



**Bright
Spark
Power**

CUSTOMER HARDSHIP POLICY

1 January 2020



Our obligations

Bright Spark Power has systems in place to enable us to meet our obligations with respect to customer hardship in:

- the Retail Law, and
- the Retail Rules, and
- the AER Customer Hardship Policy Guideline, and
- this Hardship Policy.

Bright Spark Power has adopted the AER's Sustainable Payment Plans Framework as a good practice framework for assessing customers' capacity to pay.

Introduction

This policy applies to all residential customers living in NSW and QLD who find it hard to pay their energy bills due to hardship. You might experience hardship because of factors like:

- death in the family.
- household illness.
- family violence.
- Unemployment.
- reduced income.

This policy explains:

- what we will do to help you manage your energy bills,
- how we consider your circumstances and needs,
- your rights as a customer in our hardship program.

You can ask a support person to contact us such as:

- a financial counsellor,
- someone who helps you manage your energy bills.

We need your permission to talk to your support person.



About Bright Spark Power's hardship program

Energy supplies provide essential services in our society, and at Bright Spark Power we recognise that avoiding disconnection from these services - where practically possible - is both necessary and the right thing to do by our customers.

With this in mind, Bright Spark Power understands that sometimes customers who want to pay their energy bills can temporarily be in a position that they are unable to do so, and Bright Spark Power will work with customers on a case by case basis to assist where we are able. Financial hardship can occur to anyone at any time and, at Bright Spark Power, we will work with our customers to continue supply of essential services in such circumstances. As an energy retailer, Bright Spark Power will:

1. In dealing with a customer who is experiencing payment difficulties due to hardship, take into account all of the circumstances of the customer of which we are aware and, having regard to those circumstances, act fair and reasonably, and
2. In a timely manner when it is relevant to do so, including on being contacted by a customer, give a customer clear information about the assistance available to the customer under the Bright Spark Power customer hardship policy, and
3. As soon as practicable, provide a customer who is entitled to receive assistance under the customer hardship policy with that assistance.

What we will do to help you

We will assess your application for hardship assistance by 5 business days from when we receive your application.

We will let you know if you are accepted into our hardship program within 5 business days from receipt of the application.

We will tell you about our hardship program if:

- you tell us you are having trouble paying your bill
- you are referred to our program by a financial counsellor or other community worker
- we are concerned that you may be experiencing financial hardship.

We will recommend you speak to a staff member to help you join our hardship program if you have:

- a history of late payments
- broken payment plans
- requested payment extensions
- received a disconnection warning notice
- been disconnected for non-payment.

We can also support you to join our hardship program if you tell us:

- you are eligible for a relief grant or other emergency assistance
- you have personal circumstances where hardship support may help. For example, death in the family or job loss.



You may have trouble paying your bills for different reasons. Please contact us so we can discuss your individual situation.

Our staff are specially trained to help you with hardship.

Staff will:

- ask you a few questions about your circumstances
- work out if you can join the hardship program.

In most cases we will be able to assess your hardship application on the spot and let you know if you are eligible to join the program. Sometimes we might need additional time to consider your circumstances. In this case, we will provide you a response within 5 business days from receipt of your application.

If you are accepted into the hardship program, we will:

- send you a copy of the financial hardship policy via your preferred contact method
- tell you if you are on the right energy plan or if there is a better plan for you
- tell you about government concessions, relief schemes or energy rebates you may be able to receive
- give you ideas about how to reduce your energy use
- talk to you about a payment amount that suits your circumstances.

We can send you a free copy of our hardship policy.

Access and eligibility for financial hardship program

How to access the program.

You can apply for the financial hardship program at any time by contacting us on 02 8002 1052 or sending an email to fhp@brightsparkpower.com.au

Our assessment

The criteria we look at when trying to understand your eligibility for accessing the hardship program involve us looking at your individual circumstances. The things we will consider are whether:

- you have provided us your current contact information and specified your preferred contact method
- you have experienced a reduction in income due to unemployment or a change in your working conditions
- you are suffering a long-term illness or injury leading to inability to generate income
- you are a victim of domestic violence
- you are a victim of a natural disaster
- any other relevant information you choose to provide us
- you've broken any payment plans in the last 12 months.

In order to qualify for the hardship program, we will:

- verify you have an active residential service with us



- verify that you have current outstanding debts that you are unable to pay by the next billing cycle
- ask you about what you can afford to pay towards your account and calculate a payment plan that will meet your projected consumption for the next 12 months, as well as existing debt
- discuss the payment plan with you to confirm you can afford to meet the payment plan arrangement
- provide you with clear options if you are unable to meet the payment plan arrangement

If we deem that you are ineligible for our hardship program, we will provide a reason for the ineligibility within 5 business days of receiving your application.

We will always discuss your personal situation with you to ensure you are offered the highest level of support available. We may ask you to provide supporting evidence of financial hardship to verify your circumstances.

Authorised support person or financial counsellor

If you've given us permission to talk to a support person or financial counsellor, we will engage with them as we would with you and keep you fully across all communications and interactions

If you wish to nominate a support person, simply give us your permission by calling or emailing us. If you want us to stop using a nominated support person or financial counsellor, simply let us know by calling or emailing us.

We will work with you

If you have joined our hardship program, we will not:

- charge late payment fees
- require a security deposit
- make changes to your plan without your agreement.

For example, we will not put you on a shortened collection cycle unless you agree first.

Payment options

What we will do

There are different payment options available to hardship customers, including:

- Payment plans
- Direct debit
- Centrepay.

When you are in our hardship program, we will offer you flexible payment options to suit your individual situation. To make your payment plan, we will consider:

- how much you can pay
- how much you owe
- how much energy we expect you will use in the next 12 months.

This will help us figure out a payment plan that is right for you.



We will offer a payment plan to suit your situation. This will include payments to cover:

- what you owe
- an amount to cover your energy use.

Once we agree to a payment plan, we will send you information including:

- who you can contact for more help,
- how long the payment plan will go for,
- the amount you will pay each time,
- how many payments you need to make,
- when you need to make your payments (this is also called the frequency of the payments),
- how we worked out your payments.

You can choose to use Centrepay if you are eligible. Centrepay is a free service you can use to help pay your bills. Centrepay can automatically take an amount of money from your Centrelink payments to go towards energy bills and expenses.

We will see if another energy plan may be better for you. If you agree, we can transfer you to a better energy plan for free.

Depending on the rules in our hardship policy, we may be able to remove some debt, fees or charges you owe.

We will monitor your payment plan progress and update you via your preferred contact method periodically (based on your payment plan frequency i.e. weekly or fortnightly) to keep you up to date on your progress (payment history and remaining debt). If we notice a payment has been missed, we will contact you within 2 business days if we do not hear from you first (Refer to Missed Payment for more detail). A financial hardship specialist from our team will contact you monthly to check-in. If you have any item related to the financial hardship program or your circumstances and wish to speak with a financial hardship specialist from our team, you can contact us anytime via the provided contact email or during business hours by phone.

Periodic Check-In

A specialist member of our team, trained in the financial hardship program, will be your contact point throughout your time in the financial hardship program. We will contact you monthly via your preferred contact method to provide you an update on your progress in the program and your specific payment plan progress. We will also confirm if your situation has not changed. If there are any changes to your situation that affect your ability to meet your agreed payment plan, we will re-assess your situation and work with you to see if we need to change your payment plan. If your circumstances change at any time, you can contact us to initiate an assessment of your situation.

Missed payments

If you miss a payment, we will contact you to see if you need help.

We will contact you by phone. If we are unable to reach you by phone, we will send you an email and an SMS on the same day, asking that you contact us as soon as possible (either by return email or calling us).



We will continue to attempt to contact you every 2 business days by phone until 10 full business days have passed. At which point, if we have been unable to contact you and the payment is still outstanding, we will consider this a breach of your payment plan. In the instance of a breach, we will assess whether to change you back to normal billing practices (based on your current plan). If we decide to do this, we will advise you via your preferred contact method.

What you must do

Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.

Tell us if your contact details change.

We may stop helping you if you:

- stop making payments under your plan
- do not tell us when your contact details change.

If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:

- we do not have to offer you another plan
- we might disconnect your energy.

Other help and support

Our programs and services

As a hardship customer, you can access a range of programs and services to help you. Our team can assist you in using our in-home energy audit tool to understand and manage your energy usage and our team will provide a report on energy saving tips and suggestions you may be able to implement.

What we will do

We will consider your individual situation to find the right programs (e.g. concession programs) or services that meet your needs.

We can help you save energy

Using less energy can save you money.

What we will do

When you join our hardship program, we can give you tips to use less energy. This can be different depending on the state or territory you live in.

We want to check you have the right energy plan

What we will do

When you join our hardship program, we will talk to you about your energy use and whether you are on the right plan.



If we think there is a better energy plan for you, we will:

- explain why the plan is better
- ask if you'd like to transfer to the new plan for free.

We will only talk to you about energy plans we can offer.

Other support to help you pay your energy bill

Depending on the state or territory you live in, there is other support to help you pay your energy bills.

What we will do

We will tell you about other ways you can get help to pay your energy bill, such as:

- government relief schemes
- energy rebates
- concession programs
- financial counselling services.

What we need you to do

If you find out you are eligible for these programs, let us know as soon as possible so we can help you.

Further information on the assistance programs for each state can be found by visiting the websites below:

- New South Wales: www.resourcesandenergy.nsw.gov.au
- Queensland: www.qld.gov.au

Complaints

We are committed to efficient, fair and courteous resolution of hardship customer complaints and disputes at all times and aim to resolve complaints at first point of contact.

If you have a complaint about our hardship policy, our team members are on hand to talk to you, and you can also ask to speak with a more senior person. Just ask.

Submitting a complaint

To submit a complaint to Bright Spark Power, you can either give our team a call or through our web-portal (see request forms).

Your complaint will be handled by a senior team member and we will contact you within 2 business days, either via phone or email as per your preferred contact method. We will aim to resolve your complaint within 5 business days from the date it is submitted.

And if you are not satisfied with our handling of your complaint, you can contact your relevant energy ombudsman.

For customers in New South Whales	Energy & Water Ombudsman NSW 1800 246 545 www.ewon.com.au
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For customers in Queensland

Energy & Water Ombudsman Queensland
1800 662 837

www.ewoq.com.au

Training

All Bright Spark Power employees are required to complete a comprehensive training course to understand this mandatory policy.

Staff training includes:

- Understanding causes of financial difficulty
- Engaging in empathetic and non-judgemental conversation
- How to answer customer queries about the Bright Spark Power financial hardship policy and our hardship program
- How to identify customers experiencing payment difficulties due to hardship
- How to assist customers experiencing payment difficulties due to hardship
- The Bright Spark Power core values

Training Review and Refresh

Training related to the Bright Spark Power financial hardship policy is regularly reviewed in-line with other Bright Spark Power policy reviews. Ad-hoc reviews will be completed if required by any external event, such as a regulatory change.

All staff are required to refresh their training on this policy each year, or within 1 month of any policy update.

Privacy

As a Bright Spark Power customer, we manage your personal and credit information under the requirements laid out in the Privacy Act 1988 (Cth). To find out more about how Bright Spark Power collects, uses, holds and discloses your personal and credit information, please visit www.brightsparkpower.com.au/privacy-policy.

Hardship Policy Accessibility

This policy will be made publicly available on the Bright Spark Power website (with a direct link from the home page) here: www.brightsparkpower.com.au/financial-hardship

The policy will be made available in PDF format for customers to download and/or print.

There will be a link to the financial hardship policy on customer invoices.

Where a customer advises us (via phone or email) that they do not have easy access to the internet, we will offer to mail a hard copy of the hardship policy to the customer, as well as all other correspondence related to the hardship program that would otherwise be sent via email (including, but not limited to, status updates, reminders periodic check-ins).



During any interaction with a customer (initiated by either the customer or Bright Spark Power), if the customer asks about or if Bright Spark Power staff determine, we will make the customer aware of the financial hardship policy on the website as well as offering to send a link/copy via customers preferred contact method.

Customers who are deaf, hard of hearing and/or have a speech impairment to make and receive phone calls.

For customers requiring additional support with communications Bright Spark Power works with the National Relay Service:

- Voice Relay number 1300 555 727
- TTY number 133 677
- SMS relay number 0423 677 767

If a customer struggles with literacy and/or numeracy, we will communicate with you in a way that takes into account your needs and provides all the information you need in the easiest way possible for you. We will make an easy-English version of this policy, available on our website or via your preferred contact method on customer request.

If customers are in remote or indigenous communities, where appropriate, we will work with indigenous elders and community leaders to ensure that the same level of access to the hardship program is available as all other customers.

Customers with linguistically diverse backgrounds can access an interpreter service, at no cost to you, on 131 450. We will work with the customer, community organisations and interpreters to ensure the same level of access to the hardship program is available to customers from non-English-speaking households, as all other customers.