



financial
counsellors'
association of
queensland inc.

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14th June 2009

Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

electricity@qca.org.au

Dear Sir/Madam,

RE: QCA – Proposed amendments to the Electricity Industry Code regarding customer claims for Guaranteed Service Level (GSL) payments

I make this submission on behalf of the Financial Counsellors' Association of Queensland (FCAQ).

FCAQ is the peak body for the Financial Counselling sector in Queensland. The association has 55 members located from Cairns to the Gold Coast and west to Darling Downs.

Our membership's client base (depending on funding agreements) ranges from wage/salary earners, gamblers, and Centrelink recipients; self funded retirees, small business owners and primary producers. Financial Counsellors provide support to individuals or families experiencing financial difficulties. Support is tailored to each client and includes advocacy, budgeting, education, and empowerment. Referrals are made where necessary and appropriate to other services to further improve the situation of the client.

This submission is allowed to be put in the public domain.

FCAQ supports the proposed amendments to the code as per Annexure 1 of the discussion paper.

Although FCAQ is supportive of these amendments we note that it is hard for a consumer to access the current GSL payments especially if they do not have access to the internet. We question the commitment of the QCA to ensuring that all consumers are aware of distributors' responsibilities and GSLs.

Anecdotal information from our membership suggests a large majority of Financial Counselling clients are unaware of the responsibilities of distributors under the Code and that there are penalties for breaching those responsibilities.

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Therefore we request the following:

1. We ask that the government and regulatory bodies use their best endeavours to ensure that all *small* customers are made aware of their right to claim a GSL.
2. Suggested options to ensure that customers are aware of their rights:
 - a. Include an insert with a consumer's next energy account
 - b. Place advertisements in major regional daily newspapers
 - c. Inform lead agencies in the community sector and government agencies of GSLs, to enable their staff to pass that information on to their clients
 - d. Ensure retailers supply the GSLs with a new contract or have them included as an attachment to a contract
 - e. Ensure retailers provide a link to GSLs on their websites

Yours sincerely,

David Lawson
Executive Member FCAQ
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