



**A non-profit, volunteer organisation,
advocating to advance the interests of
consumers in Queensland**

*Secretary:
Max Howard
PO Box 261
Corinda Q 4075*

16 March 2026

**SUBMISSION ON QCA INTERIM CONSULTATION NOTICE AND ISSUES DOCUMENT ON
PROPOSED AMENDMENTS TO THE GUARANTEED SERVICE LEVELS SCHEME THAT
APPLIES TO ENERGEX AND ERGON ENERGY**

BACKGROUND

The Queensland Consumers' Association (the Association) is a non-profit organisation which exists to advance the interests of Queensland consumers. The Association's members work in a voluntary capacity and specialise in particular policy areas, including energy. The Association is a member of the Consumers' Federation of Australia, the peak body for Australian consumer groups and is represented on the Queensland Competition Authority's Consumer Consultative Committee and the Energy and Water Queensland Ombudsman's Advisory Council. The Association is also a member of the Queensland Council of Social Service's Essential Services Consultative Group.

The Association has participated in every Guaranteed Service Level (GSL) consultation and welcomes the opportunity to participate in this one.

The contact person for this submission is: Ian Jarratt, email [REDACTED]

PHASING OUT OF CHEQUES

We support a change of the EDNC to facilitate GSL payments via retail electricity bills.

We support providing more consumer protections and recommend the implementation of Approach 3 (derogation to the NERL) for retailers and Approach 1 for the distributors.

We consider that it also important to ensure that:

- the process remains automatic i.e. customers do not have to lodge a claim
- customers are notified by the distributor that a payment will be made
- customers can make a claim themselves to the distributor
- customers can appeal against a distributor's decision
- the current payment arrangements for Ergon Energy customers with card operated prepayment meters continue
- there are satisfactory arrangements for customers who have changed, or no longer have, a retailer
- customers are paid as soon as possible after the event
- since currently GSL payments are made direct to the customers, they should the option of a payment being credited to their retailer bill or paid by the retailer into a bank account nominated by the customer
- customers are informed when a GSL payment has been credited to a bill
- unresolved disputes with distributors and retailers can be accepted by EWOQ.

We consider that any new arrangements should be introduced as soon as possible and be accompanied by an adequately resourced and effectively implemented consumer education campaign.

GSL EXCLUSIONS

We support the proposal in principle. However, unless both distributors are prepared to reduce charges to customers by the cost forecasts for such GSL payments included in their AER approved revenues for the 2025-30 regulatory period, we consider that further consideration of it should be deferred to the consultations for the next GSL review period.