

**Australian Pensioners' and Superannuants' League Qld Inc.**

ABN 64 035 038 557

State Secretary: Ian Gordon

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Ms Dianne McGrath
AER price comparator project

Dear Ms McGrath

The APSLQ thanks you for the opportunity to participate in consultations for the development of the AER price comparator website. The APSLQ welcomes this development as there is great potential for it to be of significant assistance to older people by giving them access to reliable information about the prices available for purchasing their energy needs. Many older people have low fixed incomes, and for them every dollar which can be saved in unnecessary expenditure is important.

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.

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.

Attached for your consideration are our comments on some salient aspects of the issues paper. As is indicated in our submission, the APSLQ recommends that there be specific consultation with older people and testing of proposed information architecture for the website as it is developed. We are only too willing to recruit older people for this purpose including people who live in regional areas of Queensland. Additionally we would also be available for consultation about drafting and/or testing information material and to participate in information dissemination prior to launch of the website. Please contact the APSLQ policy coordinator, Ms Lynn Barratt, if you require any clarification or further comment.

Yours sincerely

Ian Gordon
Secretary/Treasurer

1.2.1 Accept disclaimer

The disclaimer needs to be in large print prominently displayed. Key words – “this is a guide only” should be displayed in large letters and on the offers.

Customer Information

- 1.2.3 Options for sorting needs to take into account the needs of people who do not have access to the internet and have to provide information by phone and receive printed versions of the results.
- 1.3.1.1 Postcode only may not be adequate for consumers who live in places covered by more than one distribution zone. Consider adding street and town/city.
- 1.3.1.3 As some people may not understand what their meter type is, they may be more likely to know tariff type as it is on the bill. Consider providing option for meter or tariff.

The Queensland Government’s direction to the Queensland Competition Authority develop a new N+R charging methodology for Queensland to start in 2012 includes the development of a voluntary time of use tariff for domestic customers. Whether it will lower the cost of electricity for low users, many of whom are older people who are pensioners and superannuants, is unclear at this stage. Use of time tariff will also require the installation of particular meters if consumers do not already have them. It is likely to be promoted as a method of cost saving but may in fact not be so for low users. It is therefore important that this be incorporated as soon as possible, with information that this facility is available if it is in a particular area.

- 1.3.1.4 A warning needs to appear to check whether the bill being used to estimate is an actual or estimated bill.
- The seasonal weighting needs to accommodate Australia’s climate zones and weather differences which may be able to be correlated to postcodes. Temperatures can vary significantly over relatively small geographic differences e.g. between Brisbane & Ipswich, the latter usually being colder in winter and hotter in summer, by a few degrees.

Showing offers

- The disclaimer, at least the words “This is a guide only” should be prominently displayed in large type.
- For people who do not have the use of a computer, the way offers are presented will need to be discussed with them at the time of giving the information. The information which would be provided in the links to retailers as well as information about how to switch retailers will need to be provided in a brochure or fact sheet format.
- The information provided in the tables needs to clearly indicate whether it includes discounts or rebates. Information should be provided prominently about conditional discounts and when they apply such as on-time payment discounts. The estimates should show the final cost with and without these discounts costs as does the Brisbane City Council rate notice. Offers should clearly show clearly and consistently which retailer does or does not provide a particular discount. A good example of how this may be done are health insurance products which set out in columns, showing with a tick, which level provides which service for easy comparison.
- Information needs to be clearly provided as to whether paying fortnightly, monthly or quarterly results in a lower cost and if so by how much for each available option.

- A list needs to be provided to enable the customer to indicate what kind of contract is offered, and whether standard contracts are offered.
- The AER needs to monitor retailer websites closely and remove links to those which do not keep information accurate and up to date.
- The total amount a customer would pay should be provided GST inclusive in the offers. This should be made very clear.

Website accessibility

- In designing the presentation of the website and information to be provided to older people who do not have computers, it is strongly recommended that the AER consult with seniors about their needs and preferences. This would not be an onerous task. In Queensland, the DOC QGOV Project team is developing a seniors' web franchise to provide a single, consistent and accessible internet site for the seniors' sector to access information and services relevant to them regardless of the agency that provides the information or service. It is to be launched in November 2011. The APSLQ recruited seniors to participate in consultations and testing the initial design for the development of the QGOV Seniors web franchise and information architecture. The draft information architecture for the seniors' web franchise was designed drawing directly from the outcomes of the customer research activities. Older people were then recruited to test the draft proposals. Modifications were made as a result of this testing. The APSLQ is willing to recruit older people for consultation and testing the proposed AER information architecture as it is developed.

Information and marketing

- It is most important that older consumers are adequately informed and provided with access to clearly written information before the website is launched. The APSLQ is willing to recruit older people for consultation about what they want and need and to test drafts as they are developed. The APSLQ is also willing to recruit older people to participate in dissemination of information to other older people in the Queensland community particularly in regional areas.

