

Module 4:

Energy Industry Compliance

This module will help you understand the key components of energy industry compliance, its role in protecting consumers, and how regulations shape sales strategies and customer engagement.

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Welcome to the

AWAKEN ENERGY

Employee Learning & Development Program

Welcome to Awaken Energy's Employee Learning and Development Program. This program is designed to equip you with the knowledge and skills needed to succeed within your role at Awaken Energy by maintaining the highest standards of compliance and customer care.

The energy industry plays a vital role in powering homes, businesses, and communities across Australia. Understanding the market landscape is key to navigating its complexities and ensuring customers receive reliable, informed guidance. This module will introduce you to the structure of the Australian energy sector, its key stakeholders, and the broader forces that shape the industry.

Let's get started and awaken your potential in energy sales!

What is Energy Industry Compliance?

Energy industry compliance refers to the set of laws, regulations, and industry standards that govern how energy providers, retailers, and sales agents operate. It ensures that businesses act fairly, ethically, and in the best interests of consumers, while maintaining transparency and accountability across the energy market.

Compliance covers key areas such as:

- Consumer protection and data privacy
- Fair marketing and sales practices
- Transparent pricing and billing
- Adherence to national and state-based energy regulations

For sales teams, compliance means following the rules that promote honest communication, ethical selling, and respect for customer rights - all while helping maintain trust in the energy industry.



Why Compliance Matters

Compliance is crucial in the retail energy sector. It protects consumers and ensures businesses operate within legal frameworks. This module will provide you with an understanding of the key regulations relevant to your role in the Australian energy industry.

Key Legislation Covering Australian Businesses:

- The Privacy Act
- The Competition and Consumer Act – including Australian Consumer Law
- Energy Industry Regulations

These laws apply to most Australian businesses and specifically guide the operations of retailers and marketers within the energy market.

Energy Industry Regulations & Codes of Conduct:



We'll also explore industry-specific and state-based regulations that govern energy retail practices:

National Energy Customer Framework (NECF)

- Includes the National Energy Retail Law (NERL) & National Energy Retail Rules (NERR)

Western Australia:

- Gas Marketing Code of Conduct
- Compendium of Gas Customer Licence Obligations
- Australian Gas Association Customer Service Code

Victoria:

- Electricity Industry Act & Gas Industry Act
- Energy Retail Code of Practice
- Guidelines and Guidance notes issued by the Victorian Essential Services Commission



These rules guide how energy retailers like Origin operate, ensuring we follow proper processes and communicate accurately with customers. By understanding these regulations, you'll help maintain compliance and protect both the company and our customers.

The Privacy Act

Understanding the Australian Privacy Act

The Commonwealth Privacy Act protects personal information and sets clear guidelines for its handling.

It includes **13 Australian Privacy Principles (APPs)** that cover:

- The Collection, Use & Disclosure of personal information
- Storage & Security measures
- Access & Correction rights

What is Personal Information?

Personal information is any data that can identify a person, such as:

- Full Name
- Address
- Contact Details
- Identification Numbers
- Photos
- Date of Birth
- National Meter Identifier (NMI)
- Meter Installation Reference Number (MIRN)



The Privacy Act

THE WHY

Why It Matters in Energy Industry Sales

Sales reps often collect sensitive customer data (e.g., energy bills, identification).

Compliance with the Privacy Act ensures:

- Customer trust is maintained
- Legal obligations are met
- Fines & legal actions are avoided

THE WHO

Who Must Comply?

The Privacy Act applies to:

- Energy Retailers & Brokers
- Government Agencies
- Medium to Large Businesses
- Private Health Services & Credit Reporting
- Organisations Trading in Personal Data

& YOU

Key Responsibilities for Sales Teams

- Only collect information necessary for energy comparison & service connections
- Keep customer data secure and confidential Never disclose personal info without consent
- Allow customers to access & correct their information

Direct Marketing

Direct marketing involves targeting potential or existing customers through:

- Telemarketing (Phone Calls)
- SMS Messages
- Emails & E-Services
- Mail-Out Campaigns

The goal is to create sales opportunities and engage customers directly.

Managing Customer Data

- Both Awaken and partner retailers may retain consumer information, even after accounts become inactive.
- Consumers have the right to opt-out of direct marketing at any time.

Opt-Out Process

Customers can opt-out of all forms of direct marketing, including:

- Outbound calls
- Emails
- SMS
- Letters

Once an opt-out request is received:

- Action it immediately
- Maintain opt-out status until the customer requests reactivation

Your Responsibilities

- Respect customer preferences—once they opt out, no further marketing can be sent.
- Check with your Manager for company-specific processes to comply with the Spam Act.



Ignoring opt-out requests can lead to legal breaches under the Spam Act. Always verify customer preferences before conducting marketing activities.

Do Not Call Register

The Do Not Call Register is a national database, regulated by the Australian Communications and Media Authority (ACMA), that allows individuals, small businesses, and government bodies to opt out of receiving unsolicited telemarketing calls and marketing faxes.

Why Is It Used?

- Protects consumer privacy and control over contact.
- Reduces nuisance calls and unwanted telemarketing.
- Ensures ethical and trustworthy marketing practices.

Non-Compliance Risks

- Fines & Legal Action
- Damage to Reputation
- Loss of Consumer Trust

How We Must Comply?

- Do NOT contact numbers listed on the DNC Register without explicit consent or valid exemption.
- Regularly update call lists to ensure registered numbers are excluded.
- Respect opt-out requests—if a customer asks not to be contacted, action it immediately.
- No calls on Sundays or Public Holidays.
- Adhere to the Spam Act and ACMA guidelines to avoid penalties.
- Follow permitted calling hours which are Mon–Fri: 9 AM – 8 PM, Sat: 9 AM – 5 PM



Ignoring opt-out requests can lead to legal breaches under the Spam Act. Always verify customer preferences before conducting marketing activities.

'Do Not Knock' stickers

The 'Do Not Knock' Sticker is a legally recognised notice used by households and businesses in Australia to deter unwanted door-to-door sales. Supported by the Australian Competition and Consumer Commission (ACCC), the sticker signals that uninvited salespeople are not permitted to knock or approach the premises for sales purposes.

Why Are They Used?

- To Protect Consumer Privacy: Allows individuals and businesses to control who approaches their property.
- To Minimise Unwanted Sales Visits: Prevents unsolicited interruptions from door-to-door marketers.
- To Enforce Consumer Rights: The sticker acts as a formal refusal of unsolicited sales under Australian Consumer Law.

Non-Compliance Risks

- Fines & Legal Action under Australian Consumer Law.
- Damage to Company Reputation.
- Loss of Consumer Trust.

How We Must Comply?

- Do NOT approach or knock on premises displaying a Do Not Knock Sticker—it is considered trespassing.
- Educate sales teams about recognising and respecting the sticker.
- Understand the legal backing—ignoring the sticker can breach the Australian Consumer Law and may lead to penalties.
- Promote respectful practices during door-to-door campaigns to maintain trust and compliance.

Competition and Consumer Act

The Competition and Consumer Act 2010 (formerly the Trade Practices Act 1974) is Australia's primary law governing fair trading, competition, and consumer protection. It ensures that all businesses operate with honesty, fairness, and transparency in their dealings with customers, suppliers, and other businesses. Applying nationwide, the Act creates consistent rules and responsibilities for businesses of all sizes and industries.

Why Is the CCA Important for Sales?

- **Promotes Fair Competition:** Prevents unfair business practices and creates a level playing field.
- **Protects Consumers:** Ensures that customers are treated fairly and provided with clear, honest information.
- **Prevents Misleading Conduct:** Businesses cannot mislead or deceive customers through false advertising or deceptive sales tactics.
- **Regulates Unsolicited Sales Practices:** Includes strict rules for door-to-door sales, telemarketing, and other direct selling methods.



Australian Consumer Law

The Australian Consumer Law (ACL) is a national law that provides consistent consumer protections across Australia. It outlines consumer rights and sets clear obligations for businesses in all industries, including the energy sector, ensuring fair and transparent practices.

The ACL aims to:

- Promote fair trading
- Prevent misleading or deceptive practices
- Protect consumers from unethical business conduct

Key Protections Under the ACL:

- Misleading or Deceptive Conduct
- False or Misleading Representations
- Unconscionable Conduct
- Unsolicited Sales (Door-to-Door & Telemarketing)

Who Regulates the ACL?

Australian Competition and Consumer Commission (ACCC):

- Oversees general business compliance and enforces penalties for breaches of the ACL.

Australian Securities and Investments Commission (ASIC):

- Regulates consumer protection within the financial services sector.

State & Territory Consumer Protection Agencies (Fair Trading):

- Enforces the ACL at a state and local level, handling disputes and consumer complaints.

Misleading & Deceptive Conduct

Under the Competition and Consumer Act 2010, it is illegal for businesses or sales representatives to engage in misleading or deceptive conduct. In energy sales, this means providing accurate and honest information, avoiding actions that could create a false impression, and ensuring all claims, offers, and pricing are transparent and truthful.

Examples of Misleading or Deceptive Conduct in Energy Sales:

- **False Savings Claims:** Saying a customer will “definitely save money” without reviewing their current energy plan.
- **Misrepresenting Offers:** Advertising discounts without explaining conditions, like limited timeframes or usage restrictions.
- **Omitting Key Information:** Leaving out important details about rates, fees, or contract terms that impact the customer’s decision.
- **Impersonating Other Companies:** Suggesting you represent the customer’s current energy provider or a government body when you don’t.
- **Exaggerating Benefits:** Overstating environmental impacts, rebates, or the scope of renewable energy benefits.

How to Stay Compliant:

- **Be Transparent:** Clearly explain rates, fees, terms, and conditions.
- **Use Approved Materials and Scripts:** Only use marketing and scripts provided, these materials are created to help you stay compliant.
- **Fact-Check Statements:** Ensure all claims are accurate and supported.
- **Respect Cooling-Off Periods:** Inform customers of their 10-day cancellation right.
- **Avoid High-Pressure Tactics:** Allow customers time to make informed decisions.

False or Misleading Representation

Under the Competition and Consumer Act 2010, it is illegal for businesses or sales representatives to make false or misleading representations about products, services, or prices. In energy sales, this means avoiding untrue, exaggerated, or incomplete statements, withholding important information, or using tactics that could create a false impression of the offer or product.

Examples of False or Misleading Representations in Energy Sales

- **Incorrect Pricing Information:** Quoting lower rates or discounts that don't apply to the customer's location or usage.
- **Misleading Contract Terms:** Failing to mention fixed contract lengths, exit fees, or automatic rollovers.
- **Fake Endorsements or Affiliations:** Claiming the energy plan is backed by the government or environmental agencies without proof.
- **Inflated Environmental Claims:** Overstating renewable energy contributions or carbon offsets.
- **Deceptive Product Comparisons:** Misrepresenting a competitor's rates or conditions to make your offer seem better.

How to Stay Compliant

- **Be Accurate:** Ensure all rates, fees, and contract terms are explained clearly.
- **Disclose Key Information:** Highlight any conditions, hidden fees, or limits on discounts.
- **Avoid Generalised Claims:** Statements like "best rates in Australia" must be factually supported.
- **Use Verified Data:** Only use approved sales materials and data when discussing pricing or savings.
- **Be Honest About Affiliations:** Never suggest government or independent backing if it doesn't exist.

To stay compliant and protect both you and the customer, it's essential that you only use the approved scripting and marketing materials provided by Awaken.

They've been carefully developed to ensure your conversations are clear, accurate, and legally compliant.

Unconscionable Conduct

Unconscionable conduct, under the Competition and Consumer Act 2010, refers to actions that are harsh, oppressive, or unfairly manipulative. In energy sales, this includes exploiting customer vulnerabilities, using high-pressure tactics, or misleading customers into contracts they don't fully understand.

Examples of Unconscionable Conduct in Energy Sales:

- **High-Pressure Sales Tactics:** Forcing a customer to make a quick decision or threatening negative consequences if they don't sign up.
- **Exploiting Vulnerable Customers:** Taking advantage of elderly customers, non-English speakers, or people with limited understanding of energy products.
- **Misusing Authority or Trust:** Implying that you're from a government body or the customer's current provider to gain trust.
- **Withholding Important Information:** Failing to disclose fees, contract terms, or the impact of changing energy providers.
- **Ignoring Customer Requests:** Continuing a sales pitch after the customer has asked you to leave or stop the conversation.

How to Stay Compliant

- **Be Transparent:** Always explain rates, fees, and contract terms in simple language.
- **Respect Customer Choices:** If a customer says "no," stop the sales process and leave the premise immediately. After leaving the premises, update the CRM to reflect the customer's request for you to leave.
- **Identify Vulnerabilities:** If you notice a customer may not fully understand the offer, take extra care or stop the sale.
- **Avoid Manipulative Tactics:** Don't use fear, guilt, or urgency to pressure customers into making decisions.
- **Follow Ethical Sales Practices:** Focus on helping the customer, not just making the sale.

Unsolicited Sales

Unsolicited sales, under the Australian Consumer Law (ACL), occur when a salesperson contacts a customer without a prior request, typically through door-to-door sales or telemarketing. In energy sales, these interactions are tightly regulated to ensure fairness, transparency, and consumer protection, including restrictions on permitted calling hours.

Permitted Calling Hours:

Day	Allowed Times
Monday - Friday	9am - 6pm
Saturday	9am - 5pm
Sunday & Public Holidays	No Sales Allowed

Your Legal Responsibilities:

- **Identify Yourself:** State your name, the company you work for, and clearly identify the retailer you are representing (e.g. Origin Energy). Explain your purpose and show ID if requested.
- **Respect "Do Not Knock" Signs:** Do not approach properties with a Do Not Knock sticker.
- **Provide Clear Information:** Explain rates, terms, and conditions, and give a written agreement with cooling-off details.
- **Cooling-Off Period:** Customers have 10 business days to cancel without penalty; no payments or services can start unless requested.
- **Leave When Asked:** Stop the sales process and leave the premise immediately. After leaving the premises, update the CRM to reflect the customers request for you to leave.

Unlawful Practices to Avoid:

- **High-Pressure Tactics:** Don't pressure customers to sign on the spot.
- **Misrepresenting Affiliations:** Never claim to represent the government, regulator, or existing provider if you don't.
- **Failing to Explain Cooling-Off Rights:** Always inform customers of their right to cancel.
- **Ignoring Opt-Outs:** Respect all Do Not Call and Do Not Knock requests.

National Energy Customer Framework

The National Energy Customer Framework (NECF) is a unified regulatory framework that governs the sale and supply of energy to customers across several Australian states and territories. It aims to standardise energy regulations and ensure the protection of consumer rights, providing consistency in how energy is sold, supplied, and managed across participating regions.

The Framework includes:

- New South Wales (NSW)
- South Australia (SA)
- Australian Capital Territory (ACT)
- Queensland (QLD)

The Framework includes:

- **National Energy Retail Law (NERL)** – Sets out obligations for energy retailers and customer rights.
- **National Energy Retail Rules (NERR)** – Provides detailed operational guidelines for energy retailers.
- **National Energy Retail Regulations** – Complements NERL and NERR with specific regulatory requirements.

Key Protections Under NECF:

- **Transparent Billing & Pricing** – Clear and accurate energy bills for consumers.
- **Disconnection & Reconnection Rules** – Protections around service disconnections and reconnections.
- **Customer Hardship Policies** – Retailers must have hardship programs for vulnerable customers.
- **Rights to Access and Switch Retailers** – Ensures customer freedom to choose or change energy providers.

State Specific Frameworks

The National Energy Customer Framework (NECF) is a unified regulatory framework that governs the sale and supply of energy to customers across several Australian states and territories. It aims to standardise energy regulations and ensure the protection of consumer rights, providing consistency in how energy is sold, supplied, and managed across participating regions.

Victoria

- **Operates outside NECF:** Under its own energy laws and regulations.
- **Energy Retail Code of Practice:** Rules for billing, contracts, marketing, and customer support.
- **Distribution Code of Practice:** Covers supply, outages, disconnections, and life support protections.
- **Customer Transfer Code:** Sets standards for switching between retailers.

Victoria strongly focuses on customer rights, billing clarity, and responsible marketing.

Western Australia

- **WA Opt-Out:** Operates under its own state-based framework, separate from NECF.
- **Electricity Industry Act & Gas Supply Regulations:** Core energy supply laws.
- **Gas Marketing Code of Conduct:** Regulates ethical gas marketing practices.
- **Gas Customer Licence Obligations:** Outlines responsibilities for gas providers.
- **Gas Association Customer Service Code:** Sets service standards for gas retailers.

WA's framework prioritises energy safety, reliability, and customer protection.

Why State-Based Compliance Matters:

- Each jurisdiction has unique rules that energy retailers and sales teams must follow.
- Non-compliance can lead to legal penalties, financial losses, and reputation damage.
- Understanding state-specific frameworks ensures ethical sales practices and protects consumer rights.

Consumer Protections

The National Energy Customer Framework (NECF) and the Victorian Retail Codes establish minimum protections for small retail customers, covering both residential and small business customers. These protections ensure fair treatment, transparent pricing, and reliable service.

However, the protections and service standards can vary depending on the type of contract:

- Standing Retail Contracts – Offer basic protections with regulated terms and conditions, providing a safety net for customers.
- Market Retail Contracts – Typically offer competitive rates or additional benefits but may have different terms, conditions, and service standards compared to standing contracts.

It's essential for customers to understand the differences between these contract types to make informed decisions about their energy plans.



Consumer Protections

Market Retail Contracts

- Customers must provide explicit informed consent before entering into a market retail contract.
- Discounts, incentives, and other benefits may be offered under market contracts.
- Origin has the flexibility to vary terms and conditions with appropriate notice provided to the customer.

Standard Retail Contracts

- Origin is required to offer standard retail contracts to eligible customers, with eligibility criteria varying across different states and territories.
- These contracts follow regulated pricing and offer consistent protections under energy legislation.

Bill Content Requirements

- Actual or estimated usage – Meters must be read at least once every 12 months.
- Usage graphs – To help customers track their energy consumption.
- Information on the availability of concessions and rebates.

Billing Frequency

- In NECF jurisdictions, customers must be billed at least once every 3 months for electricity and natural gas.
- In Victoria, natural gas customers must be billed at least every 2 months.
- Customers with an eligible smart meter can opt-in for monthly billing.

Undercharging & Overcharging Protections

- Time limits apply for recovering any undercharged amounts.
- Customers must be refunded for overcharges within regulated timeframes.

Consumer Protections

Payment & Financials

Flexible Payment Arrangements

- Options for payment deferrals, promises to pay, and structured payment plans.

Payment plans must:

- Allow for payments both in arrears and in advance.
- Clearly outline the start date, payment amounts, and include scheduled plan reviews.

Credit & Usage Management

- In NECF jurisdictions, customers must be billed at least once every 3 months for electricity and natural gas.
- In Victoria, natural gas customers must be billed at least every 2 months.
- Customers with an eligible smart meter can opt-in for monthly billing.

Disconnection Protocols

- Clear guidelines on when and how a customer can be disconnected.
- Customers must be given proper notice and opportunities to avoid disconnection.

Assistance Programs

Customers must be informed of available financial assistance options, including:

- Concessions and rebates
- Utility Relief Grant Scheme (Victoria only)
- Energy Accounts Payment Assistance (EAPA) (New South Wales only)
- Independent financial counselling services
- Energy efficiency audits

Hardship Policy

- Origin's Hardship Policy ensures support for customers experiencing financial hardship.
- Tailored payment solutions and access to support resources.

Billing Due Dates & Fees

- Payment due dates must be at least 13 business days from the bill issue date.
- Late payment fees are capped and only applicable to specific products, in line with regulations.

Standard Customer Protections

Additional Customer Protections

Energy Products & Offers

Compliance with regulations on offering:

- Regulated energy plans
- Market offers
- Transparent eligibility criteria for all offers

Metering Services

- Clear notifications and timeframes for meter changes, replacements, and upgrades.

Strict controls around:

- Data access
- Privacy protection
- Complaint management related to metering services

Complaints & Dispute Resolution

- Clear complaint handling procedures and escalation pathways.
- Customers can escalate unresolved issues to the Energy Ombudsman for independent review.

Exit Fees

- Limitations on exit fees, including caps on the maximum amount and specific product eligibility.

Life Support Protection

- Strict safeguards for customers who rely on life support equipment.

Obligations include:

- Prompt notification to the energy distributor upon life support registration.
- Ensuring continuous supply and additional protections during outages or planned works.

Regulatory Requirements- Product & Price

Welcome Packs

When a customer accepts an energy offer and joins Origin, they will receive a Welcome Pack via post or email, which includes essential information about their plan and their rights.

Key Inclusions in the Welcome Pack:

- Contract summary outlining the key terms and conditions
- Pricing details specific to the customer's distribution zone and fuel type
- Billing frequency, payment options, and fees
- Cancellation notice with clear instructions on how to cancel the contract
- Contact information for Origin's customer service

For VIC Customers:

- A Quote Summary must be provided upon request before finalising the sale.

How to Cancel:

- Customers can cancel by calling Origin or by using the Cancellation Notice provided in their Welcome Pack.



Regulatory Requirements- Product & Price

Pricing & Plan Information

Energy retailers must ensure that product and pricing information is clear, accurate, and easy to access.

State / Territory	Pricing Document	Where to Access
VIC	Victorian Energy Fact Sheets (VEFS)	Linked PDF's on Retailer Websites
NECF	Basic Plan Information documents (BPID'S)	Energy Made Easy
WA	Energy Price Fact Shhets	Avaliable On Retailer Rebsites

Important Notes



- A separate pricing document exists for each distribution zone, fuel type, and product.
- These documents outline all available tariffs, fees, and charges applicable to the customer.
- Customers must be provided with the correct pricing document based on their location and selected energy product.

Regulatory Requirements- Product & Price

Cooling Off Period

The Cooling-Off Period gives customers the right to cancel their energy contract for any reason within 10 business days after receiving their Welcome Pack.

Key Cooling-Off Period Rules:

- All customer cancellation requests during this period must be processed without penalty.

The Cooling-Off Period may be extended if:

- The sale was not conducted in a compliant manner.
- The Welcome Pack was delayed beyond standard processing times.
- No disconnection fees or penalties can be charged if the customer cancels within the Cooling-Off Period.



Understanding Regulatory Changes

Since 1 July 2019, several regulatory reforms have been introduced to improve transparency and fairness for customers engaging with energy retailers.

Why Were These Changes Made?

- Customer Feedback: Industry reviews highlighted concerns about the complexity of energy pricing and high energy bills.
- Fairer Practices: The changes aim to make retailer conduct more transparent and to simplify the customer experience.
- Empowering Customers: These reforms help customers make better-informed decisions about energy plans and pricing.



Understanding Regulatory Changes

-5 Key Regulatory Changes

Victorian Default Offer (VDO) & Default Market Offer (DMO)

- These offers provide a fair, government-regulated energy price as a reference point for customers.
- VDO applies to Victorian customers, while the DMO applies to NSW, SA, and QLD.
- Customers who do not actively choose a plan will be placed on these default offers, ensuring they are not overcharged.

GST-Inclusive Pricing

- All prices presented to customers must now include Goods and Services Tax (GST).
- This ensures customers see the total cost without hidden fees.

Best Generally Available Offer on Bills

- Energy bills must display the best generally available offer from the retailer.
- This helps customers easily compare their current plan with better offers that may be available.

Clear Advice Entitlement

- Retailers are required to provide customers with clear advice about plans, pricing, and options during all sales and customer service interactions.

Sales reps must clearly explain:

- Plan benefits and limitations
- Any fees, discounts, or contract terms
- How the plan compares to other available options

Bill Change Notices

- Customers must be given advance notice when any changes occur to their rates, charges, or terms.
- This allows customers to make informed choices before changes take effect.

GST Pricing (Victoria)

Since 1 July 2019, the Victorian Government has mandated that all electricity and gas retailers display GST-inclusive pricing on all customer communications in Victoria.

Why Was This Change Introduced?

- To provide customers with full transparency on the total cost of their energy services.
- To make it easier for customers to compare offers and avoid unexpected costs.
- To ensure consistent pricing information across all energy retailers.

Sales Requirements When Quoting or Selling in Victoria

State All Rates Inclusive of GST:

- Whether quoting usage rates, daily supply charges, or service fees—always include GST.

Ensure Clarity in All Customer Communications:

- Avoid quoting ex-GST prices or separating GST as a hidden charge.

Use Correct Pricing in Sales Materials:

- All sales brochures, online listings, and verbal quotes must reflect GST-inclusive rates.

Highlight GST-Inclusive Pricing in Contracts:

- Ensure that the total cost breakdown in customer contracts aligns with Victorian regulations.



GST Pricing (Victoria)

What Must Include GST-Inclusive Pricing?

The following documents and customer communications must clearly display all rates, tariffs, fees, and charges inclusive of GST:

Document/Notice	Pricing Document
Bills	Includes service order fees, usage charges, and concessions.
Overdue Notices	All amounts owing, including penalties and late fees.
Vacant Consumption	Charges for energy used at vacant premises.
Quotes & Contract Packs	All quoted rates and charges in customer proposals.
Victorian Energy Fact Sheets	Tariffs, fees, and charges presented for plan comparisons.

Best Available Offer (Victoria)

Since 1 July 2019, all Victorian electricity and gas bills must display information indicating if there is a better generally available offer that the customer is not currently on.

Purpose of This Change

- To help customers easily compare their current plan with potentially cheaper alternatives.
- To increase transparency and empower customers to make better-informed energy decisions.

What Does This Mean for Customers?

- The bill will highlight if there's a better generally available offer that could result in cost savings.
- While this offer may be cheaper, it might not always be the most suitable based on the customer's preferences.

Considerations for Customers

- **Billing Preferences:** Some offers may require direct debit or email-only billing, which may not suit every customer.
- **Payment Flexibility:** Certain plans may have specific payment conditions or restrictions.
- **Usage Patterns:** The best plan depends on individual energy consumption habits and lifestyle needs.

Clear Advice (Victoria)

The Clear Advice initiative, introduced for Victorian customers, ensures that consumers receive clear, timely, and reliable information to help them make informed decisions about their energy plans. The goal is to provide transparent and easy-to-understand details so customers can confidently select the plan that best suits their needs.

What Information Must Be Shared with Customers?

Applicable Fees:

Any fees that may apply based on the customer's choices, including:

- Paper bill fee
- Payment processing fee (e.g., over-the-counter payments)
- Card payment fee (for credit/debit card transactions)

Right to Vary Charges:

- Customers must be informed that Origin reserves the right to adjust charges as per regulatory and market changes.

Discount Expiry or Changes:

- Clearly explain when any discounts or benefits will end or change, ensuring there are no surprises later.

How Is This Applied in Sales Conversations?

- All this information is embedded in the approved sales scripts, ensuring that sales reps consistently provide clear advice during every interaction.
- Explicit Informed Consent (EIC) processes are in place to guarantee that customers understand the key terms before agreeing to a plan.

Consistency Across States

While the Clear Advice initiative is a Victorian-specific requirement, these principles have been integrated into sales scripts nationwide to:

- Maintain consistency in customer messaging.
- Ensure transparency and fairness for all customers.

Victorian Energy Fact Sheets (VEFS)

In Victoria, energy retailers now use the Victorian Energy Fact Sheet (VEFS) to standardise all product information instead of creating individual pricing sheets. This approach presents offers in a clear, transparent, and consistent format, making it easier for customers to compare plans across different retailers.

Key Features of the VEFS

- **Standardised Format:** All retailers follow the same template, making plan comparisons simple.
- **GST-Inclusive Pricing:** All rates, fees, and charges are displayed inclusive of GST.
- **Estimated Annual Costs:** Provides an estimate of the total cost based on typical usage for the distribution zone.
- **Terms & Conditions:** Outlines contract terms, billing frequency, and details of any discounts or fees.
- **Unique Reference Number:** Each VEFS has a unique reference number that customers can use to:
 - Request a copy of the fact sheet.
 - Refer to specific offers during discussions with customer service or sales representatives.



Victorian Energy Fact Sheets (VEFS)

Why is the VEFS Important for Sales?

- Ensures transparency in pricing and product information.
- Helps customers easily compare energy plans and make informed decisions.
- Promotes fair competition between energy retailers.
- Supports compliance with Victorian regulatory requirements.

Sales Team Responsibilities

- Always refer to the VEFS when discussing pricing and plan details with Victorian customers.
- Direct customers to the VEFS when they want more information or need clarification.
- Provide the unique reference number if a customer requests it for future reference.
- Ensure that all quotes and offers align with the information in the VEFS.



Key Compliance Tip

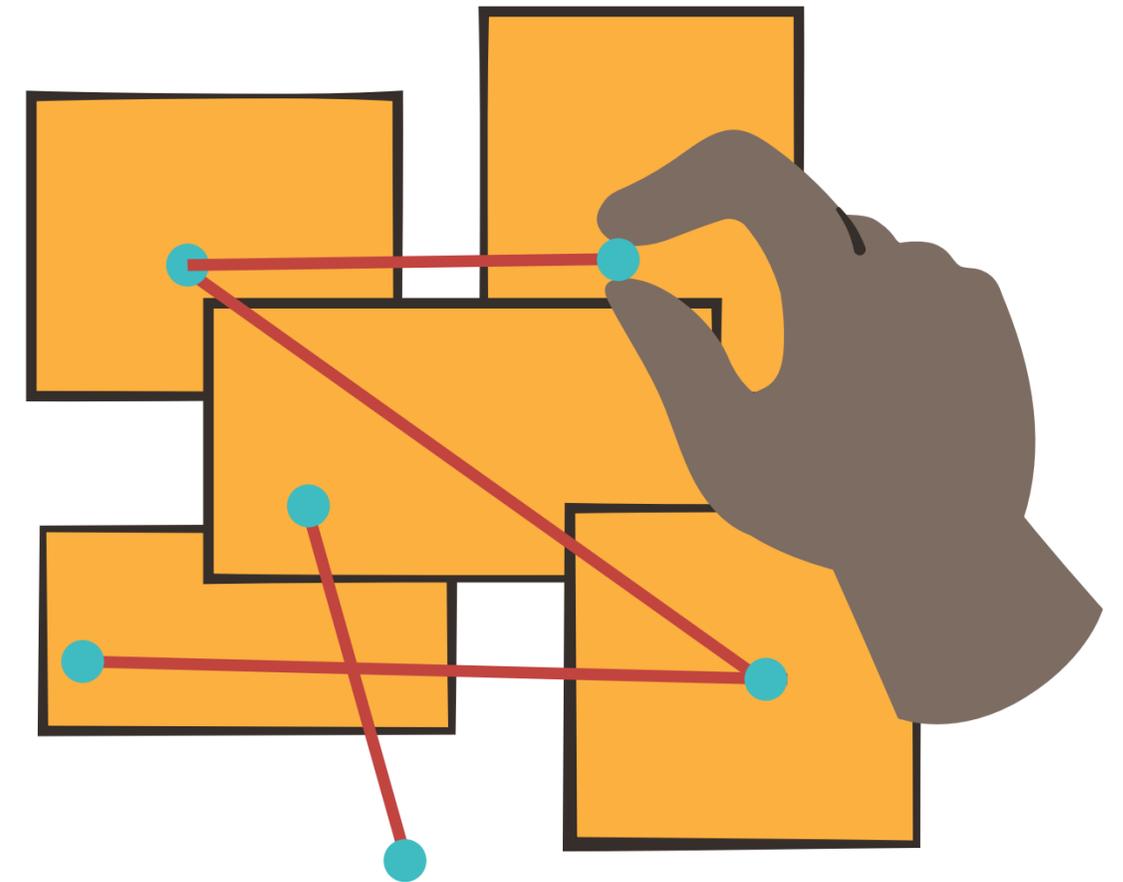
- If a customer asks for a copy of a specific plan's VEFS, you must provide it.
- All pricing, terms, and conditions discussed with the customer must match the information listed in the VEFS.

Basic Plan Information Document (BPID)

The Basic Plan Information Document (BPID) is a mandatory, standardised summary used in NSW, QLD, SA, and ACT to outline key details of each energy offer, ensuring transparent pricing and enabling informed customer decisions. All BPIDs are available on the Energy Made Easy website and are regulated by the Australian Energy Regulator (AER).

Key Features of the BPID

- **GST-Inclusive Pricing:** All rates, fees, and charges are displayed inclusive of GST.
- **Estimated Annual Costs:** Provides estimated yearly costs based on typical usage in the customer's distribution zone.
- **Tariffs and Charges:** Breaks down energy rates, daily supply charges, and any applicable discounts or fees.
- **Contract Terms:** Includes information on contract length, billing frequency, and exit fees (if applicable).
- **Plan Conditions:** Highlights any specific conditions such as:
 - Direct debit requirements
 - Online billing preferences
 - Solar feed-in tariffs (if available)
- **Unique Offer ID:** Each BPID has a unique identifier that allows customers to reference or request a specific plan.



Basic Plan Information Document (BPID)

Why is the VEFS Important for Sales?

- Ensures transparent and consistent pricing across all energy retailers.
- Helps customers compare energy plans with confidence, knowing all offers follow the same format.
- Supports compliance with regulations enforced by the Australian Energy Regulator (AER).
- Builds trust with customers by providing clear, factual, and standardised information.

Sales Team Responsibilities

- Always use the BPID when quoting prices and explaining energy plans to customers.
- Refer customers to the Energy Made Easy website for further plan comparisons.
- Provide the unique offer ID if a customer requests details of a specific plan.
- Ensure that all quotes and information provided during sales conversations align with the details in the BPID.
- Provide every customer that has a pricing conversation with the BPID used to form your pricing discussion.



Key Compliance Tip

- Never provide rates or plan details that differ from the official BPID.
- You must provide the necessary BPID during the sales conversation or before you finish your customer interaction once pricing has been discussed.
- Always include GST-inclusive pricing when discussing rates and fees.

Explicit Informed Consent (EIC)

Before any energy sale can be finalised, the customer must give Explicit Informed Consent (EIC). This means they fully understand the offer, have received all required information, and are agreeing to the plan freely, without pressure or confusion.

EIC is a legal requirement across the energy industry and is essential to ensuring customers are protected and treated fairly during the sales process – regardless of the state or regulatory framework in which the sale occurs.



A customer has provided Explicit Informed Consent when they:

- Have been given clear, complete, and accurate information
- Understand the product, pricing, and terms of the energy plan, and have been given the opportunity to ask questions or seek clarification before providing consent. If there is any confusion or uncertainty, this must be resolved prior to proceeding
- Know their rights, including the 10-business-day cooling-off period
- Give their consent freely, without pressure or undue influence
- Are referred to an interpreter service if they express concern about understanding the contract due to language barriers, or if it is apparent that English is not their preferred language

Key Steps to Ensure EIC is Obtained

1

Explain the Offer Clearly

- Outline the benefits, costs, and terms of the plan using simple, plain language.
- Highlight any tariffs, fees, or additional charges.

2

Confirm Customer Understanding

- Ask if they understand the product attributes, how it works, and what it will cost.
- Check if they know about the cooling-off period and how to cancel if needed.

3

Recap & Reassure

- Provide a quick summary of the key points.
- Ask if they need time to think it over or wish to discuss it with someone else.
- Offer to schedule a follow-up call if they are unsure.

Explicit Informed Consent (EIC)

What Must Be Disclosed Before EIC?

- **Product details:** tariffs, charges, fees, and any applicable discounts
- **Terms & Conditions:** including contract length, billing frequency, and payment options
- **Cooling-Off Rights:** 10 business days to cancel without penalty
- **Contact Information:** how to reach Origin for questions or cancellations
- **Tariff Variations:** if and how rates may change during the contract

How Do We Obtain EIC?

EIC can be obtained through the following methods:

- **Verbal Consent:** via recorded phone calls (with the customer's permission)
- **Written Consent:** through physical documents or signed forms
- **Electronic Consent:** via emails or online agreement forms

Remember

- The entire sales conversation is part of obtaining EIC—not just the final scripted statement.
- If a customer requests access to their EIC record, refer the request to a Manager.

Why Is EIC Important?

- It ensures legal compliance and protects both the customer and the retailer
- It builds trust and reinforces transparency in energy sales
- Failure to obtain proper EIC is a reportable breach to the Australian Energy Regulator (AER) and the Victorian Essential Services Commission (ESC). It may also result in fines, regulatory enforcement action, customer complaints, and reputational damage

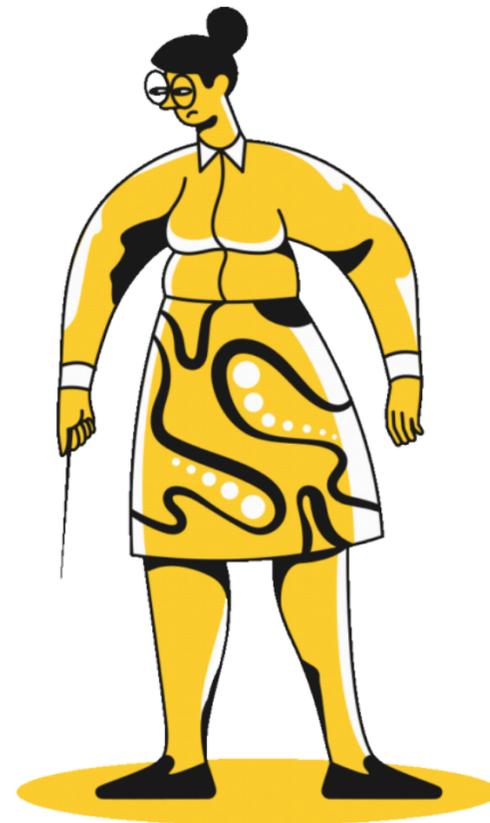
Complaints

Why Effective Complaint Handling Matters

Energy retailers are required to follow sound complaint handling and dispute resolution procedures in line with Business Standards and Energy Industry Regulations.

These regulations ensure:

- Fair treatment of all customers
- Transparency in handling disputes
- The customer's right to escalate complaints
- to a senior representative or the Energy
- Ombudsman if unresolved



Standard Complaint Handling Procedures

Published Complaints Procedure:

- Every energy retailer must have a publicly available complaint handling process, typically found on their website.

Complaint Management Framework:

- For companies using Third-Party Sales representatives, a formal Complaint Management Framework should be in place to ensure consistency in how complaints are handled.

Record-Keeping Requirements:

- Maintain accurate records of all customer complaints.
- Be prepared to provide complaint records to a Regulator or the Energy Ombudsman upon request.
- Timely reporting is required for Regulatory Audits and Compliance Reviews.

Complaints

Timeframes & Escalation Procedures

Acknowledge the Complaint Promptly

- Customers should receive acknowledgment within standard timeframes as set by industry regulations.

Timely Resolution

- Strive to resolve complaints as quickly as possible. Complex cases should have regular updates provided to the customer.

Escalation Options

Customers must be informed of their right to escalate:

- Internally to a senior team member
- Externally to the Energy Ombudsman if unresolved

Non-Compliance Risks

- Regulatory Penalties for improper complaint handling
- Reputational damage due to unresolved or poorly managed complaints
- Increased likelihood of disputes being escalated to the Energy Ombudsman

Responsibilities for Complaint Handling

Sales Teams

- Log all customer complaints accurately
- Follow internal protocols for resolving and escalating complaints

Management Teams:

- Ensure adherence to the company's Complaint Handling Policy
- Monitor compliance with Regulatory Standards
- Oversee any complaints escalated to the Ombudsman

Third-Party Partners:

- Must follow the Complaint Management Framework and comply with all industry standards

Best Practices for Handling Complaints

- Listen actively and show empathy
- Acknowledge the issue and provide clear next steps
- Follow up until the complaint is fully resolved
- Always inform customers of their right to escalate

Complaint Escalations

Why Complaint Management is Important

Effective complaint handling ensures fair treatment of customers and strengthens trust between the customer, the sales channel, and the energy retailer.

- It's a regulatory requirement to follow proper complaint handling procedures.
- Unresolved complaints can be escalated to the Energy Ombudsman, leading to additional costs for the retailer and potential reputational damage.
- Third-Party Sales Channels must share customer complaints with Retailer Partners to ensure complete visibility and proper resolution.

Complaint Escalation Process

Acknowledge & Document:

- Record all details of the customer's complaint accurately.
- Ensure the customer feels heard and understood.

Escalate When Necessary:

- If the customer is unsatisfied with the initial resolution, escalate the complaint to a Senior Representative or Manager.

Referral to the Ombudsman:

- If the issue remains unresolved after escalation, inform the customer of their right to contact the Energy Ombudsman for their state or territory.
- The Ombudsman acts as an independent mediator between the customer and the retailer.
- This service is free for customers, but retailers incur costs for each referred case.

Third-Party Sales Channels – Additional Responsibilities

All complaints received through third-party sales channels must be shared with Retailer Partners to:

- Maintain transparency
- Ensure consistent messaging to the customer
- Support the retailer's customer engagement and resolution process

Complaint Escalations

Key Things to Remember

- Always escalate complaints to a Senior or Manager if the customer is unhappy with the proposed solution.
- Inform customers of their right to contact their state's Energy Ombudsman if further resolution is needed.
- Ensure third-party complaints are shared with retailer partners for proper oversight and support.
- Poor complaint handling can lead to regulatory penalties, reputational damage, and increased costs for the retailer.



Complaint Escalations

State/Territory	Ombudsman Website	Phone Number
New South Wales	Energy & Water Ombudsman NSW	1800 246 545
Australian Capital Territory	ACT Civil & Administrative Tribunal (ACAT)	(02) 6207 1740
Queensland	Energy & Water Ombudsman QLD	1800 662 837
Victoria	Energy & Water Ombudsman VIC	1800 500 509
South Australia	Energy & Water Ombudsman SA	1800 665 565

Hardship

In the energy industry, supporting customers experiencing financial hardship is both a legal obligation and a critical part of responsible customer care.

What is customer hardship?

A customer is considered to be experiencing hardship when they are struggling to pay their energy bills due to financial difficulties caused by factors such as:

- Loss of income or employment
- Illness, disability, or family emergencies
- Natural disasters
- Domestic or family violence

Energy retailers must have a Hardship Policy in place to provide supportive options and prevent disconnection of essential services for vulnerable customers.

Key Principles of Hardship Programs

- **Fairness & Respect:** Treat all customers with empathy, dignity, and understanding.
- **Accessibility:** Ensure customers are aware of and can easily access hardship support options.
- **Flexibility:** Offer tailored solutions that meet individual customer needs.
- **Transparency:** Clearly explain options available and how the hardship process works.



Hardship

Signs a Customer May Be in Hardship

Be alert for these indicators during sales or service conversations:

- Frequent complaints about bills being too high
- Requests for payment extensions or payment plans
- Comments about financial stress or unexpected life events
- Disconnection threats or requests for urgent assistance

Support Options for Hardship Customers

Flexible Payment Plans:

- Options to pay in arrears or in smaller, more manageable amounts.
- Customers must be informed of start dates and regular reviews of payment arrangements.

Bill Assistance Programs:

- Access to concessions, rebates, or government-funded grants (e.g., Utility Relief Grant in VIC or EAPA in NSW).

Energy Efficiency Advice:

- Guidance on how to reduce energy usage and lower future bills.

Debt Waivers or Fee Reductions:

- In cases of extreme hardship, certain fees may be reduced or waived.

Your Responsibilities as a Sales Representative

- Identify when a customer may be in hardship and offer support.
- Inform customers about the retailer's hardship program and how they can apply.
- Never pressure a customer in financial distress into signing a contract.
- Document any hardship indicators and escalate cases when necessary.
- Always refer customers to the appropriate hardship team or customer support service.

IMPORTANT NOTICE

Origin's policies DO NOT allow Third Party Providers to sell to hardship customers.

Doing so may result in compliance breaches and reputational damage.

Customers in hardship must be directed to

(PROCESS TBC)

Family & Domestic Violence (FDV)

In the energy industry, recognising and supporting customers affected by Family and Domestic Violence (FDV) is a crucial component of responsible and ethical customer care.

Regulatory frameworks require energy retailers to

- Implement clear policies to support FDV-affected customers
- Maintain privacy and confidentiality
- Provide flexible solutions to prevent disconnection and financial hardship
- Energy is an essential service. Customers facing FDV must be treated with care, respect, and empathy.

Key FDV Provisions for Energy Retailers

Confidentiality & Privacy:

- Customer details and FDV status must be kept strictly confidential.
- Only share information on a need-to-know basis and with explicit consent.

Flexible Payment & Debt Support:

- Offer tailored payment arrangements to reduce financial pressure.
- Waive fees (e.g., late payment or disconnection fees) where appropriate.
- Prevent disconnection of essential energy services during times of crisis.

Specialised Hardship Support:

- Customers affected by FDV should have direct access to hardship teams who are trained to handle sensitive cases.
- Provide information on external support services, including financial counsellors and FDV crisis organisations.

Safe Communication Practices:

- Allow customers to select safe communication channels (e.g., email vs. phone calls).
- Avoid sending sensitive information to shared household addresses or phone numbers where risk may be involved.

Family & Domestic Violence (FDV)

Responsibilities for Sales & Customer Service Teams:

Recognise Signs of FDV:

- Signs may include requests for account separation, concerns about privacy, or financial stress linked to personal circumstances.

Respond with Sensitivity:

- Approach the conversation with empathy and non-judgement.
- Avoid pressing for personal details and focus on offering help and solutions.

Provide Accurate Information:

- Inform customers of the available hardship policies, payment options, and support pathways.
- Clearly explain disconnection protections and debt assistance available to FDV-affected customers.

Escalate When Needed:

- If a customer indicates they are affected by FDV, escalate the case to a trained hardship or specialist support team.
- Ensure the customer's privacy and security are maintained throughout.

Regulatory Requirements:

- Energy retailers must comply with state and national guidelines regarding FDV support in the energy industry.
- Retailers may be audited on FDV support procedures and their adherence to consumer protection laws.

IMPORTANT NOTICE

Origin's policies DO NOT permit Third Party Providers to discuss energy plans or offers with customers impacted by family or domestic violence.

This ensures we do not unintentionally increase risk or breach customer protections.

If an FDV-affected customer wishes to explore energy options, they must be referred to:

(PROCESS TBC)

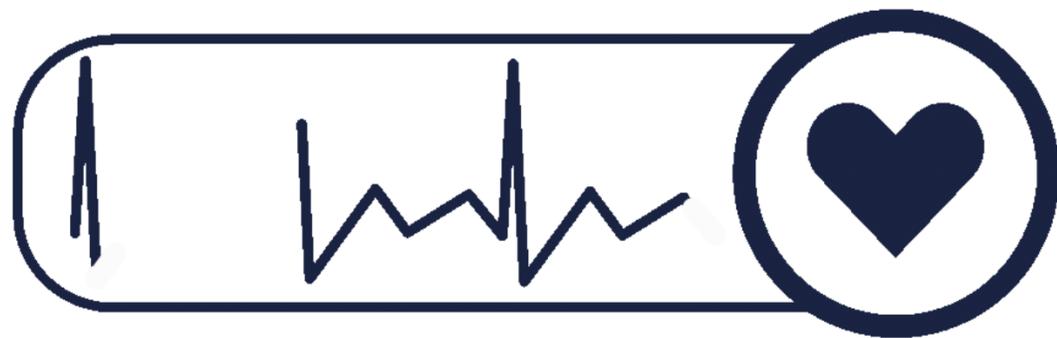
Life Support Customers

A Life Support Customer is a customer who relies on specific medical equipment that requires a continuous energy supply to sustain life or manage serious health conditions.

Examples of life support equipment include

- Oxygen concentrators
- Dialysis machines
- Ventilators
- Nebulisers
- Monitors for heart or respiratory functions

Energy retailers have a legal obligation to provide additional protections to ensure these customers have uninterrupted energy access whenever possible.



Key Protections for Life Support Customers

Registration of Life Support Status:

- Customers must register their life support equipment with their energy retailer and energy distributor.
- Retailers must ensure accurate information is shared with the distributor to prevent service disruptions.

Disconnection Protections:

- Life support customers cannot be disconnected due to non-payment or maintenance work without prior notice.
- Disconnection is only permitted under extreme circumstances and with proper safeguards in place.

Planned & Unplanned Outages:

- Advance notice must be provided for planned outages.
- Retailers and distributors should work together to minimise the impact of outages on life support customers.

Emergency Contact:

- Customers should have emergency contact details and be informed about procedures during power outages.

Life Support Customers

Sales & Customer Service Responsibilities

Identify Life Support Needs Early:

- During sales calls or account setup, ask if there is life support equipment at the premises.

Assist with Registration:

- Guide customers through the process of registering life support equipment with both the retailer and distributor.
- Ensure all required documentation is completed and processed promptly.

Communicate Responsibilities:

Inform customers of their obligations to:

- Notify the retailer if life support equipment is added or removed
- Keep contact details updated for urgent notifications

Prioritise Life Support Customers:

- Flag life support accounts for priority handling in all service-related matters.
- Escalate issues immediately if the customer reports outages or service concerns.



Non-Compliance Risks

Failure to properly manage life support customer accounts can lead to:

- Regulatory penalties
- Reputational damage
- Increased risk to customer safety

Life Support Customers

Sales & Customer Service Responsibilities

Identify Life Support Needs Early:

- During sales calls or account setup, ask if there is life support equipment at the premises.

Non-Compliance Risks

Failure to properly manage life support customer accounts can lead to:

- Regulatory penalties
- Reputational damage
- Increased risk to customer safety

IMPORTANT NOTICE

Origin's policies DO NOT allow Third Party Providers to engage in sales discussions with life support customers.

This is due to the potential legal and financial ramifications if a customer's service is disrupted.

If a life support customer wishes to discuss energy offers, they must be directed to:

The Origin Call Centre

Handling Hardship, FDV & Life Support

Our Responsibility in Managing Vulnerable Customers

As a Third-Party Sales Representative, it is critical to understand that certain customers require specialised care beyond the standard sales process.

You **CANNOT** complete a sale for customers who:

- Are registered under a Hardship Program
- Are affected by Family & Domestic Violence (FDV)
- Are registered as Life Support Customers

These customers have specific processes set by our Retail Partners, and it is crucial that they are supported through the appropriate channels.

Why We Can't Process Sales for These Customers

- Retailers have dedicated teams trained to handle these sensitive situations.

Incorrect handling can result in:

- Regulatory breaches
- Financial penalties for the retailer and our business
- Severe risks to customer health, safety, and well-being

The risk of getting it wrong is NOT an option.

The Correct Process for Vulnerable Customers

Identify the Customer's Needs:

- Listen carefully for signs the customer may be experiencing hardship, FDV, or have life support requirements.
- Ask gently if they are registered under any special circumstances (without probing into sensitive details).

Supportive Redirection:

- Politely inform the customer that you cannot complete the sale through the third-party channel but will help connect them to the right team.

Choose the Appropriate Next Step:

- Warm Transfer: Directly transfer the customer to the Retail Partner's support team.
- Schedule a Call Back: Book a time for the retailer's specialised team to follow up.
- Provide Contact Information: Offer the customer the direct number for the retailer's hardship or life support team if they prefer to call themselves.

Handling Hardship, FDV & Life Support

Approach with Professionalism & Empathy

- Be patient, kind, and understanding—these customers may be under stress or facing significant challenges.
- Use empathetic language and avoid making the customer feel singled out or uncomfortable.
- Always focus on the customer's well-being, not just the sales outcome.

Non-Compliance Risks

Failing to follow the correct process could result in:

- Regulatory penalties for both the retailer and our business
- Reputational damage
- Harm to the customer's safety and well-being



Workplace Policies Workbook

Test your understanding of Awaken's key workplace policies, ethical expectations, and your responsibilities around privacy, behaviour, and compliance.





We hope this training has helped to awaken your enthusiasm and energise your potential as you step into your roles in the energy sales industry. Your passion is the spark that will drive our success at Awaken Energy, lighting the way to a brighter, more sustainable future. Embrace the journey and let your energy shine!