What the gas and electricity arrears of private low-income tenants can tell us about financial stress

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What the gas and electricity arrears of private low-income tenants can tell us about financial stress

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Abstract

This article considers the implications of two under-recognised forms of credit: that formally provided by utilities and that unwillingly provided by private landlords. The article suggests that low-income households use rental arrears as a form of overdraft facility that allows them to manage cashflow, and that this in turn assists in preventing default on electricity/gas bills. The argument is made that observed consumer behaviour indicates that loss of electricity/gas service is a deprivation avoided at almost any cost. Accordingly, better data collection by the HES for example could assist in the development of far more robust financial hardship/stress indicators.

Introduction

The use of credit by households has a long history. There are however unacknowledged forms of credit that need to be recognised if the debates around financial stress, poverty and economic liberalisation are to be better understood.

Household income and expenditure patterns have undergone substantial change over the past two decades reflecting the impact of financial and labour market deregulation and widespread privatisation and marketisation of services. The impact of neo-liberal reform on 'poverty' remains a contested field (see for example Saunders 2005 and Saunders and Tsumori 2002). The collection by the Household Expenditure Survey (HES) since 1998 of data on household financial stress can be viewed as an important, but as of yet limited contribution to understanding the impact of economic liberalisation on low-income households. This article explores the relationship between low-income households in private rental housing and the gas and electricity market in Victoria as a way of improving our understanding of financial stress. In particular, it considers two under-recognised forms of credit: credit provision by utilities and the use of rental arrears by tenants as a form of overdraft facility.

Market reform has promoted in the Victorian electricity and gas industries a return to harsher credit management practices, the purpose of which is to protect energy retailers’ cash-flow and prevent bad debt (Kliger 1998, Sharam 2004). At the same time a growing number of low-income households reside in expensive but poor quality private rental tenure as their only housing option. Using data from two sources, Burke, Neske and Ralston (2004) and the
casework of the Reach Out for Kids Foundation's (ROK) financial counselling service, as well as several other relevant studies, a number of observations about the relationship between utilities and housing can be used to improve indicators of financial stress. Burke, Neske and Ralston surveyed low-income renters in receipt of Commonwealth Rental Assistance (CRA) to gain an overall sense of the issues and problems associated with entering assisted rental housing. CRA is a form of income support paid to means tested low-income households in private rental. The ROK data involved random selection of 200 cases that permitted a detailed assessment of the experience of 116 private rental households of which less than a quarter were in affordable housing.

Background

It was Kiers' view that traditional utility credit management practices assumed there are no 'social correlates' to energy usage (Kiers 1983). In Victoria, the Cain Labor government's Social Justice Strategy of the 1980s and early 1990s was central in enabling an effective 'no disconnection' (for inability to pay) policy that over-ruled utility assumptions that late payment or non-payment was the result of unwillingness to pay (Ernst 1994). The policy position swung back with the subsequent privatisation program to the view that governments should address issues relating to affordability and that utilities should be left to operate as fully commercial, competitive businesses. This justified regulation that allows utilities to protect their cash flow through harsher credit management, although it should be noted that the consumer protections in place today are a very uneasy mixture of the two philosophies (Sharam 2006, pp.221-225).

Market reform has also meant that the state through regulation has, effectively, guaranteed utilities privileged creditor status. This occurs because unlike other un-secured creditors, utilities have the ability to threaten withdrawal of supply of a non-discretionary and essential service. They can also demand full repayment of debt over time. Unsecured creditors frequently receive little or nothing in cases of default.

What is not understood, is that the ability to acquire arrears for rent and utilities, is a significant tool for low-income households in managing their own cash flow and that this seems to have a positive effect on preventing bad debt. The impact of punitive credit management practices is to remove the flexibility required to manage cash flow. Without flexibility households must adjust in other ways such as rationing (which many do anyway); going without other essentials such as food; borrow; or experience periods without supply (Deasey and Montero 1983, Kiers 1983, Backman, Ceballos, Kane, Pasiopoulos and Skrobek 1987, Mills 1988, Siemon 1995, Kliger 1998, Neilson c2001, Lawrence 2002). Each of these diminishes the ability to cope, and in the case of borrowing and disconnection it is likely to undermine future ability to pay. Finally, energy retailers create rivals for themselves if they encourage low-income households into sourcing funds through borrowing, particularly if it is predatory or unsecured lending, which is likely to be the case if the household is borrowing in order to avert disconnection. Poor thermal efficiency of housing and inefficient appliances also acts as rivals because the household consumes more energy in order to have the same

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1 In both samples, median income reflected the median Victorian individual income. Only a quarter of tenants in both data sets lived in affordable housing (that is, spending less than 30 percent of income on rent). Figures in the tables and text sometimes do not total to 100 percent. This occurs as a result of rounding up. For the ROK sample, CRA has been treated as income.

2 These forms of credit are very expensive reflecting the perception of risk.
level of amenity. This increases the potential for late payment and default. Landlords need to recognise that minimising capital expenditure on appliances results in cost shifting onto the tenant that only serves to undermine their capacity to pay their rent, and increases the likelihood that energy retailers will become the priority creditor.

**Market reform of electricity and gas in Victoria**

The Victorian *Electricity Industry Act 2000* made the Essential Services Commission (ESC) responsible for establishing the minimum standards of consumer protection for full retail competition (FRC) and prescribing the terms and conditions of supply for the Victorian deemed and standing offer tariffs. The ESC is an independent energy regulator charged with a number of obligations, the primary one being to 'protect the long-term interests of Victorian consumers with regard to price, quality and reliability of essential services', and at a secondary level 'to ensure that users and consumers (including low-income or vulnerable customers) benefit from the gains from competition and efficiency' (*Essential Services Commission Act 2001*). The ESC prepared a position paper detailing its formulation of the role of consumer protection in the competitive market (Office of the Regulator-General 2000). It also developed the Electricity and Gas Retail Codes, legally binding instruments setting out the rights and responsibilities of both customers and retailers. Under the now Energy Retail Code and its subsidiary guidelines there are a number of measures to mitigate retailer losses accruing from non-payment or late payment. These are detailed below:

**Regulating for risk**

Key methods of containing financial risk include the application of risk premiums and a general strategy to increase the price paid by problem payers. On face value, this strategy would lift profits, but increased default and late payment would offset the gains. In practice, it depends on the size of the risk premium, its application and who assumes the cost.

**Security deposits**

A customer at the point of connection or reconnection may be asked to provide a refundable advance (a security deposit or bond). If they are experiencing chronic fuel poverty, this merely increases their financial stress. The bond may protect the retailer from potential losses, but it adds to the likelihood that the customer will default.

**Reconnection fees and late payment fees**

High reconnection fees and late payment fees (if they were introduced) act in the same way as security deposits.

**Shortened collection cycles**

The length of collection cycle will reduce or increase the flexibility the customer has in making payment, but if it is longer it presents as cash-flow loss for the retailer. A longer cycle increases the propensity for payment (McLeod 2001). Shortened collection cycles have been permitted since privatisation, with the standard cycle being reduced by two days.

**Debt recovery**

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3 Which provided a temporary legislative “obligation to offer”. 
The Retail Code provides retailers with the legal right to payment in full and hence to debt recovery.

**Credit checks**

Credit checks are permitted although limited to utility debts. A utility debt however is a very good indicator of a more general indebtedness.

**Higher prices**

In opening the market to the household level, the Electricity Industry Act 2000 provided for a transitional tariff (the deemed contract) and a safety net tariff (the standing offer). Both were initially legislated to sunset (or cease) at the end of 2003, although this was later extended by a year, and then to the end of 2007. These tariffs were conceived as including 'headroom' or a premium over the cost of supply as an incentive for retailers to enter the market in order that the price of electricity and gas could be competed down. The standing offer would be a contract of last resort for customers otherwise unable to secure a market offer. Access to the safety net tariff by vulnerable low-income customers accordingly was premised on the payment of a premium.

While the first response is to assume that retailers may seek to avoid low-profit customers, and there is evidence to support this (Community Power 2002, Sharam 2004), an alternate strategy is to retain these customers but increase prices. It is possible for retailers to increase charges simply by changing the structure of the tariff. Research by Sharam (2003) on customer experience in the market found that only 8 percent of switchers actually compared tariffs.

In summary, retailers have secured a minimum rate of return on each customer, have increased the returns available from low-volume households, and have other insurance or recovery mechanisms in case of default. This shift in the relationship between the retailer and the customer however did not come about as a result of the market but through state intervention. Regulation of credit management sought to balance the demands of the utilities for commercial freedom, including the need for revenue protection arising out of perception of many customers' unwillingness to pay, and arguably a perception at a political level for social protection for those experiencing an inability to pay. The impact of this compromise however is that retailers’ cash flow interests were strengthened, removing the flexibility required by low-income households. Treatment of bad debt on the other hand could be viewed as a significant win for low-income households because they can avoid disconnection for non-payment and accumulate considerable arrears that may never need to be paid (assuming the customer knows their rights). In reducing the ability of households to manage their own cash flow, regulation and retailer policy myopia has served to increase bad debt.

The solution according to industry is the introduction of prepayment metering (PPM). PPM do not allow for the accumulation of arrears, as payment is required in advance. Naturally this has a positive cash flow impact for the retailer.

The issue that is missed by retailers and by policy makers is what priority households place on paying their utilities now and what will happen if utilities gain privileged access to household budgets or payment priority over other essential household consumption. Currently the risk of non-payment falls onto retailers where the customer is able to exercise their rights under the Retail Code, but mostly it falls on the customers (because they do not know their rights), the charitable sector, landlords and Department of Human Services. If
PPM were introduced there would be no public headlines about disconnection rates (as the act of disconnection is privatised), and there would be no bad debt to sully retailers’ bottom lines.

**Energy consumption and financial stress**

The ABS collected for the first time in the 1998-99 Household Expenditure Survey data intended to provide indicators of financial stress. Bray (2001) grouped these into three categories:

- Missing out: being unable to have family or friends over for a meal, nights out, hobbies, holidays away from home, or having to buy second-hand clothing, due to a shortage of money;
- Cashflow problems: being unable to pay bills on time or needing to borrow money from friends or family;
- Hardship: being unable to afford heating and meals, having to pawn or sell possessions, or needing to obtain assistance from community organisations (deprivation).

One of findings by Bray was that all income quintiles experienced an inability to pay utility bills due to a shortage of money. Actual deprivation of energy in the highest quintile (Q5: the 20 percent at the top of the income range) however was virtually non-existent. While cash flow issues exist even for these higher income households, it is clear as Table 1 indicates that they are not rationing their heating. It appears that higher income households have greater discretion about their expenditure and can avoid forfeiting essential services whereas this cannot be said for those in the lowest quintiles (Q1 and Q2, the 40 percent at the bottom of the income range). Table 1 shows that there is a considerable difference in late-payment and actual deprivation between upper and lower quintiles. ABS data collection needs to be far more specific to capture distinctions between households who over commit themselves in terms of discretionary expenditure and those whose cash flow problems arise from a lack of discretionary funds. Bundling services, (gas/electricity/telephone) together as if they were of equal importance only further serves to mask distinctions between cash flow and underlying hardship.

**Table 1: Comparison of deprivation versus cashflow, HES (percentage)**

<table>
<thead>
<tr>
<th>Quintile</th>
<th>Q1</th>
<th>Q2</th>
<th>Q3</th>
<th>Q4</th>
<th>Q5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Could not pay gas/electricity/telephone on time</td>
<td>23.4</td>
<td>22.5</td>
<td>17.6</td>
<td>11.7</td>
<td>5.2</td>
</tr>
<tr>
<td>Unable to heat home</td>
<td>5.1</td>
<td>3.6</td>
<td>1.4</td>
<td>0.8</td>
<td>0.3</td>
</tr>
</tbody>
</table>

Source: Bray 2001:9

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4 It should be noted that there is no crisis of bad debt. Energy retailers’ bad debt levels remain enviably low in comparison with similar industries such as banks. The issue is that they have an opportunity to reduce it to zero.

5 He excluded "capacity to raise emergency money ($2,000)" and "living standard worse than"
Both non-payment, due to shortage of money and inability to afford heating fail to take account of the provision of credit by utilities to most customers. Credit permits consumption even where financial stress, cash flow problems or hardship are experienced. Non-payment at the due date does not mean the service ceases immediately or automatically. The experience of community-based financial counsellors is that households prioritise electricity payments and, if they are disconnected, every effort is made by the customer to get supply back on (Sharam 2004). In Victoria this may mean that intervention by a financial counsellor, for example, can persuade the utility to agree with debt waiver or it may mean accessing a payday lender.

The HES asks whether respondents can afford to heat their home. Respondents to this question may misinterpret this question. It could be interpreted as disconnection, disuse of certain appliances or fuel swapping, or rationing. Sharam found that 42 percent of Victorian households heated their homes less than they would have liked because they either had limited income and/or found the bills too expensive (Sharam 2005, unpublished PhD thesis).

Our current understanding of financial stress would be improved if the HES permitted us to appreciate what occurs when households accumulate utility arrears and household debt in general. The question in the HES about the type of emergency funds that were accessible to the household is not finely grained enough. The respondents are asked to choose between products and providers when it should be only a list of products. Access to and the cost of credit relies on an assessment of the likelihood of default (credit-rating). Clear distinctions therefore also need to be made between secured and unsecured forms of lending. Those with assets (such as a home) will be able to obtain cheaper credit. Access (as opposed to cost) has become less of an issue than it has been in the past given the uptake of risk-based pricing by credit providers.

The HES asks whether the household 'spends more money than it gets' per week without seeking to understand whether deficits are addressed through access to savings or use of credit. There is a danger that the indebtedness of vulnerable households masks both cash flow problems and hardship. The obvious implication, as highlighted by Burke and Ralston's (2003) study of public tenants, is whether or not they can service the debt.

The capacity of the HES to provide data in relation to financial stress runs into the same issues that energy retailers contend with. The issue is not just about income and expenditure but credit and hierarchy of expenditure. Surprisingly, despite headlines about household indebtedness and record levels of credit card use little is known about low-income household indebtedness, especially if they do not own their own home.

Utility retailers usually argue that providing more flexibility (that is, leniency in credit management) constitutes a moral hazard. Yet examination of low-income private renters, a group that may be perceived to be a group with a higher risk of arrears or default, does not support the implication that such customers engage in deliberate fraud. Burke, Neske and

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6 The HES in an Australian survey. Some states, such as Tasmania have Prepayment Meters
7 Sharam (2004) found that some customers “plan” for the disconnection of gas supply during the summer months. Others have the gas disconnected permanently and adopted electrical heating, eg using the oven.
8 Risk-based pricing uses sophisticated statistical modelling that predicts when default will occur. The cost of credit therefore ensures profitability despite default. Customers who default are no longer loss-makers, and indeed the servicing of this "risky" customer segment is a highly profitable business (Alwitt and Donley 1996).
Ralston (2004) surveyed low-income renters in receipt of Commonwealth Rental Assistance (CRA) but not on a waiting list for social housing. The main aim of this Rental Assistance Survey (RAS) was to gain an overall sense of the issues and problems associated with entering assisted rental housing, both social and private, including recipients' perceptions and practice of entering the rental sector. CRA is a form of income support paid to means tested low-income households in private rental. The survey used data obtained through a questionnaire mailed to 12,000 addressees randomly selected from Centrelink records. There were 2,493 responses nationally, and 310 valid responses from Victoria. The Victorian data is used in this paper.

The RAS revealed that 35.7 percent \((n = 305)\) of Victorian respondents had had rental arrears during the past year. Looking at Table 2 gas and/or electricity bills were by far the greatest cause of rental arrears (63 percent). As of 30 June 2002, 201,477 or 42 percent of Victorian tenants were receiving Commonwealth Rental Assistance (Steering Committee for the Review of Government Service Provision 2003). This represents the number of income units receiving assistance at that specific time, rather than the total for the year. Rent assistance is available to social security beneficiaries and those in receipt of family tax benefit A. Based on the Productivity Commission's (2003) assessment of the number of rent assistance claimants at the end of the 2002 financial year, an arrears rate of 35 percent would equate to 71,927 people, of which more than 45,000 have a utility problem. If the RAS findings are indicative of the experience of all CRA recipients the actual figure may be higher⁹.

Table 2: RAS survey: If you have been behind in your rent in the past year, what were the main causes?* \((n = 122)\)

<table>
<thead>
<tr>
<th>Reason for arrears</th>
<th>percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gas/electricity etc</td>
<td>63</td>
</tr>
<tr>
<td>Food bills</td>
<td>34</td>
</tr>
<tr>
<td>Car repair</td>
<td>29</td>
</tr>
<tr>
<td>No income/job loss</td>
<td>29</td>
</tr>
<tr>
<td>Health expenses</td>
<td>28</td>
</tr>
<tr>
<td>Debt repayment</td>
<td>25</td>
</tr>
<tr>
<td>Educational expenses</td>
<td>21</td>
</tr>
<tr>
<td>Christmas expenses</td>
<td>11</td>
</tr>
<tr>
<td>Gambling debt</td>
<td>3</td>
</tr>
<tr>
<td>Appliance repair</td>
<td>3</td>
</tr>
<tr>
<td>Holidays</td>
<td>2</td>
</tr>
<tr>
<td>Administrative error by landlord</td>
<td>1</td>
</tr>
</tbody>
</table>

⁹ Accumulative number of recipients per year is unavailable
Respondents could choose up to three responses to the question asked in Table 2. For 55 percent who chose the 'gas/electricity etc' the 'no income/job loss' category was also chosen. This left 45 percent of cases in which competing expenditure and/or on-going income were issues. This indicates cash flow or chronic affordability issues rather than a temporary income related crisis in these cases.

It is worth noting that private rental tenure accounts for 23 percent of housing in Victoria. In addition, the equivalent of 40 percent of Victorian households claimed concessions for electricity in 2003-04 (Victorian Government 2003-04).

Of significant interest is how low-income households responded to financial stress. The RAS survey found that 36 percent of respondents carried no debt. Of those with debt, only 10 percent had debts greater than $10,000. Cross-tabulations showed that higher indebtedness was clearly associated with families. The RAS asked a series of questions that are very similar to the HES in relation to financial stress. Table 3 divides responses into a matrix where the answers of those who are indebted and non-indebted are separated and polarises their responses to the question. As Table 3 indicates, debt had considerable impact upon responses.

<table>
<thead>
<tr>
<th>I pay all my bills on time</th>
<th>Agreed/strongly agreed</th>
<th>Disagreed/strongly disagreed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-debtor (n = 102)</td>
<td>80</td>
<td>10</td>
</tr>
<tr>
<td>Debtor (n = 184)</td>
<td>47</td>
<td>36</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sometimes there's not enough money to buy basic food items</th>
<th>Agreed/strongly agreed</th>
<th>Disagreed/strongly Disagreed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-debtor (n = 97)</td>
<td>23</td>
<td>42</td>
</tr>
<tr>
<td>Debtor (n = 183)</td>
<td>36</td>
<td>40</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>I don’t have to seek assistance from welfare or community agencies</th>
<th>Agreed/strongly agreed</th>
<th>Disagreed/strongly disagreed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-debtor (n = 99)</td>
<td>44</td>
<td>23</td>
</tr>
<tr>
<td>Debtor (n = 182)</td>
<td>36</td>
<td>39</td>
</tr>
</tbody>
</table>

* ‘don’t know’, ‘not applicable’, ‘neither agree or disagree’ answers excluded

Further cross-tabulation revealed that 20 percent of non-debtors and 9 percent of debtors went without food in order to pay bills on time. Similarly, 18 percent and 16 percent respectively sought welfare assistance so that they could do so. This accords with anecdotal
evidence and previous community studies (Deasey and Montero 1983; Lawrence 2002; Neilson c2001; Dufty 1995). Broken down into household types, it was clear that couples without children fared the best. Single-parent families, on the other hand did not with 38 percent stating they failed to pay their bills on time. A quarter also said they went without food. Almost half, 42 percent, sought welfare assistance. Sole person households also struggled with 37 percent of this group going without food although 22 percent managed to pay their bills on time. Only 28 percent sought welfare assistance. The anecdotal evidence referred to previously supports these figures. Most couples with children paid their bills on time but 12 percent did go without food.

Access to emergency funds saw non-debtors in a relative good position. Asked 'If I urgently needed $1,000 I could borrow it from my bank or credit union or from a friend or relative', 49 percent of non-debtors (n =101) agreed or strongly agreed that they could do so, and only 27 percent disagreed or strongly disagreed. For the debtors (n =186), this question reveals the greatest proportional difference in responses, with only 32 percent agreeing that they could obtain credit, 44 percent could not. The experience of financial counsellors is that clients present at their services after formal and informal credit options are exhausted. Respondents may have exhausted their options to borrow or had none. These people have little flexibility in managing cash flow.

The data obtained through the RAS was supplemented by case studies. A random selection of two hundred cases handled by the financial counsellor at the Reach Out for Kids Foundation (ROK), an outer eastern metropolitan Melbourne non-government organisation. Financial counselling assistance frequently involves dealing with creditors, consumer complaints and bankruptcy. The cases studies cover the period from 1 July 2000 to 30 June 2003 (42 percent of the cases handled during this time), which includes six months prior to the electricity market opening in January 2001. The value of the ROK data resides in its reliability. Income and expenditure are subject to scrutiny by a professional who is familiar with local costs, and clients have an incentive to disclose all income. As many are social security recipients, there is also considerable governmental scrutiny of earnings. The limitation of this data is that clients of financial counsellors generally have a broader financial issue or crisis. On the other hand this group probably represents only a small proportion of those in difficulty overall, as services are limited. Financial counselling services generally have long waiting lists and are not widely available. As case studies, the data is not representative of the wider population.

Of the 200 cases selected 116 represented private rental households. Only 23 percent were in affordable rental housing. This proportion reflects the findings of the RAS. Not surprisingly, almost half (44 percent, n =106) reported being in rental arrears.

Of the private renters in the sample, 3 percent had only utility debt. 15 percent had a utility debt, but only 3 percent of these did not also have rental arrears.

Over a third of the private renters (39 percent, n =108) held no debt (excluding rental arrears and energy debts), but over half (54 percent) had non-energy related debts. Nearly half (45 percent) had debts greater than $10,000. Someone with rental arrears was twice as likely to have other debts. The existence of debt in itself however did not mean that rental arrears were any more likely.

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Information obtained through interviews conducted for FCRC (Sharam 2004)
The ROK case studies confirmed that payment of utilities remains a high priority despite other pressing expenditure requirements. This provides a sense of how important this particular essential service is. Like the canary in the coalmine, electricity arrears, rationing and in particular disconnection alert us to a 'hardship' tipping point. This may allow the development of a better tool for quantifying the existence of hardship and financial stress. In addition it could permit a better understanding of when and how public and private policy works to alleviate or exacerbate hardship and financial stress. To this end the following section examines how utility policy in Victoria diminishes the discretion of vulnerable electricity customers have in the management of their cashflow, and accordingly how this pushes them towards the tipping point.

**Conclusion**

The ROK case studies offer a finding, amongst this cohort at least, that utility arrears reflect a more general problem of indebtedness: these households rarely had utility arrears without other debts. More broadly the RAS demonstrates the juggling act low-income households perform as a matter of prudent domestic budget management (Deasey and Montero 1983; Kliger 1998; Sharam 2004).

The credit traditionally associated with gas and electricity supply and the credit effectively afforded through the ability to accrue rental arrears appears to be crucial to low-income tenants' management of cash flow, which in turn mitigates the likelihood of default. Arrears for low-income households therefore can be regarded as a sound financial strategy intended to maintain longer-term financial solvency. The renewed focus by retailers on preventing arrears fails to account for the constraints under which these households operate and may serve to increase defaults.

'Financial stress' is an indicator included in the HES and is comprised of the following elements: 'missing out' on socially expected but non-essential items due to a shortage of money; 'cashflow' problems resulting in indebtedness; and 'hardship' or deprivation. It is intended that indicators of financial stress can assist in understanding the nature and extent of poverty within Australia. Some of the questions asked by the HES therefore need to account for the provision of credit by energy retailers. The financial products/services questions also need to be better delineated. Otherwise both cash flow difficulties and hardship may be masked.

These findings can assist the ongoing development of financial stress indicators. From a broader social justice perspective however, immediate policy attention should focus on the aspiration of energy retailers to withdraw credit from low-income or payment troubled customers. The desire of utilities to introduce prepayment technology assumes that the provision of credit is the problem whereas studies of fuel poverty show that credit is an important part of the solution that prevents deprivation.

Finally, these findings highlight the need for state government regulation to ensure a right of supply to essential services and strong and consistent consumer protections.
References


McLeod, F. 2001, correspondence to the Director of Gas, Water and Ports, Office of the Regulator-General re: review of the Draft Gas Retail Code 2001, covering the introduction of changes to the standard collection cycle and the introduction of the shortened collection cycle, 8 May (obtained under FOI)


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