



Australian Pensioners' and Superannuants' League Qld Inc.

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State Secretary: Ian Gordon

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Queensland Competition Authority
GPO box 2257
Brisbane Qld 4001

Submission – Issues Paper – *Review of Regulated Retail Electricity Tariffs and Prices*

The Australian Pensioners and Superannuants' League Qld Inc. appreciates the opportunity to make comment on the issues paper "*Review of Regulated Retail Electricity Tariffs and Prices*".

The APSLQ is a state wide incorporated association with branches throughout Queensland. The objects for which the League was established include "taking an active interest in all or any matters pertaining to the welfare and betterment of pensioners generally". Our mission is to work to promote all aspects of security, well-being and dignity of pensioners of all ages, superannuants and other self-funded retirees, low income families and other disadvantaged people including Indigenous people and culturally and linguistically diverse people. We aim to promote and apply the United Nations Principles for Older People in all our activities.

While we are pleased to have this opportunity to comment, our submission is restricted to only a few issues as it is a very complex technical area. Our comments are based on our appreciation of the views of our constituents and seniors as we have listened to them in the course of our activities and engagement with other organisations in the sector who share our commitment to advocacy for pensioners, superannuants and seniors.

Attached for your consideration are our comments on some salient aspects of the issues paper from the perspective of pensioners, superannuants and seniors. In making this submission the APSLQ is also indicating our interest in participating in future workshops and any other further consultation processes. As we have a state wide network of branches we are very keen to ensure that consumers are fully informed about the new charging regime so that they are able to make informed choices about how the new charging structure affects them and what is the best option for them to choose. We would therefore be very keen to participate in any way we can in the future information dissemination and education processes within the seniors sector.

Please contact the APSLQ policy coordinator, Ms Lynn Barratt, if you require any clarification or further comment.

Yours sincerely

Ian Gordon

Secretary/Treasurer

Customer impact study

There is no indication in the issues paper that a customer impact study has been conducted. It is therefore difficult for the APSLQ to make informed comment about issues of concern and potential concern.

The proposed changes will have different effects for different groups of people some of whom will benefit some of whom will not. It was acknowledged in the 2009 review that there was a high probability that fixed charges would negatively affect low users. Pensioners are both low income and low usage consumers. At a time when Australia and the rest of the world are looking to reduce energy consumption, we consider it is illogical that low usage customers may pay more than they currently do. There will be no incentive to keep usage low. This is of considerable concern to the APSLQ and we are desirous of seeing the detail of the proposed changes.

If a customer impact has been conducted the APSLQ requests that it be made public and if not the APSLQ considers one is required so that properly informed comment can be made.

Inclining block tariffs

To make a fully informed comment it is necessary to know how many blocks are proposed, the band width of the blocks and the charge rate for each block.

Time of use charges

Many pensioners and superannuants are retired and many spend a considerable amount of time at home during the day. As we understand these features, they are more likely to benefit people who can shift time of use to outside peak and shoulder tariff blocks.

Interval meters

Time of use charging will be on a voluntary opt in basis. Should the new time of use charging regime prove to be beneficial to low users, and they wish to opt in, in order to take advantage of lower charges, consumers will have to install interval meters unless they have old ones replaced by the provider. The APSLQ considers this is an undesirable impost on low income customers. We will be seeking financial assistance for interval meter installation for low income pensioners, superannuants and seniors who opt in to time of use charging.

Fixed charges

This is a major area of concern. Even if pensioners benefit from the time of use charging and inclining block tariffs, it is likely that these benefits will be offset by increased fixed charges.

Education and Information

There will be a need for extensive information dissemination and education programs so that consumers can make fully informed decisions about deciding to opt in to time of use charging.

The AOSLQ has perused and supports the QCOSS submission which deals with these issues in greater detail.