



ICRC Retail Electricity Prices Investigation 2024-27

ACTCOSS Submission

actcoss@actcoss.org.au

02 6202 7200

actcoss.org.au

ABN 81 818 839 988



About ACTCOSS

ACTCOSS acknowledges Canberra has been built on the land of the Ngunnawal people and recognises any other people with connection to the lands of the ACT and region. We pay respects to their Elders past and present and recognise the strength and resilience of Aboriginal and Torres Strait Islander people. We celebrate Aboriginal and Torres Strait Islander cultures and ongoing contributions to the community sector and society.

The ACT Council of Social Service Inc. (ACTCOSS) advocates for social justice in the ACT and represents not-for-profit community organisations.

ACTCOSS is a member of the nationwide COSS Network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS's vision is for Canberra to be a just, safe and sustainable community in which everyone has the opportunity for self-determination and a fair share of resources and services.

The membership of the Council includes the majority of community based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

Contact Details

Phone	02 6202 7200
Address	Weston Community Hub, 1/6 Gritten St, Weston ACT 2611
Email	actcoss@actcoss.org.au
Web	actcoss.org.au
CEO	Dr Devin Bowles
Policy Officer	Lyndsay Bassett

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Acronyms

ACT	Australian Capital Territory
ACTCOSS	ACT Council of Social Service Inc.
ACCC	Australian Competition and Consumer Commission
ACCO	Aboriginal Community Controlled Organisation
AEMC	Australian Energy Market Commission
AER	Australian Energy Regulator
BNPL	Buy Now Pay Later
COTA	Council on the Aging
ECA	Energy Consumers Australia
EV	Electric vehicles
ICRC	Independent Competition and Regulatory Commission



Summary

The ACT Council of Social Service (ACTCOSS) welcomes the opportunity to make a submission in response to the Independent Competition and Regulatory Commission (ICRC) Retail Electricity Price Investigation 2024-27 Issues Paper. ACTCOSS seeks to ensure that the energy system in the Australian Capital Territory (ACT) is inclusive as well as sustainable and provides optimal outcomes for all people, communities, and the environment. ACTCOSS believes there are improvements that could be made to the method used by the ICRC to determine regulatory settings for pricing of supply of electricity.

Based on meetings with the community sector and the ICRC, we provide some background on how low income and vulnerable consumers engage with the energy market. Generally low income and vulnerable people who are seeking support from ACTCOSS' member organisations, like Care Financial Counselling (Care) and the Council on the Ageing (COTA) ACT, find the energy market complex and struggle with cost of living pressures. First Nations clients report similar barriers to engagement in the electricity market, as well as additional constraints.

ACTCOSS would like to highlight how decreases in the spending power of low income households due to the current cost of living crisis impact on their capacity to cope with increases in the cost of electricity. To improve outcomes for consumers and assist in encouraging competition it would be more consistent if the standing offer applied to all retailers operating in the ACT, rather than just ActewAGL. The ICRC should also consider how to ensure consumers are better off in the long run and whether a requirement for continual engagement in the market to avoid the standing offer should be considered the optimal outcome for consumers.

The calculation of the averaging period should be designed to maximise reduced costs to consumers and the ICRC should seek to ensure the way all components of retail electricity costs are calculated is fit for purpose and adaptable to the changing market environment caused by the energy transition.

Recommendations

1. The method for determining standing offer prices for the supply of electricity to small customers should take into account the current cost of living crisis as well as the unpredictable market environment caused by the ACT's energy transition.
2. Any awareness or communication campaigns about electricity plans, concessions and support should be specifically designed to reach the target audience e.g. First Nations communities, those on low incomes or government support payments, older citizens, renters, or CALD communities.
3. Encourage competition in the ACT electricity market, including through greater transparency.
4. The standing offer price should apply to all retailers operating in the ACT.
5. The calculation of retail electricity costs should seek to maximise reduced costs to consumers while providing price stability.
6. The ICRC should ensure the approach used to calculate the components of retail electricity costs are appropriate for the anticipated energy system of 2027.



Introduction

Recommendation

1. The method for determining standing offer prices for the supply of electricity to small customers should take into account the current cost of living crisis as well as the unpredictable market environment caused by the ACT's energy transition.

ACTCOSS welcomes the opportunity to make a submission in response to the ICRC's Retail Electricity Price Investigation 2024-27 Issues Paper. ACTCOSS advocates for social justice in the ACT and represents not-for-profit community organisations. In preparing this submission, ACTCOSS has consulted with Care Financial Counselling (Care) and the Council on the Ageing (COTA) ACT.

ACTCOSS seeks to ensure that the energy system in the ACT is inclusive as well as sustainable and provides optimal outcomes for all people, communities, and the environment. ACTCOSS and our members seek to support ACT low income and vulnerable households and community sector organisations to participate in decision making on energy issues to achieve better consumer outcomes in terms of affordable, reliable, safe, and clean energy as an essential service.

ACTCOSS believes there are improvements that could be made to the method used by the ICRC to determine regulatory settings for pricing of supply of electricity. We are particularly interested in ensuring the methodology for determining standing offer prices does not unduly disadvantage those customers who do not or cannot actively engage with the energy market.

Based on a meeting with Care and the ICRC, we have provided some background on how low income and vulnerable consumers engage with the energy market. We have also provided responses to some of the questions posed in the Issues Paper, that are pertinent to ACTCOSS' members and people experiencing poverty. Our responses to these questions are informed by analysis of the current cost of living crisis and experiences of hardship in the ACT, conducted to inform our [2023 Cost of Living Report](#).

Our analysis shows that between December 2017 and December 2022, Canberra has experienced significant increases in prices for key goods and services, including electricity (25%), which rose at a rate above the overall Consumer Price Index (CPI).¹ While in the last year (December 2021 to December 2022), Canberra's electricity prices have risen by less than the national average (7.7% compared to 11.7% nationally), over the five years to December 2022, price increases in Canberra have been higher than the national average for electricity (25% compared to 2%).² Price increases for essential goods such as electricity have a disproportionate impact on low income households in the ACT.

¹ ACTCOSS, [2023 ACT Cost of Living Report](#), ACTCOSS, 2023, p.10-11.

² ACTCOSS, [2023 ACT Cost of Living Report](#), p.12.



In addition, the ACT Government has also recently announced its intended pathway to phase out fossil fuel gas, electrify the city and reach net zero emissions by 2045.³ While this is necessary to tackle climate change, the energy transition will bring with it a range of extra complexities to the energy market (both anticipated and unanticipated). Therefore, when determining the standing offer prices for the supply of electricity to small customers, the ICRC must consider the context of the current cost of living crisis, as well as the changing and unstable market environment for electricity.

Vulnerable consumers in the electricity market

Through the ACT Energy Consumer Policy Consortium, ACTCOSS became aware that some community sector organisations were interested in engaging with the ICRC's investigation but were apprehensive about the technical nature of the Issues Paper and did not have capacity to produce a detailed submission. ACTCOSS arranged for Care and COTA to provide verbal feedback to the ICRC on 22 and 23 August 2023 and a thematic summary of the discussion is provided below.

While important to note not all low income clients are homogenous, generally people seeking support from ACTCOSS' member organisations like Care and COTA find the energy market complex. Indeed, this is true of most energy consumers in the ACT. Clients often demonstrate a lack of trust in retailers with there being a range of ways that retailers could better engage with their customers.

When clients are seeking support, they are generally primarily motivated to resolve their issues with debt and cost of living. However, once stable, many clients do express a desire to engage with broader societal and environmental concerns.

When aiding clients, our members find that electricity bills vary in content and complexity between retailers and clients often don't understand the difference in specific terminology such as 'plans' and 'tariffs'. However, it was noted that the recent introduction of the Australian Energy Regulator (AER) [Better Bills Guideline](#) is anticipated to improve consistency of bills across retailers. When directed to the Federal Government's [Energy Made Easy](#) website, many clients have not previously heard about it and find it complex to navigate.

For those experiencing vulnerability, hardship, or cost of living concerns, they may find it difficult to afford food, bills and energy. Our members state that generally for people on low incomes in Canberra, energy costs are always a factor. Consumers in this position will often reduce energy consumption to reduce their bill. They may be paying an excessive proportion of their income on energy bills or be unable to pay their bills and fall into debt. They may be going without adequate heating or cooling

³ ACT Government, [Developing ACT's Integrated Energy Plan - Position Paper](#), YourSay website, 2023.



to reduce energy costs or be cutting out other essentials like food and medication.⁴ Behaviours such as never using the heater or cutting down on medications can have flow on effects on health and wellbeing.

Due to managing multiple stressors, clients often perceive that searching for a better electricity plan involves significant effort and will not result in a price reduction. Clients are also often unaware of what government support and concessions are available to them and will borrow from friends and family, use credit cards or BNPL services in order to pay their bill on time.

It is also often the case that even when customers are engaged with their retailer's hardship program that they don't have any concessions applied. Retailer behaviour and policies are often inconsistent (within and between retailers) and customers who express specific concerns or vulnerabilities are not necessarily given adequate or appropriate follow up support.

First Nations people's experiences

Recommendation

2. Any awareness or communication campaigns about electricity plans, concessions and support should be specifically designed to reach the target audience e.g. First Nations communities, those on low incomes or government support payments, older citizens, renters, or CALD communities.

Care's First Nations Engagement Officer also provided feedback on Aboriginal and Torres Strait Islander experiences of the electricity market. While these experiences may not be representative of all Aboriginal and Torres Strait Islander people in Canberra, they provide valuable insight into how First Nations people engage with the electricity market and electricity retailers and how this might be similar or different from others in the wider ACT community.

First Nations people generally find out about electricity plans through word of mouth from other people in the Aboriginal and Torres Strait Islander community or family members who have the relevant knowledge. The likely most important considerations when choosing a plan include price, customer service, ease of communication and flexibility. However, many of Care's First Nations clients do not report feeling confident that they are on the best plan for their circumstances. They may not be on a plan at all and do not feel as though they have the time or resources to negotiate or undertake analysis to choose the best plan.

⁴ S Carley and DM Konisky, 'The justice and equity implications of the clean energy transition', *Nature Energy*, 2020, 5:569-577, doi:10.1038/s41560-020-0641-6, p.572; E Liu, B Judd, and M Santamouris, 'Challenges in transitioning to low carbon living for lower income households in Australia', *Advances in Building Energy Research*, 2019, 13(1):49-64, doi:10.1080/17512549.2017.1354780, p.57; L Daniel, T Moore, E Baker, A Beer, N Willand, R Horne, and C Hamilton, [Warm, cool and energy affordable housing policy solutions for low-income renters](#), Australian Housing and Urban Research Institute (AHURI), 2020, p.36.



First Nations clients often do not find it easy to get information about their electricity plan and other options that might be available to them. They find it to be a difficult process that often involves speaking to multiple people or being offered plans without being given the time to understand or review the plan to ensure it is suitable.

There is also a perception that retailers use customer interactions as marketing opportunities. Distrust in retailers has also increased with the increased rate of financial scams in this area. Clients report receiving multiple phone calls a week from scammers regarding cheaper electricity options. However, the experience of scam callers is likely not exclusive to those in the Aboriginal and Torres Strait Islander community.

First Nations clients' understanding of the available choice of electricity providers is similar to that reported by older citizens to COTA. Often, they are not aware of the range of choice of retailers available and tend to choose ActewAGL because it is known to them. Lots of Aboriginal and Torres Strait Islander clients report being reluctant to switch plans due to concerns about being disconnected and potential interruptions to their electricity supply if they do decide to change. This was reported as a key barrier preventing First Nations clients from possibly accessing better electricity plans.

Additionally, First Nations clients reported a range of different impacts that the cost of electricity imposes on the Aboriginal and Torres Strait Islander community and additional barriers that prevent them from engaging in the market. As with the rest of the ACT, many First Nations people are being affected by the current cost of living crisis, leaving people with reduced discretionary income and less ability to cover the cost of essentials. Different cultural obligations such as Sorry Business, family situations, additional family staying in the home or having to stay with family and financial obligations to support extended family are additional reasons why Aboriginal and Torres Strait Islander people may not be able to afford their bill or fall behind on paying their bill.

First Nations clients report seeking advice and support from family, friends, Aboriginal Community Controlled Organisations (ACCOs) and charities. Often people are not fully aware of or are distrusting of Government support and there is a lack of understanding of the range of types of support available to help with electricity costs and how it can be useful. Community education is extremely important in this area to ensure supports such as concessions and rebates are utilised and vulnerable members of the Aboriginal and Torres Strait Islander community benefit from reduced electricity costs at the same or higher rate as other Australians.



Consultation questions

Pricing and competition

Recommendations

3. Encourage competition in the ACT electricity market, including through greater transparency.
4. The standing offer price should apply to all retailers operating in the ACT.

1. Do you have any comments on electricity prices and competition in the ACT or on other measures that could improve the balance between them to improve outcomes for ACT consumers?

ACTCOSS would like to highlight how decreases in the spending power of low income households due to the current cost of living crisis impact on their capacity to cope with increases in the cost of electricity.

ACT consumers' confidence in the energy market is reported as low. The Energy Consumers Australia June 2023 Energy Consumer Sentiment Survey showed that the ACT had some of the lowest consumer satisfaction, trust, and confidence in the electricity market in the country.⁵

- Half (49%) of survey respondents were not positive they were receiving value for money from their electricity company.
- Many (72%) respondents were not confident that the overall electricity market (the energy industry and regulators) is working in their long term interests.
- Almost half (44%) of ACT respondents were not satisfied with the customer service from their electricity retailer in the past six months, the highest rate of dissatisfaction in the country.
- Over one third (37%) of ACT respondents were not satisfied that their billing and usage information was clear and simple to understand, again the highest rate of dissatisfaction in the country.
- One third (33%) of respondents were not satisfied with the ease of accessing their account information.
- Half (49%) of respondents were not satisfied with the communication (other than bills) received from their electricity retailer in the past six months.
- Almost two out of three (62%) respondents were not satisfied with the cost of their electricity supply in the past six months.
- Almost half (45%) of respondents were not satisfied with the assistance provided by their electricity retailer to manage their electricity bill in the past six months.

⁵ Energy Consumers Australia (ECA), [Energy Consumer Sentiment Survey June 2023](#), ECA, 2023.



This is consistent with ACTCOSS' analysis of cost of living data that shows that low income households are increasingly unable to keep up with the cost of essentials.⁶ While Canberra has amongst the highest average weekly income in the country,⁷ this means that the electricity market is more likely responding to the higher average and is less likely to be responsive to moderate and low income consumers.

While ACT electricity prices are relatively low compared to the rest of the country,⁸ their negative effects are hidden by a large income disparity. Wealthy Canberrans have more disposable income so are less affected by increases in electricity costs, while low income Canberrans (often living in old and energy inefficient homes) have less disposable income and are unable to take advantage of lower electricity prices. Low income households spend a much larger proportion of their income on energy costs than high income households, regardless of the overall price.⁹

ACTCOSS' findings from the [2023 ACT Cost of Living Report](#) relevant to consumer confidence and spending power are:

Living costs in the ACT have reached their highest levels in 20 years¹⁰ and low income households disproportionately face the effects of these increases. Over the past 12 months the ACT community sector has seen an increase in demand for social services alongside an increase in poverty, disadvantage, and complexity of need among the people and communities they support.

Canberra's electricity prices rose well above the national rate.¹¹ In the past year (December 2021 to December 2022), the price of electricity in Canberra rose by less than the national rate (7.7% in Canberra compared to 11.7% nationally). However, over the past five years (December 2017 to December 2022) the price of electricity in Canberra has risen by almost 25%, which was markedly above the national rise over the same period of 2.3%.

Other essential service prices in the ACT rose above the national rate.¹² For example, from December 2021 to December 2022 the price of rents increased by 6% in Canberra compared to 4% nationally and the price of childcare increased by 3% in Canberra compared to a decrease of -2% nationally. In addition, in the five years to December 2022, CPI in Canberra was higher than the national rate for housing (21% compared to 16%), rents (17% compared to 4%), property rates and charges (31% compared to 14%), utilities (14% compared to 6%), electricity (25% compared to 2%) and education (20% compared to 14%).

⁶ ACTCOSS, *2023 ACT Cost of Living Report*.

⁷ Australian Bureau of Statistics (ABS), *Average Weekly Earnings, Australia*, ABS website, 2023.

⁸ Independent Competition and Regulatory Commission (ICRC), *Issues Paper: Standing offer prices for the supply of electricity to small customers from 1 July 2024*, ICRC, 2023, p.4.

⁹ ACTCOSS, *2022 ACT Cost of Living Report*, ACTCOSS, 2022, p.9-10.

¹⁰ ACTCOSS, *2023 ACT Cost of Living Report*, p.16.

¹¹ ACTCOSS, *2023 ACT Cost of Living Report*, p.12.

¹² ACTCOSS, *2023 ACT Cost of Living Report*, p.11-12.



Government income support payments remain inadequate to meet essential living costs in Canberra. ACTCOSS' analysis shows that all households whose income is derived from government support payments and also often for those with minimum wage work, live below the poverty line and struggle to cope with the cost of living in Canberra.¹³ While government income support payments are clearly inadequate, our analysis also shows that the current high level of inflation means that the purchasing power of people in full time work is also greatly reduced.¹⁴ This is consistent with the experiences of the community sector seeing more people in full time work seeking support to access essential goods.

Additionally, most households on the minimum wage or in the second income quintile are ineligible for electricity concessions and supports offered by the ACT Government, so even though their income is higher than if they were receiving income support payments, this can fail to translate into capacity to cope with the cost of living in Canberra.

ACTCOSS considers that efficient electrification of new and existing households as part of the ACT Government's pathway to electrification would be beneficial for low income households and allow them to take more advantage of the ACT's low electricity prices. While the Issues Paper notes some schemes available to ACT residents to assist with their home energy efficiency and electrification upgrades, there are considerable eligibility constraints and administrative barriers preventing uptake of these programs among low income and vulnerable households.

According to the ICRC, ActewAGL has 74% of the market share and a lower proportion of customers on market offers than other jurisdictions.¹⁵ Almost one third (28%) of ActewAGL customers are on the standing offer, compared to just over 20% of all ACT electricity customers. In comparison, over 90% of small electricity customers are on market offers in New South Wales and South Australia.¹⁶ On the basis that many of the people who don't engage in the electricity market are people who can't, then the ICRC should seek to ensure that customers are not penalised for choosing the default or not engaging in the market. Even though the ACT had the lowest standing offer price increase in the country in 2023,¹⁷ this does not necessarily translate into consumers paying less.

Similarly, the ICRC should also seek to protect customers who do engage in the market by choosing offers provided by smaller retailers. The Issues Paper highlights that there are 16 active retailers (retailers with customers) in the ACT.¹⁸ With vast majority of the market share taken up by ActewAGL, Origin Energy and Energy Australia, this may mean that customers who choose smaller retailers are vulnerable

¹³ ACTCOSS, *2023 ACT Cost of Living Report*, p.18.

¹⁴ ACTCOSS, *2023 ACT Cost of Living Report*, p.20.

¹⁵ ICRC, *Issues Paper*, p.6-7.

¹⁶ ICRC, *Issues Paper*, p.7.

¹⁷ Australian Energy Regulator (AER), [AER releases final determination for 2023–24 Default Market Offer](#), AER website, 2023; Essential Services Commission (ESC), [Victorian Default Offer 2023-24: final decision](#), ESC website, 2023; ICRC, [Update of the 2023–24 regulated electricity prices for small customers](#), ICRC website, 2023.

¹⁸ ICRC, *Issues Paper*, p.24.



to inconsistencies in retailer policies and customer service practices. From consultation with Care, ACTCOSS is aware that often vulnerable clients who choose smaller retailers are often not given accurate information about ACT specific prices, policies or support. Customers who do engage in the market should be provided with ACT specific support and information regardless of their retailer.

To improve outcomes for low income and vulnerable consumers, ACTCOSS suggests that better competition in the ACT electricity market is encouraged. According to the Australian Competition and Consumer Commission (ACCC), competition leads to lower prices, increased consumer choice and better quality products and services which has flow on effects to the prosperity and welfare of the community.¹⁹ To assist in encouraging competition and protecting consumers it would also be more consistent if the standing offer applied to all retailers operating in the ACT, rather than just ActewAGL. The results of the 2023 Energy Consumer Sentiment Survey also indicate that retailers could do a lot more to better engage and communicate with their customers.

2. Do you consider that the implementation of ACT Reference Price and requirements in the Code have been useful in keeping consumers informed and more confident in choosing a retail electricity plan?

ACTCOSS supports the introduction of the ACT Reference Price. In theory, the ACT Reference Price and requirements in the ACT Retail Electricity (Transparency and Comparability) Code should make it easier for consumers to compare and choose plans when they engage in the market. However, it is unclear how this will encourage people to change plans if they are not already intending to do so. The observations of the community sector in previous sections also highlights that vulnerable and low income consumers continue to find the electricity market complex to navigate.

ACTCOSS would like to highlight that even if consumers engage in the market, there is limited data available about whether they continue to be better off in the long run. For example, many plans advertised by electricity retailers only offer a 12 month discount period before they expire. Customers are then required to engage again to choose a different plan. If their provider is ActewAGL they may be put on the standing offer price if they do not engage. However, it is unclear what plans are available to customers at the end of the 12 month discount period and what pricing structure they will be placed on if they do not engage with their non-ActewAGL retailer. The ICRC should consider how to ensure consumers are better off in the long run and whether a requirement for continual engagement in the market should be considered the optimal outcome for consumers.

¹⁹ Australian Competition and Consumer Commission (ACCC), [Competition and anti-competitive behaviour](#), ACCC website, n.d.



Components of retail electricity costs

Recommendations

5. The calculation of retail electricity costs should seek to maximise reduced costs to consumers while providing price stability.
6. The ICRC should ensure the approach used to calculate the components of retail electricity costs are appropriate for the anticipated energy system of 2027.

ACTCOSS would support calculation of retail electricity costs to maximise reduced costs to consumers while providing some stability. Consumers consistently report preferences for price stability, in the context of significant price rises over the past decade. Consumers are looking for a smoothing out of price rises rather than step changes in price. As the price of electricity production and distribution is expected to reduce over the coming decade, there will at some point be an opportunity for price reductions by retailers. Low and middle income consumers, and small and medium enterprises in the private or community sectors would all value early pass through of price reductions rather than smoothing these out over a longer timeframe.

8. Do you consider that the current approach of using actual load data for 5 calendar years remains appropriate?

ACTCOSS considers that the current approach of using actual load data for the past five calendar years may not remain appropriate. With the increase in working from home since COVID-19, the start of the energy transition and the introduction of electric vehicles, Canberra's load profile has changed in the past five years and will experience increased change as the energy transition accelerates. For example, the introduction of EVs being used as household batteries is the kind of change that solely using the last five years of load data will not provide information about. If the same approach is used, then price assumptions will be based on 2018 to 2023 data and may not be appropriate for the energy system of 2027. Presumably by then the load profile of the city will look very different and the ICRC should seek to ensure the way costs are calculated is fit for purpose and suits the changing market environment.

Data from the previous five years should only be used to help inform projections for the next regulatory period, to help gauge the rate of change and what the changes will be as a result of the energy transition. The past five years of data may not be useful when Canberra is undergoing such large qualitative changes like full electrification. ACTCOSS would support the use of better data, rather than basing decisions on assumptions.

The ICRC could investigate if they would get more accurate load data by incorporating smart meter data, but according to the Australian Energy Market Commission (AEMC), the diffusion rate in the ACT is the lowest in the country at just



16%.²⁰ Therefore, the ICRC should be cautious about making decisions based on a small non-representative percentage of consumers. As more households start using smart meters in Canberra it may make sense to incorporate both types of data, but the ICRC should take into consideration what kinds of households are more likely to have smart meters (e.g., wealthier households), and the possible correlations between smart meters, solar and battery uptake and more engagement in the market.

Final comments

There are a number of areas where the ICRC has yet to decide on an approach.²¹ ACTCOSS is confident these will consider a range of evidence types appropriate for the ICRC and highlights the importance of community consultation as evidence.

We thank the ICRC for considering this submission. ACTCOSS looks forward to continued collaboration with the ICRC to ensure the standing offer provides a reasonable price for low income and vulnerable consumers and those not actively engaged in the energy market. We would also like to thank the ICRC for their flexible facilitation of feedback from those in the community sector. If you would like to discuss any of the issues we have raised, please do not hesitate to contact Lyndsay Bassett, Senior Policy Advisor, ACTCOSS at lyndsay.bassett@actcoss.org.au or call 02 6202 7227.

²⁰ Australian Energy Market Commission (AEMC), [Review of the regulatory framework for metering services \[PDF\]](#), AEMC, 2020, p.19.

²¹ ICRC, *Issues Paper*, p.10, 15, 16-17.

actcoss@actcoss.org.au

actcoss.org.au

02 6202 7200

ABN 81 818 839 988

