



Energy Retailers Association  
of Australia Limited

28 May 2010  
Essential Service Commission of South Australia  
L8, 50 Pire St  
Adelaide SA 5000  
By email: [escosa@escosa.sa.gov.au](mailto:escosa@escosa.sa.gov.au)

**Re: Review of Energy Regulatory Information Guideline No 2**

The ERAA welcomes the opportunity to comment on the ESCoSA's Review of Energy Regulatory Information Guideline No 2. The ERAA is the peak body representing the core of Australia's energy retail organisations. Membership is comprised of businesses operating in the electricity and gas markets throughout the National Electricity Market (NEM), as well as the Northern Territory and Western Australia. These businesses collectively provide electricity to over 98% of customers in the NEM and are the first point of contact for end-use customers of both electricity and gas.

The ERAA believes that, in general, any changes to energy regulatory information guidelines or similar requirements ought to be as consistent as possible with the forthcoming National Energy Consumer Framework. Based on today's informal consultations by the AER with hardship stakeholders, it's clear that there is not yet consensus on what constitute valid performance indicators in this area.

Beyond this, the ERAA believes that the above draft decision calls for disclosure of customer debt data which ERAA members regard with good reason as being highly sensitive commercial information, and would object to being required to disclose, especially in an identified format.

The ERAA compiles state by state debt data on behalf of its members for use in de-identified format for our internal policy purposes. This year's data will be subject to external review. The ERAA would naturally notify public policy makers of any significant trends of concern in this data. Therefore the ERAA does not believe that mandatory disclosure of such data is warranted.

Should you wish to discuss the details of this submission further, please contact me on (02) 9241 6556 and I can facilitate such discussions with my member companies.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cameron O'Reilly', is written over a light blue horizontal line.

Cameron O'Reilly  
Executive Director

**Energy Retailers Association of Australia**