

QCOSS submission on draft instrument -

AER Performance Reporting Procedures and Guidelines

Queensland Council of Social Service (QCOSS) is the peak body for over 600 welfare and community sector organisations in Queensland. For over 50 years QCOSS has worked to promote social justice and exists to provide a voice for Queenslanders affected by poverty and inequality. We act as a State-wide Council that leads on issues of significance to the social, community and health sectors. We work for a Fair Queensland and develop and advocate socially, economically and environmentally responsible public policy and action by community, government and business.

QCOSS has been funded by the Department of Employment, Economic Development and Innovation for an energy consumer advocacy project in Queensland. The purpose of this project is to advocate on behalf of Queensland consumers and particularly vulnerable and low income households in relation to energy.

This is the final stage of the AER's consultation on the Performance Reporting Procedures and Guidelines. QCOSS welcomes the multiple opportunities we have had to comment.

QCOSS previously stated that we supported the performance indicators that were listed in the November 2010 Position Paper. We note there have been a number of small changes since then to the proposed set of indicators, and that the AER canvassed these changes with the consumer representatives on the Customer Consultative Group. Given the consultation to date, we are prepared to support the proposed set of indicators.

We also believe that once the reporting framework is implemented and indicator data is available, the AER intends to review at least some of the performance reporting framework. The changes from the November 2010 Position Paper that we will closely monitor and comment on are:

- the use of quarterly data instead of monthly data for some of the payment plan indicators (S3.13 and S3.14)
- the use of annual data instead of quarterly data for the payment method of hardship program customers (S4.6), and the
- removal of indicators around the proportion of hardship program customers whose payments are covering or exceeding ongoing energy costs (the AER states that it will reconsider these indicators if other information does not explain the trends in debt levels reported).

We will now turn our attention to implementation of the new framework, reviewing the AER performance reports, and identifying any compliance issues in Queensland around retailer obligations. One area of compliance that we are concerned about is the setting of repayment rates for payment plans for those customers outside the hardship program. We continue to receive anecdotal evidence that unsuitable payment plans are being established for vulnerable energy customers, especially for those on low incomes or from CALD backgrounds.

If you have any questions about this submission, please contact Roger Church at QCOSS on rogerc@qcoass.org.au or by phone on (07) 3004 6915.