



Report

Rank the Energy Retailer 2025

Research findings from a 2025 survey of financial counsellors on the hardship practices of Australian energy retailers.

About this report

About financial counsellors

Financial counsellors are professionals who provide advice, support and advocacy to people experiencing financial difficulty. Financial counsellors work in community organisations and their services are free, confidential and independent.

About the project

The Rank the Energy Retailer 2025 Project is a collaborative project coordinated by Financial Counselling Victoria (FCVic) in partnership with Energy Consumers Australia (ECA), Financial Counselling Australia (FCA) and the Consumer Policy Research Centre (CPRC) with support from each State and Territory financial counselling peak association.



Rank the Energy Retailer 2025 is funded by [Energy Consumers Australia](#) as part of its Grants Program to support consumer advocacy and research projects that benefit household and small business consumers.



Acknowledgements

The project partners FCVic, FCA, ECA and CPRC thank financial counsellors across Australia for their participation in the survey, and more broadly acknowledge the ongoing vital services that financial counsellors, financial capability workers and energy resilience workers provide to their communities across Australia.

CPRC designed the survey of financial counsellors and conducted the survey results analysis.

ECA conducted analysis on retailer performance data from the Australian Energy Regulator.

The Rank the Energy Retailer 2025 project was guided by a National Reference Group comprising representatives from financial counselling sector peak associations — Financial Counsellors' Association of Western Australia (FCAWA), South Australian Financial Counsellors Association (SAFCA) and Financial Counsellors Association of Tasmania (FCAT) — in addition to FCVic, FCA, ECA, CPRC and community organisations the Justice and Equity Centre, and the Australian Council of Social Service (ACOSS).

Disclosure

State and territory financial counselling associations in Australia may receive financial contributions from energy retailers from time to time. Such contributions are used to support annual financial counselling conferences and other similar activities which build capacity in the sector. FCA receives conference sponsorship from energy retailers and a variety of other creditors.

A range of energy retailers contribute funds to the independent Financial Counselling Industry Fund which distributes funding through a competitive grants process to financial counselling agencies to support the growth and innovation of financial counselling services across the country. Contributing energy retailers do not influence the distribution of funding.

Disclaimer

This report is based on a survey of financial counsellors and does not represent the attitudes or opinions of third parties, including the project funder Energy Consumers Australia.

The information in this report is for general guidance only. FCVic has made every effort to provide accurate information in this report, but does not warrant or make any guarantees about the accuracy, currency or completeness of the report information.

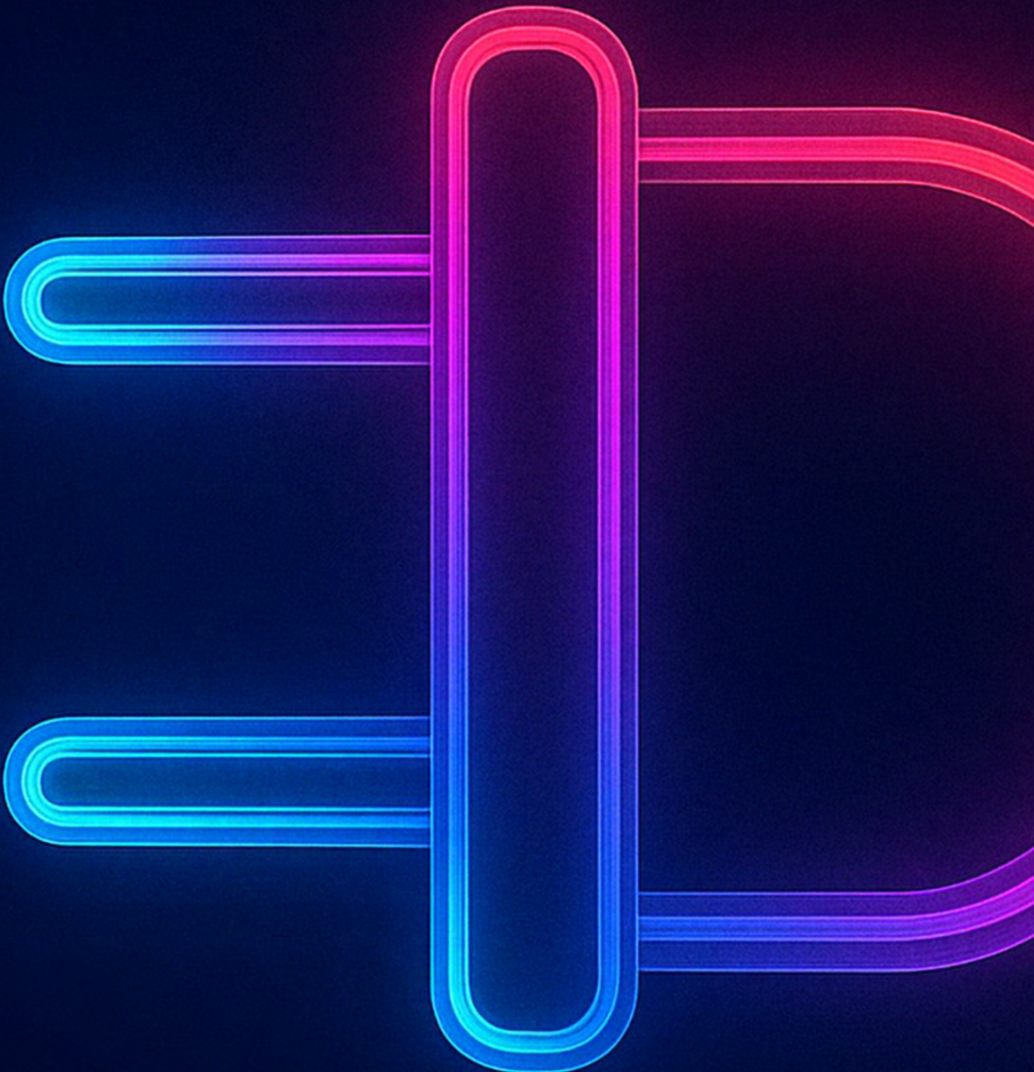
Published by:

Financial Counselling Victoria Inc.
Wurundjeri Country
Level 6, 179 Queen Street,
Melbourne VIC 3000

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Statement of Recognition

FCVic acknowledges the Traditional Owners of the lands on which our organisation is based. We pay our respects to their Elders, past and present, and to the Elders of other Aboriginal and Torres Strait Islander communities throughout Victoria and Australia.



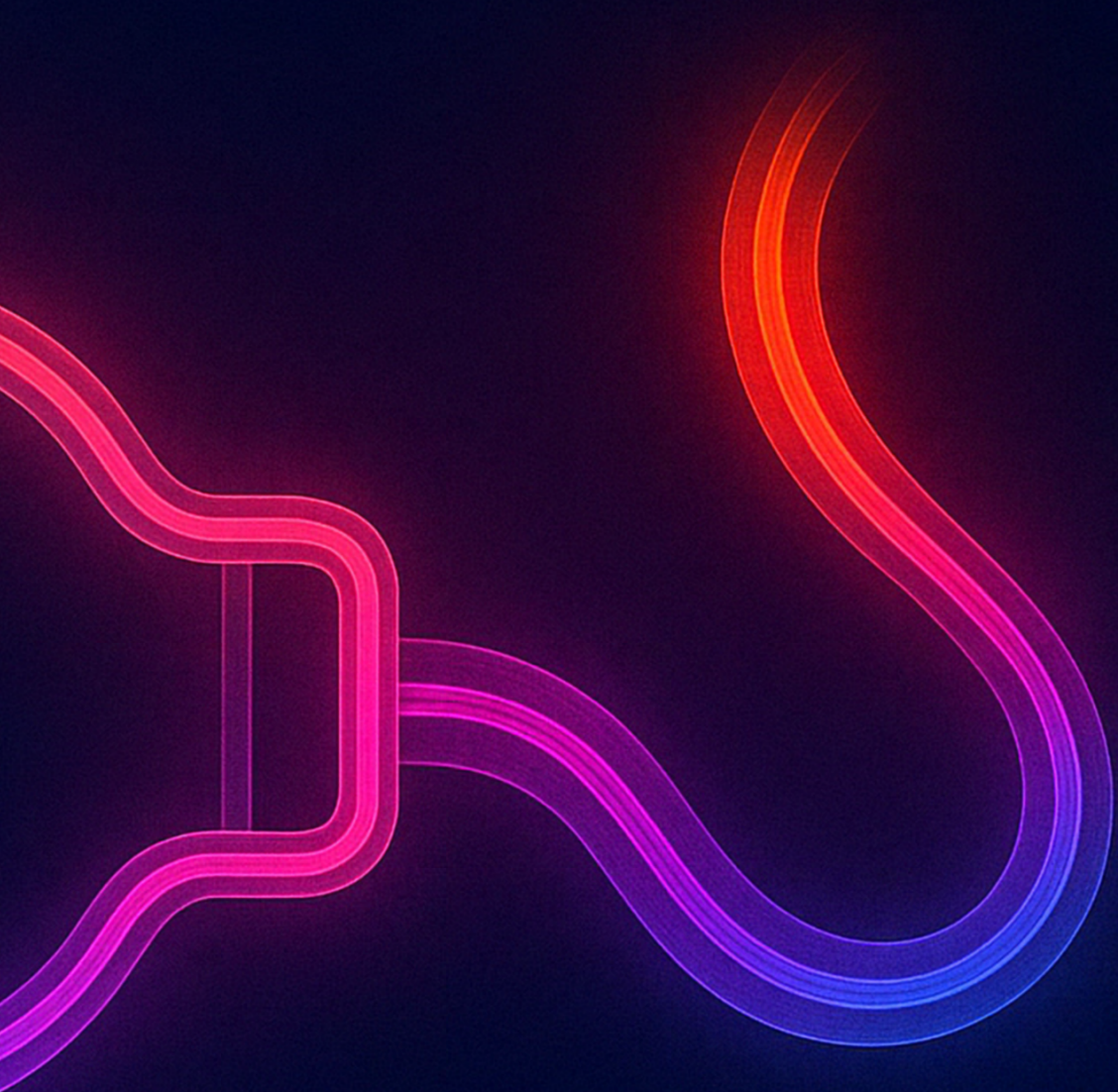
Contents

Volume 1 - Report

1.	Executive summary	6
2.	Background	12
3.	What we did	18
4.	Conclusion and recommendations	47
5.	State by State Snapshots	52

Volume 2 - Appendix

Published separately



Executive summary

Financial counsellors are at the frontline of Australia's energy hardship crisis. Every day, they support people facing mounting energy debts, disconnection threats, and complex financial and personal challenges — including job loss, illness, family violence and housing stress. Through this work, financial counsellors develop a detailed understanding of how energy retailers respond to customers in difficulty, and where systemic failures are causing harm.

Despite the existence of formal hardship frameworks, many people continue to miss out on support. Financial counsellors report that clients are often unaware of their entitlements, confused by inconsistent processes, or pushed into unaffordable repayment plans. In some cases, clients are disconnected before they are offered appropriate support. This reflects an ongoing “assistance gap”—one that disproportionately affects people already dealing with significant vulnerability.

In 2025, Financial Counselling Victoria (FCVic), in partnership with Financial Counselling Australia (FCA), the Consumer Policy Research Centre (CPRC) and Energy Consumers Australia (ECA), led a national study surveying more than 400 financial counsellors. The Rank the Energy Retailer research provides clear evidence of inconsistent practices across the energy sector. While some retailers were recognised for compassionate and flexible responses, many others were criticised for rigid policies, poor communication, and inadequate training of hardship teams.

Only 12% of financial counsellors rated energy retailers as “excellent” in their hardship responses—well behind water and banking sectors. Key failings included a lack of proactive support, burdensome eligibility checks, and disconnection processes that are misused as tools for engagement. Importantly, these experiences are not isolated—they are seen across all states and territories and represent systemic issues within the energy market.

Energy retailers have a significant role to play in improving outcomes for people experiencing payment difficulty. They can engage earlier, identify customers at risk using available data, and provide support that is empathetic, accessible, and based on what people can realistically afford. Retailers should train their staff in trauma-informed and culturally safe practices, proactively apply concessions and grants, offer flexible payment plans, and provide tailored energy efficiency advice. Disconnections should only occur as a genuine last resort, and systems must be designed to support all customers—particularly those without advocates—through clear communication, easy access to assistance, and continuity of care.

While retailers can and should do more, structural reform is essential to ensure fair and consistent outcomes across the energy market. Voluntary measures and good intentions are not enough when access to support varies widely between providers, and many people in hardship continue to fall through the cracks. Structural reform means establishing nationally consistent, enforceable obligations that guarantee all consumers the right to timely, affordable, and effective support—regardless of who their retailer is or where they live. This includes mandatory minimum standards of assistance, clear rules to prevent disconnection prior to genuine engagement, automatic access to best offers and concessions, and stronger enforcement mechanisms to hold retailers accountable.

We have the evidence. The time to act is now.



Zyl Hovenga-Wauchope
Chief Executive Officer
Financial Counselling Victoria



Dr Dominique Meyrick
Co-Chief Executive Officer
Financial Counselling Australia

Summary of financial counsellor experience ratings



Access to the hardship team and communications received

- Third-Party Authorisation acceptance was rated highest (74%) followed by ease of contacting hardship teams (57%) as the most positive aspects of retailer engagement.
- The most negative aspects were poor communication quality (24%) and lack of proactive accommodation of diverse needs (23%).

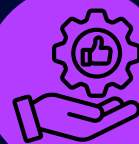
Customer outcomes and consistency

- Financial counsellors rated resolution of issues in-house and consistency in arrangements as the most positive outcomes (both 60%).
- The weakest areas were going beyond the bare minimum to support customers (44%) and resolving issues without escalation (38%).



Hardship processes and team attitude

- Energy retailer staff attitude (62%) and trust in hardship teams (58%) were rated most positively.
- Key weaknesses were early identification of hardship (33%) and adequate staff training (41%).



Proactive assistance and support provided

- Financial counsellors perceive the most common support from retailers is affordable payment options, concessions / rebates / grants, and energy efficiency advice.
- Least offered support is in relation to new appliances and energy crisis payments.
- Victim-survivors of family and domestic violence were perceived as the cohort receiving the highest support from energy retailer hardship teams (40%), followed by people with disability, the elderly, and people affected by natural disasters (all 32%).
- Least supported were perceived to be people with unrecoverable debt (14%), scam victims, and small businesses (18%).



Overall energy retailer ranking



The overall ordered ranking was based on participant ratings of each retailer along a 0-10 point Likert scale.

The ranking was derived using the following formula: (% Ratings 7-10) minus (% Ratings 0-3) = NET positive position

* Caution: Small sample size (<30)

Key recommendations

1. Strengthen protections through regulation, enforcement and implementation



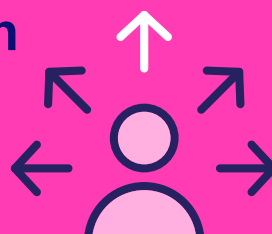
2. Make support early, accessible and equitable



3. Provide realistic payment arrangements before debt accrues



4. Embed a person-centred, future-focused approach



5. Improve data, monitoring and continuous learning



6. Leverage relationship with financial counsellors



Note: these recommendations are discussed in detail from page 47.



Background

An increasing number of people experiencing payment difficulty

Across Australia, many people are struggling to cover essential living expenses, including energy bills. ECA's Consumer Energy Report Card shows that two in five Australians are currently finding it difficult to pay their home energy bill.¹

The Australian Energy Regulator's (AER) '*Review of payment difficulty protections in the National Energy Customer Framework – Findings report*', estimates that a total of 4.8% of the electricity customers in National Energy Customer Framework (NECF) jurisdictions (NSW, Qld, SA, ACT and Tas) were in energy debt in 2023-24.² This includes 1.9% of customers in hardship programs and an estimated 2.9% of customers in energy debt but not in a hardship program.

Jurisdictions and regulations

Across Australia there are significant differences in how energy retailers are regulated. Not all states and territories have adopted the 'National Energy Customer Framework' (NECF), or are regulated by the AER. For example, Victoria has strong protections under its own 'Payment Difficulty Framework'. In reading and interpreting the findings in this report, the different frameworks governing retail energy providers in different jurisdictions should be considered.

1 Analysis by Energy Consumers Australia on data available in the Consumer Energy Report Card, dated December 2024 (available at <https://energyconsumersaustralia.com.au/consumer-energy-report-card>)

2 See AER's '*Review of payment difficulty protections in the National Energy Customer Framework - Findings report*' dated 15 May 2025 (available at <https://www.aer.gov.au/documents/aer-review-payment-difficulty-protections-necf-findings-report-may-2025>)

Table 1. Overview of jurisdictions and frameworks

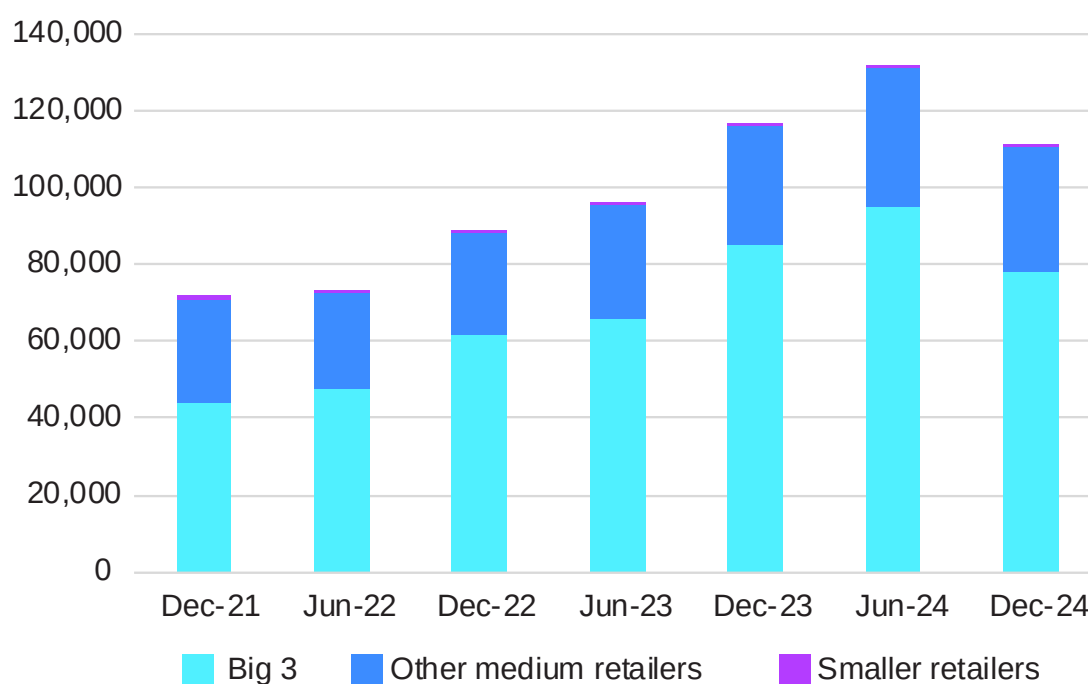
State / Territory	Regulator and other key details	National Energy Customer Framework adopted?
Australian Capital Territory	Australian Energy Regulator (AER) Independent Competition and Regulatory Commission (ICRC) regulates standing offers	Yes
New South Wales	Australian Energy Regulator (AER) AER sets the Default Market Offer (DMO) in NSW	Yes
Queensland	Australian Energy Regulator (AER) AER sets the Default Market Offer (DMO) in South-East Qld Queensland Competition Authority (QCA) regulates remote and far-north pricing Ergon Energy is government-owned and the primary retailer for regional and remote Queensland and the Torres Strait	Yes
South Australia	Australian Energy Regulator (AER) AER sets the Default Market Offer (DMO) in SA	Yes
Tasmania	Office of the Tasmanian Economic Regulator regulates standing offers	Yes
Northern Territory	Utilities Commission of the Northern Territory Main retailer Jacana Energy is government-owned	No
Victoria	Essential Services Commission (ESC) ESC sets the Victorian Default Offer (VDO) ESC's Payment Difficulty Framework applies in Victoria	No* (applies in a limited manner)
Western Australia	Economic Regulation Authority (ERA) Main retailer Synergy is government-owned	No

Source: See the Australian Energy Market Commission for the adoption of the National Energy Customer Framework (available at <https://www.aemc.gov.au/regulation/energy-rules/national-energy-retailrules/regulation>)

Increasing numbers of people in hardship programs

In the retail energy sector, there has generally been an increase in the number of hardship customers over the past two years. Analysis shows that for residential electricity customers in NECF jurisdictions, nearly all retailers have seen a growth in the number of hardship customers over the past two years.³

Figure 1. Customers entering hardship plans



Source: Australian Energy Regulator retail performance data, <https://www.aer.gov.au/industry/retail/performance-reporting>

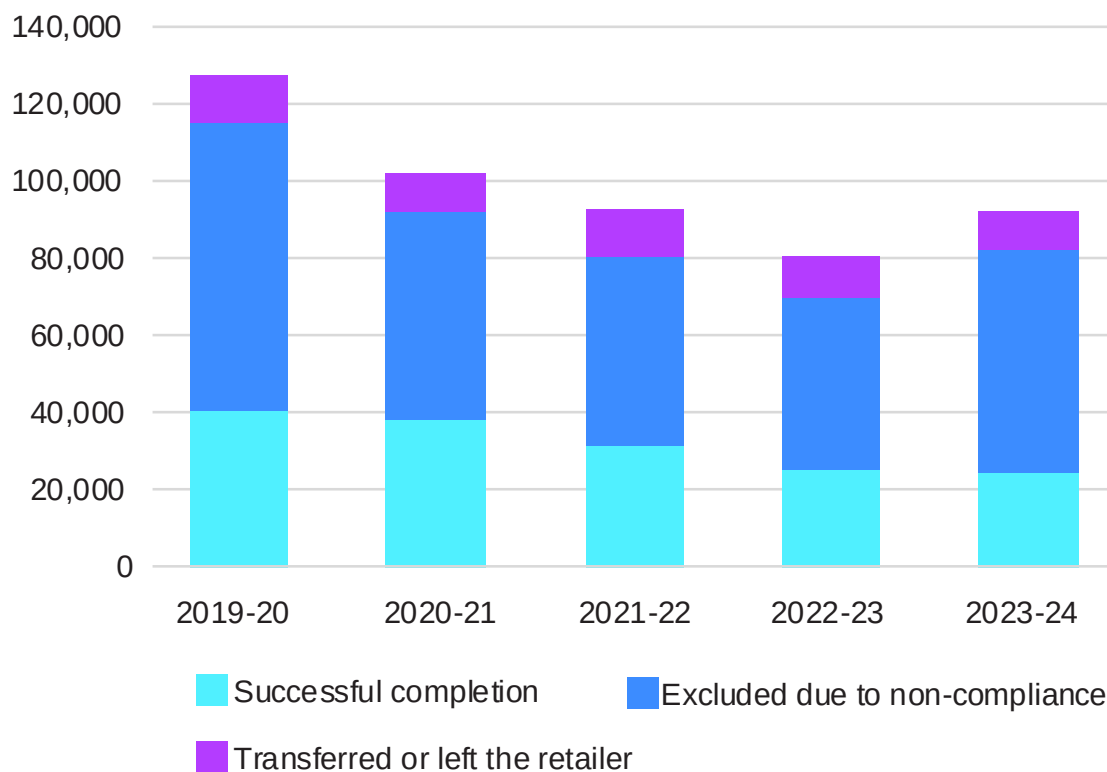
³ Analysis by Energy Consumers Australia of Australian Energy Regulator retailer performance data (available at <https://www.aer.gov.au/industry/retail/performance-reporting>)

Not all hardship programs are effective

People who enter a hardship program, do not always stay within the program.

ECA's analysis of AER data reports on three reasons why a person ends a hardship program: either 1) they successfully completed it, 2) they were excluded from the program due to non-compliance or 3) they transferred/ left that retailer. Concerningly, the most common reason why a person leaves a hardship program is that they were excluded due to non-compliance. Analysis by ECA on AER data reports that around 57% of hardship customers in NECF jurisdictions are excluded for non-compliance.

Figure 2. Number of customers leaving hardship program by reason



Source: Australian Energy Regulator retail performance data, <https://www.aer.gov.au/industry/retail/performance-reporting>

Non-compliance can also mean that people are excluded from a hardship program because they are unable to meet their payment plan conditions, especially when those payment plans are not tailored to their circumstances or capacity to pay.

This data reinforces concerns about systemic shortcomings in energy hardship responses. With 57% of customers exiting hardship programs due to non-compliance—often because payment plans are not suited to their capacity to pay—it highlights a widespread failure to provide realistic and sustainable support.

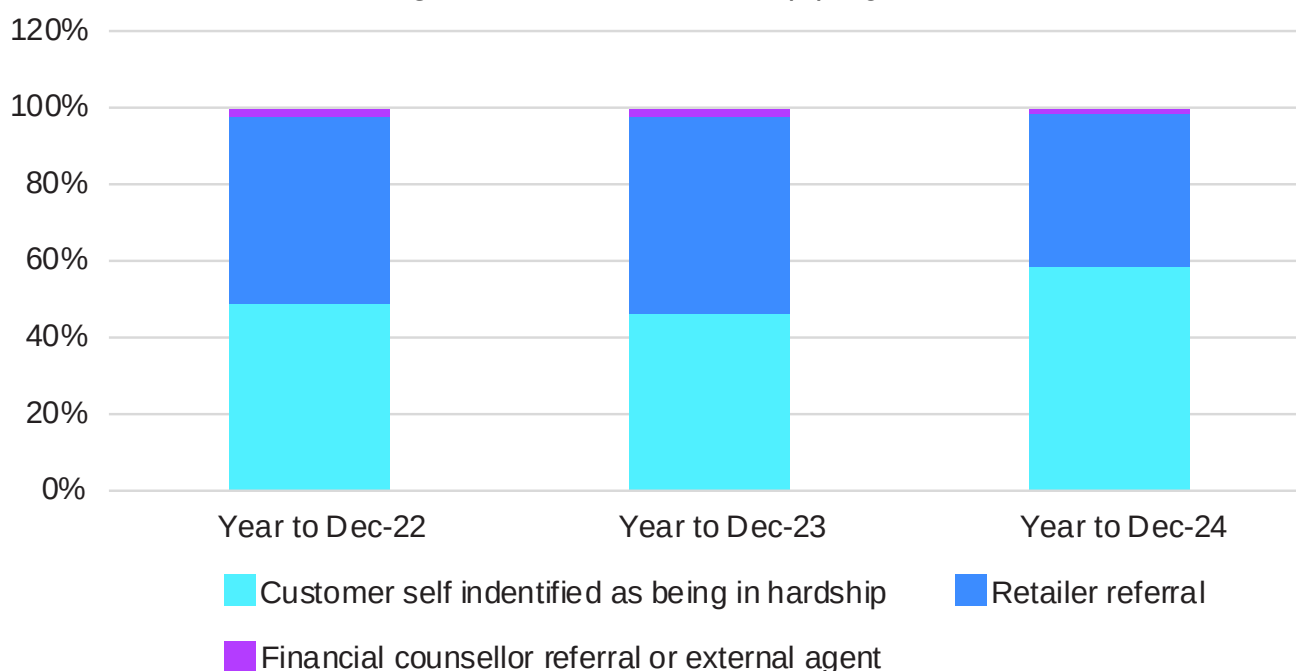
Better outcomes with support

Financial counsellors are highly effective advocates for their clients, but they are a small workforce with approximately 1,200 financial counsellors nationally. As such, financial counsellors can only assist a limited number of people who are in payment difficulty.

Financial counsellors are experienced at navigating energy retailers' processes and policies and often have established relationships with energy retailer hardship teams. This means that individuals experiencing financial hardship receive the "gold standard" response from energy retailers when they are supported by a financial counsellor, far surpassing the support typically available to customers from energy retailers when customers are left to navigate financial difficulty and hardship on their own.

Most customers entering hardship do not have the benefit of assistance from a financial counsellor. Analysis of AER retailer performance data for customers who are residential electricity customers in NECF jurisdictions, demonstrates that most people who enter hardship programs either self-refer (59% in 2024) or are referred by their energy retailer (40% in 2024), whereas only 1% of customers in 2024 (and 2% in 2023) were assisted by a financial counsellor or other third party agent.⁴ It is essential that the system works effectively for anyone in Australia to self-advocate and still receive fair hardship support from their retailer.

Figure 3. Avenue to hardship program



Source: Australian Energy Regulator retail performance data <https://www.aer.gov.au/industry/retail/performance-reporting>.

The Rank the Energy Retailer 2025 Project focuses on the insights of the financial counsellors who navigate energy retailers' hardship processes every day on behalf of their clients.

⁴ Analysis by Energy Consumers Australia of Australian Energy Regulator retail performance data (available at <https://www.aer.gov.au/industry/retail/performance-reporting>)

This report in context

As more households experience energy stress, the need for effective responses to payment difficulty is greater than ever. In this context, the insights of financial counsellors offer a valuable perspective on how current systems are working in practice. Their frontline experience highlights where individual retailers are meeting their obligations, and where they are falling short. Just as importantly, it points to deeper structural weaknesses in how hardship support is designed and delivered.

These insights help identify both the immediate improvements retailers can make and the broader changes needed to ensure the system is fair, accessible and effective. This report takes place in the context of a live conversation about what these broader changes might look like. For example, the AER has been reviewing the framework that governs how energy retailers support customers in payment difficulty. Its findings reflect what financial counsellors have long observed: too many people are not being identified early, not receiving the help they need, and are still at risk of disconnection being used as a routine debt management and engagement tool, rather than a true last resort. The Essential Services Commission has also been reviewing the Victorian Energy Retail Code of Practice.

To contribute to this broader reform conversation—and to ground it in the everyday experiences of people in financial hardship—we sought to better understand how the system is currently functioning from the perspective of those working on the frontline. The next section outlines what we did and how we approached this work.

What we did

Aim and objectives of the survey

The overall aim of the 2025 Rank the Energy Retailer survey is to provide a solid benchmark for future measurement, enabling tracking over time. Specific research objectives were to:

- explore financial counsellors' experiences and interactions with various energy retailers' hardship teams over the past 12 months;
- measure financial counsellors' sentiment and perspectives of energy retailers' hardship practices over the past 12 months; and
- identify barriers to energy consumers in accessing fair, reasonable and appropriate hardship assistance.

CPRC developed a new questionnaire in close collaboration with FCVic, FCA and ECA and consultation with the project's National Reference Group. The online survey was undertaken by financial counsellors between 14 March and 13 April 2025, taking on average 30 minutes to complete (median time of 26 minutes). Financial counsellors who participated were given the opportunity to enter an incentive draw for the chance to win a \$500, \$200 or \$100 gift card.

All State and Territory peak financial counselling associations assisted in the distribution of the online survey link to their financial counsellor members; 1,053 financial counsellors were invited across Australia, 428 started the survey and dropped out at various points and 223 completed the survey. The participation rate was 41% and the final response rate was 21%. As such, we have included all responses where possible regardless of drop off point.

Financial counsellors were asked to rate up to four energy retailers of their choosing in terms of the performance of their hardship practices. Overall, 350 financial counsellors rated at least one, 166 rated at least two, 105 rated at least three, and 61 rated four energy retailers.

More detail on the methodology is available in the Appendix.

How to read this report

Charts have been ordered from most to least positive for aggregated ratings of 7-10/10 across all scaled variables. This provides an order of best performing retailer to worst performing retailer.

Most questions were asked in a way where the end of the scale (i.e. 10) represented a positive perspective. Questions asked in the opposing direction, i.e. where the end of the scale represented a negative perspective, have been reversed in this report to be consistent with the majority of questions.

This report presents overall rankings and high-level findings, including relative multi-dimensional scaling, for each main retailer against all others.

The Appendix presents detailed ratings for each retailer against each individual question.

This report showcases the performance of energy retailers Australia-wide, as well as snapshots using quantitative and qualitative data at the state and territory level (where possible).



Key findings

1. The energy sector compares poorly to other sectors

Energy retailers' hardship practices rated lower than water and banking sectors, with only 12% of financial counsellors rating them as excellent. However, the energy sector outperformed telecommunications and debt collection. Financial counsellors with clients in Western Australia stood out, with these financial counsellors more likely to rate energy hardship support as excellent.

2. Quality of hardship responses varies between energy retailers

Financial counsellors in Western Australia were the most satisfied with their energy retailers, with Synergy and Horizon Power ranking highest.

EnergyAustralia, Origin Energy, and AGL Energy followed, while ActewAGL and Red Energy placed sixth and seventh. ENGIE, Jacana Energy, and Lumo Energy ranked lowest due to a high volume of negative ratings outweighing positive ratings.

Top-rated retailers were praised for empathy and flexibility (27%) and positive staff attitudes (14%). The main driver of negative ratings was rejection and inflexibility of hardship support (31%).

3. Quality of hardship responses varies across jurisdictions

Energy hardship support varies significantly across Australia. Western Australia stood out for consistently strong performance while NECF jurisdictions like New South Wales and Queensland showed more variable outcomes and barriers to early, flexible support. Financial counsellors in South Australia and Victoria reported sharp rises in energy-led cases, often involving complex hardship, highlighting the urgent need for consistent, structural reform across states. While a small sample size, Northern Territory financial counsellors ranked the government-owned retailer Jacana Energy poorly, with 80% of financial counsellors reporting hardship was too hard access and untimely in the Northern Territory.

To better understand where energy retailers are performing well—and where they are falling short—the following section breaks down the survey results by theme. Each theme reflects a critical part of the customer journey through hardship support, from first contact with a retailer through to the type and consistency of assistance offered. This thematic analysis highlights not just technical performance, but the human experience behind the data—revealing how systems, processes, and attitudes shape outcomes for people in financial stress.

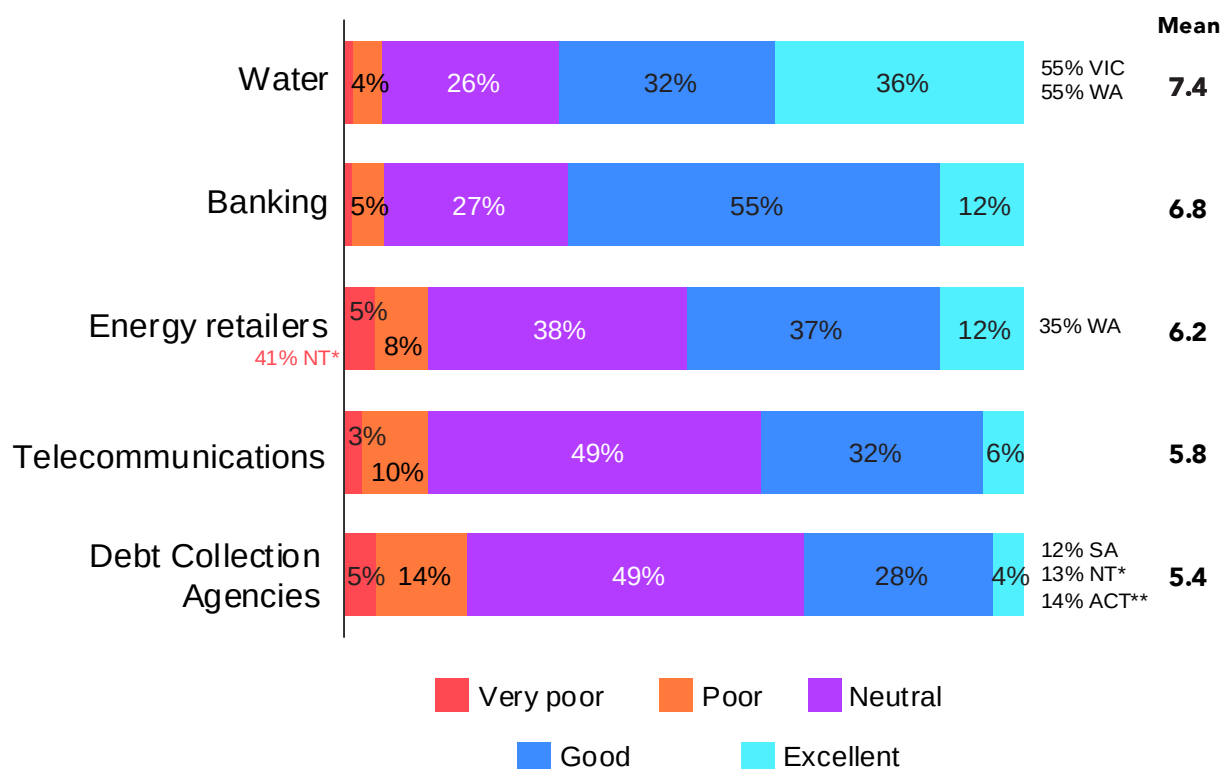
Sector benchmarks

When comparing hardship practices of the energy retail sector with those of other sectors, energy scored lower than both the water and banking sectors. Water retailers were rated as good by 32% of financial counsellors and excellent by 36% overall, with those with clients in Victoria and Western Australia particularly impressed by hardship practices in this sector (55% in each state providing a rating of excellent).

Energy retailers were rated as good by 37% and excellent by 12% of financial counsellors overall. Interestingly, financial counsellors with clients in Western Australia were more likely than other states to rate energy retailers' hardship practices as excellent (35%). Financial counsellor ratings of the energy sector may reflect that financial counsellors often receive 'premium' assistance from retailer hardship teams when compared with the experience of consumers.

The Consumer Energy Report Card reports that consumers across Australia ranked the electricity sector as the worst ranked industry when compared with water, telecommunications/internet, and banking industries in 2024.⁵ The Consumer Energy Report Card survey was of general consumers, and did not include debt collection agencies, unlike the Rank the Energy Retailer survey, reflecting that financial counsellors regularly work with the debt collection agencies in their casework.

Figure 4. Benchmarking retailer energy sector hardship practices against other sectors



Base: Total who responded to the question, n range=367-399

* Caution: Small sample size (<30)

** Caution: Very small sample size (<10)

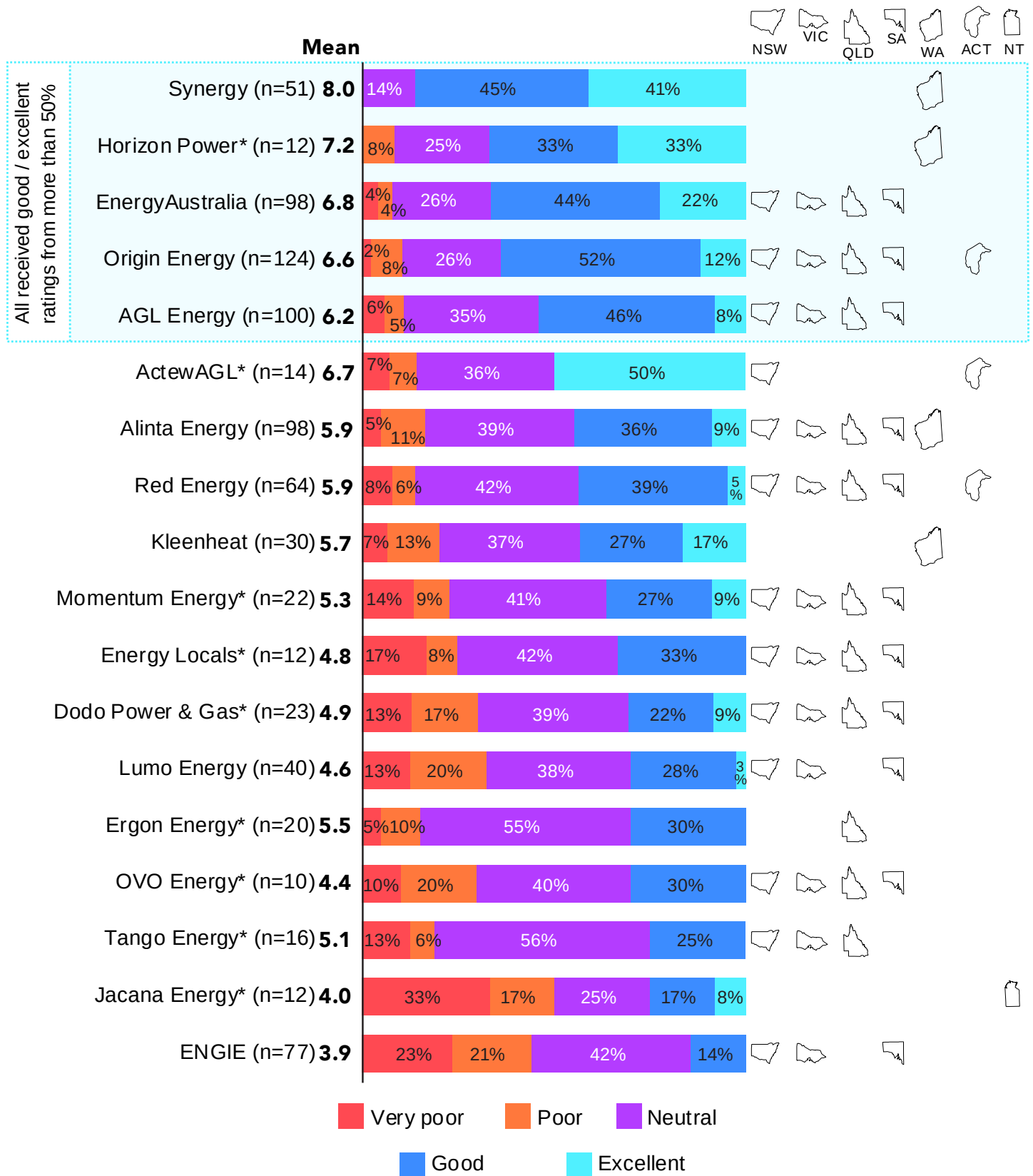
States listed either side of the results with a % indicate that that state is a significant outlier in the data.

5 Energy Consumer Australia's Consumer Energy Report Card dated December 2024 (available at <https://energyconsumersaustralia.com.au/consumer-energy-report-card>)

Energy retailer ratings

While each state and territory differs in number of energy retailers and how each retailer is governed and operated, overall, financial counsellors in Western Australia appeared to be the most satisfied. The top-rated energy retailers comprised Synergy and Horizon Power, each receiving a mean rating of more than 7 out of 10, and ratings of excellence from a third or more of the financial counsellors surveyed.



Figure 5. Ratings of overall performance of energy retailers

Base: Total ratings received (>10) for each individual retailer, n range=10-124

* Caution: Small sample size (<30)

Note: No energy retailers from Tasmania featured in the ranking due to sample sizes lower than 10.

This Fig 5 orders energy retailer performances by aggregated positive ratings (ie the highest Good + Excellent ratings).

Positive ratings

Primary reasons given for higher ratings include empathy and flexibility shown towards customers experiencing hardship (27%), followed by a great attitude and the hardship team being nice to work with (14%).

“Synergy have improved their financial hardship assistance with the continued development of their case management offering for clients.” – Financial counsellor with clients in WA

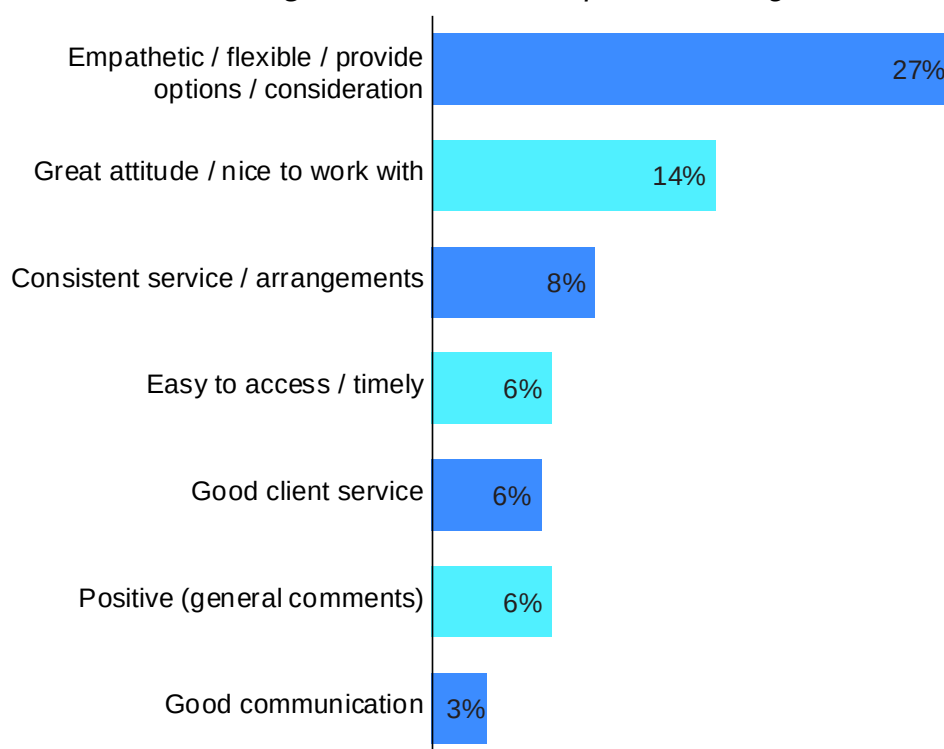
“Synergy have a great hardship program which focuses more on the client being able to afford what they are committing to, instead of focusing purely on usage and repayment of overdue bills.” – Financial counsellor with clients in WA

“The Hardship Manager [at Origin] is compassionate and very helpful, interacting with other general team members can be challenging. Email responses are often standard responses that do not address the issue or questions asked, meaning the communication has to go back and forth and wastes time.” – Financial counsellor with clients in NSW

*“[Origin is] somewhat more flexible with cohorts of clients with various issues impacting their ability to meet their payment obligations.”
– Financial counsellor with clients in NSW*

*“All [Origin] issues are usually resolved within the first call.”
– Financial counsellor with clients in SA*

Figure 6. Reasons for positive ratings



Base: Total who responded to the question, n=180

Negative ratings

The primary reason for negative ratings was the rejection of hardship and inflexibility on the part of the energy retailer (31%).

This was followed by difficulty accessing hardship (12%), experienced disproportionately by financial counsellors with clients in the Northern Territory.

“AGL have on several occasions taken payments without clients’ approval and this can take time to resolve with AGL which results in financial hardship for the customer.” – Financial counsellor with clients in NSW

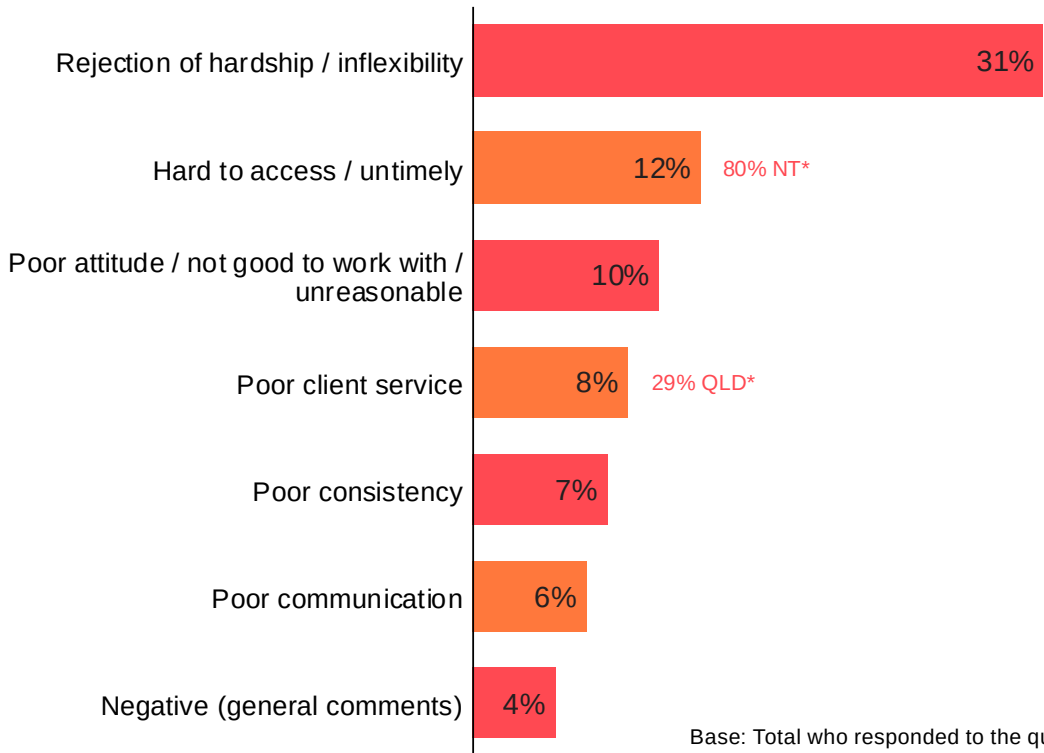
“They [Jacana] refuse to waive debts but continue to allow people to get into thousands of dollars worth of debt.” – Financial counsellor with clients in NT

“Jacana staff seem to have compassion for client circumstances sometimes, but the practices and hardship policy’s structure can do with a lot of improving. Jacana only recognises and issues concessions to members of the NT Concession Scheme and this does not include Jobseeker recipients and this needs to change.” – Financial counsellor with clients in NT

“I think Ergon do really well in offering payment plans but often without a Financial counsellor involved they make these payment plans unaffordable.” – Financial counsellor with clients in QLD

“[Lumo is] the worst of the lot.” – Financial counsellor with clients in VIC

Figure 7. Reasons for negative ratings



Base: Total who responded to the question, n=180
* Caution: Small sample size (<30)

Overall ranking of energy retailers

The top two positions in the overall ranking were taken by Western Australian retailers Synergy and Horizon Power. Third, fourth and fifth places were EnergyAustralia, Origin Energy and AGL Energy. Sixth and seventh places were taken by ActewAGL and Red Energy.

Retailers ENGIE, Jacana Energy and Lumo Energy performed substantially worse than all others, due to substantial proportions of negative ratings, outweighing positive ratings.

Notably, the two best performing energy retailers in the ranking are both government owned and in WA, both performing significantly better than the next ranked retailers. However, one of the poorest ranked retailers is also government owned, and some of the middle-ranked retailers are government owned. Privately owned retailers are found across the ranking.

Preliminary analysis of the ranking does not demonstrate a definitive relationship between ownership structure and hardship performance, and further analysis of the impact of corporate ownership structures or other regulatory/market environment factors is beyond the scope of this report. The relative performance of some retailers in the ranking is clearly worthy of further investigation.

Figure 8. Overall energy retailer ranking



The overall ordered ranking was based on participant ratings of each retailer along a 0-10 point Likert scale.

The ranking was derived using the following formula: (% Ratings 7-10) minus (% Ratings 0-3) = NET positive position

* Caution: Small sample size (<30)

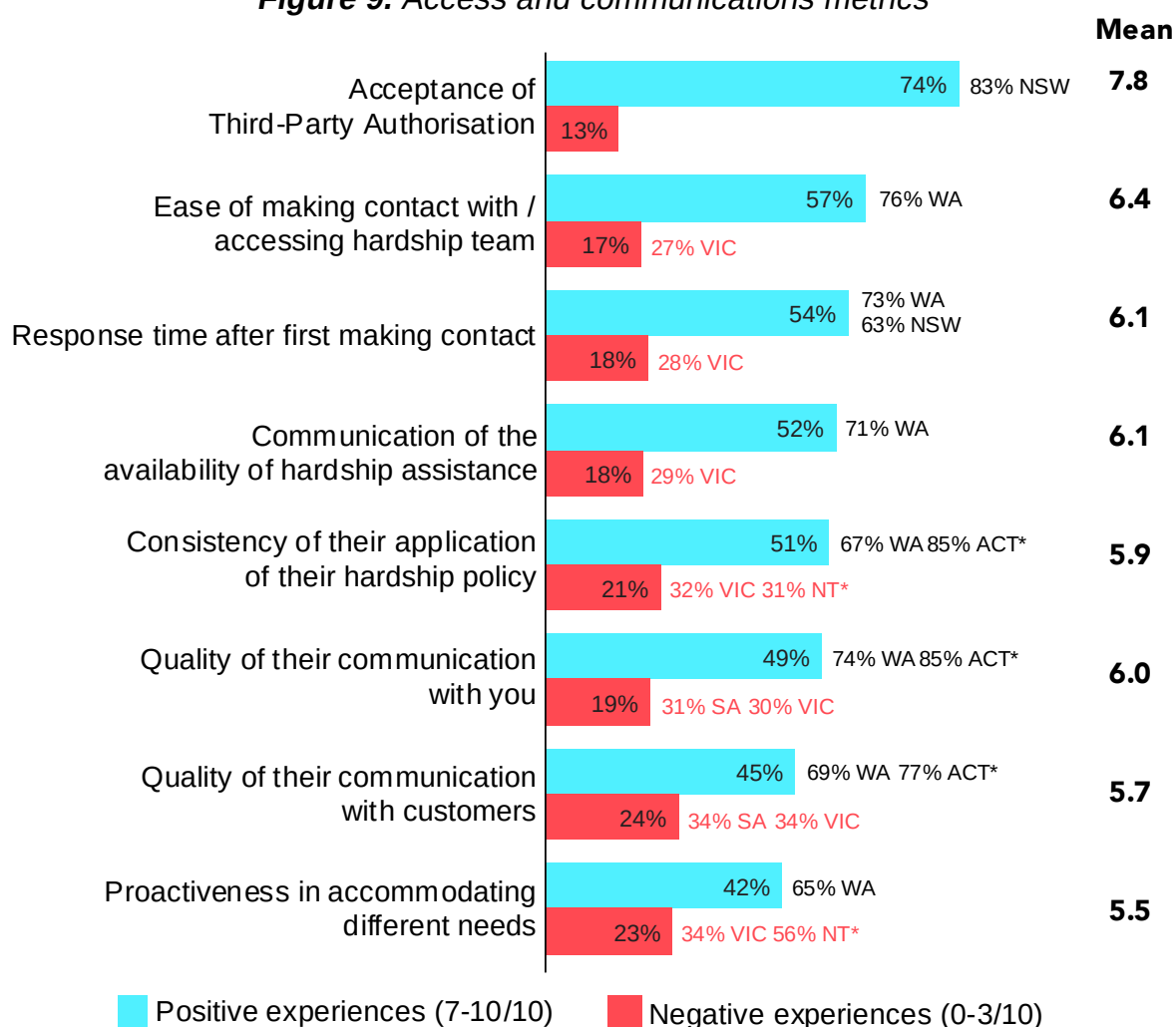
Access to hardship teams and quality of communications

Sector level macro ratings of access and communications metrics

At a macro level, acceptance of financial counsellors' Third-Party Authorisation was the most positive experience overall (74%), followed by ease of making contact with the hardship team (57%). Of note, financial counsellors with clients in Western Australia and New South Wales tended to provide more positive ratings.

The most negative experiences were quality of communications with customers (24%) and proactiveness in retailers accommodating different needs (23%). This sentiment was expressed mostly by financial counsellors with clients in Victoria and South Australia.

Figure 9. Access and communications metrics



Base: Financial counsellors who provided a rating, n range: 571-601

* Caution: Small sample size (<30)

Retailer performance across access and communications metrics

In relation to metrics associated with access to retailers' hardship teams, and communications received from these teams, Synergy and EnergyAustralia were consistently in the top three highest performing energy retailers, most often accompanied by Origin Energy.

In contrast, poorest performing retailers were most commonly ENGIE, Dodo Power & Gas and Lumo Energy.

Table 2. Highest and lowest performing retailers in access and communication

Positive score (7-10/10)	Bottom 3 retailers	Top 3 retailers
Acceptance of Third-Party Authorisation	45% Dodo Power & Gas* 50% ENGIE 64% KleenHeat*	93% Jacana Energy* 86% EnergyAustralia 82% Synergy
Ease of making contact with / accessing the retailer's hardship team	9% ENGIE 18% Dodo Power & Gas* 30% Lumo Energy*	87% Synergy 77% EnergyAustralia 66% Origin Energy
Response time after first making contact	9% Dodo Power & Gas* 16% ENGIE 26% Lumo Energy*	81% Synergy 66% EnergyAustralia 63% Jacana Energy*
Communication of availability of hardship assistance	5% ENGIE 18% Dodo Power & Gas* 26% Lumo Energy*	83% Synergy 68% EnergyAustralia 59% Red Energy
Consistency of their application of their hardship policy	9% ENGIE 27% Dodo Power & Gas* 35% Lumo Energy*	83% Synergy 66% EnergyAustralia 55% Origin Energy
Quality of communications with you	5% ENGIE 9% Dodo Power & Gas* 31% Ergon Energy*	87% Synergy 68% EnergyAustralia 63% Jacana Energy*
Quality of communications with customers	5% ENGIE 18% Dodo Power & Gas* 25% Ergon Energy*	79% Synergy 64% EnergyAustralia 48% Kleenheat*
Proactiveness in accommodating different needs	7% ENGIE 18% Dodo Power & Gas* 22% LumoEnergy*	77% Synergy 61% EnergyAustralia 44% Origin Energy

Note: Comprehensive breakdowns for each energy retailer are shown in the Appendix.

Base: Financial counsellors who provided a rating, n range: 571-601

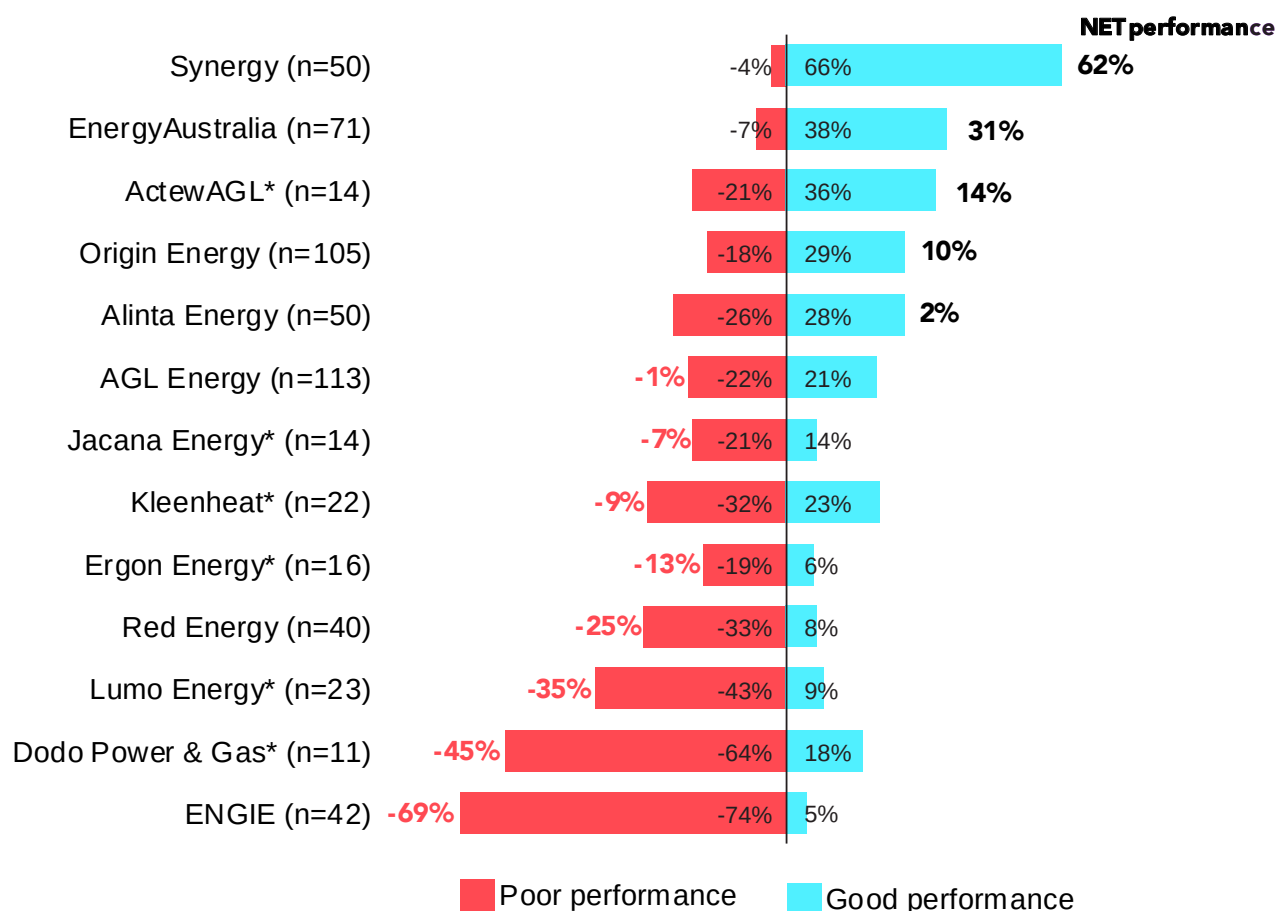
* Caution: Small sample size (<30)

Retailer rank: Access and communication of hardship team

Looking at relative 'net performance' for access to each energy retailer's hardship team and their communications with financial counsellors, Synergy and EnergyAustralia were the top performers (62%, and 31% net performance, respectively).

In contrast, ENGIE was found to be the poorest performer (-69% net performance), followed by Dodo Power & Gas (-45% net performance). While Alinta Energy and AGL Energy displayed positive performance of 28% and 21% (respectively), ratings were polarised, resulting in low net performance score of 2% and -1% (respectively).

Figure 10. Relative performance of energy retailers on access and communications of hardship teams



Note: A multi-dimensional scale was created aggregating all responses to communications and access questions: Q10 (ease of access), Q11 (communications evaluations) and Q16 (Third Party Authorisation acceptance).

'Net performance' rank is relative, derived by % responses in lowest quartile minus % responses in highest quartile.

Base: Total responses included in the scale, n=571

* Caution: Small sample size (<30)

While ranked overall by a substantive sample of respondents, Horizon Power, Momentum Energy, Energy Locals, Tango Energy and OVO Energy received too few in-depth evaluations for inclusion on this scale.

Interactions, processes and attitudes of hardship team

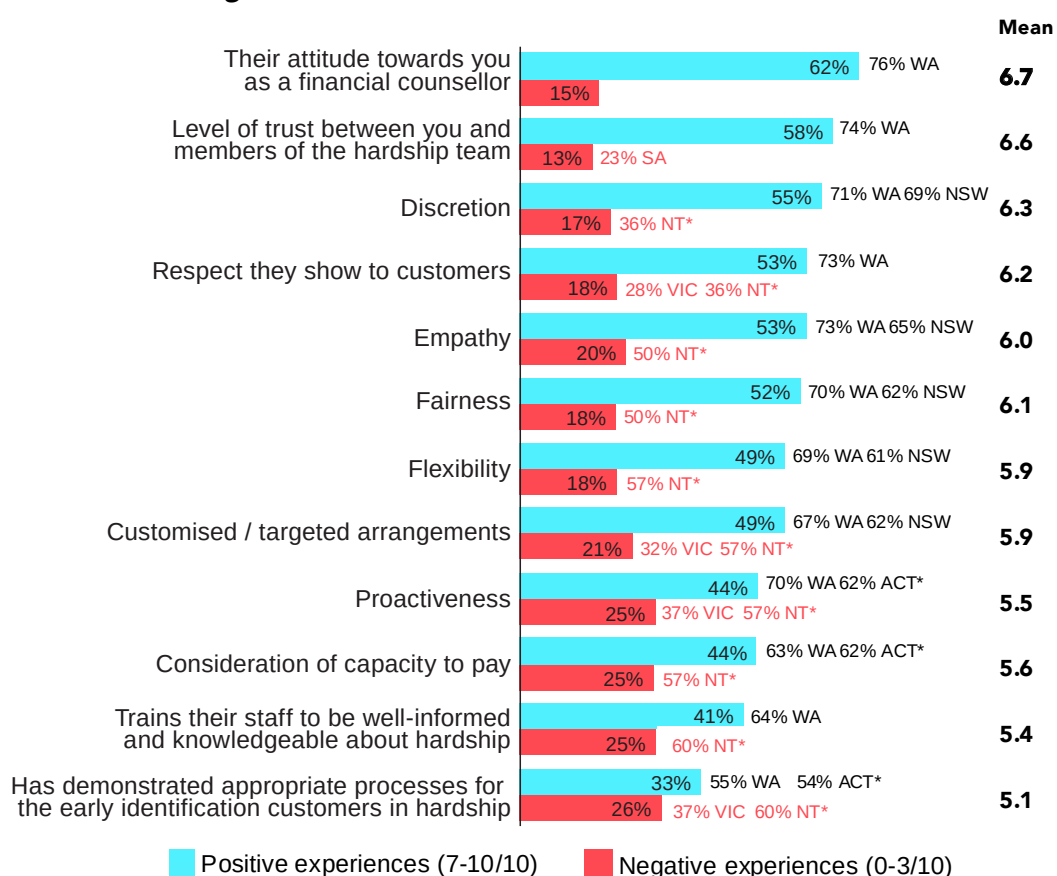
Sector level macro ratings of process and attitude metrics

Looking across ratings of process and attitude from retailers' hardship teams, staff attitude towards financial counsellors was perceived as the most positive overall (62%), followed by the level of trust between the financial counsellor and members of the hardship team (58%). Again, financial counsellors with clients in Western Australia and New South Wales were more positive.

While staff attitude was rated highly, hardship processes were where financial counsellors believe retailers require improvement. Retailers performed poorly on early identification of customers in hardship (33%), and training of staff to be well-informed and knowledgeable about hardship (41%).

The demonstrated strong relationships between financial counsellors and customer hardship teams indicates a clear opportunity to leverage that relationship to improve the systems, policies, and practices of energy retailers in consultation with industry and regulators.

Figure 11. Process and staff attitude metrics



Base: Financial counsellors who provided a rating, n range: 566-572

* Caution: Small sample size (<30)

Retailer performance across process and staff attitude metrics

In relation to metrics associated with retailers' hardship processes, and staff attitude, consistently high performing retailers were Synergy and EnergyAustralia.

Consistently poorer performers included ENGIE, Jacana Energy, Lumo Energy and Dodo Power & Gas.

ECA's analysis of AER retailer performance data shows that for Dodo Power & Gas and ENGIE, the proportion of customers entering a hardship program with a debt less than \$500 is considerably lower than the national average.⁶ At the same time, the proportion of customers entering a hardship program with debt over \$2,500 is above the national average, particularly in the past 18 months.

This analysis corroborates the survey findings, where financial counsellors identify Dodo Power & Gas and ENGIE (among other retailers, including Jacana Energy in the Northern Territory) who fail to demonstrate appropriate processes for early identification of customers in hardship.

Table 3. Highest and lowest performing retailers in process and attitude

Positive score (7-10/10)	Bottom 3 retailers	Top 3 retailers
Their attitude towards you as a financial counsellor	17% ENGIE 18% Dodo Power & Gas* 48% Lumo Energy*	88% Synergy 79% EnergyAustralia 69% Ergon Energy*
The level of trust between you and members of the hardship team	14% ENGIE 18% Dodo Power & Gas* 35% Lumo Energy*	86% Synergy 80% EnergyAustralia 64% Jacana Energy
Discretion	21% ENGIE 27% Lumo Energy* 36% Jacana Energy*	84% Synergy 76% EnergyAustralia 63% Ergon Energy*
The respect they show to customers	14% ENGIE 18% Dodo Power & Gas* 36% Jacana Energy*	84% Synergy 73% EnergyAustralia 57% ActewAGL*

Note: Comprehensive breakdowns for each energy retailer are shown in the Appendix.

Base: Financial counsellors who provided a rating, n range: 566-576

* Caution: Small sample size (<30)

⁶ Analysis by Energy Consumers Australia of Australian Energy Regulator retailer performance data, on residential electricity customers in the NECF jurisdictions (available at <https://www.aer.gov.au/industry/retail/performance-reporting>)

Table 3 (continued). Highest and lowest performing retailers in process and attitude

Positive score (7-10/10)	Bottom 3 retailers	Top 3 retailers
Empathy	12% ENGIE 21% Jacana Energy* 27% Dodo Power & Gas*	86% Synergy 73% EnergyAustralia 59% Kleenheat*
Fairness	17% ENGIE 21% Jacana Energy* 27% Lumo Energy*	84% Synergy 74% EnergyAustralia 55% Origin Energy
Flexibility	12% ENGIE 18% Dodo Power & Gas* 21% Jacana Energy*	80% Synergy 73% EnergyAustralia 51% Origin Energy
Customised / targeted arrangements	10% ENGIE 21% Jacana Energy* 23% LumoEnergy*	80% Synergy 70% EnergyAustralia 52% Origin Energy
Proactiveness	10% ENGIE 14% Jacana Energy* 18% Dodo Power & Gas*	84% Synergy 66% EnergyAustralia 57% ActewAGL*
Consideration of capacity to pay	12% ENGIE 14% Jacana Energy* 27% Dodo Power & Gas*	74% Synergy 64% EnergyAustralia 50% ActewAGL*
Staff are trained to be well- informed and knowledgeable about hardship	5% ENGIE 13% Jacana Energy* 18% Dodo Power & Gas*	78% Synergy 63% EnergyAustralia 57% ActewAGL*
Demonstrated appropriate processes for the early identification of customers in hardship	7% Jacana Energy* 7% ENGIE 9% Dodo Power & Gas*	66% Synergy 46% EnergyAustralia 41% Kleenheat*

Note: Comprehensive breakdowns for each energy retailer are shown in the Appendix.

Base: Financial counsellors who provided a rating, n range: 566-576

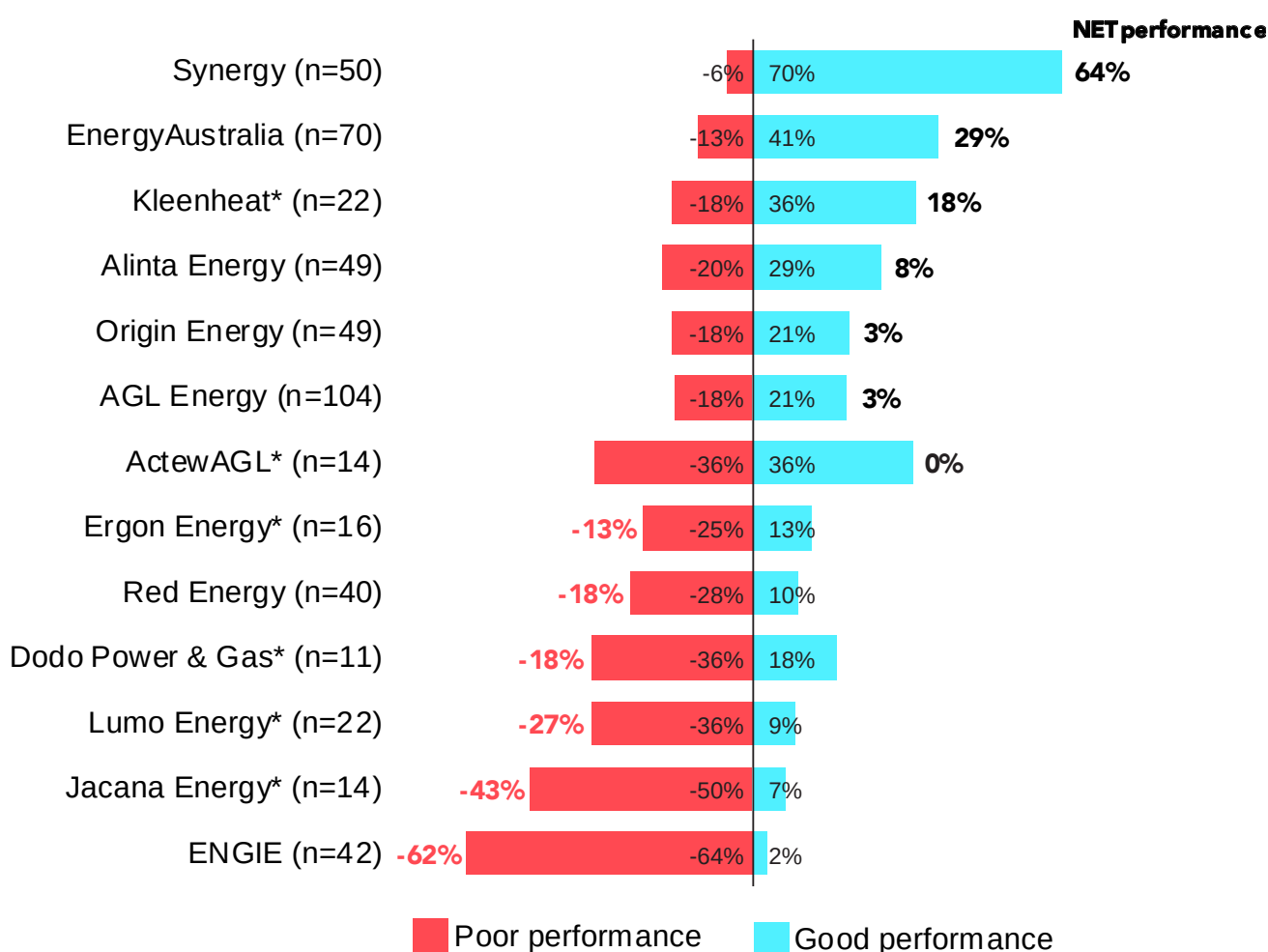
* Caution: Small sample size (<30)

Retailer rank: Process and attitude of hardship team

Synergy and EnergyAustralia were the top performers on process and staff attitude (net performance of 64% and 29%, respectively). In contrast, ENGIE and Jacana Energy showed the weakest performance (-62% and -43%, respectively).

While ActewAGL showed some strong performance, ratings were polarised such that net performance of this retailer was low (0%).

Figure 12. Relative performance of energy retailers on process and staff attitude of hardship teams



Note: Multi-dimensional scale comprised of Q13 (staff training and aptitude), Q14 (staff attitude), Q15 (trust) and Q17 (staff approach).

'Net performance' is relative, derived by % responses in lowest quartile minus % responses in highest quartile.

Base: Total responses included in the scale, n=566

* Caution: Small sample size (<30)

While ranked overall by a substantive sample of respondents, Horizon Power, Momentum Energy, Energy Locals, Tango Energy and OVO Energy received too few in-depth evaluations for inclusion on this scale.

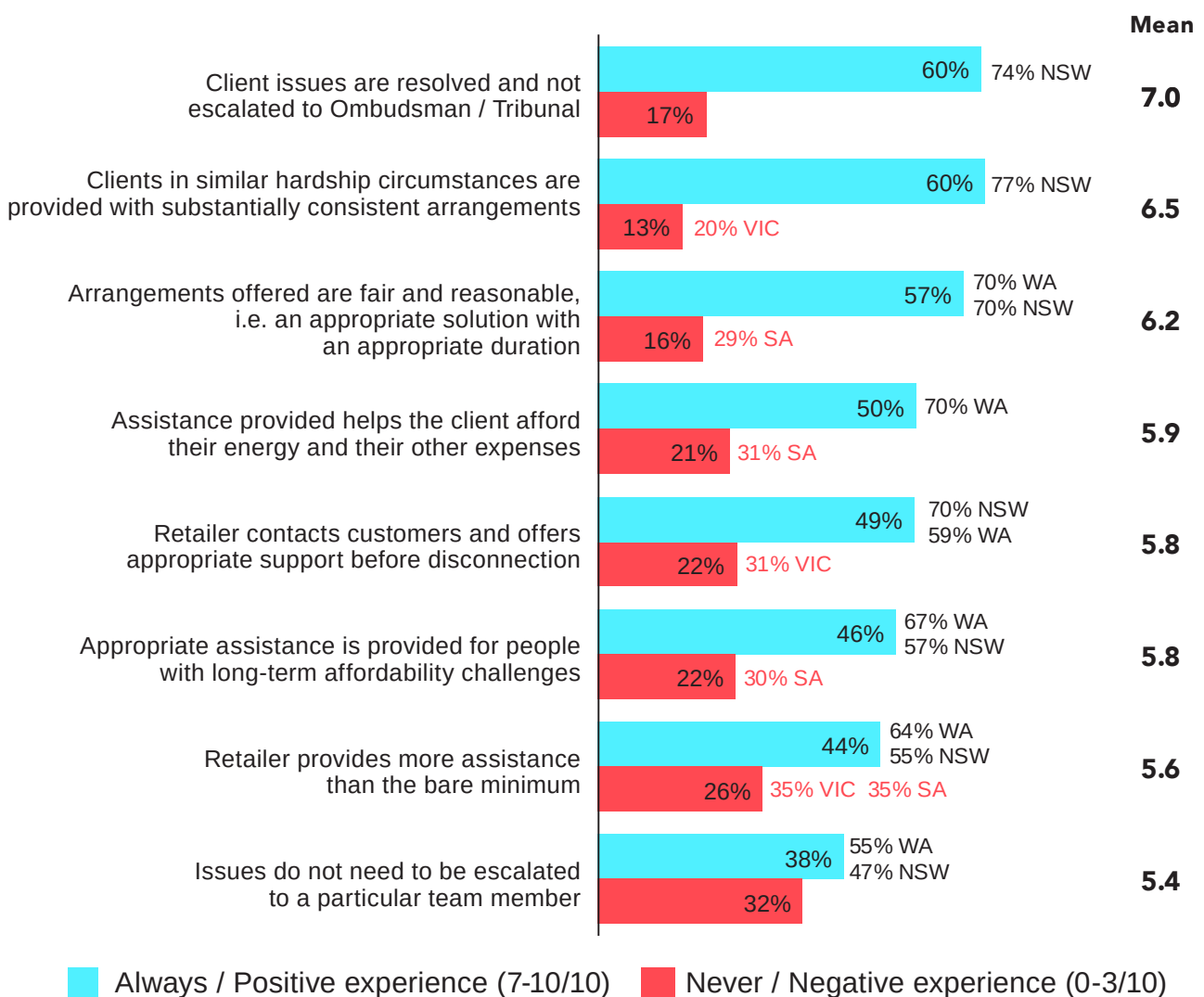
Outcomes and consistency

Sector level macro ratings of outcome and consistency metrics

Consistent hardship practices that lead to better, fair outcomes for consumers are paramount. Across the ratings provided by financial counsellors, resolution of client issues and consistency in how arrangements are made to clients in similar circumstances were perceived as the most positive outcomes overall (both 60%). This was followed by offering fair and reasonable arrangements (57%). Again, financial counsellors with clients in Western Australia and New South Wales tended to provide more positive ratings.

Retailers performed the worst on providing more than just the bare minimum to assist customers (44%), and issues not needing to be escalated to a particular team member (38%).

Figure 13. Outcomes metrics overall



Base: Financial counsellors who provided a rating, n range: 398-521

* Caution: Small sample size (<30)

As stated in the Background, the most common reason for a person leaving a hardship program is exclusion by the energy retailer due to that customer's non-compliance.

Analysis by ECA of AER retailer performance data in Figure 2 'Number of customers leaving hardship programs by reason' (page 15) (on residential electricity customers in the NECF jurisdictions), reports on three reasons why a person left a hardship program – either they successfully completed it, they were excluded from the program due to non-compliance, or they transferred/left that energy retailer.⁷

ECA's analysis shows that around 57% of those hardship customers within the NECF jurisdictions are generally excluded for non-compliance. Around 33% of such customers' hardship programs were concluded because the customer successfully completed the program.

In contrast, the exclusion rates for non-compliance in Western Australia's energy retailer data are significantly lower than in the NECF. The Economic Regulation Authority notes that "In 2023/24, 82 per cent of all customers who entered a hardship program successfully completed it or exited by mutual agreement with their retailer".⁸ While this rate is significantly higher than NECF jurisdictions and corroborates the generally high ratings of Western Australian energy companies in this report's survey findings, there may be some nuance regarding what a 'mutual agreement' entails.

For further context across other jurisdictions, Victoria's levels of customers exiting 'tailored assistance' sits between Western Australia's high rate (82%) of successful completion, and the NECF jurisdictions' lower rate of around 33%. In Victoria, the Essential Services Commission reports in 2023-24 that residential accounts no longer receiving tailored assistance have rates of 50.08% exit due to non-compliance, whereas around 5.67% exit due to transfer, and the remaining 44.25% complete the program (around 20.03% exiting with no arrears, and the other 24.22% exiting with arrears).⁹

⁷ Analysis by Energy Consumers Australia of Australian Energy Regulator retailer performance data (available at <https://www.aer.gov.au/industry/retail/performance-reporting>)

⁸ See the Economic Regulation Authority's Energy retailers and distributors 2024 - Annual data report, page 29 (available at <https://www.erawa.com.au/energyreports>)

⁹ See the Essential Services Commission's Victorian Energy Market Dashboard, 2023-24, "Residential (electricity) accounts no longer receiving tailored assistance – reasons" (available at <https://www.esc.vic.gov.au/electricity-and-gas/victorian-energy-market-reporting-hub/victorian-energy-market-insights/energy-market-dashboard>)

Retailer performance across outcome metrics

In relation to metrics regarding outcomes provided by hardship teams, consistently EnergyAustralia, and Synergy featured in the top three energy retailers, accompanied most often by Origin Energy and ActewAGL. In contrast, the poorest performing retailers were most commonly Jacana Energy, ENGIE and Lumo Energy.

Analysis of AER data by ECA indicates that the ratio of successful hardship program completions for EnergyAustralia (34%) is above the national average of 26% in 2023/24. In contrast, the hardship program completion rates of Lumo (17%), and ENGIE (10%) are considerably below the NECF jurisdictions' average.

Table 4. Highest and lowest performing retailers in outcomes and consistency

Positive score (7-10/10)	Bottom 3 retailers	Top 3 retailers
Client issues are resolved and not escalated to the Ombudsman / Tribunal	41% Kleenheat* 45% ENGIE 45% Alinta Energy	75% EnergyAustralia 74% Synergy 67% Jacana Energy**
Clients in similar hardship circumstances are provided with substantially consistent arrangements	17% ENGIE 19% Lumo Energy* 23% Jacana Energy*	84% Synergy 79% EnergyAustralia 63% AGL Australia
Arrangements offered are fair and reasonable, i.e. An appropriate solution with an appropriate duration	17% Jacana Energy* 18% ENGIE 24% Lumo Energy*	85% Synergy 76% EnergyAustralia 60% Origin Energy
Assistance provided helps the client afford their energy and their other expenses	15% ENGIE 15% Jacana Energy* 30% Lumo Energy*	83% Synergy 63% EnergyAustralia 57% ActewAGL*
The retailer contacts customers and offers appropriate support before disconnection	9% Jacana Energy* 13% ENGIE 37% Alinta Energy	75% ActewAGL* 75% EnergyAustralia 71% Synergy
Appropriate assistance is provided for people with long-term affordability challenges	13% ENGIE 17% Jacana Energy* 20% Lumo Energy*	80% Synergy 59% EnergyAustralia 47% Origin Energy
Retailer provides more assistance than the bare minimum	8% ENGIE 15% Jacana Energy* 21% Ergon Energy*	79% Synergy 60% EnergyAustralia 50% ActewAGL*
Issues do not need to be escalated to a particular team member	10% Jacana Energy* 26% Red Energy 27% ENGIE	62% Synergy 54% EnergyAustralia 50% ActewAGL*

Note: Comprehensive breakdowns for each energy retailer are shown in the Appendix.

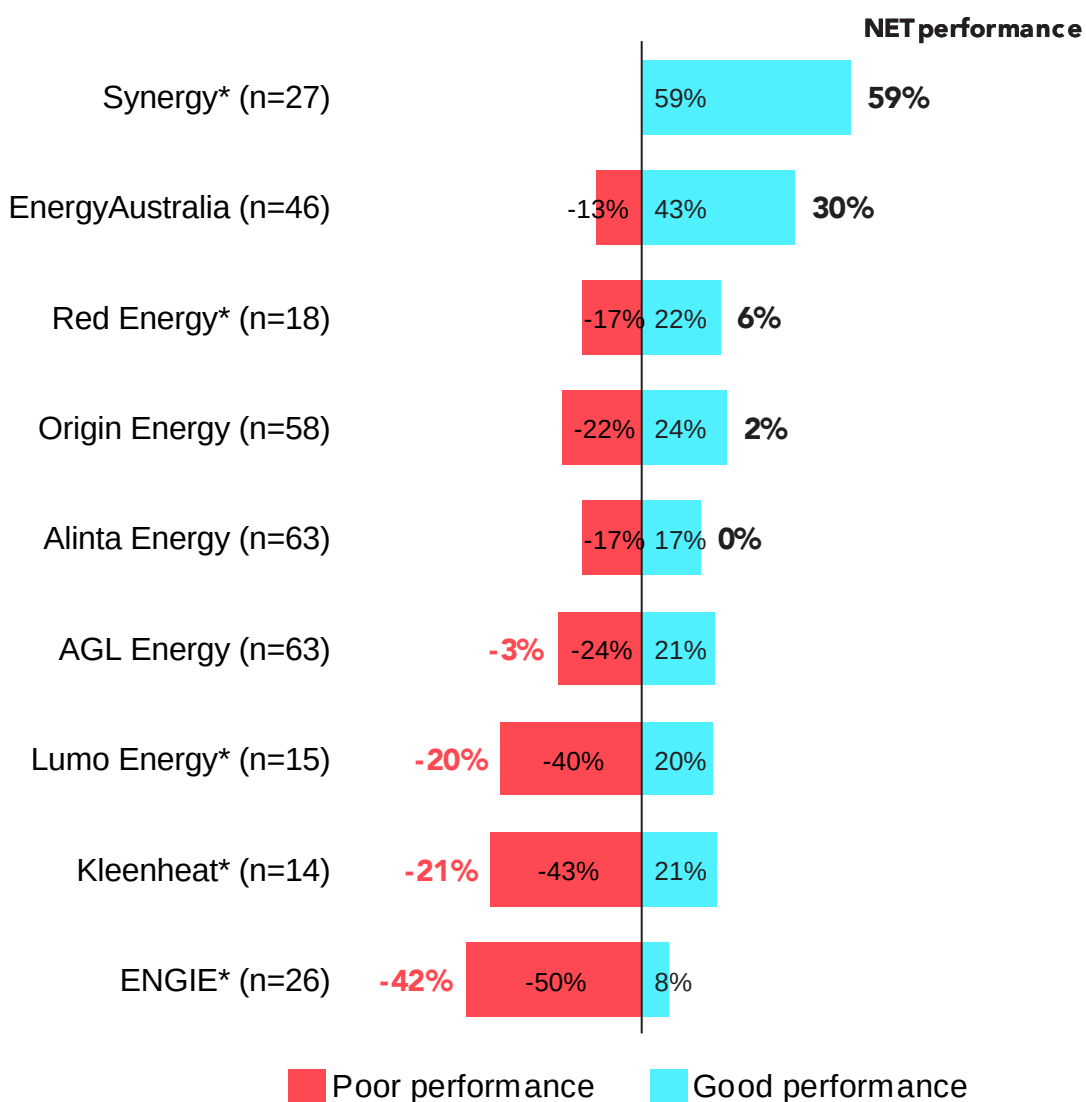
Base: Financial counsellors who provided a rating, n range: 398-521

* Caution: Small sample size (<30) ** Caution: Very small sample size (<10)

Retailer rank: Outcomes and consistency provided by hardship teams

Synergy and EnergyAustralia were the top performers on outcomes ratings (59% and 30% net positive performance, respectively). Again, ENGIE displayed the weakest performance (-42%), followed by Kleenheat (-21%). While Alinta Energy showed some strong performance, ratings were polarised such that net performance was zero.

Figure 14. Relative performance of energy retailers on consistency of outcomes provided by hardship teams



Note: Scale comprised of a series of questions (Q18 appropriateness of outcomes and arrangements).

'Net performance' is relative, derived by % responses in lowest quartile minus % responses in highest quartile.

Base: Total responses included in the scale, n=319

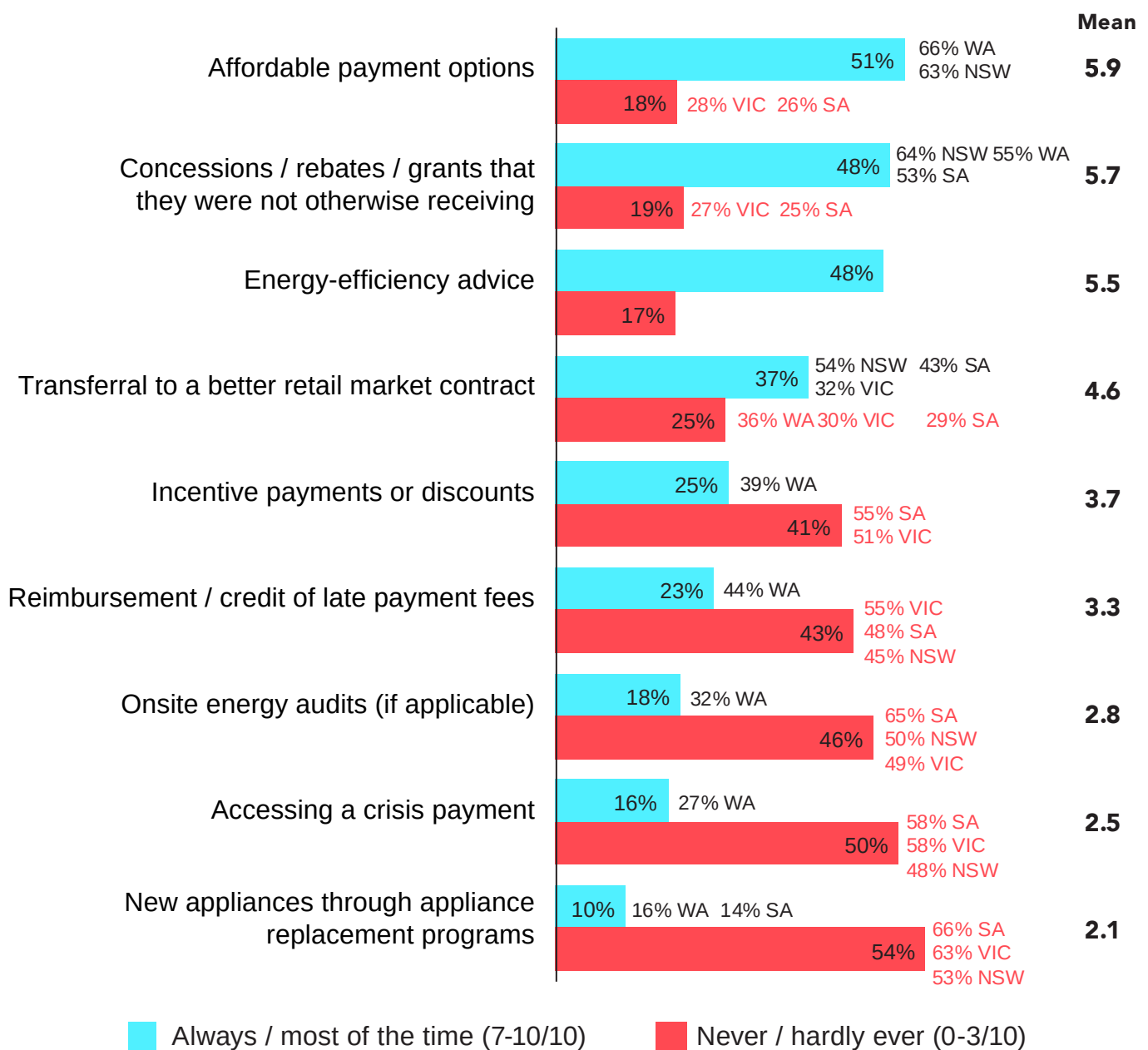
* Caution: Small sample size (<30)

While ranked overall by a substantive sample of respondents, Horizon Power, Momentum Energy, Energy Locals, Tango Energy, OVO Energy, Dodo Power and Gas, ActewAGL, Jacana Energy and Ergon Energy received too few in-depth evaluations on these metrics for inclusion on this scale.

Sector level macro ratings of proactive assistance and support provided

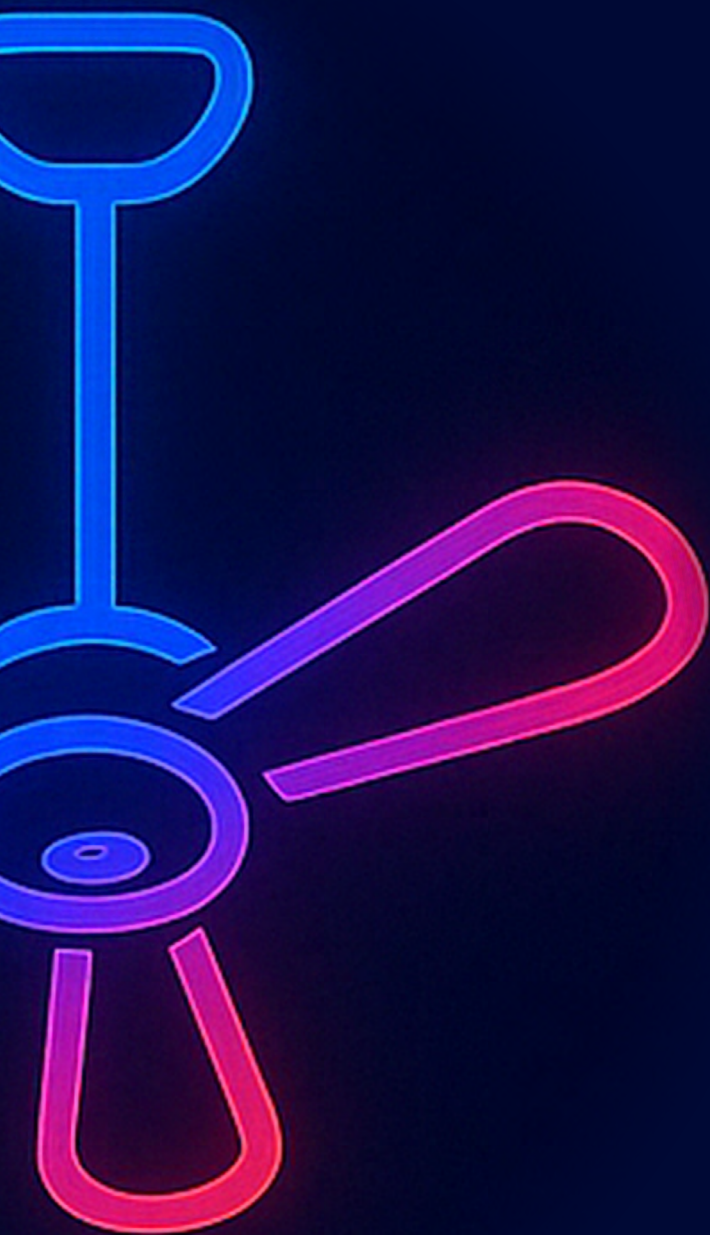
According to financial counsellors, the top assistance and support provided is affordable payment options, concession / rebate / grant information and energy-efficiency advice (51%, 48% and 48%, respectively); most likely in Western Australia. New appliances and energy crisis payments were perceived to be the least likely offered by energy retailers.

Figure 15. Proactive assistance and support offered



Base: Financial counsellors who provided a rating, n range: 467-523

* Caution: Small sample size (<30)



The AER's *'Review of payment difficulty protections in the National Energy Customer Framework'* Findings report dated May 2025 finds that the forms of assistance given to people in hardship in the NECF jurisdictions by energy retailers, is generally limited to payment plans and incentive payments.¹⁰ The AER reported that other forms of assistance that can lower people's energy costs, such as debt waivers and energy efficiency assistance including audits and appliance upgrades, are "rarely offered" to people in payment difficulty.¹¹ AER's report shows the stark contrast between forms of assistance, where customers are largely given incentive payments or discounts, and very few people receive help that might lower their ongoing energy bills.

This correlates with the Rank the Energy Retailer survey responses of financial counsellors nationally regarding energy retailers' proactive assistance.

¹⁰ See AER's *'Review of payment difficulty protections in the National Energy Customer Framework - Findings report'* dated 15 May 2025, at page 9 (available at <https://www.aer.gov.au/documents/aer-review-payment-difficulty-protections-necf-findings-report-may-2025>)

¹¹ See AER's *'Review of payment difficulty protections in the National Energy Customer Framework - Findings report'* dated 15 May 2025, at page 9 (available at <https://www.aer.gov.au/documents/aer-review-payment-difficulty-protections-necf-findings-report-may-2025>)

Retailers providing assistance and support

Teams perceived most likely to provide assistance and support to customers in hardship were from the retailers Synergy and EnergyAustralia, as well as Origin Energy and ActewAGL.

In contrast, retailers perceived least likely to offer various forms of assistance and support to customers were most commonly ENGIE, Jacana Energy and Ergon Energy.

Table 5. Most and least assistance and support provided by retailers

Positive score (7-10/10)	Bottom 3 retailers	Top 3 retailers
Affordable payment options	15% Jacana Energy* 16% ENGIE 20% Ergon Energy*	74% Synergy 60% EnergyAustralia 59% Kleenheat*
Concessions / rebates / grants that they were not otherwise receiving	15% Jacana Energy* 24% ENGIE 25% Kleenheat*	76% Synergy 57% ActewAGL* 55% EnergyAustralia
Energy-efficiency advice	9% ENGIE 21% Ergon Energy* 23% Jacana Energy*	80% Synergy 57% ActewAGL* 56% Origin Energy
Transferral to a better retail market contract	0% Ergon Energy* 6% ENGIE 8% Jacana Energy *	48% Origin Energy 47% AGL Energy 46% EnergyAustralia
Incentive payments or discounts	0% Ergon Energy* 3% ENGIE 10% Lumo Energy*	52% Synergy 38% EnergyAustralia 25% Jacana Energy*
Reimbursement / credit of late payment fees	0% Jacana Energy* 7% Ergon Energy* 9% ENGIE	59% Synergy 26% Alinta Energy 25% Kleenheat*
Onsite energy audits	0% Jacana Energy* 0% ENGIE 6% Red Energy	50% Synergy 29% ActewAGL* 24% Origin Energy
Accessing a crisis payment	0% Jacana Energy* 0% Ergon Energy* 3% Red Energy	33% Synergy 20% Origin Energy 18% Alinta Energy
New appliances through appliance replacement programs	0% Jacana Energy* 0% ENGIE 0% Ergon Energy*	24% Synergy 14% ActewAGL* 12% EnergyAustralia

Note: Comprehensive breakdowns for each energy retailer are shown in the Appendix.

Base: Financial counsellors who provided a rating, n range: 467-523

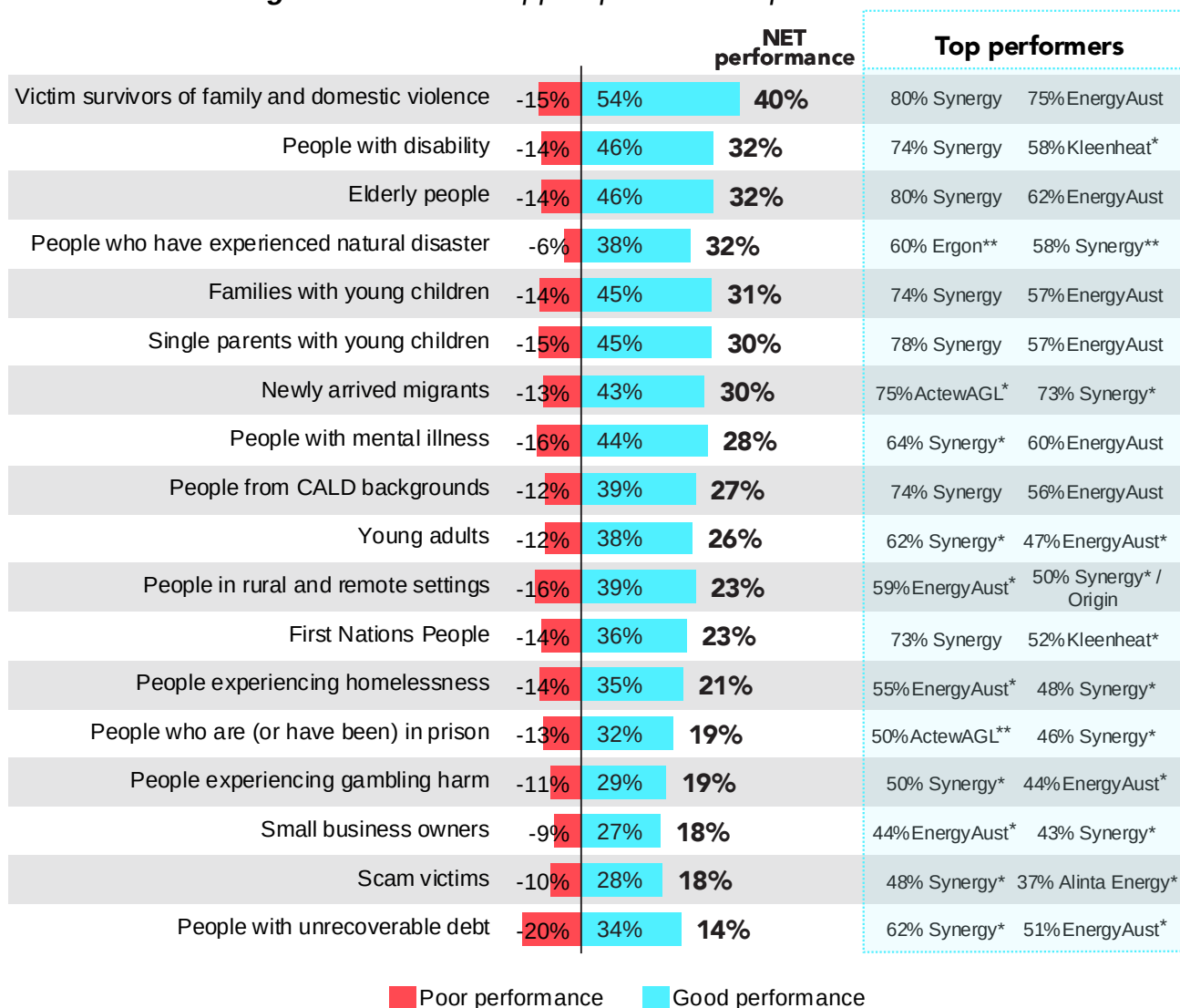
* Caution: Small sample size (<30)

High level macro indicators of supporting specific cohorts of people

The cohort with the highest net support from energy retailer hardship teams is perceived by financial counsellors to be victim-survivors of family and domestic violence (40% net support), followed by people with disability, elderly people and people who have experienced natural disaster (all 32%). Financial counsellors perceive the lowest level of support is provided to people with unrecoverable debt (14%), followed by scam victims and small businesses (both 18%).

Synergy and Energy Australia were consistently top performers across multiple cohorts.

Figure 16. Overall support provided to specific cohorts



Base: Financial counsellors who provided a rating, n range: 154-536

* Caution: Small sample size (<30) **Caution: Very small sample size (<10)

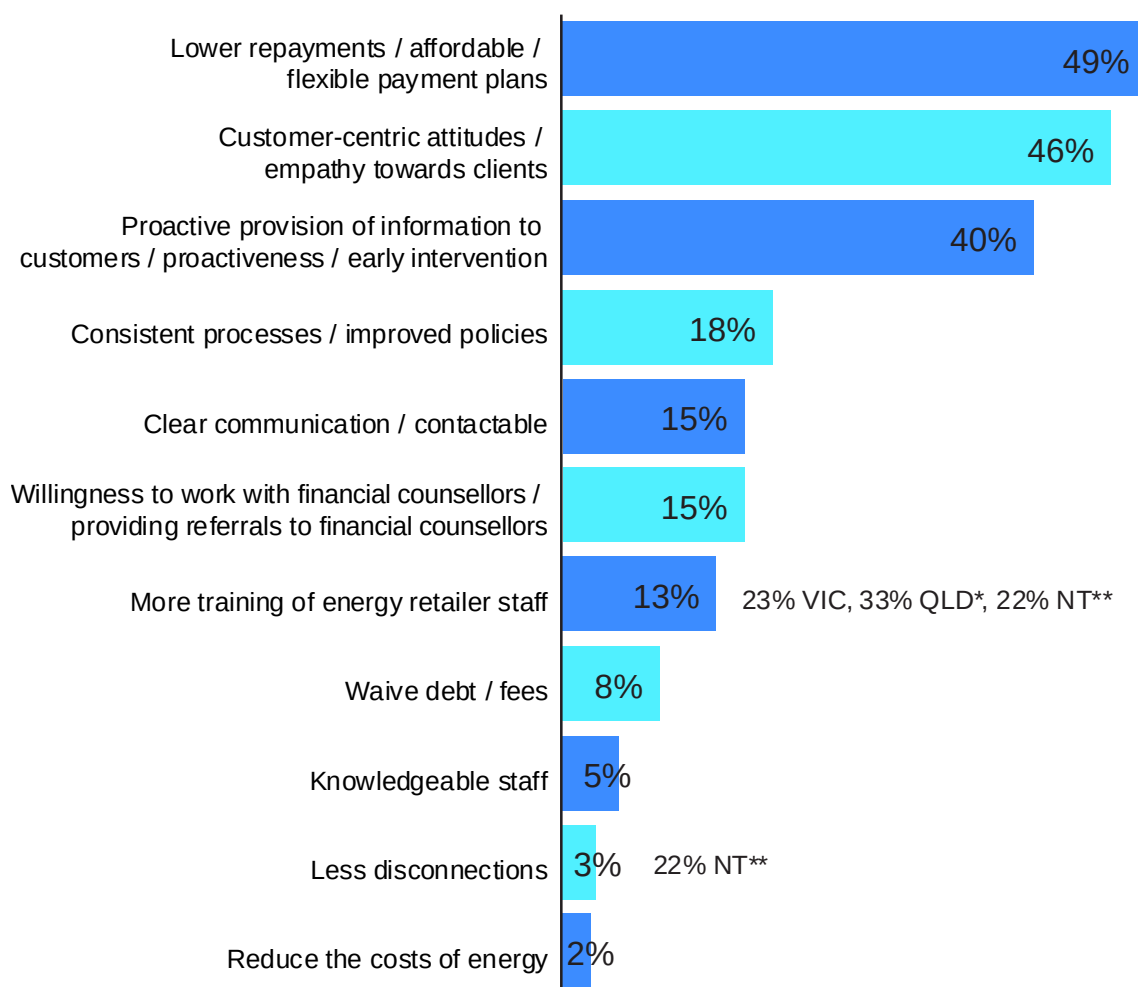
Net performance calculated by subtracting poor performance from good performance

Improving outcomes for customers in hardship

Good hardship practices

In the eyes of financial counsellors, what constitutes a good hardship response that would improve outcomes for customers include: lower repayments and affordable payment plans (49%), customer-centric attitudes and empathy (46%), and proactive provision of information to customers and early intervention (40%).

Figure 17. Perspectives of good practice in hardship responses



Note: Financial counsellors were asked to describe a good hardship response in their own words. The percentages represent the frequency that financial counsellors mentioned that category in their response.

Base: Financial counsellors who provided a comment, n=168

* Caution: Small sample size (<30)

**Caution: Very small sample size (<10)

Financial counsellors, in their own words, have shared what good hardship practices look like:

"A good hardship response centers on providing timely, empathetic, and effective solutions to customers in need, ensuring that they are able to maintain access to essential services and avoid falling further into debt. The goal should be to create a long-term, sustainable pathways for customers to recover from financial hardship. Sometimes financial counsellors recommend payment matching or debt waivers to reduce to arrears because we have made a financial assess[ment] of the customer - trust our professional judgement."

– Financial counsellor with clients in VIC

"Really listen to their circumstances and what they can afford. Make sure they are getting all the rebates and concessions etc, encourage energy audits and appliance replacement. People are really struggling out there and they are not aware of Energy Accounts Payment Assistance NSW, hardship policies etc. They should know to call the retailer as soon as they are in need and not feel scared to do so."

– Financial counsellor with clients in NSW

"A good hardship response from an energy retailer is one that offers proactive, flexible, and compassionate support, including tailored payment plans, fee waivers, energy efficiency advice, and direct referrals to financial counsellors to prevent further financial distress."

– Financial counsellor with clients in WA

"I think there is a lot of value in first person conversations with your customers - hearing their story first-hand from them, listening with empathy, asking the right questions to understand what options might be available to them, and resolving their issue on first contact (where possible). This approach equips your customers to self-advocate, which is a lifelong valuable skill and gives them increased confidence to manage their own financial affairs."

– Financial counsellor with clients in QLD

"Training for call centre staff about financial counsellors and not treat us as people who know nothing but as people with knowledge. I hate being read a script about hardship options that include seeing a financial counsellor... It's quite insulting."

– Financial counsellor with clients in VIC

"Reach out to the customer to try and find out what has happened for them to be in financial hardship so assistance can be provided before disconnection."

– Financial counsellor with clients in VIC

"Utility companies proactively contacting clients (phone, email, post) to advise hardship options, particularly when the client's debt is in the early stages of accruing."

– Financial counsellor with clients in VIC

"Be more proactive in contacting clients and informing of the support available. Actively reach out to clients on a payment plan when a new bill is issued, and when they become eligible to apply for grants. Increase understanding and leniency when clients disengage for a time due to health or FDV."

– Financial counsellor with clients in WA

"Listen to client especially when they call for themselves. Some come frustrated saying that they were not heard well when they tried to call to advocate for themselves."

– Financial counsellor with clients in WA

"Well-trained staff with consistent responses to hardship requests; being proactive in offering all aspects of possible help; and having empathy and compassion for my client's situations."

– Financial counsellor with clients in NSW

"That they are guided by a Financial Counsellor specifically around a capacity or no capacity to pay at this time. It should be an automatic response that customers are on the cheapest plans available."

– Financial counsellor with clients in NSW

"Consistency of decision making amongst energy staff so that we can reasonably know what to expect when presenting similar cases for the energy providers consideration."

– Financial counsellor with clients in WA



Conclusion and recommendations

This report paints a clear and consistent picture: financial counsellors are seeing more clients in energy stress, facing greater complexity, and navigating systems that are too often slow, inconsistent, and ineffective. While some retailers are responding well — with strong examples of trust, empathy and practical support — the overall landscape is marked by fragmentation and growing inequity.

Too many clients, particularly in regional and remote communities, are struggling to access the support they are entitled to. They arrive with little knowledge of how the energy system works and face barriers at every step — from unclear communication, to rigid processes, to a lack of tailored or proactive assistance. Financial counsellors are routinely left to do the heavy lifting: negotiating with hardship teams, explaining rights and entitlements, and trying to secure basic support to keep the lights on.

The findings highlight that hardship programs — when well designed and delivered — can play a crucial role in protecting people from further financial harm. But they must be consistent, accessible, and centred on the needs of the customer. That is not the reality for many people today. Retailer discretion is too broad, standards are uneven, and mechanisms for oversight and accountability remain weak.

To shift this picture, meaningful reform is needed — both at the regulatory level and within the daily practices of retailers. Drawing on the lived experience of financial counsellors and their clients, this report makes the following recommendations:

1. Strengthen protections through regulation, enforcement and implementation

- Ensure all energy retailers are required to offer clear, consistent support aligned with mandatory minimum standards.
- Make the Sustainable Payment Plans Framework mandatory across all jurisdictions.
- Automatically place customers in payment difficulty on their retailer's best offer.
- Prohibit reconnection fees and raise the minimum disconnection threshold to better reflect current energy costs.
- Strengthen enforcement through transparent public reporting, audits, and clear penalties for non-compliance.

These recommendations address the wide variability in hardship practice standards, including the many retailers rated as performing poorly as well as the individual rating components that vary widely. Together, these recommendations would lead to a substantial improvement in energy hardship practices Australia wide.

2. Make support early, accessible and equitable

- Provide dignified, consistent and tailored support without requiring customers to 'prove' hardship.
- Require retailers to proactively identify signs of payment difficulty using data and behavioural triggers.
- Ensure support is equally accessible to unrepresented consumers—support should not rely on having an advocate.
- Mandatory staff training must include trauma-informed practice, cultural safety and disability awareness, as well as training in taking flexible approaches to working with customers.
- Communication should be inclusive, in plain language, and available through multiple channels.

These recommendations address financial counsellor concerns about poor hardship practices including inflexibility and rejection of hardship requests (31%), difficulties in accessing hardship (12%), and unreasonable and poor attitudes (10%). It also addresses that some states recorded significantly higher negative ratings across access and communication data points – e.g. Victoria recorded a -27% rating for 'Ease of making contact with / accessing the hardship team' compared to the national average of -17%.

3. Provide realistic payment arrangements before debt accrues

- Require retailers to intervene before debt becomes unmanageable—not after.
- Payment plans must reflect capacity to pay, rather than full usage or arrears.
- Retailers should be responsible for identifying and applying all available concessions, rebates and grants proactively.

These recommendations reflect financial counsellor ratings of whether energy retailers have appropriate processes for early identification of hardship (-26%), and appropriate consideration of a customer's ability to pay (-25%). Less than half (48%) of financial counsellors nationally reported that retailers proactively applied concessions/rebates/grants to their eligible customers' accounts.

4. Embed a person-centred, future-focused approach

- Where appropriate, customers should have access to a consistent contact person to foster trust and continuity.
- Retailers must maintain internal records so customers don't have to repeat their story every time they contact support.
- Assistance should include energy efficiency support to help reduce future bills and build resilience.
- Retailers should plan for and provide a 'soft landing' at the end of hardship arrangements by proactively assessing customers' ongoing needs, offering extensions or transition plans where required, and connecting them to relevant supports.

These recommendations address financial counsellor feedback about the lack of support in assessing customers' ongoing energy needs, including a lack of onsite energy audits (-46%), and little access to appliance replacement programs (-54%). It also draws upon positive qualitative data about the effectiveness of case management models in supporting customers in hardship, and regulatory data showing significant proportions of customers exiting hardship plans due to non-compliance.

5. Improve data, monitoring and continuous learning

- Acknowledge and address the 'assistance gap'—many customers in payment difficulty are not accessing support.
- Require retailers to publish disaggregated data on hardship program access, exits, disconnections and outcomes.
- Encourage retailers to share lessons with each other and benchmark their practices to improve the customer experience across the board
- Protections must extend to embedded networks, prepaid customers, and small business customers.
- Require regular consultation with lived experience representatives and consumer advocates to improve practice.
- Benchmark retailer performance against better-performing sectors like water and banking to drive improvement.

These recommendations address financial counsellor feedback on the performance of energy retailers (49% rated as good or excellent) against the water industry (68%) and banking (67%), as well as AER data on 2.9% of customers who are in energy debt but are not in a hardship program.

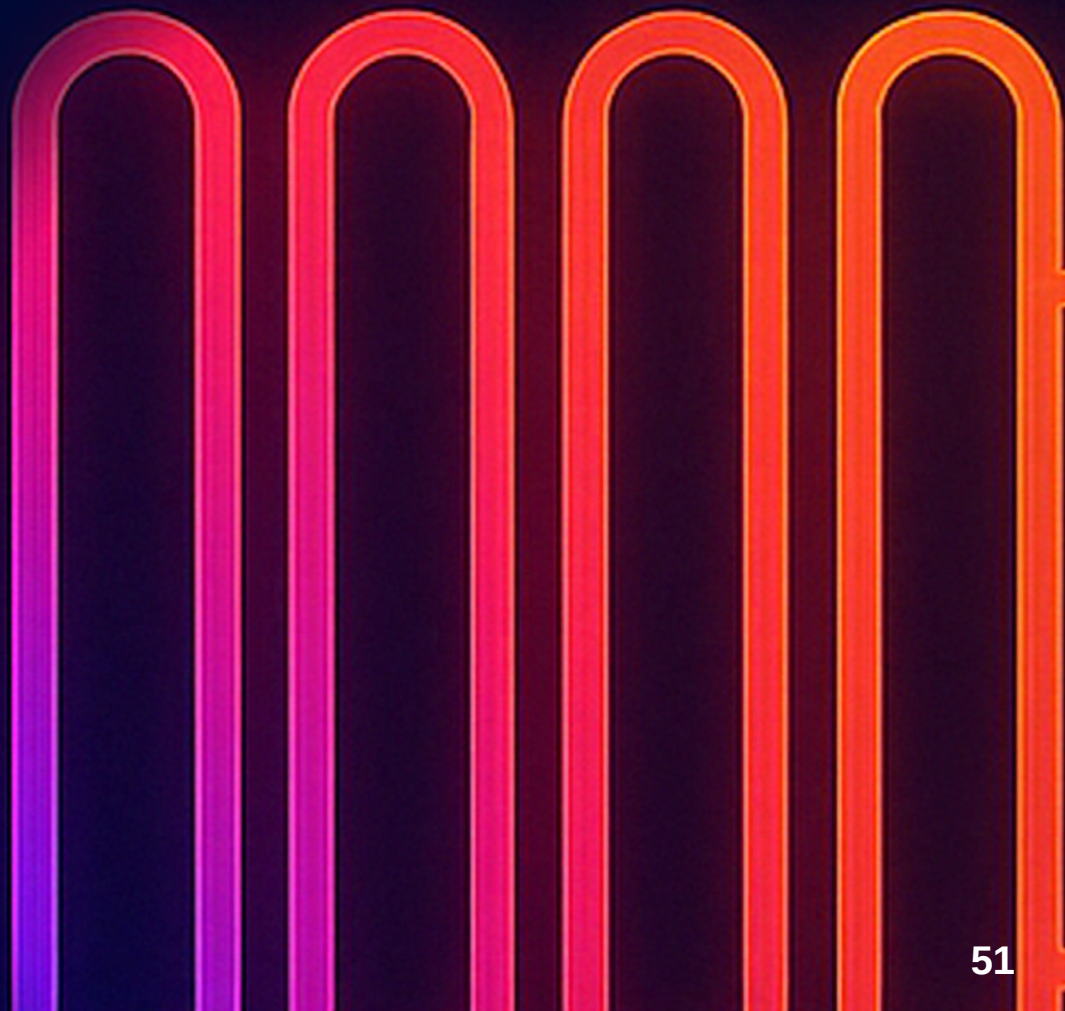
6. Leverage relationship with financial counsellors

- Access the expertise of financial counsellors in improving the hardship practices of energy retailers
- Require that all energy retailers have clear and effective third-party authorisation processes for financial counsellors
- Use existing resources, including SAFCA's ABCDs of Hardship document, to inform continuous improvement in hardship practices.

These recommendations address the gap in energy retailers' engagement with financial counsellors – further engagement with these hardship specialists can only improve retailer practices.

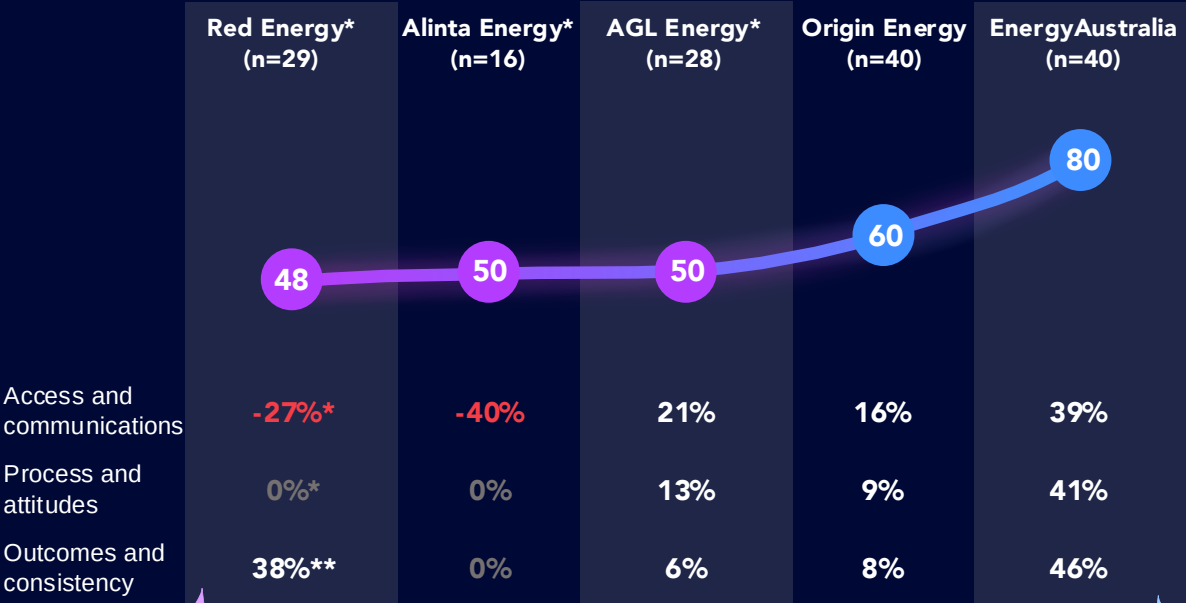
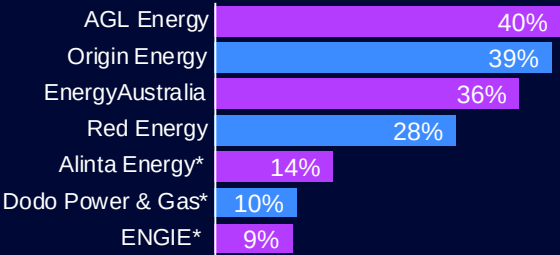
We recognise that we are not alone in calling for reforms to energy retailer hardship management, and acknowledge recent reports like the AER's *Review of payment difficulty protections in the National Energy Customer Framework*, the ESC's *Regulator Impact Statement on the Energy Retail Code of Practice*, and Flequity Ventures' *Designed to Disrupt: Safety by Design for Essential Services* report, all of which are important contributions to the national understanding of energy hardship policy. To the extent that our recommendations align with recommendations from these reports, we endorse them.

By making changes to the management of energy hardship, the energy sector can move towards a more just and sustainable model — one where hardship responses are not an afterthought, but a core part of delivering essential services. Financial counsellors see what works every day. Our recommendations are grounded in that experience, and offer a roadmap for real improvement.





Energy retailers interacted with in past year

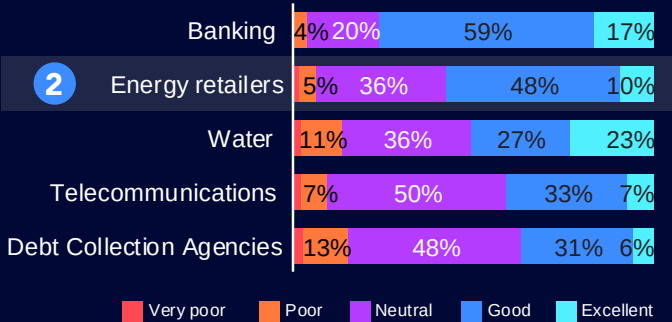


“Red Energy often are empathetic to a client's situation however, in instances of client's unaffordability of current and overdue usage can be difficult to negotiate an appropriate solution.”

“They [EnergyAustralia] are very good at responding, very respectful. When a client says they are with EnergyAustralia I'm like oh that's great.”

“Some providers offer 2 for 1 payments. That is, every time the client pays \$50 the provider waives \$50. I have found when this is offered clients are really motivated by the opportunity.”

Cross-sector benchmarks



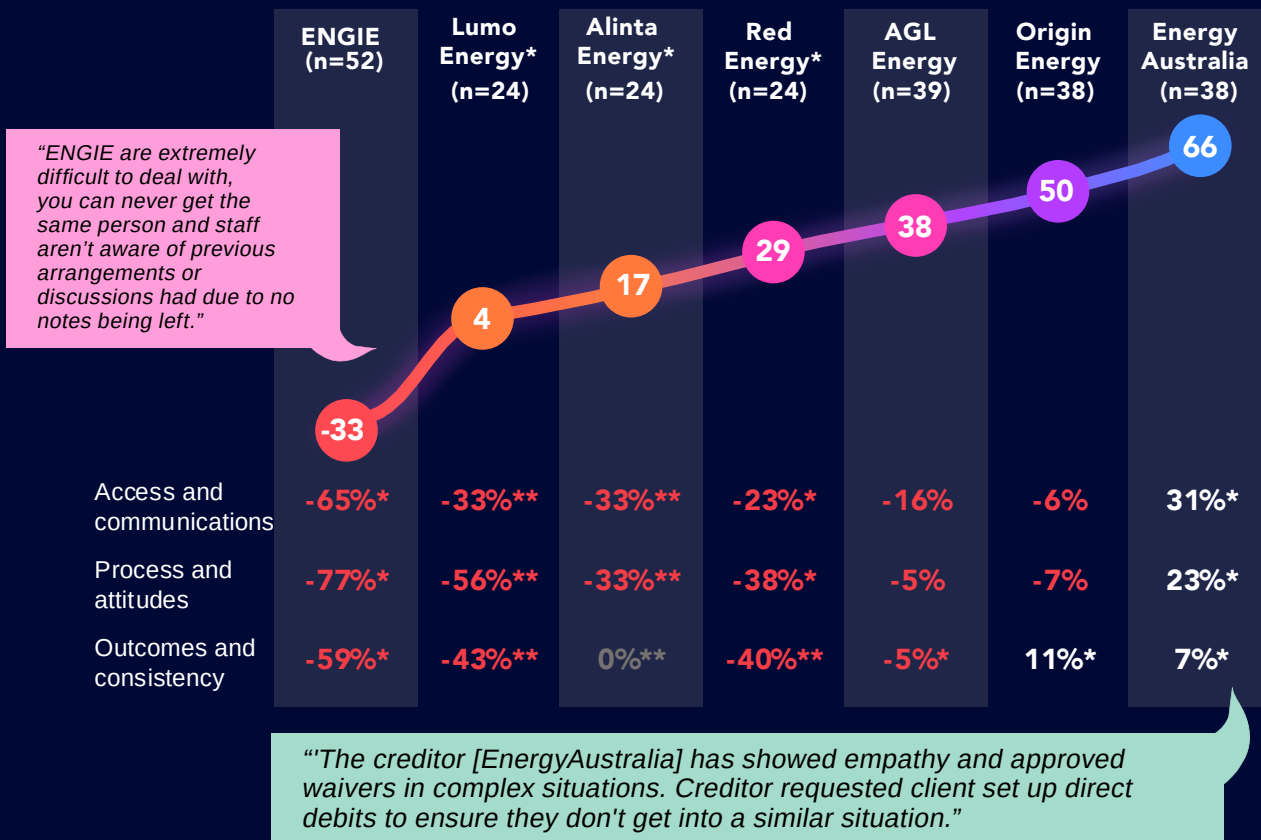
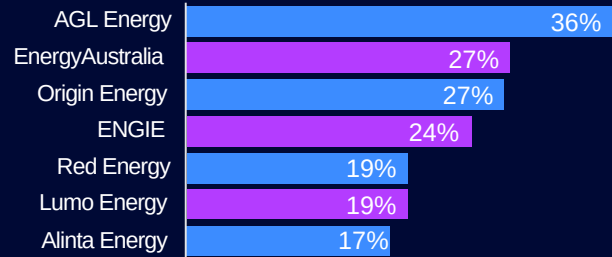
Top 3 cohorts supported

- 1 61% Victim-survivors of family and domestic violence
- 2 54% Families with young children
- 3 54% People with mental illness

Base: Financial counsellors with majority of clients in NSW, n=117
* Caution: Small sample size (<30)
** Extreme caution: Small sample size (<10); results indicative only

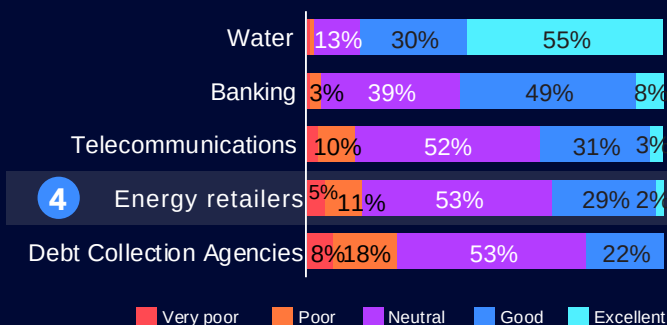
Victoria

Energy retailers interacted with in past year



"One thing I find frustrating as a financial counsellor is the energy companies not assisting vulnerable clients at the first instance in regard to payment arrangements. As a financial counsellor we aim to empower clients to ensure that in the future they are able to advocate for themselves and negotiate affordable payment plans."

Cross-sector benchmarks



Top 3 cohorts supported

- 1 **47%** People in rural and remote settings
- 2 **47%** Victim-survivors of family and domestic violence
- 3 **39%** Elderly people

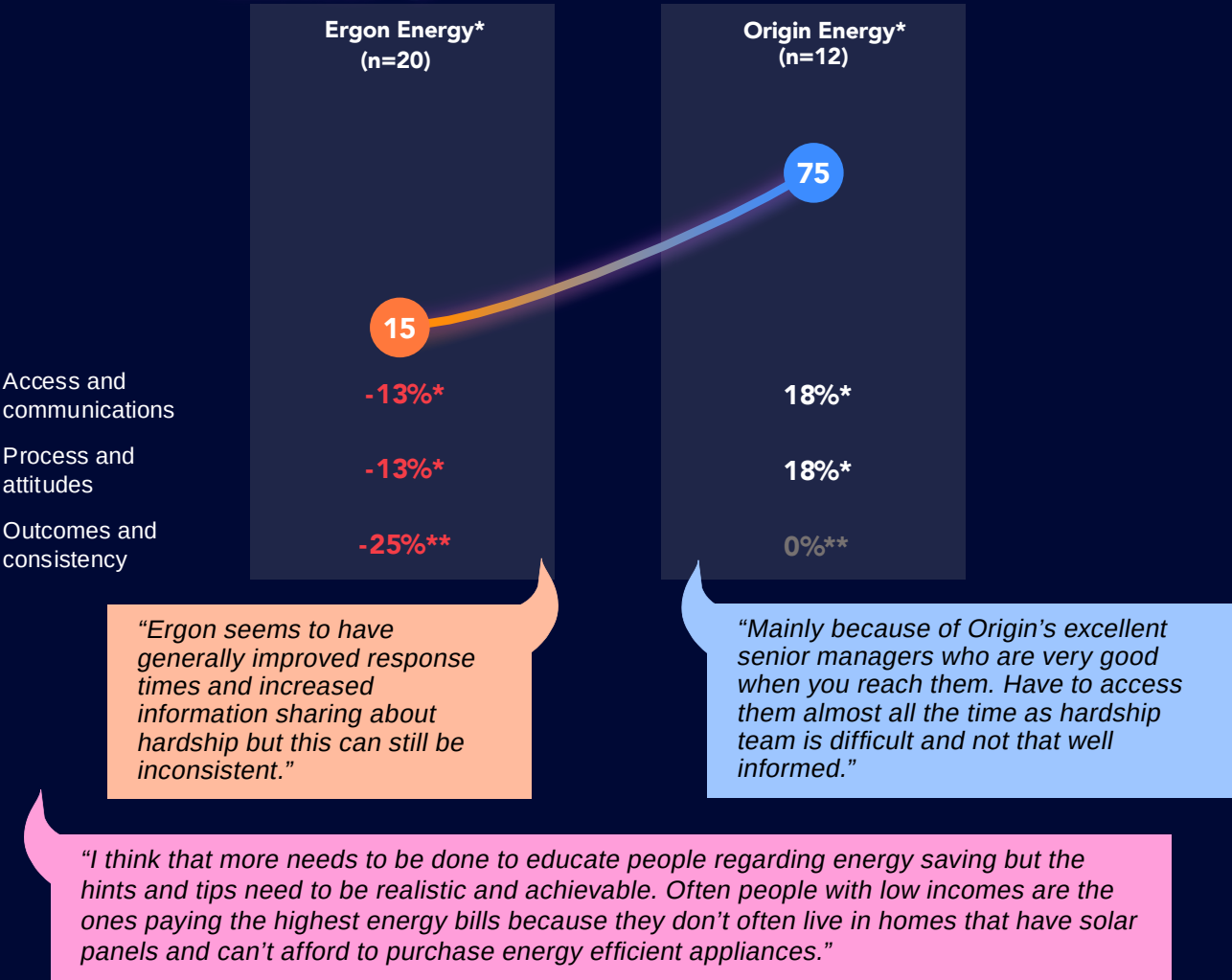
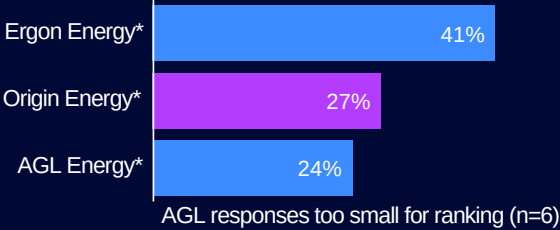
Base: Financial counsellors with majority of clients in VIC, n=101

* Caution: Small sample size (<30)

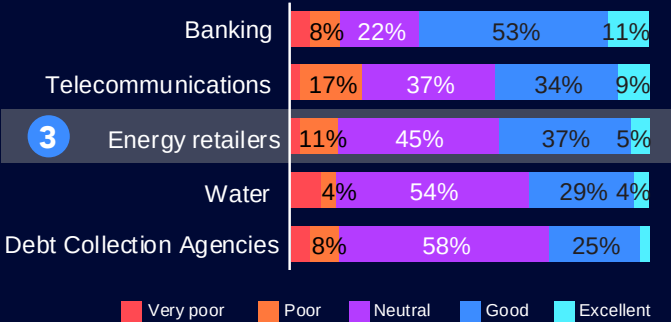
** Extreme caution: Small sample size (<10); results indicative only

Queensland

Energy retailers interacted with in past year



Cross-sector benchmarks



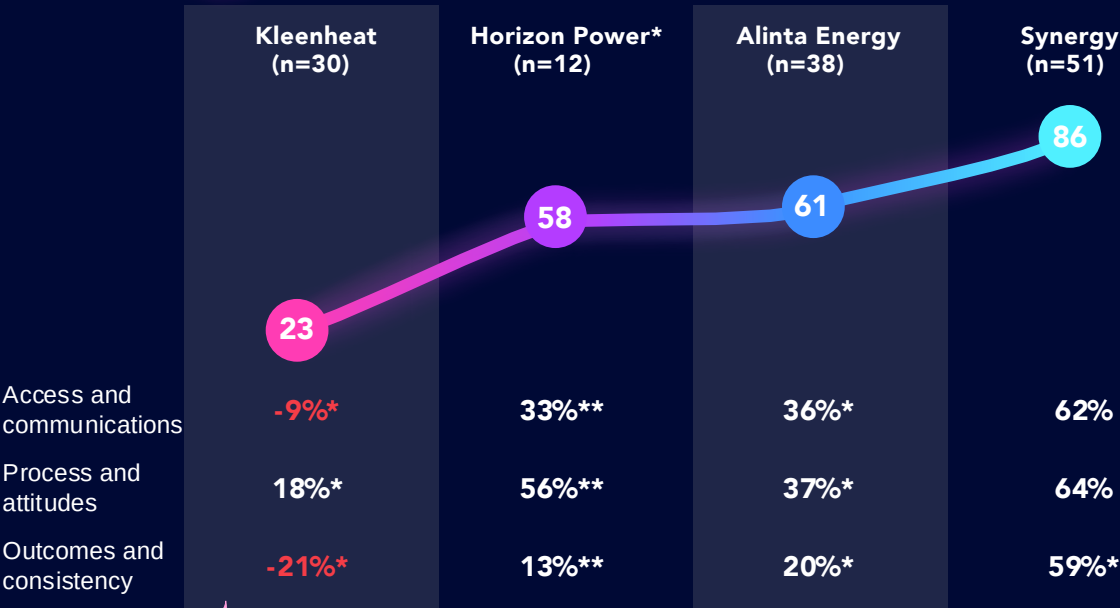
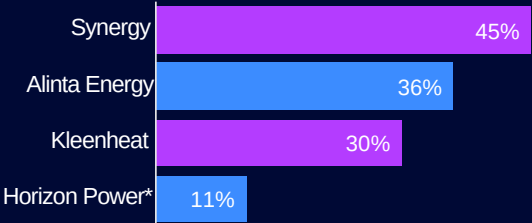
Top 3 cohorts supported



Base: Financial counsellors with majority of clients in QLD, n=43
* Caution: Small sample size (<30)
** Extreme caution: Small sample size (<10); results indicative only

Western Australia

Energy retailers interacted with in past year

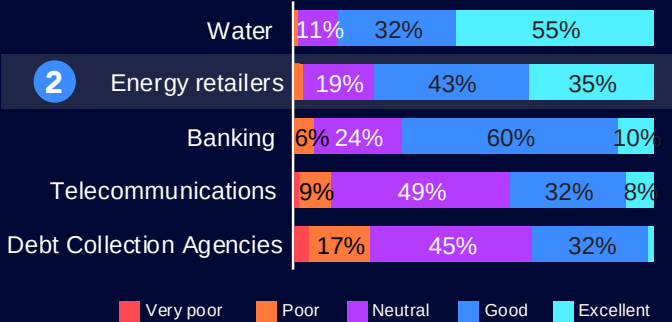


"Kleenheat are not proactive in addressing a customer debt before it becomes out of control. Debt is allowed to pile up and often it reaches an amount the client cannot deal with."

"Synergy have always been empathetic to clients and when discussing a payment plan will always ask if this is reachable as they do not want to put the client in a position where essentials can't be afforded. They also offer energy assessments and organise the Hardship Utility Grants Scheme."

"Had a client with disconnection and when called the financial hardship team; they demanded money upfront before connecting the client + the outstanding bill. The client was a First Nations client with small kids with no gas connection for 3 days already. Very sad."

Cross-sector benchmarks



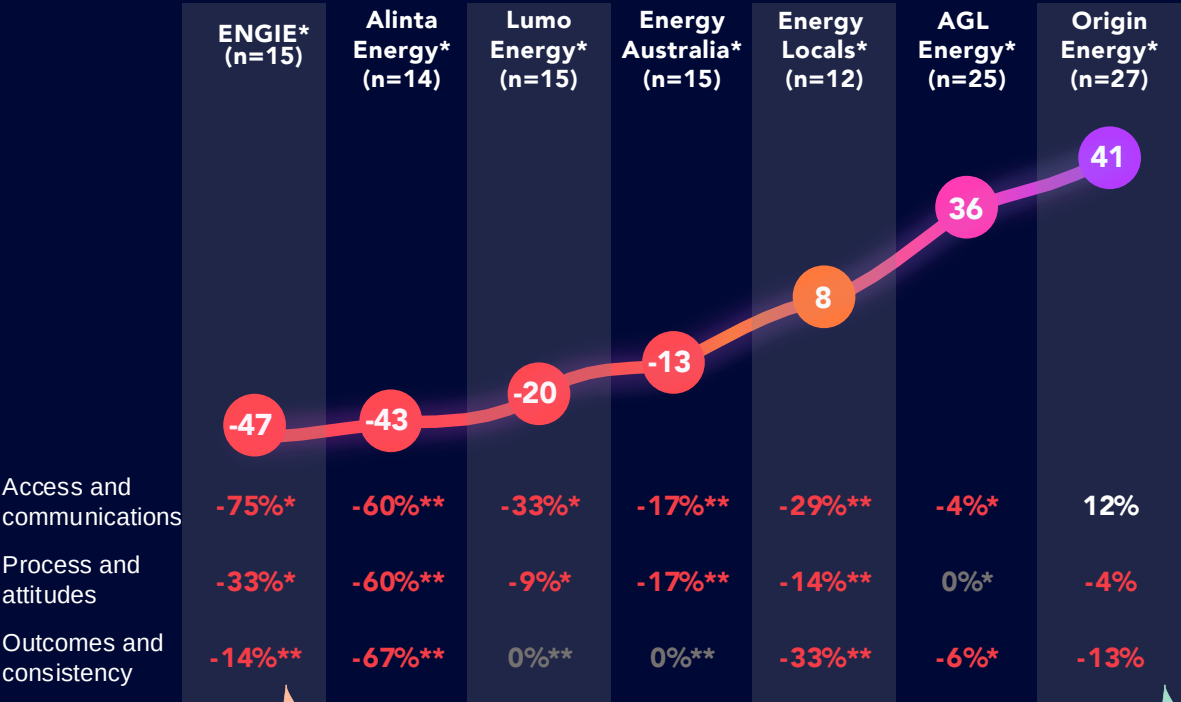
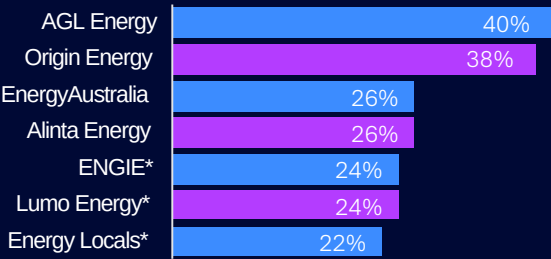
Top 3 cohorts supported

- 1 69% Victim-survivors of family and domestic violence
- 2 64% Single parents with young children
- 3 64% Families with young children

Base: Financial counsellors with majority of clients in WA, n=75
* Caution: Small sample size (<30)
** Extreme caution: Small sample size (<10); results indicative only



Energy retailers interacted with in past year

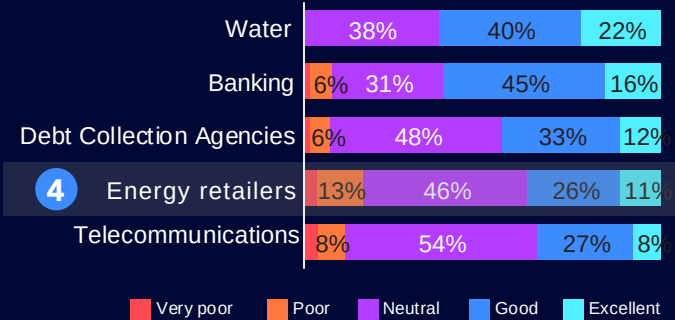


"When clients call ENGIE they do not get assistance from the hardship team usually unless they know to ask for the hardship or to be placed on the hardship program. Some do not have ongoing payment plans which indicates there has been no attempt to find an ongoing solution."

"Origin are ultimately helpful and we get an arrangement, but the new processes are taking too long."

"Most energy retailers allow debt to build significantly with no long-term plans to address mounting debt."

Cross-sector benchmarks



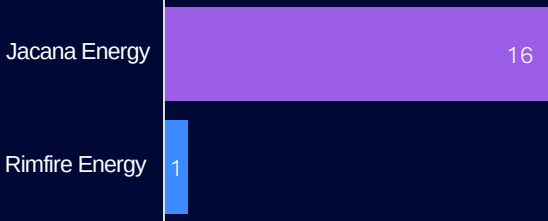
Top 3 cohorts supported

- 1 60% People who have experienced natural disaster
- 2 46% Victim-survivors of family and domestic violence
- 3 41% People with disability

Base: Financial counsellors with majority of clients in SA, n=56
* Caution: Small sample size (<30)
** Extreme caution: Small sample size (<10); results indicative only



Energy retailers interacted with in past year



Jacana Energy
(n=12)

Access and communications

-25

-7%*

Process and attitudes

-43%*

Outcomes and consistency

-83%**

"Request to waive outstanding debt incurred as a result of family violence has been deferred until client maintains current payment plan for 12 months. This policy, or lack of understanding of the effects of the abuse, continues to act as the abuser's proxy."

"No flexibility. No consideration of affordability. Refer to FCs and then don't listen (not staff fault, is the overall processes and policies)."

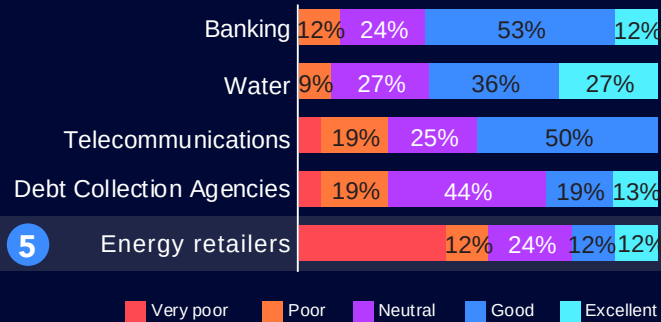
"They have been kinder to their customers in the past, now there is an expectation that if you cannot afford to pay for your power Jacana will disconnect or just leave you in the dark as the power may have already been disconnected."

"Jacana staff seem to have compassion for client circumstances sometimes, but the practices and hardship policy's structure can do with a lot of improving. Jacana only recognises and issues concessions to members of the NT Concession Scheme and this does not include Jobseeker recipients and this needs to change."

"No accountability or options for clients. the closed market and only 2 available price plans, keeps people in financial hardship with no option to alter the situation."

"The inconsistencies of their approaches to Financial Hardship. No real options provided to clients, unless a Financial Counsellor gets involved. In the past there was better leadership within the Financial Hardship Team, now it is too fragmented and staff are constantly changing."

Cross-sector benchmarks



Top 3 cohorts supported

- 1 Victim-survivors of family and domestic violence
- 2 Scam victims

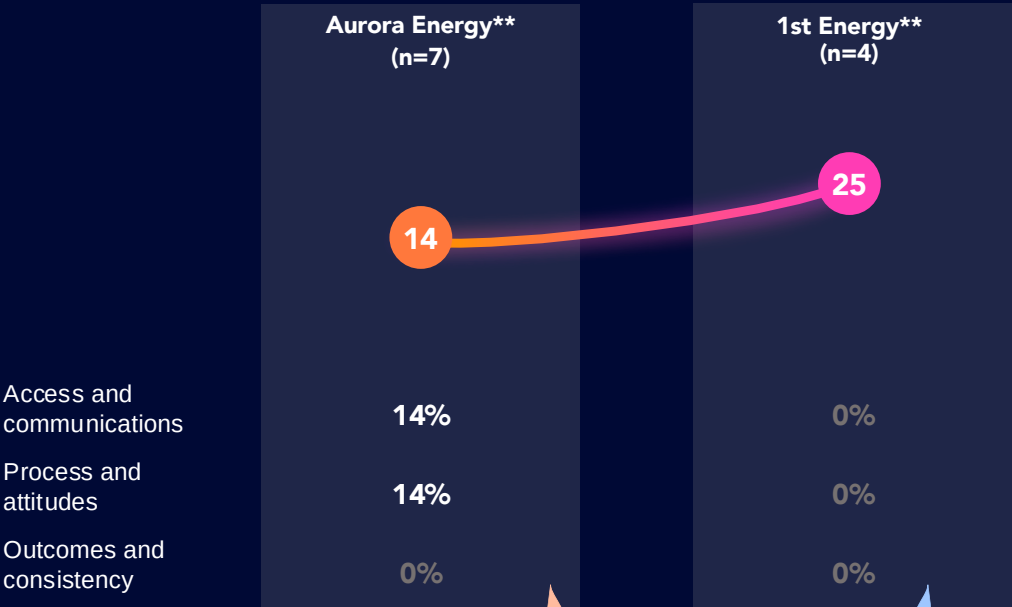
Base: Financial counsellors with majority of clients in NT, n=18*

* Caution: Small sample size (<30)

** Extreme caution: Small sample size (<10); results indicative only; Raw numbers presented



Energy retailers interacted with in past year

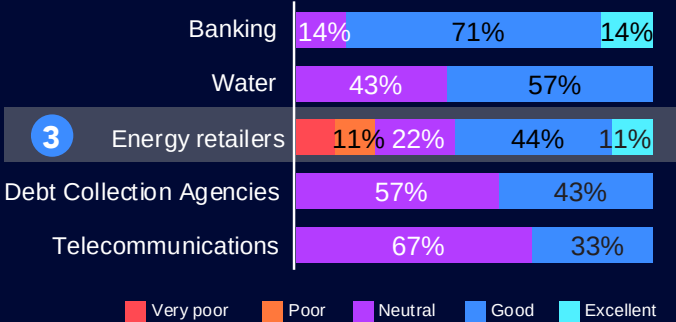


“Some hardship situations seem to be ignored, such as domestic violence situations, that aside from checking the perpetrator does not have access to the Aurora account anymore, there seems to be no other hardship support or consideration offered.”

“[Best practice looks like] empathy, and consideration of other factors that can influence a person’s affordability.”

“With 1st Energy, it is more difficult to communicate with them due to whenever we are transferred to another employee, we often need to re-explain the situation each time whereas with other retailers, that is usually not an issue. This would likely be an issue with clients whose circumstances involves trauma or domestic violence needing to linger on discussing that with a stranger on the phone in order to explain their circumstances.”

Cross-sector benchmarks



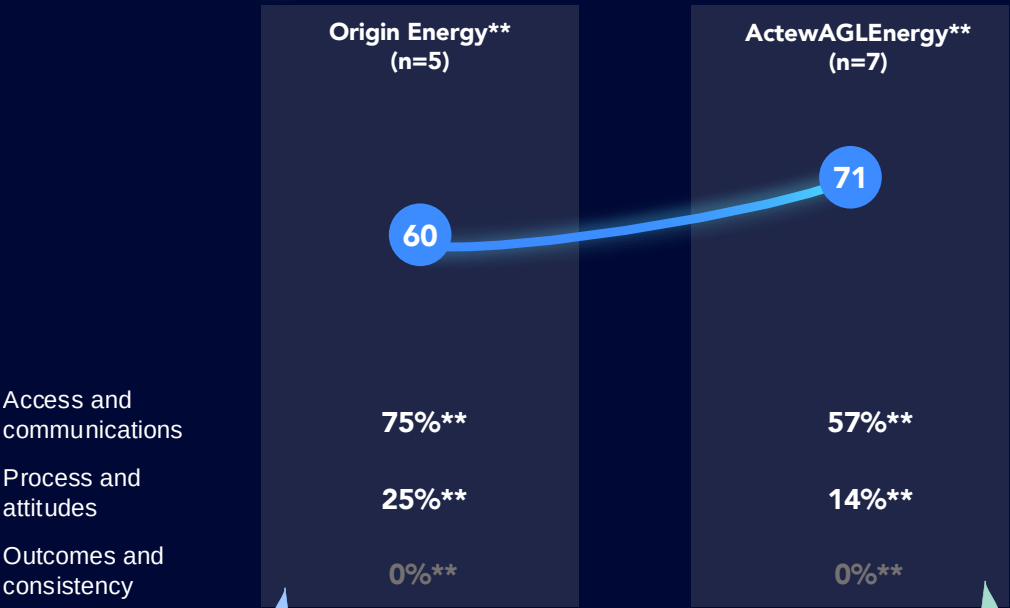
Top 3 cohorts supported

- 1 People with disability
- 2 Victim-survivors of family and domestic abuse
- 3 Families with young children

Base: Financial counsellors with majority of clients in TAS, n=9**
** Extreme caution: Small sample size (<10); results indicative only
Raw numbers presented

Australian Capital Territory

Energy retailers interacted with in past year

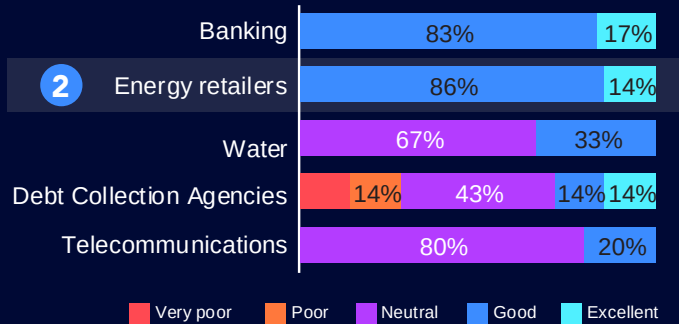


"The Origin hardship team are an example of how to do utility hardship well. They are the benchmark in this region in terms of attitude, approach and outcome. It is difficult to fault them on anything."

"Synergy have always been empathetic to clients and when discussing a payment plan will always ask if this is reachable as they do not want to put the client in a position where essentials can't be afforded. They also offer energy assessments and organise the HUGS grants."

"A good hardship response is the retailer accepting a level of responsibility for the position of the client and working with them with what is achievable and realistic, beyond a rigid approach based on debt and usage."

Cross-sector benchmarks



Top 3 cohorts supported

- 1 Young adults
- 2 Elderly people
- 3 People experiencing homelessness

Base: Financial counsellors with majority of clients in ACT, n=9**
** Extreme caution: Small sample size (<10); results indicative only
Raw numbers presented

