



29th August 2009

Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

electricity@qca.org.au

Dear Sir/Madam,

RE: Submission Interim Consultation Notice Retailer Reporting Requirements Electricity and Gas Industry Code Reviews

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.

2.1 Monitoring and reporting role

We support the proposal to change the 'annual basis' of reporting to a 'quarterly basis'. This change in frequency will allow the QCA and the Energy Ombudsman (EOQ) as well as consumer groups to identify and investigate possible systemic or process issues sooner than they would be able to under the present annual reporting period.

2.2 Customer disconnection data

We endorse the following proposals:

- To change the time period for when customer disconnection data is required to be given to the QCA by retailers, to 'within one month after the end of each quarter'.

- The requirement for gas retailers to disaggregate data by residential and small business customers, bringing it in line with the Electricity Code (Code).
- The requirement for distributors to separately report the number of disconnections initiated by them.

2.3 Customer complaint data

We support the following proposals:

- To change the reporting of complaints data from ‘within two months after the end of the year’ to ‘within one month of each quarter’.
- The requirement for gas retailers to disaggregate complaints data into residential and small business.

3 Restriction on special meter reads

FCAQ has no opinion on whether there should be a restriction on special meter reads regarding transferring to another retailer. However, we firmly believe if the restriction is to be terminated, we ask that the Code clearly state the following requirements before a special meter reading for transfer be made:

- Explicit consent from the customer.
- How much the meter read will cost.
- The expected date of the meter reading.

FCAQ welcomes the intent and thrust of this consultation by the regulator, as it will allow a more timely review of disconnections and complaints than what is available at present.

Further, we ask that the QCA set out in the Code the format, layout, terminology (as well as definitions) and presentation of the data to ensure all retailers present their data in a consistent manner that will allow comparison between retailers and to ensure the data is reliable.

We ask that consideration be given to enhance reports given by Distributors in the various components of GSLs, which would allow a more comprehensive picture of Distributors’ commitment or otherwise in keeping or meeting GSLs.

Yours sincerely,

David Lawson
Executive Member FCAQ

