

Developing an approach to measure the effect of additional hardship allowances

Staff paper

September 2013

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DEVELOPING AN APPROACH TO MEASURE THE EFFECTS OF ADDITIONAL HARDSHIP ALLOWANCES

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1 INTRODUCTION

In the Metropolitan Water Price Review Final Decision 2013, the Commission allowed \$5.25 million for the metropolitan retailers (City West Water \$1 million, South East Water \$2 million, Yarra Valley Water \$2 million, and Western Water \$250 000) to help them assist customers to manage the impact of price increases.

The allowances are to go into customer programs with verifiable and reportable outputs. Businesses are expected to use the additional revenue to enhance existing hardship policies, expand programs, adopt best practice and improve associated infrastructure. The extra revenue is not intended for direct financial customer assistance – the Government provides direct financial assistance to applicable water customers through Concessions and the Utility Relief Grant Scheme.

With this allowance came the requirement that businesses continue to consult with customer and welfare groups and put in place improved measures to support customers who have difficulty paying their bills, particularly low income and vulnerable customers. Additionally, businesses must update the Commission regularly on how the additional allowances are being spent during the third regulatory period (1 July 2013 – 30 June 2018).

This staff paper seeks to start a discussion about a possible methodology to measure the effects of the allowances provided to water businesses to spend on their financial assistance and hardship programs for low income and vulnerable customers.

To monitor the effectiveness of the use of these additional allowances, water businesses will provide information to the Commission to demonstrate that the

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¹ Essential Services Commission 2013, *Price Review 2013: Greater Metropolitan Water Businesses — final decision*, June. available at www.esc.vic.gov.au

allowances have been used to address issues related to low income and vulnerable customers. Staff propose to release an annual report based on this information to explain how these allowances have been spent, starting in December 2014.

This paper discusses how the effects of additional allowances granted to the businesses may be measured. This will assist in determining the benefits of the additional allowances.



2 BACKGROUND

2.1 CURRENT VICTORIAN FRAMEWORK FOR CUSTOMER FINANCIAL HARDSHIP

The Commission already has a number of financial hardship requirements of water businesses which includes reporting hardship-related information. The Commission's main instrument for regulating the businesses on customer hardship is the Customer Service Code. The Customer Service Code for urban water businesses requires water businesses to have a hardship policy. The Code requires that the hardship policy must:

- (a) provide internal assessment processes:
 - (1) to determine a customer's eligibility using objective criteria₁ as indicators of hardship; and
 - (2) designed to make an early identification of a customer's hardship; and
 - (3) to determine the internal responsibilities for the management, development, communication and monitoring of the policy;
- (b) provide for staff training about the water business's policies and procedures and to ensure customers in hardship are treated with sensitivity and without making value judgments;
- (c) subject to clause 6.6, exempt customers in hardship from supply restriction, legal action, and additional debt recovery costs including by waiving any interest accrued prior to the customer being identified as in

² Essential Services Commission 2013, *Customer Service Code: Urban water businesses*, July. Available at www.esc.vic.gov.au

hardship and exempting the debt from the accrual of interest on overdue amounts during the customer's period of hardship – while payments are made to the water business according to an agreed flexible payment plan or other payment schedule;

- (d) state any circumstances in which it will waive or suspend interest payments on outstanding amounts;
- (e) subject to water law, offer a range of payment options in accordance with the customer's capacity to pay;
- (f) provide for written confirmation of any alternative payment method to be sent to customers within 10 business days of an agreement being reached;
- (g) offer information and referral to government assistance programs(including the Utility Grant Relief Scheme) and no-cost independent financial counsellors;
- (h) offer information about the water business's dispute resolution policy, and the customer's right to lodge a complaint with EWOV and any other relevant external dispute resolution forum if their hardship claim is not resolved to their satisfaction by the water business;
- (i) offer information on how to reduce water usage and improve water efficiency and referral to relevant government water efficiency programs (including the Smart Homes program);
- (j) detail the circumstances in which the policy will cease to apply to customers; and
- (k) provide for a review mechanism of the policy and its associated procedures.

Water businesses are also required to publish their hardship policies on their websites and must make a copy available to customers on request.

Within the framework of the Customer Service Code water businesses have been working with low income and vulnerable customers and reporting on the results for many years. The various support programs already in place are outlined at the water businesses' websites.

In addition to the support provided by water businesses there are support measures in place for customers in hardship such as:

- government grants in the form of Utility Relief Grant Scheme (URGS) and
- · concession and health care card discounts.



3 ISSUES TO BE ADDRESSED

The appropriate measures of the impact of the additional hardship allowances depend upon the water business's decisions about where to use the allowances. Past work by the Commission and the recent workshop with water businesses and customer welfare groups provided information and ideas about where funds could be targeted to benefit low income and vulnerable customers.

3.1 RESEARCH INTO FINANCIAL HARDSHIP

In 2006 the Commission undertook a review of all 19 Victorian water businesses' hardship policies. The review assessed whether policies and practices met the requirements of the Customer Service Code, were working efficiently and effectively, and were being appropriately targeted. The review revealed that businesses' hardship policies varied in comprehensiveness and effectiveness, and that some businesses implemented processes above the minimum requirements. The most effective policies and practices (against the Commission's criteria) were identified as best practice for the industry. The review also resulted in changes to the Customer Service Code.¹

In 2010 the Commission initiated a study to provide greater insights into the experience of customers in financial difficulty when dealing with water and energy retail businesses.

¹ Essential Services Commission *Examples of best practice approaches* page 9 http://www.esc.vic.gov.au/getattachment/0e423e2c-6a1d-42b9-8077-08380ad0ed02/Report-Selected-best-practice-approaches-in-financ.pdf

The study suggested that water and energy retail businesses could do more to provide support to customers experiencing hardship. The study identified possible issues associated with:

- a lack of customer service skills within businesses and an inability to provide appropriate information to hardship customers at the right time
- customers not being aware of hardship assistance products and services available to them, even after liaison with their utility business
- inflexible approaches by businesses to setting payment terms under installment plans
- a lack of customer awareness of pending energy service disconnection and/or water service restriction.

The study found customers wanted better information on available assistance, greater flexibility in structuring instalment plans and better management of the threat of disconnection or restriction of supply. Customers also called for a change in the way the relationships involved in the delivery of hardship support are managed.²

Based on the consultant's report and the submissions on it, the Commission prepared a document on best practices for hardship customer management. This best practice report included the ways in which water businesses sought to identify hardship customers which included:

- the customer is having difficulty paying an instalment plan (2 consecutive payments missed or delayed) or breaks a second instalment plan
- the customer has a debt of greater than \$500 and is a concession card holder
- the customer has been sent a Utility Relief Grant application
- the customer has demonstrated difficulty in meeting an installment plan
- a customer appears on outstanding debtor reports for Financial Reminder Notice non-payment.³

² Hall and Partners Open Mind *Customers of water and energy providers in financial hardship: a consumer perspective May 2011* p. 5.

³ Essential Services Commission *Improving approaches to customer financial hardship – Summary of business responses to Commission request for information on hardship policies and procedures pp. 8-9 http://www.esc.vic.gov.au/getattachment/1e2fbeb1-bee5-4c34-a9fc-303fd0bf4f52/Summary-Business-responses-to-hardship-policies-an.pdf*

3.2 FINANCIAL HARDSHIP WORKSHOP

Following the release of the final decision of the Metropolitan Water Price Review – which included additional allowances for businesses to assist customers requiring financial assistance – the Commission hosted a workshop on customer financial hardship support. The workshop sought the views of water businesses and consumer groups on the objectives the additional allowances should achieve and how performance against these objectives could be measured. Some workshop participants highlighted the Commission's previous work on customer hardship as useful background to the current review.

The customer hardship support workshop participants highlighted the key hardshiprelated issues and outcomes that were needed:

- increase awareness among low income and vulnerable customers of the services available to them
- make customers comfortable seeking assistance from water businesses
- early intervention in cases of vulnerable customers or those experiencing financial difficulty
- increase the flexibility of instalment plans
- increase cooperation among water businesses on what approaches work best.

There appears to be a common understanding that the additional allowances for hardship programs should focus on some or all of these areas. Rather than look at inputs to the process, there should be an output focus when reporting the results. The following section of this paper explores potential indicators to measure the results of the additional allowances for low income and vulnerable customers.

4 POTENTIAL INDICATORS

4.1 EXISTING INDICATORS AROUND FINANCIAL ASSISTANCE AND PAYMENT

In addition to the Customer Service Code establishing the requirements for hardship policies, the Commission collects data on the impact of the policies on customers. The following indicators are already collected from water businesses:

- percentage of customers on instalment plans
- percentage of customers subject to legal action
- percentage of customers restricted
- percentage of restrictions restored within 3 days
- percentage of restrictions still in place after 14 days
- average debt levels for customer subject to restriction or legal action (\$)
- number of physical visits associated with Guaranteed Service Level (GSL) process management
- number of hardship grant applications (grants refer to business's own scheme and not government scheme)
- number of hardship grant applications (excluding Utility Relief Grant Scheme (URGS))
- hardship grants and amount paid (excluding URGS)
 - number of hardship grant applications
 - number of hardship grants paid
 - dollar amount of hardship grants paid.

We also have access to the following information from the Energy and Water Ombudsman Victoria (EWOV) which may provide information relevant to customers in hardship:

- number of enquiries to EWOV
- number of complaints to EWOV
 - investigated complaints
 - assisted referrals
 - unassisted referrals
 - complaint investigations finalised.

We also have a hardship-related GSL that protects customers from wrongful disconnection and provides customers with \$300 if a breach occurs.

The indicators used to measure aspects of the businesses' performance on hardship have been reviewed and consulted on a number of times to ensure they capture, as well as possible, the results of the activities relating to hardship that the businesses undertake.

Generally, water businesses perform well on hardship management relative to energy businesses. However, due to increases in water prices there will be more pressure on customers, likely resulting in more customers requiring assistance.

4.2 HARDSHIP INDICATORS USED IN OTHER SECTORS

To ensure the Commission can assess the results of the additional allowance for financial assistance granted to water businesses, staff have considered a range of existing quantitative and qualitative hardship indicators for this paper. The main relevant measures are as follows:

- The Commission has financial hardship measures for Victorian energy customers. A list of the energy hardship indicators is at appendix A.
- The Australian Energy Regulator has hardship indicators for gas and electricity customers.² These indicators are at appendix B.

Essential Services Commission Review of energy retail performance indicators final decision May 2013 http://www.esc.vic.gov.au/getattachment/df71aac9-af12-4c8e-860a-4b05e46a0081/Final-Decision-Energy-Retail-Performance-Indicator.pdf

- The Independent Pricing and Regulatory Tribunal of New South Wales included hardship indicators in the June 2013 reporting manuals for Sydney Water and Hunter Water.³ These indicators are at appendix C.
- The Office of the Tasmanian Economic Regulator has developed performance indicators for customer hardship which are at appendix D.⁴

4.3 POTENTIAL INDICATORS TO MEASURE OUTCOMES OF ADDITIONAL ALLOWANCES

Staff know that measuring the impacts of additional allowances for financial hardship is a challenging task. It is likely to require a mix of both qualitative and quantitative data in order to allow for the appropriate analysis. No one indicator is expected to be sufficient to measure the outcomes. The final set of indicators will be a mix of preexisting measures and new measures. Where possible we will draw on preexisting data for which time-series data is already available.

Below we set out possible measures for the areas identified as issues in section 3.2. These measures are a starting point for discussion and staff request comment on them. We look to water businesses to propose indicators that they consider would adequately measure the outcomes of the funding allowances. Water businesses' responses will inform the Commission's final decision on the set of measures to be used. Staff will hold a workshop with water businesses in October 2013 to develop a final set of measures and discuss implementation issues.

² Australian Energy Regulator AER (Retail Law) Performance Reporting Procedures and Guidelines June 2012 Version 2 http://www.aer.gov.au/sites/default/files/D12%2090627%20%20AER%20Performance%20Reporting %20Procedures%20and%20Guidelines%20-%20June%202012.pdf

³ IPART Reporting manual for Sydney Water Corporation June 2013 http://www.ipart.nsw.gov.au/Home/Industries/Water/Public_Water_Licensing/Reporting_Manual_-_Reporting_Manual_for_Sydney_Water_Corporation_-_June_2013

Office of the Tasmanian Economic Regulator Tasmanian Water and Sewerage Industry Performance and Information Reporting Guideline April 2013 http://www.energyregulator.tas.gov.au/domino/otter.nsf/LookupFiles/131168_Water_and_Sewerage_I ndustry_Performance_and_Information_Reporting_Guideline_%20v1.2_April_2013.PDF/\$file/131168 _Water_and_Sewerage_Industry_Performance_and_Information_Reporting_Guideline_%20v1.2_April_2013.PDF

The workshop on hardship identified a number of indicators that could be used to measure the extent to which water businesses had addressed the problems facing low income and vulnerable customers. Qualitative measures included:

- explanations by businesses of what new programs had been implemented or what changes to programs had been made
- · case studies of customers and their experiences
- focus groups of hardship customers regarding changes in their interactions with businesses
- discussions with financial counselors on their views of the water businesses' hardship programs.

Quantitative measures considered at the workshop and measures from staff research are listed in table 1. There will be limitations to any new indicators – including the lack of time-series data available and the possibility that results will be unclear or inconclusive. Measures listed in table 1 are not the final list of indicators that will be used – rather they are a starting point for further discussions. Initially, qualitative reporting is likely to be the best we can expect, as it will take time for any quantitative measures to show discernible results.



TABLE 1 PROSSIBLE QUANTITATIVE MEASURES

Issue	Possible measure
Improved awareness among customers of financial support available	 Surveys of customer awareness of financial support available Number of customers self-identifying as in hardship or requiring financial assistance Number of customers requesting to be put on payment plans
Interactions with water business staff that encourage vulnerable customers to seek assistance	 Surveys of customer experience of financial support programs The number of customers receiving financial assistance or support The number of retrospective concessions applied Number of financial assistance participants for whom access was sought by a third party on their behalf
Early intervention in cases of vulnerable customers	 The levels of customer debt when beginning a financial assistance program Percentage of customers in financial assistance programs who are: not meeting ongoing water and sewerage costs covering ongoing water and sewerage costs covering ongoing costs and portion of arrears How long a customer had not met a repayment since being on a hardship program Proportion of customers on payment plans meeting their payment requirements
Flexible approaches by businesses with regard to instalment plans	 The last time a customer paid their required amount in full Percentage of customers experiencing financial difficulty who pay by: payment plan Centrepay A reduction in the failure of payment plans Average length of participation in a hardship program The number of customers leaving payment plans
Improved co-operation and collaboration among water businesses	 Number of meetings between water businesses to discuss best practice Number of water businesses using similar programs or techniques with success

Businesses will provide the Commission with data on an agreed set of measures. The Commission would undertake surveys to obtain additional data. Reporting would commence in August 2014 on the agreed set of indicators. The Commission would release a report in December of each year. Reports would be available on the Commission's and water businesses' websites.

4.4 QUESTIONS

Are the issues listed the issues the water businesses should address?

Are there other issues water businesses should address with the allowances?

Which qualitative indicators would be most useful to measure the outcomes of businesses' financial assistance programs?

Which quantitative indicators would be most useful to measure the outcomes of businesses' financial assistance programs?

Propose measures that you think would be useful to measure the outcomes of businesses' financial assistance programs.

How should the data or results be reported?

Are there any other areas of concern?

5 RESPONDING TO THIS PAPER

Responses received through this public consultation process will assist Commission staff to produce a final guidance paper. Staff would like to hear from a variety of stakeholders – including water businesses, customers, customer groups and other regulatory bodies. When responding, please be guided by the questions listed in the paper.

Submissions are due 25 October 2013. Staff will hold a workshop with water businesses in October 2013 to develop a final set of measures and discuss implementation issues. The Commission will release a final paper in November 2013.

Staff would prefer submissions by email at water@esc.vic.gov.au

You can also send comments by mail, marked Submission to *Measuring outcomes* from hardship programs review to:

Essential Services Commission Level 37, 2 Lonsdale Street Melbourne VIC 3000

Please direct any queries about this paper to:

Jason Fitts, Project Manager, (03) 9032 1335 or

Marcus Crudden, Acting-Director Water, (03) 9032 1326.

APPENDIX A – ENERGY HARDSHIP PROGRAM INDICATORS

Reported for <u>residential</u> customers only, under a single 'Energy' category

TABLE A.1 ENERGY FINANCIAL HARDSHIP PROGRAM INDICATORS

Indicators	Reporting requirements	Interpretation
Hardship program participants	The number of current participants in a retailer's hardship program as at the last day of each month within the reporting period, reported under a single 'Energy' category. Additional guidance: No. of participants reported in the previous month + new entrants into the program - total exits from the program = No. of participants reported as at the end of the current month	# Numbers
New entrants into a retailer's hardship program	The number of customers accepted into a retailer's hardship program during each month within the reporting period.	# Numbers
Hardship program participants	The number of current participants in a retailer's hardship program as at the last calendar day of each month	% of Program participants

ESSENTIAL SERVICES COMMISSION VICTORIA

DEVELOPING AN APPROACH TO MEASURE THE EFFECTS OF ADDITIONAL HARDSHIP ALLOWANCES – STAFF PAPER APPENDIX A – ENERGY HARDSHIP PROGRAM INDICATORS

Indicators	Reporting requirements	Interpretation
receiving energy concessions	within the reporting period who are also energy concession customers. An energy concession customer is a residential customer that is recorded by the retailer as eligible for and is receiving an energy concession, where the concession is administered by the retailer. Note: By default, this will also enable the Commission to calculate the remaining participants in a hardship program who are not in receipt of energy concessions.	
Customers denied access to a retailer's hardship program	The number of customers denied access to a retailer's hardship program during each month within the reporting period. This includes those customers referred to the hardship program by any means but who are not accepted into the program. It does not include customers who decline to participate in the program.	% of the SUM of Program participants + No. of customers denied access
Average debt of new entrants into a hardship program	The average debt (amount outstanding for over ninety days) of those customers entering a retailer's hardship program during each month within the reporting period.	\$
Debt classifications of new entrants into a hardship program	The number of customers entering a retailer's hardship program during each month within the reporting period with a debt that was: (a) Between \$0 and \$500 (b) Over \$500 but less than \$1,500 (c) Over \$1,500 but less than \$2,500 (d) \$2,500 or more	\$
Average debt of hardship program customers	The average debt (amount outstanding for over ninety days) of all current hardship program customers as at the last day of each month within the reporting period.	\$ Not compared to entry debt
Average length of participation for customers in a hardship program	Average number of days since current participants entered a retailer's hardship program (calculated as at the last calendar day of each month in the reporting period).	Days
Hardship program exits with agreement from the retailer	For each month within the reporting period, the number of customers exiting a hardship program following successful completion of the program or by agreement with the retailer.	% of Total domestic customers
Hardship program exits due to switching, transferring or leaving the retailer	For each month within the reporting period, the number of customers exiting a retailer's hardship program because they switched / transferred to another retailer or otherwise left the retailer.	% of Total domestic customers
Hardship program participants	For each month within the reporting period, the number of customers excluded or removed from a retailer's	% of Total domestic

Indicators	Reporting requirements	Interpretation
excluded for not complying with requirements	hardship program for non-compliance with program requirements (for example, customer did not make the required payments or failed to maintain contact the retailer). Note: This should also include those participants who leave the program because they feel they are unable to meet program requirements or make the payments required by the retailer.	customers
Disconnections of all previous hardship program customers within 12 months	The number of customers whose supply was disconnected for non-payment during each month within the reporting period who had, within the previous 12 months, been on the retailer's hardship program.	% of Program participants ALSO % of Total disconnections
Reconnections of all previous hardship program customers within 12 months	The number of customers whose supply was reconnected in the same name and at the same address within 7 days following disconnection for non-payment during each month within the reporting period who had, within the previous 12 months, been on the retailer's hardship program.	% of Program participants ALSO % of Total reconnections
Energy field audits provided at no cost	The number of energy field audits provided at no cost to customers during each month within the reporting period. By definition, this excludes energy audits conducted by telephone.	% of Program participants
Energy field audits provided at partial cost	The number of energy field audits provided at partial cost to customers during each month within the reporting period. By definition, this excludes energy audits conducted by telephone.	% of Program participants
Average cost contributed to an energy field audit where a customer contribution was required	Average dollar amount contributed by customers to cover the cost of an energy field audit during each month within the reporting period. Note: The average is based only on customers from whom a partial contribution was required, thereby excluding those audits provided at no cost to the customer.	\$
Appliances provided under a hardship program	The number of appliances provided to participants of a retailer's hardship program, either by the retailer or by a third party nominated by the retailer, during each month within the reporting period. This indicator is intended to reflect the Energy Legislation (Hardship, Metering and Other Matters) Act 2006 (page 4) which refers to "flexible options for the purchase or supply of replacement electrical equipment designed for domestic use". a. Small electrical equipment (eg. light globes, powerboards) b. Large electrical appliances (eg. fridges, freezers)	% of Program participants

APPENDIX B – AUSTRALIAN ENERGY REGULATOR INDICATORS

TABLE B.1. AUSTRALIAN ENERGY REGULATOR INDICATORS

Indicator	Reporting requirements	Reporting period
S4.1. Number of customers on a retailer's hardship program	Number of residential electricity and gas customers on a retailer's hardship program at the end of each calendar month of the reporting period, in each participating jurisdiction.	Quarterly
S4.2. Number of hardship program customers receiving energy concessions	Number of electricity and gas hardship program customers who are also energy concessions customers, as at the last day of the reporting period in each participating jurisdiction.	Quarterly
S4.3. Number of customers denied access to the hardship program	Number of residential electricity and gas customers denied access to the hardship program during each calendar month of the reporting period, in each participating jurisdiction.	Quarterly
S4.4. Average debt upon entry into the hardship program	The average energy bill debt for those electricity and gas hardship program customers who entered the hardship program during the reporting period, as at the last calendar day of the reporting period in each participating jurisdiction.	Quarterly

Indicator	Reporting requirements	Reporting period
S4.5. Levels of debt of customers entering the hardship program	The number of electricity and gas hardship program customers who entered the hardship program during the reporting period, with an energy bill debt (as at the last calendar day of the reporting period) that was: (a) Between \$0 and \$500 (b) Over \$500 but less than \$1,500 (c) Over \$1,500 but less than \$2,500 (d) \$2,500 or more in each participating jurisdiction.	Quarterly
S4.6. Payment methods of hardship program customers	Number of electricity and gas hardship program customers using each of the following payment methods, as at the last day of the reporting period, in each participating jurisdiction: (a) Payment plan (excluding those who make their payment plan payments using Centrepay) (b) Centrepay (c) Prepayment meter (PPM) (d) Any other payment method.	Annual
S4.7. Average debt of hardship program customers	Average energy bill debt of electricity and gas hardship program customers, as at the last day of the relevant reporting period in each participating jurisdiction.	Quarterly
S4.8. Number of customers exiting the hardship program	Total number of electricity and gas customers who exited the hardship program, as at the last day of each calendar month during the reporting period in each participating jurisdiction.	Quarterly
S4.9. Reasons for customers exiting the hardship program	Total number of electricity and gas customers who exited the hardship program during the reporting period, who: (a) Successfully completed the hardship program or exited with the agreement of the retailer (b) Were excluded or removed from the program for non-compliance (for example, where the customer did not make the required payments, or where they failed to contact the retailer. This should also include those hardship program customers who leave the program because they feel they are not able to meet the program requirements or payments requested by the retailer) (c) Switched, transferred or left the retailer in each participating jurisdiction.	Quarterly
S4.10. Disconnection of previous hardship program customers	Number of residential electricity and gas customers disconnected for non-payment of a bill during the reporting period, who successfully completed the hardship program, or exited by agreement with the retailer, in the previous 12 months, in each participating jurisdiction.	Quarterly

Indicator	Reporting requirements	Reporting period
S4.11. Reconnection of previous hardship program customers	Number of residential customers who successfully completed the hardship program or exited by agreement with the retailer in the previous 12 months, who were reconnected in the same name and at the same address within seven days of disconnection for non-payment, in each participating jurisdiction.	Quarterly
S4.12. Assistance provided to hardship program customers	Retailers must provide a written summary (up to two A4 pages of information) on the types of assistance offered and provided to hardship customers throughout the reporting period. Where possible retailers should provide quantitative data on the various types of initiatives and assistance provided to hardship program customers in the reporting period.	Annual
S4.13. Case studies (optional)	Retailers may provide anonymous case studies that highlight the assistance provided under their hardship program and the positive impact and outcomes achieved for their customers (no more than 500 words).	Annual

APPENDIX C – IPART HARDSHIP PERFORMANCE INDICATORS

TABLE C.1 IPART HARDSHIP PERFORMANCE INDICAOTRS

Indicator No.	Indicator detail
C4	The total number of residential customers disconnected for non-payment of amounts owed to the water utility.
C5	The total number of non-residential customers disconnected for non-payment of amounts owed to the water utility.
C6	Total number of residential customers on whom water flow restrictions have been imposed
C7	Total number of non-residential customers on whom water flow restrictions have been imposed
C8	Number of residential customers per 1000 residential properties experiencing financial difficulty who are being assisted through the water utility's hardship program or payment plans.
C9	Percentage of residential customers in C 8 who are: (a) not meeting ongoing water and sewerage costs (debt increasing) (b) covering ongoing water and sewerage costs (debt stable) (c) covering ongoing costs and portion of arrears (debt reducing).
C10	Percentage of residential customers in C 8 who pay by: (a) Payment plan (b) Centrepay
C11	Break up by percentage of residential customers who no longer meet C 8 by exiting the water utility's hardship program or payment plans because: (a) they have paid off their outstanding debt (b) they have been flow restricted (c) other

APPENDIX D – OFFICE OF THE TASMANIAN ECONOMIC REGULATOR HARDSHIP INDICATORS

TABLE D.1 OFFICE OF THE TASMANIAN ECONOMIC REGULATOR HARDSHIP INDICATORS

Indicators

Customer Service Code requirements - customers

Percentage of complaints resolved, or agreement of timeframe for resolution, within 10 days

Number of restrictions applied for non-payment of water bill

Percentage of customers paying by the due date

Flexible payment plans:

- created
- completed
- defaulted
- cancelled
- total number active
- average debt (\$)

Affordability and hardship information and measures

Total number of concession recipients

Number of customers on payment plans

- residential
- concession card holders

Number of residential customers on a payment plan in the previous 24 months who were restricted for nonpayment

- residential
- concession card holders

Number of customers on a payment plan in the previous 24 months who were restricted for non-payment of bills and subsequently had the restriction removed within seven days - residential

- concession card holders

Affordability and hardship information and measures

The number of residential customers using direct debit facilities to pay customer accounts

The number of direct debit plan terminations resulting from default or non-payment - residential

Number of customers repaying a debt

- residential
- non-residential

Average debt of customers

- residential
- non-residential

The number of customers owing more than \$500

- residential
- non-residential

Number of restrictions applied for non-payment

- residential
- non-residential
- concession card holders

The number of restrictions removed within seven days of being applied

- residential
- non-residential
- concession card holders

The number of customers with restrictions applied more than once at the same premises within a rolling 24 month period

- residential
- non-residential
- concession card holders

The number of customers on the retailer's 'hardship program'

The number of customers on the hardship program who are concession customers

The number of customers entering the hardship program in the reporting period

The number of customers denied entry to the hardship program

Customers' average debt, upon entry and upon exit from the hardship program

- upon entry
- upon exit

The number of customers exiting the hardship program

The number of customers excluded from the program after commencement due to failure to engage or non-compliance

The number of customers who have had restrictions applied who had been on the hardship program in the previous 24 months

The number of customers who have had restrictions removed within seven days of being applied, who had been on the hardship program in the previous 24 months