

10 November 2009

Queensland Competition Authority  
GPO Box 2257  
BRISBANE QLD 4001

[electricity@qca.org.au](mailto:electricity@qca.org.au)

Dear Sir / Madam

**RE: Draft decision: Retailer Reporting Requirements**

Thank you for the opportunity to respond to the above mentioned Queensland Competition Authority draft decision.

QCROSS supports the proposed amendments to retailer reporting requirements. We congratulate the QCA on its decision to make these improvements to the reporting arrangements, which we believe will provide much more timely and useful information regarding the experiences of low income and vulnerable consumers in the electricity and gas markets.

However, we believe that in addition to these amendments, further changes should be made to reporting requirements under the Electricity and Gas Industry Codes, as discussed below.

**Data Format**

QCROSS reiterates our previous recommendation that data should be reported as either a percentage of customers, or as a number per 100 customers. Queensland is currently the only jurisdiction in the National Electricity Market (NEM) that reports customer disconnection and complaints data as a raw number rather than a rate. This makes it extremely difficult to compare the performance of retailers without knowing how many customers they have, or to evaluate the development of the electricity and gas markets in Queensland. Reporting data in a format that allows for comparisons to be made between retailers or jurisdictions, or over time, will facilitate identification of issues affecting customers, assessment of the relative success of retailers' hardship policies or other approaches in dealing with customers experiencing payment difficulties, and the impact of other policies on consumers.

**Additional Performance Indicators**

QCROSS welcomes the QCA's decision to adopt some of performance indicators we proposed in our submission in response to the interim consultation notice. However we believe that collecting other data in addition to these indicators would provide a more complete picture without adding significantly to the costs or burden on retailers. Accordingly, QCROSS reiterates its recommendation that the following indicators be added to the reporting requirements set out in the Codes:

- *Proportion of bills that are estimated accounts* – feedback from organisations in the community sector providing support to consumers with payment difficulties suggests that estimated accounts are a significant issue contributing to hardship for some customers.
- *Proportion of customers on instalment plans* – although most retailers offer hardship programs, Queensland regulations currently only require that customers experiencing payment difficulties are offered instalment plans. The number of customers paying by instalment plans is therefore an important indicator of the state of the electricity and gas markets in Queensland, and of how effectively retailers are dealing with customers who experience payment difficulties. This information is part of the reporting requirements in all NEM jurisdictions except Queensland.
- *Proportion of new customers required to provide security deposits, value of security deposits held, and proportion that have been held for more than 12 months* – this information is an indicator of the accessibility of energy for low income and vulnerable consumers, since those most likely to be asked to provide security deposits tend to be those who are most likely to experience payment difficulties. The number of security deposits held is also reported in all NEM jurisdictions except Queensland.
- *Proportion of customers disconnected and reconnected who were previously on a payment plan, who had participated in a hardship program in the previous 12 months, and who were previously disconnected in the same name and address in the past 24 months* – these indicators are important in assessing the prevalence of long term hardship and the effectiveness of approaches to addressing energy hardship. Disconnections of customers previously on instalment plans and multiple disconnections are also reported in most other NEM jurisdictions.
- *Number of calls to customer services lines forwarded to an operator, proportion responded to within 30 seconds, average waiting time, and proportion of calls that were abandoned* – call centre performance is an indicator of the ease with which customers are able to access assistance and resolve issues relating to their energy accounts. Since issues affecting large numbers of customers, not all of whom register complaints, will impact on call centre performance, it also complements complaints data. Not only is the proportion of calls answered within 30 seconds or abandoned included in the reporting requirements of all other NEM jurisdictions, this information is commonly used by businesses to measure their own call centre staff's performance and therefore can be assumed to be readily available.

QCROSS notes concerns raised in other submissions regarding the cost and burden of implementing additional reporting requirements and the future development of new reporting requirements under the National Energy Customer Framework (NECF). However, we reiterate the view that retailers are already required to report much of this information in other jurisdictions, and therefore the changes required to existing reports and data queries required to enable the same reporting in Queensland are minimal and not costly. Furthermore, we believe it is unlikely that indicators that are already established as part of the reporting requirements of the majority of jurisdictions would be dropped in the course of developing a national reporting framework.

### **Other matters**

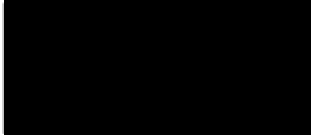
QCROSS supports the recommendations of the Queensland Consumers Association, that the reporting requirements in relation to complaints be clarified and extended to include additional categories. We also support the Queensland

Consumers Association's proposal that retailers be required to report on compliance with the obligations set out in the Codes in relation to disconnection procedures.

Finally, QCOSS supports the QCA's proposed amendments to the Electricity Code regarding explicit informed consent for special meter reads conducted for the purpose of customer transfers.

We look forward to continuing to represent the interests of Queensland consumers in all energy related matters. If you would like any further information or to clarify any aspect of this submission, please feel free to contact me on 3004 6900.

Yours sincerely



Jill Lang  
**Director**