

Energy Accounts Payment Assistance (EAPA)

Public Consultation Paper on proposed reforms

November 2023

Acknowledgment of Country

We acknowledge that Aboriginal and Torres Strait Islander peoples are the First Peoples and Traditional Custodians of Australia, and the oldest continuing culture in human history.

We pay respect to Elders past and present and commit to respecting the lands we walk on, and the communities we walk with.

We celebrate the deep and enduring connection of Aboriginal and Torres Strait Islander peoples to Country and acknowledge their continuing custodianship of the land, seas and sky.

We acknowledge the ongoing stewardship of Aboriginal and Torres Strait Islander peoples, and the important contribution they make to our communities and economies.

We reflect on the continuing impact of government policies and practices, and recognise our responsibility to work together with and for Aboriginal and Torres Strait Islander peoples, families and communities, towards improved economic, social and cultural outcomes.

Artwork:






Regeneration by Josie Rose



Contents

Icon definitions	4
Introduction.....	5
Have your say	6
1 Policy intent and outcomes.....	7
1.1 Intent of EAPA.....	7
1.1.1 Proposed reforms	8
1.1.2 Consultation questions	9
1.2 Energy debt	10
1.2.1 Proposed reforms	10
1.2.2 Consultation questions	11
1.3 EAPA for embedded networks	12
1.3.1 Work underway or planned.....	12
1.3.2 Consultation questions	13
2 Access and awareness	14
2.1 Communications.....	14
2.1.1 Work underway or planned.....	15
2.1.2 Proposed reforms	15
2.1.3 Consultation questions	15
2.2 Application process	16
2.2.1 Work underway or planned.....	17
2.2.2 Proposed reforms	18
2.2.3 Consultation questions	18
3 EAPA limits and delivery	19
3.1 Voucher value, application and fuel limits.....	19
3.1.1 Proposed reforms	19
3.2 Delivery model.....	20
3.2.1 Work underway or planned.....	21
3.2.2 Proposed reforms	21
3.2.3 Consultation questions	23
Appendix A: EAPA Review Terms of Reference	24
Appendix B: EAPA review consultation paper questions	25
Appendix C: Glossary	26

Icon definitions

Icon	Definition
	Policy
	Regulation
	Dollar value
	Communication and/or awareness
	Application process

Introduction

Review context

In 2022 the Office of Energy and Climate Change (OECC) commenced a review of the Energy Accounts Payment Assistance (EAPA) scheme to ensure EAPA remains fit for purpose and continues to deliver intended customer outcomes. The review Terms of Reference are provided at [Appendix A](#).

This consultation paper seeks stakeholder views on proposed reforms to the EAPA arising from the review process.

About EAPA

The NSW Government's annual \$330 million Energy Social Programs support nearly 1 million NSW households pay their electricity and gas bills, and stay connected to essential energy services each year. This includes 6 energy rebates and a crisis support scheme known as the EAPA.

The EAPA helps NSW households experiencing difficulty paying their energy bills due to a sudden financial crisis or emergency. EAPA is delivered by over 220 Non-Government Organisations (NGOs) and a NSW Government EAPA Assessment team, collectively known as EAPA Providers. EAPA Providers assess customers for eligibility. Eligible customers receive digital vouchers in \$50 increments, sent directly to their energy retailer, to help pay their electricity or gas bills. To receive EAPA, customers must be experiencing difficulty paying their energy bill due to a short term financial hardship, crisis or emergency (such as loss of income, unexpected costs, natural disaster or received a disconnection notice). Customers must be individually assessed for vouchers through an interview which occurs after the application is made.

Customers can apply for EAPA on the Service NSW website. The application is then assessed by the NSW Government EAPA assessment team. Customers can also apply in person or over the phone with an NGO EAPA provider. Contacting an NGO EAPA provider may be more suitable if the customer prefers an in-person assessment, does not have an email address or needs other support such as no-interest loans, financial counselling and clothing or food assistance.

Once the application is received, an EAPA representative will contact the customer within 2 to 4 weeks to assess the customers' eligibility. The assessment will involve asking the customer for details about their crisis and a call with the energy retailer to discuss what support they can offer.

EAPA's policy intent and delivery model have evolved since the program launched over 30 years ago. Policy changes over time have led to multiple interpretations of EAPA's purpose. Additionally, the age of EAPA and successive delivery modifications have resulted in an EAPA delivery process that combines legacy design and system limitations. This results in limited data on EAPA customers and their transaction details, and a lack of clarity on the policy intent, making outcome evaluation difficult.

EAPA is not intended to provide longer term or ongoing support to customers. There are, however, flow on benefits of EAPA which allows some customers to afford other basic amenities that have limited assistance. The growing costs of living and energy prices are increasing pressures on households making it increasingly important to ensure that EAPA supports NSW households that need it the most.

The data from the COVID-19 impact report¹ demonstrated that EAPA is an agile and flexible scheme that responds well to large-scale economic crises.

Have your say

How do you think the EAPA can support NSW households experiencing difficulty paying their energy bill due to a short term financial hardship, crisis or emergency to stay connected to their energy services? We want to hear the views of stakeholders on how we plan to reform the EAPA.

We welcome your feedback on the questions set out in this consultation paper. This paper poses 11 questions to guide your feedback, as seen in Appendix B.

To provide your feedback, complete the survey online or upload a written submission on the Have Your Say website under Review of Energy Accounts Payment Assistance.

All submissions will be made publicly available unless you specifically request otherwise.

Submissions are now open and will close at 11:59 pm (AEDT) on Wednesday 13 December 2023.

¹ 2023 Energy Social Programs COVID Impact Report, source: <https://www.energy.nsw.gov.au/sites/default/files/2023-03/NSW-Energy-Social-Programs-Covid-19-Impact-Report-March-2023.pdf>

1 Policy intent and outcomes

1.1 Intent of EAPA

EAPA's policy intent has evolved since it was launched in 1988 which has created ambiguity and leads to varied interpretations of its purpose

Given the age of the scheme, documents about the evolving intent of EAPA is limited resulting in information gaps around the reasoning and timeframe for various iterations. This has led to different interpretations of the EAPA policy by stakeholders and causes ambiguity about EAPA's purpose.

EAPA supports customers with the cost of their energy consumption and is not intended for other fees or charges

EAPA helps customers pay their energy bills when they are unable to afford them due to a crisis or emergency. The timing and impact of crises and emergencies are inherently diverse and unpredictable. As a dedicated crisis and emergency support scheme, EAPA ensures NSW energy customers can quickly access the short term help they need to manage uncertain events. There is a genuine customer need for the kind of support EAPA offers, with close to 50,000 people accessing EAPA each year.

The purpose of EAPA is to help households with the cost of energy consumption. Supplementary non-consumption charges are applied under an energy contract including fees for late payments, disconnection and reconnection, account setup and early termination. Energy retailers have the discretion to waive charges whilst adhering to state and national regulations. Under the National Energy Retail Law (Adoption) Regulation 2020, NSW energy retailers are required to waive late payment and early termination fees for customers who receive EAPA, the Low Income Household Rebate and Medical Energy Rebate².

EAPA operates parallel to the National Energy Retail Law and Rules

EAPA can be a pathway to trigger an energy retailer's awareness that a customer needs hardship assistance. However, EAPA is not a precondition for retailers to provide nationally required hardship supports. There are national protections in place for consumers in financial difficulty including energy retailers' hardship policies. These protections are not dependent on any jurisdictional regulations or programs available to customers. Energy retailers have dual obligations to provide support to consumers at both jurisdictional levels. However, EAPA customers' needs can result in the jurisdictional supports and protections overlapping. This can create ambiguity with how these protections and supports interact including the sequence of when support is provided or offered.

EAPA helps customers 'stay connected' to essential services however this purpose can be interpreted in different ways

Section D1.6 of the NSW Social Programs for Energy Code (the Code) requires that an energy retailer cannot disconnect a customer awaiting assessment for EAPA. Additionally, by providing a payment to a customer's energy account, EAPA can help a customer avoid disconnection for non-payment in that payment cycle.

However, it is not clear whether the intent is to stop a disconnection at the point in time of application, to keep a customer connected over the crisis or emergency time period or both. In practice, EAPA works as a temporary measure to help a customer stay connected at the point EAPA

² National Energy Retail Law (Adoption) Regulation 2020, source: <https://legislation.nsw.gov.au/view/pdf/asmade/sl-2020-511>

is applied for and then applied to the energy bill. Additionally, any customer with large energy debt, or unable to pay their energy bill in full, is still at risk of disconnection for non-payment of their account. This is unless they are afforded protection from disconnection under the retailer's hardship policy.

EAPA is being used by customers in long term hardship and debt though this is not its intent

Section D1.1A of the Code specifies that EAPA is a crisis scheme and is not intended for ongoing income support. The Code does not specify how this is classified or the length of time for which EAPA can be accessed. Moreover, there are diverse interpretations of the definition of short term and ongoing support across the energy sector. EAPA Providers typically consider up to 12 to 24 months as 'short term'. However, this is ambiguous and open to interpretation. The EAPA assessment process does accommodate varied types and duration of crises and emergencies, and the delayed effects of billing cycles on energy use and affordability. Some people regularly applying for EAPA are in long term financial hardship and factor EAPA into their ongoing household budget to manage their finances.

EAPA supports NSW residents who may not be considered low income but do face challenges to pay their energy bill due to unforeseen circumstances

The Code notes that EAPA is designed to help 'financially disadvantaged' residential customers experiencing difficulty paying their energy bill due to a crisis or emergency. The Code does not specify financially disadvantaged residential customers as being low income. This allows for EAPA to assist customers facing financial difficulty across various socioeconomic levels during times of crisis or emergency. This may be due to widespread job or work hour losses resulting from emergencies such as the COVID-19 pandemic or a natural disaster. The NSW Energy Rebates separately provide ongoing energy bill support to low income households.

1.1.1 Proposed reforms



1. Define and clarify the policy intent of EAPA to reduce ambiguity. The proposed policy intent is that EAPA:
 - can be accessed by any NSW residential customer with an electricity and/or natural gas account
 - supports customers when their ability to afford their energy bills is impacted by a crisis or emergency
 - provides short term assistance to help customers pay the part of the energy bill they are not able to afford
 - can be used on any amount owing on the current energy bill for consumption charges
 - cannot be used for non-consumption charges or fees (for example, connection/ disconnection fees and direct debit dishonour fees)
 - operates in parallel to energy retailers' obligation under the National Energy Retail Law and Rule and exempt sellers' obligations under the Exempt Selling Guidelines to support customers experiencing difficulty paying their energy bills
 - cannot be used by energy retailers or exempt sellers as a precondition for customers to receive support under National Energy Retail Law and Rule obligations or the Exempt Selling Guidelines (as applicable).
2. Articulate EAPA's intent separately from the Code to provide a comprehensive understanding of the EAPA's policy and delivery to stakeholders. This should



include clear program principles, program logic and operational parameters. Additionally, communicate the policy intent on public-facing platforms.



3. Consider defining 'short term assistance' as up to 2 years from the crisis or emergency. This definition is independent of the yearly scheme limits which are detailed further below in [Section 3](#).

1.1.2 Consultation questions

Issues 1.1 consultation questions

Q1.1a. Should the proposed policy intent of EAPA specify the timeframes for crises or emergency? For example, that the crisis or emergency event occurred within a specific time period preceding the EAPA application?

Q1.1b. Do you find any aspects of the intended policy of EAPA to be unclear or ambiguous? If yes, please outline which specific elements you find to be lacking clarity or causing confusion?

1.2 Energy debt

EAPA is not currently intended for energy debt however is used for debt in some circumstances
While the Code does not mention the application of EAPA to debt, it emphasises retailers' responsibility to handle customer debts fairly in Section D1.1A. Additionally, the Code specifies EAPA is a crisis scheme and is not intended to offer ongoing income support.

System limitations make it difficult to analyse the number and size of debts accrued by EAPA customers and their prior engagement with their retailer.

EAPA is intended to provide short term supports to customers when their ability to afford their energy bills is impacted by a crisis or emergency

According to the Code, customers need an active energy account to access EAPA. This is to help ensure customers at risk of disconnection continue to access energy at their home. If a customer's energy account is closed, access to energy at their home is not at risk from disconnection for non-payment of the closed account. If there is any outstanding amount owed on a closed account, the customer is required to manage that debt which can potentially exacerbate a customer's financial hardship. The debt on a closed account is managed by the energy retailer in line with the Australian Consumer Law.

EAPA helps customers use their income to pay for other essential services however there is a gap for customers experiencing long term financial hardship

Some customers in long term hardship regularly access EAPA. However, EAPA is not intended to address a customer's ongoing financial hardship as it is a crisis program. Customers in long term hardship may also experience crises or emergencies and can receive EAPA. Customers in long term hardship who do not experience a discrete crisis or emergency cannot access EAPA.

Long term hardship and energy debt are expected to increase due to the current economic conditions resulting in more customers needing support. NSW currently does not have a dedicated support program for long term energy hardship.

Some customers use Buy Now Pay Later products and Payday Loans to manage their expenses, leading to compounding debt if repayments are missed. Using debt products to pay energy bills means energy retailers may be unaware of their customer's financial difficulties resulting in the potential underreporting of customers in hardship.

Some people receive daily living cost support from the state and federal governments, but the supports are not sufficient when a household is in a crisis or experiencing an emergency. In addition, some vulnerable households unable to afford their energy bill are not eligible for concession cards, for example due to citizenship status or asset requirements, which limits their access to government supports. However, EAPA is not means tested and is available to all NSW residents who are having financial difficulty in paying their energy bills due to crises or emergencies.

1.2.1 Proposed reforms



1. Deliver a trial debt program to support customers in debt. Gather data from the trial to inform longer-term reforms to help customers manage energy debt.



2. Work with the Australian Energy Regulator (AER), retailers and consumer groups to further explore how the NSW Government can better help customers with energy debt.

1.2.2 Consultation questions

Issues 1.2 consultation questions

Q1.2. Are there groups currently focused on addressing energy debt issues in NSW? If yes, which of these stakeholders should the NSW Government consider consulting with on this issue?

1.3 EAPA for embedded networks

Embedded network and LPG bottle customers are not eligible to receive EAPA

The NSW Legislative Assembly Committee on Law and Safety inquiry³ into embedded networks found that some people living in embedded networks such as those in social housing, retirement and nursing homes and residential parks are among the most vulnerable customers and have limited access to support and information. Compared to those directly connected to the grid, embedded network customers generally have lower consumer protections, may face high energy costs and have limited options to switch energy retailers. The absence of competition and minimal regulation exacerbate these challenges.

The Code prohibits customers living in an embedded network from accessing EAPA. This creates a significant gap in support available for these customers during a crisis or emergency compared to on-market customers. These equity issues were raised in the embedded network inquiry.

EAPA is also not available to assist with the costs of LPG bottles during a crisis or emergency. It is estimated that many LPG bottle customers are connected to the electricity grid and can receive EAPA to assist in the cost of electricity. More data is being gathered to understand this customer base and their energy needs and usage.

There is limited publicly available information on the exact number of embedded network operators, customers and locations across NSW resulting in limited visibility over this cohort.

1.3.1 Work underway or planned



1. Expand EAPA to embedded network customers in the following phases:

- Phase 1: Authorised retailers
- Phase 2: Exempt sellers
- Phase 3: Deemed exempt sellers.



2. The NSW Government is aware that deemed exempt sellers (small exempt sellers with under 10 residents), may have limited resources to automatically apply EAPA to a customer's bill. Alternative solutions to provide EAPA to customers in these communities are being considered. These include:

- Customers receive a digital token to be redeemed with the deemed exempt seller
- Customers are paid directly onto their bill for example via B-pay
- Customers receive direct payment into their bank account.

³ <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2873#tab-reportsandgovernmentresponses>

1.3.2 Consultation questions

Issues 1.3 consultation questions

Q1.3. What processes should the NSW Government consider to provide EAPA to customers living in deemed exempt seller communities?

2 Access and awareness

The EAPA review focussed on how high priority groups become aware of and access EAPA. High priority groups include:

- people impacted by natural disasters and pandemics
- Aboriginal and Torres Strait Islander communities
- culturally and linguistically diverse communities
- regional communities
- people with disability
- people impacted by domestic and family violence
- people living in embedded networks.

2.1 Communications

EAPA's customer-facing information is difficult for many to understand, and broad communication approaches increase ineligible applications

EAPA's customer-facing information such as eligibility criteria, application procedures and email correspondence can be difficult to comprehend for many people in NSW. This is because it requires university level education or higher to read and understand some of the content. Awareness and uptake of EAPA by high priority groups is often most effective through NGOs and financial counsellors. Broad based, untargeted communication approaches such as news media are less effective and generally lead to increased numbers of ineligible applications.

More targeted awareness for high priority groups including those impacted by natural disasters will improve uptake

The frequency and intensity of extreme events is increasingly impacting NSW residents living in certain areas. These households need to be aware of and have easy access to EAPA. More can be done to promote awareness of and access to EAPA amongst high priority groups impacted by natural disasters. This includes promoting EAPA through existing NSW Government disaster recovery mechanisms such as Service NSW mobile disaster recovery centres which are a common way disaster affected residents seek assistance.

The perception of NSW Government vouchers as an entitlement can lead to a misunderstanding of EAPA eligibility

Customer interpretation of the meaning of 'vouchers' has shifted over the time EAPA has operated. Using the term EAPA 'voucher' can now mislead customers about EAPA's intent and eligibility. The recent introduction and promotion of other voucher schemes like 'Dine and Discover', 'Stays Vouchers' and 'Active Kids' vouchers have created a public impression that NSW Government 'vouchers' tend to have minimal eligibility requirements and real-time parameter-based application processes. The eligibility criteria and application process for EAPA differs from other NSW Government voucher programs.

2.1.1 Work underway or planned



1. Improving publicly available information about EAPA to increase access and awareness for high priority groups. This includes:
 - updating communication material to be available in ‘easy English’ and translations
 - clearly communicating EAPA eligibility and the application process.



2. Develop a communication strategy for EAPA with a focus on targeting high priority groups. Additionally, consider the following promotional channels as part of the EAPA communication strategy to increase awareness for high priority groups:
 - local newspaper and digital media publications
 - local radio
 - community events (e.g. information sessions on consumer energy issues by the Energy and Water Ombudsman NSW)
 - NGOs affiliated with high priority groups
 - local councils and libraries
 - other NSW Government agencies.

2.1.2 Proposed reforms



1. Rename the program to make it easier to understand and communicate including moving away from the language of ‘vouchers’.

2.1.3 Consultation questions

Issues 2.1 consultation questions

Q2.1a. Are there other promotional channels that the NSW Government should consider as part of the EAPA communication strategy? If yes, please outline them.

Q2.1b. Within these promotional channels, are there any particular media outlets, events or organisations that you believe should be taken into account when formulating the EAPA communication strategy? If yes, please provide further information about these potential channels.

Q2.1c. Are there specific times during the year when communication about EAPA would help generate more awareness? If yes, when and for how long?

Q2.1d. How else can the NSW Government improve EAPA accessibility for customers impacted by natural disasters?

2.2 Application process

The EAPA application process can be improved to better meet the needs of high priority groups

The unique needs, challenges and preferences of high priority groups can be more effectively addressed during their interactions with EAPA. For example, people with disability may face challenges accessing EAPA due to hearing or vision impairments or other physical barriers. Additionally, internet access can be challenging for people living in remote areas of NSW due to limited or slow online connections and limited data. Digital inclusion is also lower for older Australians making it difficult to navigate online information about EAPA. This is compounded for culturally and linguistically diverse people who need to access information in their own language. NGO EAPA Providers can, and do, help overcome these issues for some customers who can access NGOs. However, long travel distances and anonymity concerns can create obstacles for some customers, particularly in regional areas or small communities within larger cities.

In addition, assessing EAPA applications can be time consuming. It is a mandatory requirement that the EAPA Provider sets up a conference call between the customer and the energy retailer to confirm the customer details, amount owing on the energy account and discuss support options such as hardship plans. EAPA Providers and customers can experience long wait times to connect to the energy retailers. For some customers the conference call might not be required as the information is already available and the available support options have been previously explored.

The eligibility assessments can deter some customers from continuing to access EAPA

Shame can be a significant barrier to accessing support for some people. This can result in some people being reluctant to provide information to the NSW Government and discouraging them from applying for EAPA. Additionally, some customers can be deterred from applying for EAPA due to concerns of sharing confidential information and a lack of trust of governments. It is important that EAPA Providers are trained to manage the varied histories, cultural practices and values of their customers.

There is an opportunity to enhance engagement with Aboriginal and Torres Strait Islander people to ensure better access to EAPA

Shared decision making is valued in Aboriginal and Torres Strait Islander communities and is promoted through formal policies and partnerships under the National Agreement on Closing the Gap. There is an opportunity to engage more effectively with organisations that work with and for Aboriginal and Torres Strait Islander communities to overcome awareness and access barriers. This requires Aboriginal and Torres Strait Islander representation in EAPA delivery and improvements.

Adjusting the application and assessment process to the varied situations of people impacted by domestic and family violence can ensure better access to EAPA

EAPA has a large representation of customers impacted by domestic and family violence. These customers are often concerned about reliving their trauma and sharing personal information when applying for support. Additionally, customers impacted by domestic and family violence may face challenges in providing their identity documents and responding to the EAPA assessment team promptly due to their personal circumstances. Some NGO EAPA Providers can help resolve some barrier issues (including minimising reliving trauma, access to technology and identification), offering holistic support and access to various programs including EAPA.

Limited visibility of the online application process can frustrate some customers

Customers who apply to the NSW Government EAPA Provider usually have their applications assessed within 2 to 4 weeks. During this time a customer cannot track the status of their application. The NSW Government EAPA Provider can only be contacted by limited channels such as email which requires a certain level of digital and written literacy and internet access. This can

cause frustration for some customers and, due to the uncertainty, a potential for customers to pay their bill using other means.

2.2.1 Work underway or planned



1. Update the application process to improve EAPA accessibility considering the needs of high priority groups. This includes:
 - establishing a customer driven identification process for customers impacted by domestic and family violence and provide sensitivity training to EAPA Providers who support this cohort. The new process should consider removing the need for people impacted by family and domestic violence to repeat traumatic information
 - increasing customer visibility over the status of their applications
 - improving the efficiency of the customer contact process by allowing more proactive interaction between customers and EAPA Providers including through SMS notification and response functions
 - have a decision tree for EAPA applications for eligibility with clear easy English and translations to different languages
 - provide translations of the online EAPA application in multiple languages.



2. Integrate EAPA into a customer centric software system to improve application tracking and EAPA evaluation. The system should minimise the need for customers to provide information more than once and reduce the number of applications a customer needs to submit.



3. Improve communication in the application to improve customer awareness that their energy retailer is informed of their application and that they cannot be disconnected while waiting for their application to be assessed.



4. Consider the following actions to improve the EAPA delivery and application for all high priority customers:
 - have an inbound process for application enquiries
 - enable applications to be re-opened and assessed if the customer establishes contact before 90 days
 - do not require customers to have a Service NSW account
 - make the application process device neutral
 - have a registered caller name/ID for outbound assessment calls from the NSW Government
 - have a process to direct customers to other additional NSW Government supports tailored to what that customer has identified as needing
 - include Aboriginal and Torres Strait Islander targeted roles in the EAPA team.

2.2.2 Proposed reforms



1. Introduce a tailored approach to assessments including case-by-case consideration of the need for a conference call with the customer's energy retailer.



2. Automate notifications from the NSW Government to the customer's energy retailer to signal that a customer's application is awaiting assessment.



3. Consider the following actions to improve the EAPA application process for customers impacted by domestic and family violence:



- provide tailored front line delivery training to NSW Government EAPA staff around domestic and family violence
- 2 way data sharing with energy retailers including obtaining consent from the customer to collect necessary information



- allow other NSW Government agencies that support people impacted by domestic and family violence to refer them to EAPA and accept the referral as evidence of the nature of the crisis
- consider a process to identify an EAPA applicant impacted by domestic and family violence and ensure that applicant is assigned to one agent through their application to EAPA
- channel customers to other relevant support, including energy retailers' hardship support.

2.2.3 Consultation questions

Issues 2.2 consultation questions

Q2.2a. Are there other improvements the NSW Government should consider in the proposed updated process to assist customers impacted by domestic and family violence? If yes, please outline them.

Q2.2b. What changes can be made to the application process to alleviate the concerns from customers who are reluctant to share personal information?

3 EAPA limits and delivery

3.1 Voucher value, application and fuel limits

Generally, the maximum allowable amount of financial assistance provided per EAPA application is high enough to help customers pay their energy bills. There is also an exemption process for reviewing applications on a case-by-case basis which can provide further support. This allows flexibility to address different crises and levels of support required.

However, the EAPA voucher values and limits can lead to inequitable outcome for some customers. EAPA vouchers are provided in fixed \$50 increments and applied directly to the customer's energy account. The \$50 voucher values can leave some customers with less financial support when their energy bill costs fall between \$50 increments.

The limit of 2 applications in a financial year is inflexible to the timing of a crisis and has inequitable impacts on customers billed monthly. Additionally, EAPA provides proportionally more support for gas bills. Customers with gas and electricity can receive a higher total value of support compared to customers with electricity only.

3.1.1 Proposed reforms



1. Change the program parameters to provide EAPA on a fuel neutral basis instead of the current split into different applications for electricity and gas. The fuel neutral approach will provide the same total potential value of support to all customers regardless of their mix of electricity and gas use. Customers can access EAPA multiple times throughout a year up to an annual EAPA value cap. The revised program parameters should:
 - set an annual EAPA value cap and remove the yearly application number limits. Customers will be assessed each time they apply for EAPA. For example, a customer could submit 3 applications and when assessed as eligible at each application receive EAPA 3 times for electricity up to \$600 in total within a year.
 - remove individual \$50 voucher increments and apply exact dollar amounts as deemed suitable through the EAPA assessment. For example, a customer could receive \$237 worth of EAPA instead of \$200.

EAPA delivery method	Current parameters	Proposed parameters
Voucher value	\$50	No voucher – value provided based on assessment of customer's needs
Maximum value per transaction	\$300*	Yet to be determined maximum yearly value
Fuel type	\$300* electricity \$300* gas	Value yet to be determined Maximum yearly value
Transaction limit	2 in a financial year for each energy type	As many as required up to total maximum yearly value

- *2023-24 financial year the current EAPA values for each fuel type is \$500
- The NSW Government has set the EAPA value for 2023-2024. Any changes to the program parameters will not come into effect until after July 2024
- The NSW Government will conduct further analysis to determine the fuel neutral annual EAPA value cap.

3.2 Delivery model

The current delivery model has broadened accessibility but there is an opportunity to further improve the customer experience. EAPA is delivered through EAPA Providers who assess each customer's application. EAPA Providers are volunteer NGO's (NGO EAPA Providers) who provide in-person and phone assessments, and an internal NSW Government assessment team (NSW Government EAPA Provider) who conduct phone assessments for customers who apply online.

Expanding EAPA to online and phone channels in 2020 removed some barriers of the original in-person only NGO EAPA Provider delivery model. The expanded delivery model has increased access to EAPA, allowed flexibility in NGO operations and provided flexibility to adapt to changing customer needs.

The hybrid delivery model has made it easier for customers to access EAPA particularly in underserved areas. However, there are opportunities to improve the delivery for some customers who may find the online process challenging or have limited digital ability and access to the internet. NGO EAPA Providers undertaking phone assessments or in-person visits help fill this gap for customers who do not have an email address, smartphone, access to internet, or money or ability to travel to a local library or a post office for internet. NGO EAPA Providers also fill an access gap for people who are receiving assistance for other issues of which EAPA is one component.

EAPA NGO Provider locations mostly align with the population areas of high priority groups. However, there was lower accessibility to NGO Providers across the far west and far south of NSW. This means some remote and regional communities in these areas can have greater difficulty accessing EAPA through an NGO Provider.

To provide consistent and reliable access to EAPA, NGO EAPA Providers are required to be available to assess eligible customers for a minimum of 15 hours per week in metropolitan areas and a minimum of 10 hours a week in regional areas.

Some NGO EAPA Providers have limited capacity to manage EAPA assessments as well as EAPA compliance, administration and documenting ineligible EAPA applications. This can lead to differing customer outcomes. Minimum NGO access hours requirements and resource constraints may also lead to some NGOs ceasing to deliver EAPA in the future, impacting the availability of EAPA for some customers. There is work underway and proposed reforms (see Section 2.1, 2.2 and 3.1) to adjust minimum access hours, reduce the time for EAPA assessments and improve customer outcomes.

As part of the review process, other EAPA delivery options were also considered. This included an assisted application channel (see proposed reform 4.2.2) and NSW Government directly funding NGOs to deliver EAPA. Direct funding to NGOs could assist some NGOs to better manage capacity constraints. However, these benefits are outweighed by other considerations:

- increased overall program cost
- increased program risk and compliance requirements for NGOs due to funding arrangements, negating potential resource benefits
- funding might not increase effectiveness where time is the constraint and engaging additional staff is not an option.

3.2.1 Work underway or planned



1. Increase the number of NGOs in regional areas that support people with disabilities to access EAPA



2. Increase the number of NGOs in regional areas that support Aboriginal and Torres Strait Islander people to access EAPA



3. Review NGO minimum access hours on a case-by-case basis considering NGO location, number of potential customers and affiliation with communities in the area.

3.2.2 Proposed reforms



1. Add a new 'assisted application' channel for customers to apply for EAPA (see Figure 1). This will result in 3 application methods for customers. All channels to be managed in a new customer centric central NSW Government system.



- a. Non-online channel: NGO EAPA Providers in-person or phone applications and assessments. Customers can go to an NGO EAPA Provider and book an EAPA assessment. The NGO EAPA Provider will assess the customer's eligibility and input the information in a new NSW Government system, assisting the assessment process. The NGO EAPA Provider approves and submits the value of bill support to provide to the customer.
- b. Assisted channel: NGO EAPA Providers and other organisations assist in-person applications. This is a new delivery method. Customers can go to an NGO EAPA Provider or other approved organisation who can assist the customer in that moment to apply for EAPA. The application will be inputted into the new NSW Government system. The NSW Government EAPA Provider will then book in an appointment to assess the customer's eligibility. The NSW Government EAPA Provider approves and submits the value of bill support to provide to the customer.
- c. Online channel: NSW Government EAPA Provider online applications. This is part of the current delivery method. Customers can apply online for EAPA. The NSW Government EAPA Provider books an appointment to assess the customer's eligibility. The NSW Government EAPA Provider approves and submits the value of bill support to provide to the customer.

The new assisted applications delivery channel will:

- reduce EAPA assessment workload for NGOs who opt-in to the assisted channel
- allow NGOs to offer EAPA assistance in parallel with their other supports
- allow NGOs and other organisations to support customers applying for EAPA by assisting them to set up an assessment with the NSW Government EAPA Provider through the one EAPA system
- improve reporting on all applications
- improve the consistency in EAPA assessments and outcomes for customers
- allow other organisations to assist customers with EAPA applications such as local councils, women's shelters and other NSW Government agencies that have vulnerable customer support programs.

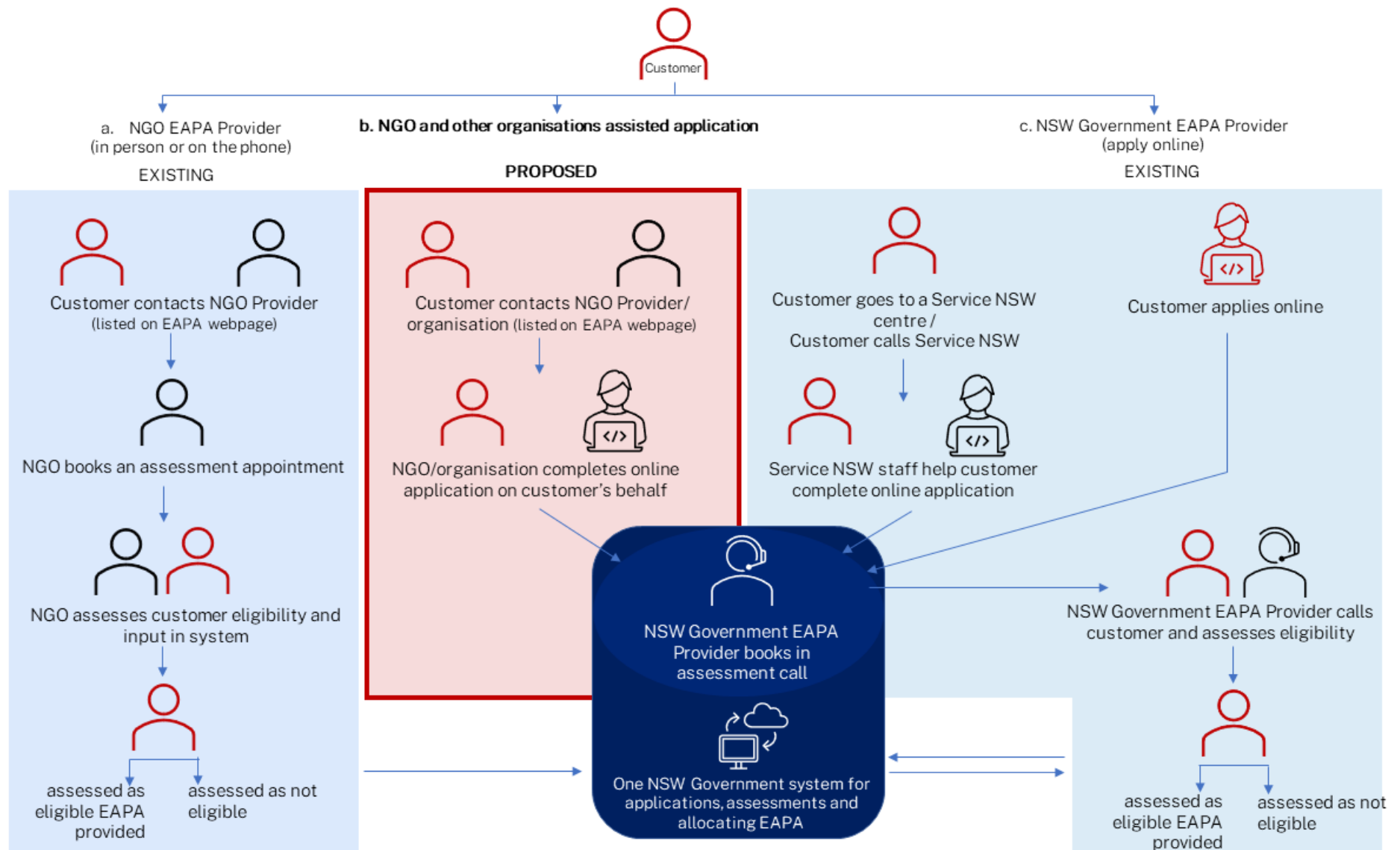


Figure 1: Current and proposed delivery channels for customers to apply and access EAPA.

3.2.3 Consultation questions

Issues 3.2 consultation questions:

Q3.2. What organisations, other than traditional NGOs, could support EAPA delivery as assisted application providers?

Appendix A: EAPA Review Terms of Reference

Context

The NSW Government's Energy Accounts Payment Assistance (EAPA) Scheme helps NSW households experiencing financial hardship and difficulty paying their electricity or natural gas bills due to a sudden short-term financial crisis or emergency to stay connected to essential energy services. The EAPA Scheme (Scheme) is delivered by over 200 approved non-government organisations (NGOs) and a NSW Government EAPA Assessment Team, known as EAPA Providers. EAPA Providers assess customers and send vouchers to eligible customers' energy retailer to help pay their bills.

Objective

In 2021, the Office of Energy and Climate Change, energy retailers, and consumer groups identified a need to review the policy intent of the EAPA Scheme to ensure it remains fit for purpose and continues to deliver intended customer outcomes.

The review will examine if the Scheme helps customers stay connected to essential energy services and contributes to the NSW Government's objective of providing affordable, reliable and secure energy.

The review will recommend potential reform options to improve customer outcomes and ensure EAPA continues to provide targeted support for customers in financial crisis.

Scope

The review will consider:

- The intent and outcomes of the Scheme, including eligibility criteria.
- Mechanisms to support customers in long-term financial hardship and debt.
- Awareness and ease of access to the Scheme by customers, including but not limited to:
 - People impacted by natural disasters and pandemics
 - Aboriginal and Torres Strait Islander communities
 - Culturally and linguistically diverse (CALD) communities
 - People with a disability
 - Regional communities
 - People impacted by domestic violence
 - Embedded network customers
- How effectively the current EAPA delivery model achieves the target outcomes of the Scheme.
- Improvements to the EAPA delivery model and alternative delivery options, including:
 - Improvements to, and simplifying, the digital and non-digital customer journeys.
 - Potential for integration into the OneForm for Energy Rebates delivery model.

Appendix B: EAPA review consultation paper questions

#	Issues paper question
1.1a	Should the proposed policy intent of EAPA specify the timeframes for crises or emergency? For example, that the crisis or emergency event occurred within a specific time period preceding the EAPA application?
1.1b	Do you find any aspects of the intended policy of EAPA to be unclear or ambiguous? If yes, please outline which specific elements you find to be lacking clarity or causing confusion?
1.2	Are there groups currently focused on addressing energy debt issues in NSW? If yes, which of these stakeholders should the NSW Government consider consulting with on this issue?
1.3.	What processes should the NSW Government consider to provide EAPA to customers living in deemed exempt seller communities?
2.1a	Are there other promotional channels that the NSW Government should consider as part of the EAPA communication strategy? If yes, please outline them.
2.1b	Within these promotional channels, are there any particular media outlets, events or organisations that you believe should be taken into account when formulating the EAPA communication strategy? If yes, please provide further information about these potential channels.
2.1c	Are there specific times during the year when communication about EAPA would help generate more awareness? If yes, when and for how long?
2.1d	How else can the NSW Government improve EAPA accessibility for customers impacted by natural disasters?
2.2a	Are there other improvements the NSW Government should consider in the proposed updated process to assist customers impacted by domestic and family violence? If yes, please outline them.
2.2b	What changes can be made to the application process to alleviate the concerns from customers who are reluctant to share personal information?
3.2	What organisations, other than traditional NGOs, could support EAPA delivery as assisted application providers?

Appendix C: Glossary

Term	Description
AER	Australian Energy Regulator
AER Customer hardship policy guidelines (AER Hardship Guidelines)	AER Hardship Guidelines creates binding, enforceable obligations on retailers to strengthen protections for customers experiencing payment difficulties due to hardship
NERL	National Energy Retail Law
NERR	National Energy Retail Rules
Application	An application for EAPA
EAPA	Energy Accounts Payment Assistance scheme
EAPA Delivery Guidelines (the Guideline)	The EAPA Delivery Guidelines (the Guidelines) set out the rules and procedures for EAPA Providers to distribute EAPA vouchers to customers
EAPA Provider	An EAPA Provider is an organisation/site approved by the OECC to assess customers, issue vouchers and be registered in Digital EAPA. This includes Non-Government Organisations and the NSW Government EAPA Provider
EWON	Energy and Water Ombudsman NSW
National Agreement on Closing the Gap (the National Agreement)	The National Agreement aims to enable Aboriginal and Torres Strait Islander people and governments to work together to overcome the inequality experienced by Aboriginal and Torres Strait Islander people and achieve life outcomes equal to all Australians
NGO	Non-Government Organisation
NSW	New South Wales
NSW Social Programs for Energy Code (the Code)	The NSW Social Programs for Energy Code (the Code) sets out how retailers must assist in delivering the NSW Government's energy assistance measures and how to claim reimbursement from the NSW Government for paying energy rebates and energy account payment assistance (EAPA) vouchers
Retailer	A retailer is an energy provider that holds a retail authorisation issued by the Australian Energy Regulator (AER) to sell energy in NSW
Embedded Network	Privately owned energy network, usually connected to the distribution network by one meter
Exempt Seller	An owner or operator of an embedded network who holds a valid exemption from the AER and does not need to become an authorised retailer to sell energy

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