

Mind the Gap



Identifying the gap between energy concession eligibility and concessions received

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The Consumer Policy Research Centre (CPRC) is an independent, not-for-profit consumer think-tank. CPRC receives funding for our work from the Victorian Government.

CPRC aims to create fairer, safer and inclusive markets by undertaking research and working with leading regulators, policymakers, businesses, academics and community advocates.

Acknowledgements

Report author: Ben Martin Hobbs

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Statement of Recognition

CPRC acknowledges the Traditional Custodians of the lands and waters throughout Australia. We pay our respect to Elders, past, present and emerging, acknowledging their continuing relationship to land and the ongoing living cultures of Aboriginal and Torres Strait Islander Peoples across Australia.

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Executive summary

Concessions on energy bills are a direct mechanism to reduce energy costs for people on low incomes, improve bill affordability and mitigate payment difficulty.

People on low incomes spend a disproportionate percentage of their income on energy bills. They are often least able to respond to price increases, due to the poor quality of housing stock, inability to install rooftop solar, and aging, inefficient appliances in rental accommodation.¹

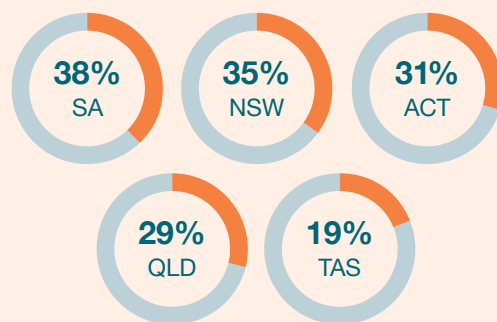
In a growing cost of living crisis, driven in part by rising energy prices, ensuring people on low-incomes receive energy concession and rebate entitlements should be a matter of priority for governments. But rather than being automatically applied to bills, the onus lies with eligible concession holders to ensure their concession is applied and updated to each bill.

Millions of Australians receive one of a range of concessions to help manage the cost of living, administered by the federal Department of Social Services or the Department of Veterans Affairs. A number of concessions provide an entitlement to a discount or rebate on a consumers’ electricity, gas and water bills. Previous estimates suggest approximately a third of Australian population (**37%**) receives an energy concession.²

In helping low-income households access the Victorian Government’s Power Saving Bonus (PSB), CPRC identified a significant gap between those eligible for energy concessions and those receiving their concession on their energy bill. CPRC’s analysis of published departmental and regulatory datasets of the total number of concession card holders and concessions received suggests this gap is generalizable across the broader population.

Across National Energy Customer Framework states, our analysis suggests the gap ranges from **38%** in SA to **19%** in Tasmania. In Victoria, our analysis suggests **7%** of concession card households do not receive their concession on their electricity bill, **12%** miss out on concessions on their gas bill, while **22%** do not receive their concession on their water bill.

Gap across National Energy Customer Framework states



VIC Households who do not receive their concession

7% of eligible Victorians did not receive a concession on their electricity bill



12% of eligible Victorians did not receive a concession on their gas bill



22% of eligible Victorians did not receive a concession on their water bill



This report outlines the insights and data collected by CPRC when working with low-income households in Melbourne, exploring insights around why concessions weren’t applied to bills, supported by additional existing research. This report also incorporates data analysis drawing from government and regulatory datasets to identify where this gap applies across the broader population and the estimated size of this gap. This analysis includes a comparison of states in the National Energy Customer Framework and a discrete analysis of Victorian data given the differences in concessions regime and data collection.

CPRC recommendations

1

The Commonwealth Government should, working with state governments and energy regulators, conduct a coordinated review of the concessions framework.



2

State governments should work with energy regulators to conduct a 'sludge audit' to identify unnecessary friction consumers face when accessing and applying for utility concessions.



3

State governments should play a stronger system stewardship role to monitor, evaluate concessions framework and publish robust outcomes data.



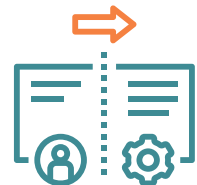
4

National cabinet should adopt data sharing about concessions as priority work area.³



5

Departments, regulators and energy retail business should implement default mechanisms to automatically apply, re-validate or roll-over concessions to reduce administrative burden on consumers.



6

Regulators should require that energy bills more effectively communicate when concessions are applied.



Identifying the gap – delivering the power saving bonus

The Consumer Policy Research Centre (CPRC) ran an outreach program to help Victorians experiencing or at risk of vulnerability access the Power Saving Bonus. The Power Saving Bonus is a one off \$250 payment initially made available exclusively to eligible concession households in Victoria – i.e. recipients of Pension Concession, JobSeeker, Youth Allowance, Abstudy or Austudy payment or anyone with a Department of Veterans Affairs Card.⁴

As part of the process to assist consumers to access the PSB, CPRC reviewed bills, and collected key data points in an anonymised database to evaluate implementation of Victoria’s Payment Difficulty Framework reforms, including whether concessions were applied to bills.

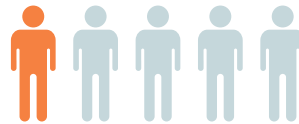
Findings from the frontline

When assisting low-income consumers to access the PSB, CPRC found between **one in five** and **one in three** people assisted who were eligible for energy concessions did not have this entitlement applied to their bill. The program was conducted in distinct waves due to project funding and COVID-19 restrictions:



First round

Between May 2021 and January 2022, CPRC found **21%** of households eligible for the Power Saving Bonus did not have their Annual Electricity Concession applied to their bill



548 of 2667 eligible households assisted.⁵

Second round

Between January 2022 and April 2022, CPRC found **35%** of households eligible for the Power Saving Bonus did not have their Annual Electricity Concession applied to their bill



781 of 2,260 eligible households assisted.

CPRC’s outreach was targeted at specific Melbourne communities most likely to need assistance, predominantly those living in public housing towers in inner city Melbourne, and often speaking English as a second language. Though it is not a representative sample of the population, CPRC’s work indicates that far too many people who most need the assistance of energy concessions are not receiving it.

Identifying the gap – is the gap generalisable?

CPRC examined available departmental and regulatory datasets to identify whether this concession gap is generalisable to the broader population, drawing on analysis produced by a team of RMIT students completing their Masters of Data Science as part of an industry partnership project.⁶ Determining which states have smaller gaps can be useful to identify where concessions frameworks or mechanisms better ensure eligible consumers receive their concessions.

Various estimates about the concessions gap have been produced in recent years, but are often state specific, old data, or draw on survey data which may not adequately sample hard-to-reach consumers:

- The ACCC's 2018 Retail Electricity Pricing Inquiry which found approximately **14%** of respondents who were eligible to receive an energy concession did not receive a concession from their electricity retailer.⁷ It is unclear how this figure was calculated.
- The 2020-21 NSW Energy Rebates Annual Report found approximately **64%** of eligible NSW consumers accessed the Low Income Household Rebate, and **56%** of eligible consumers accessed the NSW Gas Rebate.⁸
- The Department of Housing and Human Services Victorian Utility Consumption Household Survey 2015 found **87%** of eligible concession card holders in Victoria received their electricity concession while **74%** received their gas concession.⁹

At time of writing, we could not identify any publicly available data about the size of the gap between those eligible and receiving concessions in other states.



Methodology – identifying the gap at a national level

CPRC’s first sought to identify eligibility for an energy concession or rebate payments – which varies across each state (figure 1). This drew on eligibility criteria outlined on various state departmental websites and estimated the number of eligible concession card holders eligible for an energy concession/rebate in each state. While some states have broader eligibility criteria for energy concessions, we adopted a more limited eligibility criteria to reduce the incidence of overlaps between various concessions within a single household.

This approach produces a more conservative estimate of the total number of consumers eligible for an energy concession, and also results in a more conservative estimate of the gap between those eligible for and receiving their concession. Consequently, the actual gap between eligible and claimed concessions may be greater.

Figure 1 – energy concession/rebate eligibility criteria

	NSW	QLD	SA	TAS	ACT	VIC
Health Care Card – issued by Department of Social Service	√	√	√	√	√*	√
Pension Concession Card – issued by Department of Social Service	√	√	√	√	√	√
Gold Veterans Concession Card – issued by Department of Veterans Affairs	√	√	√		√	√

We calculated the estimated total number of eligible concession card holders according to the Department of Social Service concessions summary database and Department of Veterans Affairs treatment population database detailing those receiving DVA Gold Veterans Concession Cards (April 2022).¹⁰

To determine the number of households receiving a concession on their bill, we drew on the AER’s market performance reporting data for National Energy Customer Framework states (NECF) (NSW, QLD, SA, TAS, ACT) and the Department of Families, Fairness and Housing (DFFH) for Victorian concessions claimed.¹¹

The total number of eligible concession card holders is necessarily larger than the total receiving a concession on their bill because there are multiple concession card holders in many households, for example aged-pensioner households. The 2015 Victorian Utility Consumption Household Survey found **42%** of concession card households had another member of the household holding a concession card of some type, down from **49%** in 2007.¹² We developed a weighting based on this finding which has been applied to the total number of individuals eligible for an energy concession to derive an estimate of the number of households eligible for an energy concession. Note, this weighting relies on a finding from 2015 in Victoria, which we've applied to other states in lieu of other state specific data or more recent data. This weighting also assumes two concession cards per multi-concession card household, though we recognise it is possible, even likely, that there may be three or more concession cards in a multi-concession card household.

Our analysis has not taken into account the rate of switching between retailers - which varies across different states due to market maturity and concentration post deregulation. This may inflate the number of concessions claimed through separate retailer reporting. For example, if a concession card holder with retailer X has a concession applied on their bill in Q1, and they switch to retailer Y in Q3 and seek to ensure their concession is applied, this may result in an inflated number of total concessions claimed.

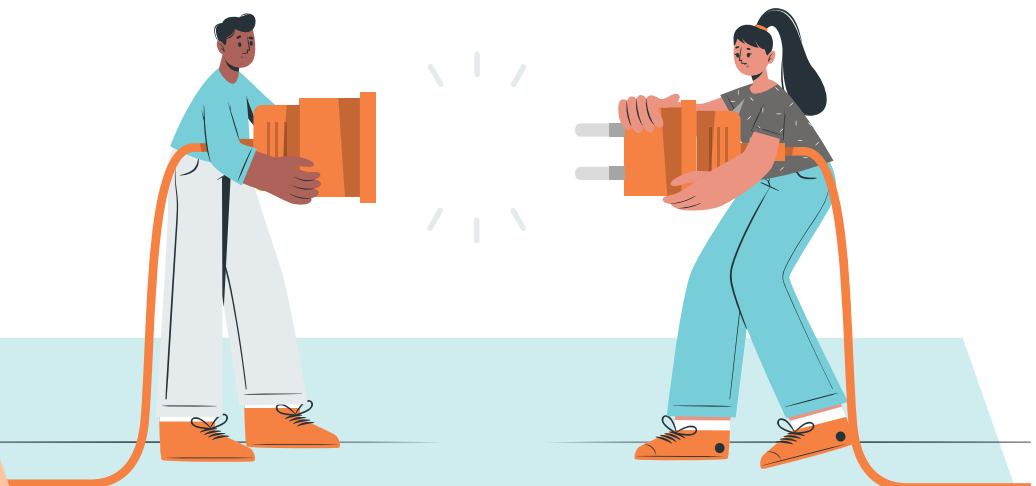
Drawing on this data we were then able to produce an estimate of the gap between those eligible for a concession card and those receiving a concession on their bill.

Victoria and NECF state data may not be comparable

The subsequent analysis has been split between National Energy Customer Framework (NECF) jurisdictions – New South Wales, Queensland, South Australia, Tasmania and the ACT - from Victoria for a number of reasons. In NECF states, rebates tend to be one off payments across both fuel types (gas and electricity). Retailers report the number of consumers with an eligible concession card to the AER, who publishes this data on a quarterly basis.

In Victoria, eligible concession card holders are entitled to a discount of **17.5%** off the total of each electricity bill and winter gas bills (May to October). Once a consumer has applied to add their concession to their account, retailers should apply this concession on an ongoing basis until the concession card expires. CPRC has been advised retailers report the number of households receiving a concession to DFFH on a monthly basis for invoicing purposes – to be reimbursed for concessions. DFFH collates and then publishes this data on an annual basis, applying an assumed churn rate to account for consumers switching retailers.

The structure of concessions and reporting frequency may give rise to differences in the data and may reduce comparability.

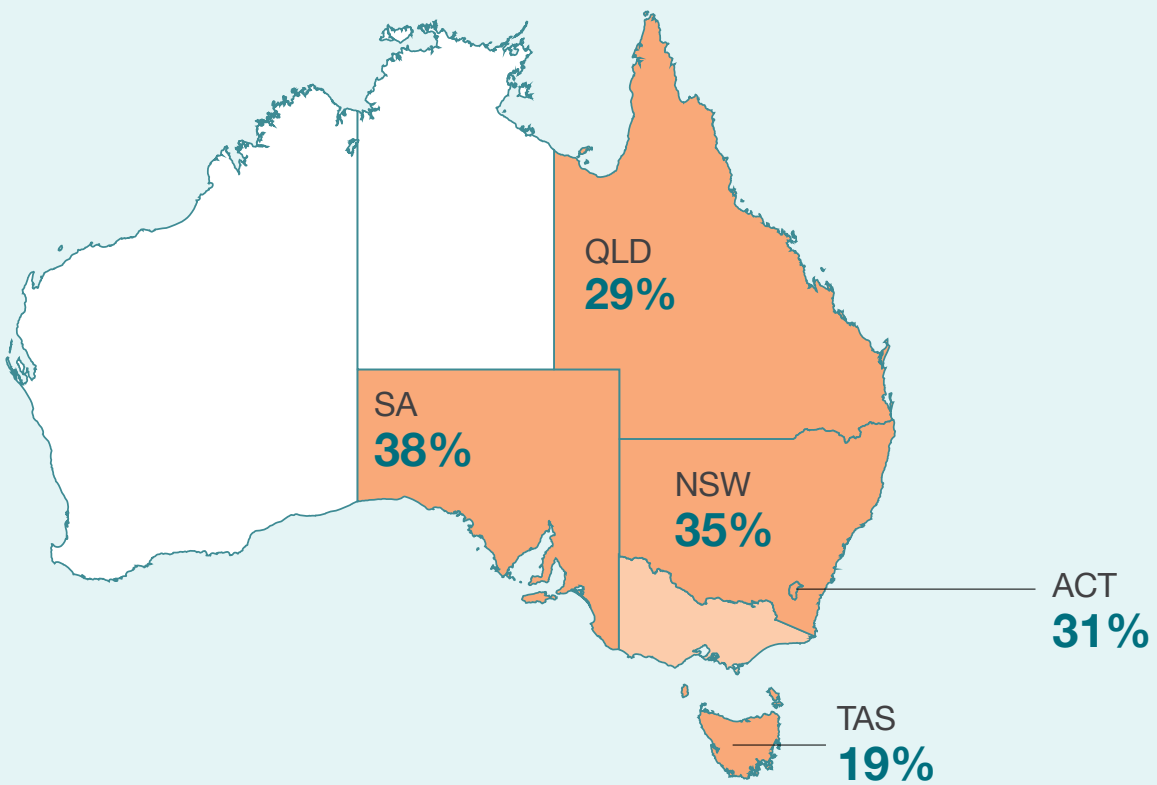


Estimating the gap in National Energy Customer Framework

Among the NECF jurisdictions, there appears to be a sizable gap between consumers with an eligible concession claiming an energy discount or rebate.

Broadly, our analysis indicates that in 2021-22 the largest gap was in South Australia, where **38%** of those consumers with an eligible concession did not receive rebate, followed by **35%** of NSW consumers, **31%** of ACT consumers, and **29%** of Queensland consumers (figure 2). Our analysis suggests that among the NECF states, the gap was smallest in Tasmania where **19%** of consumers with an eligible concession did not receive their energy discount/rebate.

Gap in National Energy Customer Framework states



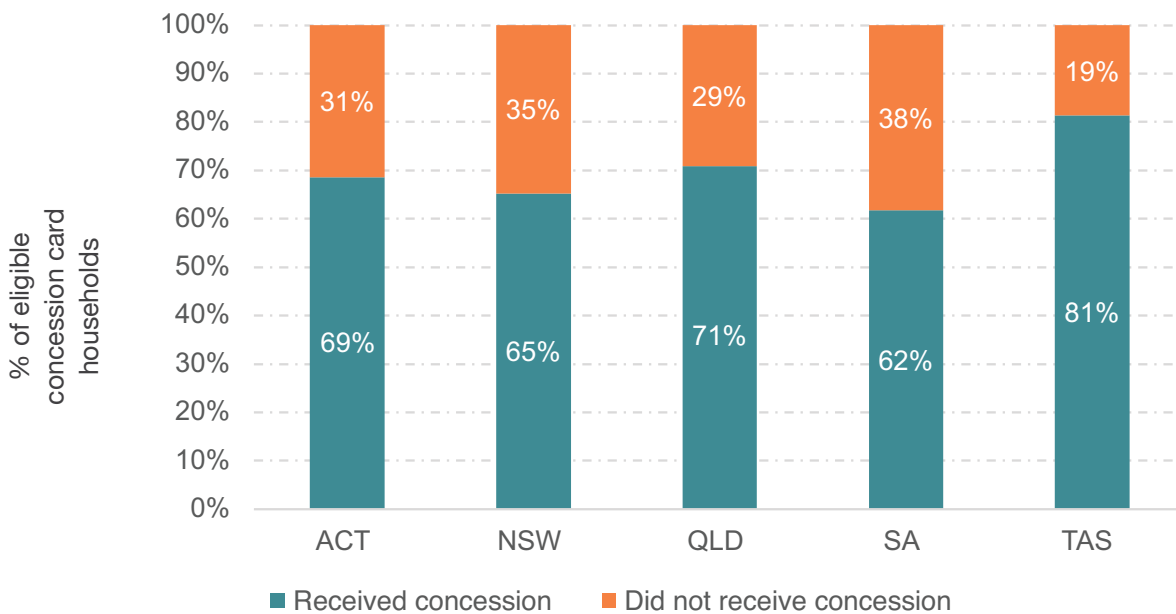
■ NECF states ■ Victoria

Figure 2: total number of consumers eligible and receiving concessions (NECF states Q3 2021-22)

	NSW	QLD	SA	TAS	ACT
Total number of eligible concession holders (CPRC data analysis)	1,783,270	1,251,305	486,527	164,726	59,135
Total number of households with at least one concession card holder (CPRC analysis)*	1,248,289	875,914	340,569	115,308	41,407
Published concessions claimed – AER data ¹³	814,313	620,614	210,584	93,889	28,505

* DHHS 2015 survey found 42% of concession card holders lived in a household with multiple concession cards down from 49% in 2007. We have applied a weighting of 0.70 to the total number of concession card holders to estimate the total number of eligible concession households.¹⁴

Figure 3: Concessions gap in National Energy Customer Framework states - electricity



Estimating the gap – Victoria

Primary analysis of DFFH data suggests a much smaller gap in Victoria between those eligible and those claiming their energy discount/rebate – compared with other states. Our analysis suggests only 7% of Victorians eligible for a concession did not claim their electricity concession (figure 4). However, the nature and structure of the concession and subsequent data collection process may contribute to a higher proportion of Victorians claiming this entitlement relative to other states.

As part of this analysis of Victorian electricity concessions, we have included an estimate of the concessions gap for both gas bills and water bills. Unlike other NECF states, three quarters of Victorians have a mains gas connection (76%).¹⁵ Also unlike some other states, the majority of Victorians (92% of households and 88% of concession card holders) have a direct relationship with their water provider – like owner occupiers, tenants are billed for usage/ sewage charges directly (landlords pay for sewage infrastructure).¹⁶

Concession eligibility criteria across all three utilities is the same – which allows for comparison of concessions received on different utility bills and may provide insights around more effective mechanisms or practices in the different utilities.

The 2015 Victorian Utility Consumption Household Survey found 42% of all households claimed a concession on their electricity bill, 37% claimed a concession on their water bill and 36% of households claimed a concession on their gas bill.¹⁷ This survey had already identified variation in the proportion of eligible households claiming concessions across their bills - 87% of concession card households received their electricity concession, 78% received their water concession, and 74% received their gas concession.¹⁸

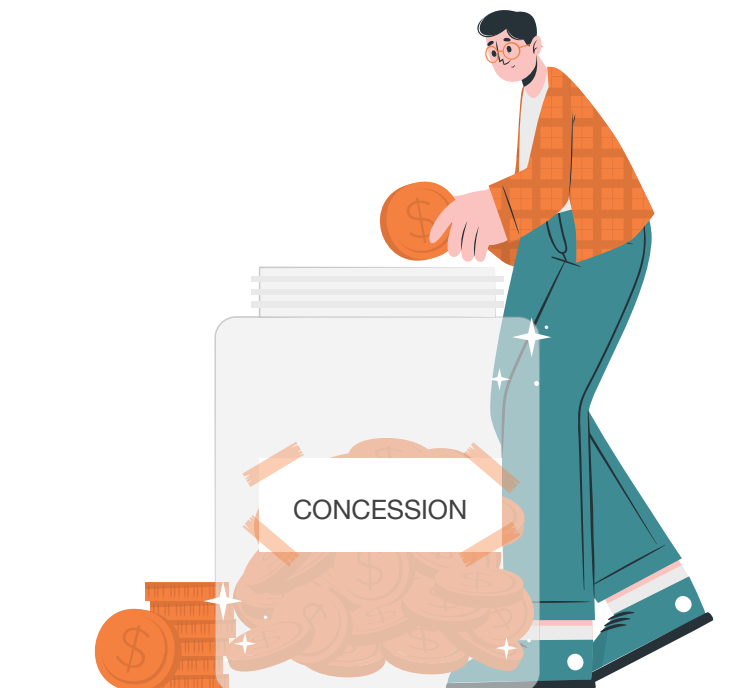


Figure 4: Total number of consumers eligible and receiving concessions (Victoria)

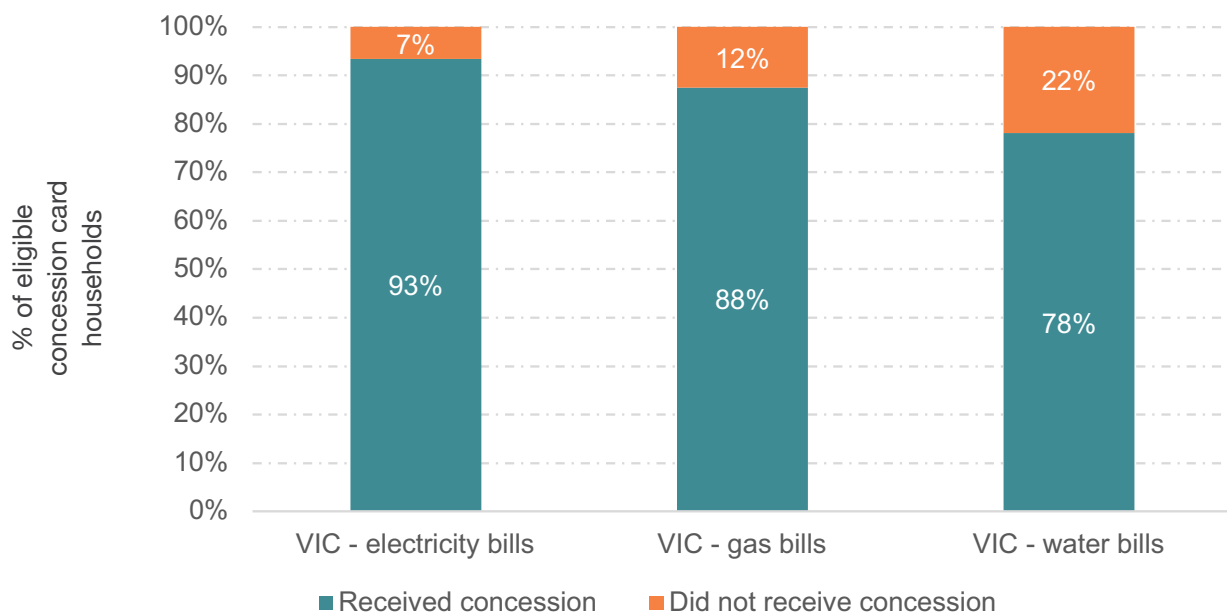
	Electricity	Water	Gas
Total number of eligible concession holders (CPRC data analysis)	1,414,194	1,414,194	1,414,194
Total number of eligible concession households (CPRC analysis)*	989,936	871,143**	752,351***
Published concessions data ¹⁹	924,888	680,191	658,831

* DHHS 2015 survey found 42% of concession card holders lived in a household with multiple concession cards down from 49% in 2007. We have applied a weighting of 0.70 to the total number of concession card holders to estimate the total number of eligible concession households.

** DHHS 2015 survey found 88% of concession card holders paid a water bill. Absent a more current update we've applied this secondary weighting of 0.88 to estimate the total number of eligible of concession households.

*** ENA found 76% of all Victorian households have gas mains – we assume this holds for concession card households as well and applied this secondary weighting of 0.76 to estimate the total number of eligible of concession households with gas.

Figure 5: Concessions gap in Victoria – Electricity, gas and water



This comparison reveals clear discrepancies between concessions received on electricity bills compared with gas and water. Our analysis found:

7% of eligible Victorians did not receive a concession on their electricity



12% of eligible Victorians did not receive a concession on their gas bill



22% of eligible Victorians did not receive a concession on their water bill



It's unclear what causes the discrepancy between the different utilities given the uniform eligibility criteria. There are a range of reasons why concessions might not be applied to gas bills:

- Gas bills have traditionally been “bundled” with electricity. Retailers may not have applied concessions to both accounts of a customer – this was identified in CPRC’s outreach work;
- Consumers do not receive concessions on gas bills during summer months – which might make identifying missing concessions potentially more difficult or confusing for consumers;
- As more retailers have entered the market to offer mains gas in Victoria, consumers may have shifted from bundled supply to two distinct retailer relationships, and in-so-doing may have forgotten to seek or had difficulty seeking a concession on both energy bills;
- Historically gas bills have also been lower than electricity bills. This might explain fewer concessions applied as a smaller cost pressure on household budgets. However, this may no longer be the case – the ESC’s representative annual bills based on median Victorian market offers suggests some gas bills may exceed electricity bills.²⁰

Reasons why concessions might not be applied to water bills:

- Water bills are on average lower than electricity bills (average state-wide bill \$1,027.52), especially for tenants who are not responsible for sewage infrastructure charges (average state-wide tenant bill is \$452.24).²¹
- Renters may not be prompted to add their concession details when they move into a new property. Some agents use third party utility connection services, which are often included in the rental application form and may not ask for concession details.
- Renters may even prefer to withhold concession details if they believe this information will be shared with their rental provider and compromise their tenancy.
- Regional and rural concession card holders may rely on tank or bore water – which they cannot claim a concession on.

But notably, water is delivered via one of the state-owned water businesses located across Victoria - rather than a competitive market. This should reduce the incidence of concessions not being applied to bills where consumers have switched energy retailers.

These findings raise questions around why the number of Victorians receiving a concession on their gas and particularly water bills are lower than electricity and warrants further investigation.

Discussion

Our analysis indicates there is a sizable number of concession card holders in each state who are eligible for an energy concession but for various reasons do not receive this entitlement on their energy bills. Particularly in a context of rising electricity prices and broader cost of living pressures, ensuring low-income consumers receive their entitlements is key to ensuring affordability and helping to mitigate payment difficulty.

Our analysis suggests that in some states it may be easier (or less difficult) to access these concession entitlements. Across the NECF states, a higher proportion of consumers in Tasmania (**19%**) and to some degree Queensland (**29%**) received concessions compared with NSW (**35%**) and SA (**38%**).

Tasmania is served by a single provider for the majority (**97%**) of residential consumers – which may reduce the incidence of consumers missing out concessions through switching energy provider and moving residence.²² However, despite this single provider, there remains a sizable gap in Tasmania between those eligible and receiving their concession, indicating there is more work to do.

Noting the concessions framework in Victoria differs significantly from other jurisdictions, our analysis suggests a particularly high rate (**93%**) of eligible concession card holders in Victoria receiving a concession on their electricity bill. There are two likely explanations why Victorian data may differ from other states.

First, the Victorian regime, the Payment Difficulty Framework, which operates as an entitlement framework, may be more effective in ensuring eligible consumers receive concessions on their bill. For Victorians in need of tailored assistance, retailers are required to provide advice and information about other support such as government assistance (including grants and energy concessions). The ESC's 2022 audit of a selection of ongoing customer relationship calls found **89%** of customers had been checked for concession eligibility at least once a two-year period since the introduction of the Payment Difficulty Framework. However, advice about energy concessions only occurred on **39%** of individual calls with customers where assistance was offered.²³

A second explanation, taking into account the discrepancy between energy and water concessions received, indicates the reported number of electricity and gas concessions received may be lower than the data suggests at face value. This raises questions around how DFFH collects the data from retailers, the reporting requirements on retailers, and whether there are different approaches that could improve the quality of the data reported, enabling a better evaluation of the concessions' framework. If the true proportion of eligible Victorians receiving a concession on their bill is significantly lower than the reported figures, this would warrant further investigation as to what causes consumers to miss out on their concessions.

The discrepancy between our analysis of published data and our findings from the frontline suggest at the very least that the gap between eligible concession card holders and those receiving a concession on their bill may be larger for some consumer cohorts than others.



Explaining the gap

Understanding why eligible concession card holders do not receive concessions on their bills – particularly any barriers that can easily be removed - is essential to ensuring low-income consumers are better able to manage cost of living pressures.

The broader research highlights how forms play a critical role in access to public programs. The literature highlights three different kinds of administrative costs:²⁴

1. **Learning costs:** people need to seek information about the existence of programs and eligibility criteria
2. **Compliance costs:** the time, effort, and financial costs of meeting administrative demands;
3. **Psychological costs:** stigma can arise from unpopular programs, experience of disempowerment, loss of autonomy, stress, and frustration.

Currently, the onus lies with consumers to ensure concessions are applied to utility bills. In the first instance, consumers must call their retailer to apply their concession card details to their account. But retailers can't update an expired concession card – consumers must call their retailer with their new concession card details when an existing concession expires. Health Care Cards have a shorter expiry than Pension Concession Cards – which means particular consumer cohorts may face a higher administrative burden keeping their concession up to date.

CPRC's own insights around barriers to accessing concessions in delivering the Power Saving Bonus and other research suggests the following factors are relevant:

- Consumers do not take advantage of eligible concession benefits due to a lack of awareness about schemes and entitlements, difficulties finding information relating to concession benefits or the available information confusing and hard to understand;²⁵
- There is low customer awareness that concession details need to be updated regularly, and each bill needs to be reviewed to identify whether the concession has been applied.²⁶ The push towards direct debt payment of bills means consumers may be less likely to review bills and identify that a concession has not been applied to their bill;
- Arbitrary requirements for further information and additional burden of proof before concessions/support is granted can also impact uptake;²⁷
- Energy bills do not prescribe the location of key information - such as concessions. This can make it more difficult for consumers and third-parties assisting consumers over the phone easily identify whether a concession has been applied to a bill;
- Consumers in an embedded network (e.g. in caravan parks or some high rise apartment buildings) without a direct relationship with an energy retailer may have to apply directly to the relevant state department for their concession, which may be paid via check rather than credited on a consumers' bill;
- Pay-on-time discounts are mistakenly understood by some households as receipt of applicable concessions; and,²⁸
- Language barriers, particularly around English literacy are common issues for Victorians with low English proficiency.²⁹ One study found households that speak a language other than English at home were significantly less likely to have received an electricity concession (**25%** compared to **37%** for all billing respondents).³⁰

There are also challenges when someone correctly applies for a concession or updates their details but doesn't receive their concession. CPRC's outreach work indicated the following factors may be at play:

- Consumers with expired concessions are not contacted by their retailer to seek current concession details;
- Concessions are not applied to bills even when concession details are current in the retailer's system;
- Concessions are not applied to both energy sources when consumers have bundled supply of gas and electricity with one provider
- Minor client name spelling differences between Services Australia, Centrelink and retailer systems prevent access to concessions and can especially impact migrants with unfamiliar names or non-Anglo-Saxon name structures.

Finally, there are also restrictive caveats that limit eligibility for concessions in various jurisdictions. Consumers in South Australia with an eligible concession card are unable to access energy concessions where another member of their household has an income of more than \$3,000 per year - unless they are a Centrelink or DVA payment recipient or are their spouse, partner or dependent.³¹ In particular, this creates a barrier to access to energy concessions for renters living in a share-house.

In Queensland and Tasmania, asylum seekers are eligible for energy concessions if they have been provided an "Immcard". However, in other states, our review of eligibility indicates asylum seekers are not eligible for a concession that provides access to energy concessions, exacerbating the risk of energy payment difficulty for an already potentially vulnerable cohort of consumers.



Conclusions and recommendations

Our findings highlight a clear gap in each state between people eligible for concessions and those receiving their concession applied to their energy bills.

As the cost of living goes up, it is extremely important that people with limited incomes access the full range of supports they are entitled to. Reducing barriers to access and removing corporate or government “sludge” – part of the choice architecture that adds friction or difficulty to a consumers decision making - is essential to ensure consumers receive concessions they are entitled to.³²

Our findings also highlight the need to address data gaps. A clear objective of the 2015 Victorian Utility Consumption Household Survey was to inform the evaluation of the adequacy, equity and effectiveness of concessions in meeting their objectives. This survey has not been repeated since 2015. Research to evaluate how these frameworks operate is essential to determine what new or unaddressed problems are limiting access to essential cost of living supports.

CPRC recommendations

1

The Commonwealth Government should, working with state governments and energy regulators, conduct a coordinated review of the concessions framework. The review should seek to answer questions including:

- How many Australians who are receiving a concession card receive their full concession entitlements – and in particular their energy concession?
- How many Australians eligible for a concession card do not access this support or do not receive this support? What barriers prevent access?
- What barriers prevent the Department of Social Services from linking new concession card holders with the full suite of concessions they are entitled to?
- Are there key federal or state eligibility criteria preventing particular groups of low-income, vulnerable consumers from accessing energy concessions altogether?
 - Are additional eligibility requirements reasonable where they preventing concession card holders from accessing particular concession entitlements?
- How can all states expand eligibility for energy concessions to asylum seekers - as is the case in Queensland and Tasmania?
- To what extent do retailers proactively and effectively check whether consumers are eligible for a concession on their energy bill?
 - What barriers might prevent energy retailers helping consumers access their concession card entitlements?
 - Do third-party organisations - such as Financial Counsellors - encounter barriers when advocating on behalf of their clients to ensure concessions are applied to bills?



CPRC recommendations (cont.)

2 State governments should work with energy regulators to conduct a 'sludge audit' to identify unnecessary friction consumers face when accessing and applying for utility concessions.



3 State governments should play a stronger system stewardship role to monitor, evaluate concessions framework and publish robust outcomes data.



4 National cabinet should adopt data sharing about concessions as priority work area.³³



5 Departments, regulators and energy retail business should implement default mechanisms to automatically apply, re-validate or roll-over concessions to reduce administrative burden on consumers.



6 Regulators should require that energy bills more effectively communicate when concessions are applied.



Endnotes

¹ See Marks, S. & Ogle, G. *The State of Concessions in South Australia: Poverty Premiums and Barriers to Access*, Unley: South Australian Council of Social Service (2021); Bryant, David, Emily Porter, Ismo Rama, and Damian Sullivan. “Power pain: an investigation of energy stress in Australia.” Brotherhood of St. Laurence, Fitzroy, Vic. (2022).

² Australian Competition and Consumer Commission, *Retail Electricity Pricing Inquiry*, 2018.

³ Consumer Action Law Centre, “Discussion Paper: Unfair trading and Australia’s consumer protection laws”, (July 2015), <https://federation.gov.au/sites/default/files/about/agreements/iga-on-data-sharing-signed.pdf>

⁴ The Power Saving Bonus has since been expanded to all Victorians, regardless of concession eligibility, see: <https://compare.energy.vic.gov.au/psb-faq>

⁵ Fewer concessions checks were conducted during this first round as Power Savings Bonus work was conducted partially over the phone during periods of social distancing, limiting the ability of CPRC to review bills.

⁶ L Browne, H Jiang, E Tunngal and M Zhang, *Analysis of Energy Concessions for CPRC*, 2022

⁷ Australian Competition and Consumer Commission, *Retail Electricity Pricing Inquiry*, 2018, p 299

⁸ NSW Department of Planning and Environment, *NSW Energy Rebates Annual Report 2020-21*, 2021, p 4.

⁹ Department of Health and Human Services, *Victorian Utility Consumption Household Survey 2015*, Roy Morgan Research Ltd, State Government of Victoria, Melbourne, 2016, p 153. Available at: <https://www.dffh.vic.gov.au/publications/victorian-utility-consumption-household-survey>

¹⁰ Department of Social Services, *DSS Payment Demographic Data - Payment recipients by payment type and state and territory*, June 2022, available <https://data.gov.au/data/dataset/dss-payment-demographic-data>; Department of Veterans Affairs, *Treatment population Statistics - Table 2: treatment Population by State, Card and Aged Group*, March 2022, available <https://www.dva.gov.au/about-us/overview/research/statistics-about-veteran-population>

¹¹ Australian Energy Regulator, *Retail Market performance, Q3 2021-22*, June 2022. <https://www.aer.gov.au/retail-markets/performance-reporting>

¹² DHHS, *Victorian Utility Consumption Household Survey 2015*, p. 48

¹³ AER, *Retail Market performance, Q3 2021-22*

¹⁴ We calculated our weighting using the formula $((100/(1+x*R))+((100/(1+x*R)*R)))/100$ which is the estimated households per 100 with at least 1 concession, where “x” = average number of concessions in multi-concession households (2) and “R” = the ratio of multi-concession and single concession households (42/58 = 0.72).

¹⁵ Energy Networks Australia, *Reliable and clean gas for Australian homes, July 2021*, p. 2

¹⁶ DHHS, *Victorian Utility Consumption Household Survey 2015*, p 120

¹⁷ *Ibid.*, p 151

¹⁸ *Ibid.* p 153

¹⁹ Department of Treasury and Finance, *2022-23 State Budget - Budget Paper No. 3, May 2022* available <https://www.dtf.vic.gov.au/2022-23-state-budget/2022-23-service-delivery>

²⁰ Essential Services Commission, *Victorian Energy Market Report 2020-21, November 2021*, p. 42.

²¹ ESC, *Water Performance Report 2020-21*, February 2022, p. 5, 8.

²² Australian Energy Regulator, *State of the Market 2022*, September 2022, p 202

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