or individuals facing unique challenges, is key to ensuring that those most in need receive tailored assistance.

The EAPA program should continue to review and evaluate its procedures to ensure continuous improvement and better outcomes for households in need.

POLICY INTENT AND OUTCOMES

Intent of EAPA

OFFICE OF ENERGY AND CLIMATE CHANGE (OECC) PROPOSED REFORM:

The intent of EAPA has evolved over time with the changing energy system. We propose to clarify the intent of EAPA to reduce ambiguity and confusion. This includes specifying timeframes for crises and emergencies.

Should the proposed policy intent of EAPA specify the timeframes for crises or emergency? For example, that the crisis or emergency event occurred within a specific time period preceding the EAPA application?

Community Industry Group recognises that a defined period of no less than two years could enhance clarity. However there is a balance to strike. Narrowly defining the crisis or emergency timeframe might exclude households experiencing late-developing post-traumatic stress or prolonged financial impacts from past events, potentially leaving them without crucial assistance.

“The current system is too constrained. Remove ‘voucher’ language and limits and instead allow EAPA providers the ability to assess people on an individual basis/as per circumstances.

Its also difficult that the person needs to provide explanation of their financial position and the short term crisis they are facing.

Better communication about the program is needed. Many people think EAPA is an entitlement they can receive twice per year.”

Southern Illawarra Community Centre Manager

Community Industry Group is supportive of separating the delivery of EAPA's intent from the Code to support clarity and transparency. This separation allows for clear delineation of program principles, logic, and operational parameter which aids stakeholders in understanding how EAPA operates. Communicating this intent on public-facing platforms will increase accessibility, ensuring that those in need are aware of the available support.

Community Industry Group is generally supportive of defining 'short term assistance' as up to two years from the crisis or emergency event. However, flexibility must be built into the program, in recognition that for some households certain crises might entail prolonged

financial strains, necessitating longer-term assistance. We recommend balancing specificity with flexibility to encompass diverse crisis situations adequately.

“For many people, if their entire energy bill was able to be paid then this would relieve the financial burden/limitations and increase their capabilities to be able to manage their financial circumstances and get on top of their bills.

Information about the EAPA scheme should be sent out with each energy account.”

Southern Illawarra Community Centre Manager

“Low income households are very concerned about the possibility of being disconnected if they are unable to pay the balance or if EAPA is not approved. Sometimes they agree to the payment plan knowing in advance they will be unable to meet the agreed payment - then they break the agreement.

It is an issue for some people who have mental health issues/ cognitive issues and their ability to keep track on when bills are due, what they are for and just remembering to pay.

Those with addiction issues/ mental health and those with long term/ongoing health issues struggle with day to day living and expenses on an ongoing basis and this is currently not considered to be a short-term crisis or extraordinary circumstances.

We need a process for supporting those who have been in long term financial hardship such as those on job seeker payments and low incomes who have struggled for a long time to meet financial obligations. Items such as food, energy and health care have become luxury items for many and these are the first items that are cut from families budgets.”

Southern Illawarra Community Centre Manager

Do you find any aspects of the intended policy of EAPA to be unclear or ambiguous? If yes, please outline which specific elements you find to be lacking clarity or causing confusion?

The EAPA policy contains several areas of ambiguity, including unclear definitions of crises, challenges delineating between consumption and non-consumption charges, complexities in interaction with national regulations, and ambiguous interpretations of 'short term' and 'financially disadvantaged' customers.

One significant area of ambiguity lies in defining the triggering events for EAPA assistance. While the policy states that EAPA *supports customers facing crises or emergencies impacting their ability to afford energy bills*, it lacks precise definition or delineation of what constitutes a crisis or emergency. The absence of clear guidelines regarding the timing and nature of these events raises questions about the eligibility criteria and leaves room for subjective interpretation.

The policy's intent to support households exclusively with energy consumption costs and not supplementary charges seems clear at face value. However, it becomes muddled when addressing non-consumption charges such as late payments or reconnection fees. While energy retailers may have the discretion to waive certain fees, the guidelines around this process lack specificity, creating confusion among consumers about what charges can be covered under EAPA.

The interaction between EAPA and the National Energy Retail Law and Rules further complicates matters. While EAPA operates parallel to these regulations, the interplay between the two can lead to overlapping supports and protections for customers. This overlapping jurisdiction raises questions about the sequence and consistency of assistance offered, generating confusion among stakeholders about when and how various supports are provided.

The interpretation of the term 'short term assistance' remains ambiguous. While the Code does not explicitly define the duration for which EAPA can be accessed, some stakeholders perceive 'short term' as 12 to 24 months. This ambiguity allows for varied interpretations, leading to instances where individuals in long-term financial hardship consistently rely on EAPA as part of their ongoing budget management strategy.

Community Industry Group is supportive of a definition of 'financially disadvantaged' which is broad and recognises that individuals and families can experience periods of financial hardship even if they are not considered low-income households.

Energy Debt

OECC PROPOSED REFORM:

There is a gap in energy bill support for customers in long-term energy bill debt. In some situations, EAPA is used by customers to help manage energy debt, however this is not the intent of EAPA. There are current system and data limitations to understanding how many EAPA customers require further support. We propose to conduct an energy debt relief trial and work with the Australian Energy Regulator, energy retailers and consumer groups to develop long-term solutions in NSW.

Are there groups currently focused on addressing energy debt issues in NSW? If yes, which of these stakeholders should the NSW Government consider consulting with on this issue?

Given the complexity of the issue, the NSW Government should consult with a range of stakeholders to comprehensively address energy debt-related challenges. These include:

- The Public Interest Advocacy Centre (PIAC),
- Choice,
- The Energy and Water Consumers' Program,
- The Australian Energy Regulator,
- Energy retailers,
- Not for profit financial counselling services and debt management experts,
- Community-based organisations and non-profits focusing on financial literacy and support services.

"Electricity providers should provide information and referrals to EAPA providers at the onset of the bill"

Northern Illawarra Neighbourhood Centre Coordinator

Energy consumer advocacy groups and organisations specialising in consumer rights and energy affordability such as the Public Interest Advocacy Centre (PIAC), Choice and the Energy and Water Consumers' Advocacy Program should be consulted. These groups possess in-depth knowledge and firsthand experience dealing with consumers facing energy debt issues. They can provide valuable insights into the challenges faced by consumers, offer recommendations for policy improvements, and advocate for fairer energy practices.

“I work as a community worker in an economically disadvantaged area, where I frequently witness the struggles of our most vulnerable community members who lack access to basic necessities. Our community has been severely impacted by rising housing and living expenses, exacerbating the challenges faced by residents. Moreover, we anticipate the additional burden of increased energy prices in the near future.

Despite our organisation's dedication to providing EAPA assistance, we face a funding shortfall that hinders our ability to offer this support. As a result, we frequently contend with a lengthy waiting list of individuals in need, and our capacity to assist them relies heavily on the commitment of our volunteers.

Moving forward, we strongly advocate for the EAPA program to secure adequate funding, enabling the efficient distribution of vouchers to those who require them. “

Southern NILS, part of Our Community Project NILS Consultant

The Australian Energy Regulator (AER) plays a pivotal role in overseeing energy retailers' conduct and compliance. Collaborating with the AER can be instrumental in understanding the regulatory landscape, identifying potential gaps, and exploring ways to enhance consumer protections against energy debt-related issues.

“The NGO we refer to is out of area and clients must wait up to 3 weeks for an appointment. As a referral source to another NGO, we regularly encounter wait times of 3 weeks. Rejection of provided information due to an increase in required paperwork ie bank statements, when the vast majority of our clients/referrals are individuals/families whose sole income is Centrelink benefits and have a real lack of access to transport or other costs to obtain statements to "prove they are poor enough" for EAPA.

Have energy providers alert consumers that EAPA vouchers are available BEFORE debt becomes unmanageable. Information campaigns targeting services and mailboxes are needed to promote. Consumers struggle with energy bills all year round.

Energy prices are unmanageable for millions of Australians. Energy prices keep rising and nothing is being done to stop this. No- and low-income earners are becoming poorer and worse off. Public housing stock needs to be maintained - many homes need rewiring.

Northern Illawarra Neighbourhood Centre Social Worker

Energy retailers themselves are crucial stakeholders in addressing energy debt. Consulting with these entities will shed light on their perspectives, challenges, and strategies in managing customer debt. Engaging retailers in discussions could lead to collaborative efforts in implementing more effective debt management solutions.

“We are not an EAPA provider, we do refer to EAPA often. We refer to a local NGO, the team there are helpful flexible in working with our vulnerable community members. The challenge is that we don't often get the entire bill paid and clients need to contact their providers to obtain the full bill (with meter usage). This can sometimes blow out the process as vulnerable people may not have the capacity to do this.

The service is essential. The one barrier we find is that a lot of our clients don't always manage the bills (paper form) well, meaning that we need to chase providers for this, this simple task can sometimes be put in the too hard basket for vulnerable people with complexities in their day-to-day life AND the capacity of the underfunded services to call up a company (anywhere from 45 - 95mins on hold) to request a copy of a bill.”

Illawarra Community Centre Manager

Not for profit financial counselling services and debt management experts should be consulted. These professionals can offer insights into best practices for debt resolution, provide guidance on supporting customers in debt, and propose strategies for preventing further accumulation of energy debt.

“Our service sees the impact daily of those who are facing financial hardship through the work undertaken by our Financial Counsellor – please note we are only funded for a part time worker. We see a pathway of internal referrals i.e., seeing one of our counsellors and then referred into financial counselling and vice versa. The impacts of poor mental health and poor financial health are deeply linked/entwined, and they both needed to be supported side by side. Please note as at today's date our books for Financial Counselling are closed until mid to late January 2024 due to demand/waitlists.”

Financial Counselling / Women's Health Provider

Community-based organisations and non-profits focusing on financial literacy and support services for individuals facing economic hardships should be part of the consultation process.

These organisations often work directly with affected individuals and can provide valuable input on preventive measures and interventions to address energy debt.

“Due to the cost-of-living pressures and this scheme being viewed as emergency/crisis is no longer going to ‘cut it’ with the reality of consumers. Time and time again we are shown that presenting a bill at the end of a billing period even if a low amount now puts pressure on user’s budgets. We are seeing an increase in the types of people seeking support – i.e. we now have what was traditional middle income earners struggling due to consistent mortgage increases.

More should be done with account holders to sign up to weekly or fortnightly, automated, smaller payments. When entering agreements this should be more of a compulsory model than an option. If you cannot afford \$10 per week for example, you have no possibly of paying for billing at 90 days. Companies must move towards acknowledging many have the inability to budget and take some responsibility for collecting funds, especially in the case where clients have already accessed EAPA. This would also reduce reliance on this scheme and in the long run reduce pressure/anxiety on the client.

The benefits of a yearly support cap of \$300.00 would be far more beneficial but you must ensure that you are not building a reliance on this money – start payment schemes as stated above.”

Financial Counselling / Women’s Health Provider

Involving academia and research institutions could provide a broader perspective. Academic insights and research findings on energy poverty, debt management, and socio-economic impacts can contribute to evidence-based policy formulation and innovative solutions to address energy debt issues.

The proposed reforms to deliver a trial debt program and collaborate with the AER, retailers, and consumer groups demonstrate a proactive approach. However, a holistic solution requires the input and collaboration of diverse stakeholders to ensure a comprehensive understanding of the challenges and the development of effective long-term strategies to manage energy debt in NSW.

EAPA for embedded networks

OECC PROPOSED REFORM:

Currently people living in embedded networks are not eligible for EAPA. This poses equity issues as the NSW Legislative Assembly Committee on Law and Safety inquiry into embedded networks found that people living in embedded networks include the most vulnerable people who have limited access to support and information. We propose to expand EAPA to people living in embedded networks. The expansion will start with authorised retailers, then exempt sellers, and deemed exempt sellers.

What processes should the NSW Government consider to provide EAPA to customers living in deemed exempt seller communities?

Addressing the exclusion of customers in embedded network communities from EAPA is crucial, considering their vulnerability and limited access to support and information. These customers often face higher energy costs, limited options to switch energy retailers, and reduced consumer protections. The absence of competition and minimal regulation intensifies these challenges, making it imperative to bridge this equity gap.

Expanding EAPA to customers in deemed exempt seller communities is a proactive step toward inclusivity and ensuring that vulnerable groups receive necessary energy bill support during crises or emergencies.

The proposed phased approach to expanding EAPA to embedded network customers allows for a systematic and controlled rollout while addressing the complexities associated with varying types of sellers and their resources. However, accommodating deemed exempt sellers, particularly those with limited resources and fewer residents, requires innovative solutions.

CI Group are in agreement that alternative methods for providing EAPA to customers in these communities should be considered. Options such as issuing digital tokens redeemable with the seller, direct bill payments via B-pay, or direct payment into customers' bank accounts present viable alternatives. These solutions aim to ensure that customers in deemed exempt seller communities receive the necessary energy bill assistance despite potential resource constraints faced by these sellers.

ACCESS AND AWARENESS

Communication

OECC PROPOSED REFORM:

EAPA reaches relatively high proportions of high-priority groups, including: people impacted by natural disasters and pandemics; Aboriginal and Torres Strait Islander communities; culturally and linguistically diverse communities; regional communities; people with disability; people impacted by domestic and family violence; people living in embedded networks. However, there are areas that we can improve, including simplifying customer information to be easy English and more targeted awareness, especially for people affected by natural disasters. We propose to change the name of the EAPA scheme to improve access and awareness.

Are there other promotional channels that the NSW Government should consider as part of the EAPA communication strategy? If yes, please outline them.

Expanding the promotional channels for the EAPA program in NSW is crucial to increase awareness and accessibility, especially among high-priority groups.

“Communicating with energy provider can cause frustration especially for those who have hearing issues or if English is not their spoken language.”

Southern Illawarra Community Centre Manager

Community Industry Group recommends:

- Offer Easy English versions of all communications material.
- Simplify the language used in eligibility criteria, application procedures, and other program details.
- Develop a comprehensive communication strategy specifically targeting high-priority groups e.g. communities affected by natural disasters, disadvantaged communities and individuals with low literacy.
- Use multiple communication channels to target those who may not access mainstream media.
- Host information stalls or sessions at community event.
- Partner with NGOs and local councils for direct engagement with communities in need.
- Use local resources like libraries or community centres.

Within these promotional channels, are there any particular media outlets, events, or organisations that you believe should be taken into account when formulating the EAPA communication strategy? If yes, please provide further information about these potential channels.

It's crucial to consider specific media outlets, events, and organisations that can effectively disseminate information about the program.

CI Group recommends using channels such as:

- Local community radio stations which serve diverse populations.
- Newspapers catering to specific ethnic groups or cultural communities.
- Participation in disaster relief forums or events to directly engage with communities impacted by natural disasters.
- Provide information through NGOs and community organisations specialising in financial counselling, welfare support, or assisting vulnerable groups.
- Collaborating with consumer advocacy groups focusing on energy affordability and consumer rights such as the Public Interest Advocacy Centre (PIAC), Choice and the Energy and Water Consumers' Advocacy Program.
- Use local councils, libraries, and community centres as hubs for information dissemination.
- Social media platforms including local community pages. Tailored advertisements, informative posts, and engaging content shared through platforms like Facebook, Twitter, and Instagram can effectively reach diverse demographics and communities across NSW.
- Integrate EAPA information into the services provided by Service NSW mobile units during visits to disaster-affected areas.

Are there specific times during the year when communication about EAPA would help generate more awareness? If yes, when and for how long?

Communication about the EAPA program could be strategically timed to generate heightened awareness during specific periods throughout the year.

Community Industry Group recommends the following key times:

- Before the onset of extreme weather conditions such as winter or summer. Households often face increased energy usage due to heating or cooling needs. This period could be ideal for proactive communication about energy-reduction strategies and EAPA to avoid bill shocks and financial strain.
- In regions like the south coast of NSW which are prone to natural disasters like bushfires, floods, or storms, communication efforts should intensify before and during these seasons.
- As part of disaster relief measures.

- During festive periods or holiday seasons when expenditure is typically higher.
- In times of economic uncertainty or shifts, such as changes in employment rates, inflation, or recession.
- Ahead of the new school year.

The duration of these awareness campaigns could vary based on the significance of the event or season. Generally, an extended period before the anticipated event or season—ranging from a few weeks to a couple of months—could provide sufficient time for information dissemination. Continuous reminders and messaging throughout these periods will reinforce awareness and encourage timely action among households facing potential energy bill challenges.

How else can the NSW Government improve EAPA accessibility for customers impacted by natural disasters?

Despite utility costs being listed as one of the costs being put under the most pressure over the last 12 months (36%), and that 33% of respondents reporting that they could not always pay utility bills on time, the Energy Accounts Payment Assistance (EAPA) vouchers, the Low-income Household Rebate and the Gas Rebate continue to be least accessed cost of living supports in the scheme.

Awareness and access of the NSW Government supports broadly targeting low-income households was relatively low, but slightly higher than 2022. For example, 18% were aware of EAPA vouchers, and among those aware only 21% had accessed the voucher. In 2022, 11% were aware of EAPA vouchers, and of those 15% had accessed them.

NCOSS - Barely hanging on: The Cost-of-Living Crisis in NSW 2023

Establish a streamlined and simplified application processes specific to disaster-affected regions. Create user-friendly online platforms or mobile applications dedicated to EAPA applications which expedite submissions. Offer alternative application methods, such as phone hotlines or physical forms to maximise accessibility for those with limited internet access or other barriers.

“For an EAPA provider, the ever-increasing rules and requirements being imposed on us results in providers not being able to meet obligations or struggling to comply. For example needing to be available 10 hpw. For a small organisation that operates 30 hpw. with 1 staff person, administering EAPA takes a 1/3 of their work time and the department do not provide any financial reimbursements to the organisation for administering the scheme”

Southern Illawarra Community Centre Manager

Proactive communication is pivotal during disasters. The government can implement targeted communication strategies through multiple channels like SMS alerts, email notifications, or physical mail to disseminate critical information about EAPA availability, eligibility criteria, and application procedures.

Collaborate with local disaster relief agencies and integrate EAPA information into their outreach programs to ensure affected communities are well-informed about energy bill assistance during recovery efforts.

Use local support networks staffed with trained personnel which operate in disaster-affected regions. These individuals can act as knowledgeable points of contact, assisting residents with EAPA applications, clarifying queries, and guiding them through the process.

Use temporary relaxation or waivers in EAPA eligibility criteria during immediate post-disaster phases, such as relaxing documentation requirements, to maximise reach for those in urgent need.

Additionally, speed up approval and disbursement of EAPA funds during disasters. Accelerate access to financial aid to help impacted households manage immediate energy bill burdens.

Tailor educational campaigns to address energy-related challenges post-disaster, coupled with the provision of resources and guides.

“In situation of crisis, especially in natural disasters, long online forms are often not accessible with very little internet etc. The electricity company would know from their information received from RFS where has been impacted and damage etc. I would encourage more of a blanket credit to accounts of holders in that district. As whilst there are people heavily impacted – loss of property, we also must remember loss of employment from being cut off and too much of a risk to travel etc. Seems to make more sense.

Attention must be given to those who live a more nomadic life. Many now live in caravans etc and need gas to run equipment etc. This type of living will continue to grow with the housing crisis and some sort of support should be offered as it is to those in fixed accommodation.”

Financial Counselling / Women’s Health Provider

Application process

OECC PROPOSED REFORM:

There are a number of challenges and opportunities for improving the EAPA application process. We propose to reduce access barriers, improve visibility and communication of the application process, and tailor the process for customers impacted by domestic and family violence.

Are there other improvements the NSW Government should consider in the proposed updated process to assist customers impacted by domestic and family violence? If yes, please outline them.

Community Industry Group is highly supportive of strategies to improve the EAPA process to better assist high priority groups, particularly those impacted by domestic and family violence.

Address barriers to access for people with disabilities, older people, people from culturally and linguistically diverse individuals or people with limited internet connectivity in remote areas. Provide alternative application methods, such as telephone or physical forms.

Partner with local NGOs that assist vulnerable groups, especially in regional areas, to bridge gaps in accessibility due to travel distances or anonymity concerns.

“NGO’s that work with those impacted by DFV should be registered with the EAPA system and be able to apply online/phone and they would be the verifying agent for the client. Often the worker supporting the victim know of the client, have possibly seen ID, understand their situation etc. This would enable a swift acknowledgement of identity, where often the victim does not have access to.”

Financial Counselling / Women’s Health Provider

To improve access for customers impacted by domestic and family violence, reduce the need to repeatedly disclose traumatic information, implement customer-driven identification processes, and offer sensitivity training to EAPA providers handling these cases to improve support and confidentiality. Simplify and translate application materials into multiple languages, along with clear eligibility decision trees in easy English to aid diverse populations in understanding and navigating the application process.

“For some people living in domestic violence relationships, they find it hard to provide information on household income/ expenses as this is usually controlled by perpetrator. Also, they may be wary to provide personal information in case someone finds out. New system of energy provider sending a code to persons phone to identify them prior to call proceeding causes stress especially for people who are not tech savvy, in DV situations etc.”

Southern Illawarra Community Centre Manager

Improvements in the visibility of the application status, such as SMS notifications and responses, can reduce frustration and uncertainty among applicants. Integrating EAPA into a customer-centric software system, minimising redundant information requests, and facilitating proactive interactions between customers and EAPA Providers can streamline the application and assessment process.

“We believe it is crucial to streamline bureaucratic processes and minimise unnecessary administrative hurdles. By reducing the "red tape," we can enhance our efficiency and expand our reach, ultimately enabling us to support a larger number of clients effectively.”

NILS Consultant

Implement two-way data sharing with energy retailers. Accept referrals from other government agencies which are supporting affected individuals and assign a dedicated agent throughout the application process to ensure a more empathetic and secure application experience.

“Time spent at EAPA appointments can take anywhere from 1 to 1.5 hrs. depending on time spent waiting for energy provider to answer call and circumstances, not including any follow up.

It can be hard for a person needing to provide explanation of financial position, short term crisis they are facing. Many people think EAPA it is an entitlement they can receive twice per year.

Concerns with use of word 'voucher' used by EAPA scheme as many are of the opinion, they will receive the money or voucher directly, and for some the term 'voucher' means they will get an ongoing discount on their account.”

Southern Illawarra Community Centre Manager

What changes can be made to the application process to alleviate the concerns from customers who are reluctant to share personal information?

It is crucial to balance the need for information with respect for individuals' privacy concerns to ensure the EAPA program remains accessible and supportive to those in need while safeguarding their confidentiality.

“Apprehensions in having to provide some personal details, many don't understand why they have to provide their date of birth.

For people who access EAPA on a regular basis they are very reluctant to enter hardship/payment plans as for many their weekly budgets are already very stretched and they cannot find the extra \$\$”

Southern Illawarra Community Centre Manager

Community Industry Group recommends:

- Provide details of the confidentiality and security protocols in place to safeguard applicants' personal information.
- Assure applicants that sensitive information will remain confidential. Clearly communicate how their data will be handled, stored securely, and used exclusively for the purpose of processing their EAPA application.
- Refine the application process to minimise the collection of sensitive personal details that are not directly relevant to the eligibility assessment for EAPA.
- Offer alternative ways for applicants to verify their eligibility without disclosing highly personal details. This could involve providing broader categories or alternate forms of verification that allow applicants to demonstrate their financial hardship without divulging private information.
- Provide clear explanations of why certain information is required and how it contributes to the assessment of eligibility for EAPA.
- Provide training to EAPA providers to engage with applicants sensitively and professionally, ensuring that individuals feel respected and understood throughout the application process.
- Establish protocols to handle delicate situations and provide empathetic support to those expressing reluctance due to personal concerns.
- Design a system where applicants can submit basic information initially and, upon eligibility confirmation, provide more sensitive information through secure means.

EAPA LIMITS AND DELIVERY

OECC PROPOSED REFORM:

There are currently limitations in how EAPA is delivered. This includes the voucher values, how a customer can apply and how often a customer can apply. We propose to make EAPA fuel-neutral, remove application limits and provide more flexibility in voucher values. We also propose to introduce an "assisted application" channel to further support people who find a digital journey challenging or have concerns for their safety.

What organisations, other than traditional NGOs, could support EAPA delivery as assisted application providers?

Community Industry Group is strongly supportive of expanding the delivery of the Energy Accounts Payment Assistance (EAPA) program through additional channels, including expanding the range of NGOs to improve accessibility for household undergoing hardship. People on the lowest incomes or in extreme financial hardship often lack access to transport to making EAPA available in local place-based agencies and NGOs such as local councils, women's shelters, and various NSW Government agencies that support vulnerable customer programs. These partnerships can extend the reach of EAPA assistance to a broader demographic, ensuring a more comprehensive and inclusive delivery model. In addition, the time and resource impost on NGOs should be recognised.

The EAPA program faces a persistent challenge where the demand for support consistently exceeds the available supply. Members involved in the program have observed a concerning trend: the emergence of new groups or cohorts seeking support. These fresh cohorts represent previously underserved or unrecognised sections of the population grappling with energy affordability challenges.

Community Industry Group also supports the introduction of an "assisted application" channel, alongside existing methods, to facilitate the application process for individuals facing digital challenges or lacking online access. Under this proposed reform, customers could seek assistance from approved organisations, in addition to NGO EAPA providers, to apply for EAPA in person. This new channel will streamline the process by providing immediate help in filling out applications and ensuring their submissions are directed to the NSW Government EAPA provider for assessment.

This assisted application channel will address several concerns, including limited digital abilities or access. Notably, this approach will reduce the workload for volunteer NGOs involved in EAPA assessments, enhance reporting on all applications, and maintain consistency in assessment outcomes.

By diversifying the delivery of EAPA through this assisted application channel and incorporating additional provider organisations into the process, the NSW Government can

enhance accessibility, reduce the burden on NGOs, and provide a more consistent and supportive experience for applicants seeking energy bill assistance.