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Queensland Competition Authority
GPO Box 2257
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By email (electricity@qca.org.au)

Response: Interim Consultation Notice, Retailer Reporting Requirements

TRUenergy welcomes the opportunity to provide comments to the Queensland Competition Authority's (QCA's) Interim Consultation Notice on the Retailer Reporting Requirements.

TRUenergy supports the objectives of affordability performance reporting that aims to:

- Facilitate competition by comparison.
- Inform customer affordability of energy services.
- Indicate performance of retailers against their obligations.

However, in developing more disaggregated reporting measures, TRUenergy recommends that the QCA balance the benefits derived from the data versus increasing the cost of energy service provision from introducing disaggregated indicators.

We would like to offer the following comments on the questions raised in the Interim Consultation Notice for the QCA consideration.

Proposal to require retailers to report customer complaint and disconnection quarterly

TRUenergy supports the proposal to seek quarterly disconnection and complaint data based on the following prerequisites:

- The QCA provides retailers at least 6 months lead time to implement and to test the required system changes to produce the reports on a quarterly basis.
- Reports to be due one month after the end of the quarter, except for the mid-year quarter. Due to the high frequency of reporting at this time of year, we recommend that the QCA allow two months before the report is due. This approach would be consistent with the South Australian reporting quarterly requirements.

Requiring distributors to report distributor initiated customer disconnection data

We have no comment on this proposal.

Proposal to require gas retailers to disaggregate data into complaints categories consistent with the Electricity Code

TRUenergy supports the proposal.

Views on how disconnection data could be drafted to acquire more meaningful data, including reconnections on account of customer hardship

In 2003 the Essential Service Commission of Victoria (ESC) engaged the Allen Consulting Group (ACG) to review disconnection and hardship performance indicators and to make recommendations to improve their effectiveness¹.

The ACG concluded that there were limitations in interpreting new disaggregated hardship related performance indicators, including ambiguity in interpreting the indicators in isolation of other more general customer income and expenditure data sets. The ACG went on to suggest that prior to introducing the new performance indicators that the ESC could obtain agreement from relevant stakeholders on the interpretation of the indicators. Further, the ACG also suggested further up-front research to generate better understanding of the drivers of disconnections and therefore provide greater clarity in the selection of the most appropriate performance indicators.

Based on these findings, TRUenergy recommends that the QCA embark on an up-front research program to examine and better understand the causes and extent of energy affordability in Queensland. This research could form the first step of the QCA's program in developing more detailed performance monitoring indicators. At a minimum, the QCA should establish that the benefit of collecting any new data set outweighs the cost of doing so.

Proposal to remove special meter reads

TRUenergy supports the QCA proposal to terminate the current restriction on special meter readings in respect of *in situ* transfers and to require retailers to obtain explicit customer consent before a transfer request on a special meter reading occurs.

We believe that removing this regulatory requirement will facilitate competition in the Queensland energy market. In particular, it will allow those consumers that are willing to pay with the option of choosing to transfer before the Next Schedule Read Date, and therefore bring forward the transfer of their retailer of choice.

Please contact me on telephone number (03) 8628 1185 or e-mail con.hristodoulidis@truenergy.com.au to discuss any aspects of the submission.

Yours Sincerely

(signed for e-mail)

Con Hristodoulidis
Regulatory Manager

¹ **The Allen Consulting Group, Draft Report to the Essential Services Commission (Victoria) – Disconnection and Financial Hardship: Performance Indicators, 11 November 2003**