

7th December 2018

Family Violence Resource Review 2018
Essential Services Commission
Level 37, 2 Lonsdale Street,
Melbourne, 3000

Via email: energy.enquiries@esc.vic.gov.au



Dear Sir/Madam,

Addendum to EARG Response - Providing family violence support – Draft paper

We refer to our response dated 5th December 2018.

We have since had some more feedback from our members and wish to make a few additional points.

Code

While we approach the ESC’s approach of “responsibility based” regulation, it is not possible from the paper to envisage what the new Code provisions might look like – in particular, how detailed (and therefore enforceable) the requirements are likely to be.

However, we have referred to “Amendments to the Energy Retail Code: Payment Difficulties” which appears to provide a reasonable level of detail in support of the customer entitlements. We would support the ESC adopting a similar structure for the family violence provisions.

EARG would like the opportunity to comment on the development of the draft code at an early stage.

“Acknowledge and address barriers to success” (page 5)

While all the principles are important, we suggest that this principle is an important one that could be overlooked. We suggest that you consider moving this up in order.

Respond to the Financial Impacts of Family Violence (page 17)

We suggest adding the following words to the sentence in the last paragraph on page 17 to emphasise the problems some victim-survivors have in decision-making. “Financial difficulty, **and difficulty in decision-making** is common for someone who is experiencing family violence.”

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Carolyn Bond'. The signature is written in a cursive style with a large initial 'C' and a long horizontal stroke.

Carolyn Bond AO
on behalf of the Economic Abuse Reference Group.