

	<p>A non-profit, volunteer organisation, advocating to advance the interests of consumers in Queensland</p> <p><i>Secretary:</i> <i>Max Howard</i> <i>PO Box 261</i> <i>Corinda Q 4075</i> <i>Telephone: 0419 678 395</i></p>
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9 September 2009

SUBMISSION ON QCA'S DRAFT DECISION ON PROPOSED AMENDMENTS TO THE ELECTRICITY CODE REGARDING CUSTOMER CLAIMS FOR GSL PAYMENTS - 1 AUGUST 2009

BACKGROUND

The Queensland Consumers' Association (the Association) is the peak body for consumer groups in Queensland. The Association's members work in a voluntary capacity. The Association is a member of the Consumers' Federation of Australia, the peak body for Australian consumer groups.

COMMENTS

General

The Association remains concerned that the QCA's final decision released in April 2009 on the GSL arrangements from 1 July 2010 failed to take the opportunity to make some significant changes beneficial to consumers and industry performance.

Specifically, we consider that the opportunity should have been taken to:

- increase greatly the GSL payment for wrongful disconnection,
- undertake further investigations on the extent that distributors are accurately recording, and making GSL payments for, wrongful disconnections due to retailer error, and
- issue guidelines on operating procedures for categorising and recording wrongful disconnections due to distributor or retailer error.

Specific

Three month time limit for lodging claims

We support extending the time limit for customers to lodge a claim for a GSL payment to three months where a time limit currently exists.

We oppose imposing a time limit where one does not currently exist, for wrongful disconnections, late connections, late reconnections and missed hot water supply appointments.

We emphasise that if there are time limits on when consumers can lodge a claim, steps must be taken to improve consumer awareness of the GSL scheme, and address this further below.

Consumer awareness of GSL payments

This must be improved for the reason given above and because the proposal to require automatic payment for all types of GSL breaches is insufficient to overcome lack of awareness of the scheme.

We consider that measures to improve consumer awareness should include requiring that information on the GSL scheme be included with electricity bills at the end of each financial year, and that retailers be required to provide links to information on GSL payments on their websites.

One month limit for processing claims

We support the proposal to require distributors to use their best endeavours to process a GSL claim lodged by a customer within one month.

All types of GSL payments to be made automatically

We support the proposal to require distributors to use their best endeavours to make payments automatically for all types of GSLs and consider that a time frame should be specified within which payments must be made.

Auditing by QCA

The QCA should audit distributors to ensure that they have, and are operating satisfactorily, systems and procedures which will enable them to comply with the new GSL requirements, especially to ensure that payments are made automatically.

The contact person for this submission is: Ian Jarratt, email ijarratt@australiainmail.com