



Australian Power & Gas
Simply smarter energy

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15th July 2008

Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

By Email

Re: Proposed amendments to the Electricity Industry Code requiring prior notice for price changes.

Australian Power & Gas (APG) welcomes the opportunity to provide comment on the Queensland Competition Authority (QCA) Interim consultation notice on the proposed amendments to the *Electricity Industry Code* requiring prior notice for price changes.

APG appreciates the rationale for the QCA conducting the review of the existing requirements. We would however strongly recommend that any proposed revision of the existing obligations around the notification to customers of tariff or price variations be as consistent as possible with the obligations that exist in other jurisdictions. To this point the QCA should also give consideration to the impending move to a National Energy Consumer Framework (NECF) and ensure that any proposed revisions are consistent with the outcomes of this body of work.

The introduction of obligations that are inconsistent with that of other jurisdictions and the NECF will only serve to add to the costs of servicing Queensland energy consumers, costs ultimately borne by consumers.

APG would also point out that its Queensland customer contract terms and conditions are structured in way that provides customers must receive prior notification before any variation can take effect. We believe this is consistent with the objectives the QCA is looking to achieve from this review.

Should you wish to discuss any aspect of our submission I may be contacted on (02) 8908 2714 or via email sruddy@auspg.com.au.

Yours Sincerely



Shaun Ruddy
Manager Regulatory & Compliance
Australian Power & Gas