

27 March 2020

Submitted via Engage Victoria

Kate Symons  
Chairperson  
Essential Services Commission

Dear Kate

## Changing the back-billing rules for retail energy customers; Draft decision

Consumer Action Law Centre (**Consumer Action**) welcomes the opportunity to comment on the Essential Service Commission's (ESC) *Changing the back-billing rules for retail energy customers; Draft decision (Draft Decision)*.

Consumer Action strongly supports the ESC's draft decisions. Households should not face bill shock for nine months of charges where they are not at fault. It is energy retailers' job to bill households correctly and distributors' responsibility to properly manage meter reads. Reducing the back-billing time frames to four months from 1 January 2021 onwards will provide an incentive for these businesses to better perform their roles in a timely way, while also reducing the risk of payment difficulty for households where back billing issues arise.

As raised in our submission to the ESC's *Ensuring energy contracts are fair and clear draft decision*,<sup>1</sup> we anticipate issues might arise with back billing that could be the fault of a third party such as a new energy technology provider. The ESC should consider how energy retailers or distributors should best assist households to prove this is the case in order to help consumers access redress.

Please contact [REDACTED] at Consumer Action Law Centre on [REDACTED] or at [REDACTED] if you have any questions about this submission.

Yours Sincerely,

**CONSUMER ACTION LAW CENTRE**

[REDACTED]

[REDACTED] | Chief Executive Officer

## About Consumer Action

Consumer Action is an independent, not-for profit consumer organisation with deep expertise in consumer and consumer credit laws, policy and direct knowledge of people's experience of modern markets. We work for a just marketplace, where people have power and business plays fair. We make life easier for people experiencing vulnerability and disadvantage in Australia, through financial counselling, legal advice, legal representation, policy work and campaigns. Based in Melbourne, our direct services assist Victorians and our advocacy supports a just marketplace for all Australians.

<sup>1</sup> Consumer Action, 2020. Submission: [Ensuring energy contracts are clear and fair draft decision](#).