

March 2006 | Discussion Paper

NATIONAL ENERGY RETAIL PERFORMANCE INDICATORS

Utility Regulators Forum

Steering Committee on National Regulatory Reporting Requirements -
Retail Working Group

Request for Submissions

Written submissions are invited from interested parties in relation to the issues raised in this paper.

Responses to this paper should be directed to:

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It is highly desirable for an electronic copy of the submission to accompany any written submission.

It is intended that all submissions will be made publicly available via the Essential Services Commission of South Australia website (www.escosa.sa.gov.au) and possibly on other regulator websites, except where a submission either wholly or partly contains confidential or commercially sensitive information provided on a confidential basis and appropriate prior notice has been given.

The Commission may also exercise its discretion not to exhibit any submission based on its length or content (for example containing material that is defamatory, offensive or in breach of any law).

Submissions should be provided by Friday, 7 April 2006.

Preface

A key objective of the Utility Regulators Forum (URF) is to provide a consistent approach to performance monitoring of energy utilities across jurisdictions and enable useful national regulatory reporting of retail businesses. In November 2000, the URF agreed that the jurisdictional economic regulators would develop a core set of nationally consistent performance reporting requirements for the electricity industry.

The Steering Committee on National Regulatory Reporting Requirements (SCONRRR) was subsequently established to oversee the development of requirements for reporting by electricity retailers and distributors. In March 2002, the URF issued a final report on national regulatory reporting requirements for electricity distribution and retailing businesses. The March 2002 Report sets out the URF's agreed national regulatory reporting framework.¹ The March 2002 Report developed a template of national data to be reported by URF members, covering operating performance indicators for retail and distribution, and financial performance indicators for distribution.²

Most jurisdictions have largely adopted the 2002 template as it applies to electricity retail businesses. However, these indicators have now been operational for several years and the following observations are made by jurisdictional regulators regarding their effectiveness:

- problems with reporting consistency between and within jurisdictions have been encountered;
- there has been convergence between electricity and gas supply as a number of retailers operating in various jurisdictions offer dual supply contracts to customers who wish to enter the competitive energy market; and
- some jurisdictions have encountered recent increases in disconnection rates and further enhancements of affordability indicators may be warranted.

The objective of this SCONRRR process is to gain agreement to apply further consistency to the data collected by regulators for national reporting purposes to the maximum extent possible across the jurisdictions. The decision as to whether or not to require additional performance indicators will continue to be made by the individual jurisdictions. Nevertheless, the outcomes of the consultation on this discussion paper will assist the jurisdictions to determine what changes, if any, need to be made to their information requirements.

This discussion paper outlines a proposal to:

- revise or clarify some of the data definitions employed for the electricity retail sector;
- expand the performance indicators to include the gas retail sector; and
- add additional affordability information for both electricity and gas retail.

¹ Refer www.accc.gov.au/content/index.phtml/itemId/332190/fromItemId/3894.

² The remainder of this Discussion Paper addresses retail performance indicators only.

Further, the approach to complaints and call centre reporting is discussed and a draft national complaints reporting guideline is attached.

The scope of this review of performance indicators has been limited, but the proposed changes are considered important in developing a strong reporting base by facilitating greater consistency in performance reporting by jurisdictional regulators, which should assist in the transition to the national energy regulatory framework.

Comment is sought from stakeholders on these proposals. Submissions should be directed to Mike Philipson, ESCoSA, email: Mike.Phippison@escosa.sa.gov.au by Friday, 7 April 2006.

Patrick Walsh
CHAIR
SCONRRR Retail Working Group

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1 Introduction

The Steering Committee on National Regulatory Reporting Requirements (SCONRRR) was established by the Utility Regulators Forum (URF)³ to oversee the development of requirements for reporting of electricity retailers and distributors. Its objective was to gain agreement by regulators⁴ to apply a national set of indicators for national reporting purposes enabling stakeholders to compare the performance of energy retailers and distributors across jurisdictions.

In March 2002, the URF issued a final report on national regulatory reporting requirements for electricity distribution and retailing businesses. This report outlined the URF's agreed national regulatory reporting framework (including a template of national operating performance indicators for retail and distribution, and financial performance indicators for distribution).

Most jurisdictions have largely adopted the March 2002 Report template of national operating performance indicators for electricity retail suppliers. These indicators have now been operational for several years and the following observations are made by jurisdictional regulators regarding their effectiveness:

- Problems with reporting consistency between and within jurisdictions have been encountered. Improved definition and clarification of these indicators appears to be warranted to ensure greater reporting consistency. In particular, this paper discusses the approach to complaints and call centre reporting and the introduction of a national complaints reporting guideline.
- There has been convergence between electricity and gas supply as a number of retailers operating in various jurisdictions offer dual supply contracts to customers who wish to enter the competitive energy market.⁵ As a consequence, regulation of electricity and gas retailers has also converged. The adoption of similar performance indicators for electricity and gas retailers now appears warranted.
- Some jurisdictions have encountered recent increases in disconnection rates and further enhancements of affordability indicators may be warranted to assist in identification of customers experiencing financial difficulties and consequently the development of policy responses in this area.

In the current climate of national energy reform it was decided to limit the scope of the review of performance indicators as much as possible. However, the expansion of the indicators to include gas, greater clarification of definitions and improved affordability indicators, will enhance consistency in reporting and will enable better comparison to be made between retail fuel sectors across jurisdictions. As a consequence, the URF strongly believes that the further

³ URF membership includes representatives of the state and territory regulators, and the ACCC and Australian Energy Regulator (AER).

⁴ URF and SCONRRR have no information gathering powers.

⁵ Whilst few retailers are currently offering dual fuel contracts in the strict sense of the term (i.e. a single contract covering the sale of both fuels), many retailers are offering contracts enabling the sale of electricity and gas by the same retailer.

limited refinement of performance indicators as outlined in this paper will assist in transition to the national energy regulatory framework.

The results of this consultation will determine whether national operating performance indicators should be revised by agreement among jurisdictional regulators.

The structure of the paper is as follows:

- Section 1 provides an introduction and overview.
- Section 2 outlines the proposed revisions to existing template definitions.
- Section 3 outlines the proposal to require all jurisdictions to collect additional affordability information.
- Section 4 outlines the proposal to achieve a uniform set of national performance indicators for gas retailers, based on the national retail electricity indicators.
- Section 5 discusses options to categorise indicators according to relevant fuel types.
- Section 6 summarises the proposed changes to the national retail reporting template.
- Section 7 briefly outlines the next steps in this process.

2 Revised Template Definitions

In light of regulatory experience and as a result of work undertaken by the SCONRRR Retail Working Group, some revisions to current definitions in the national retail template are considered warranted to provide further clarification to retail suppliers and enhance consistency in reporting.

2.1 Telephone Service

The telephone service indicators monitor a retailer's promptness in answering calls from customers.

The current (March 2002 Report) telephone responsiveness indicator measures the number and percentage (%) of calls responded to within 30 seconds from when a customer is connected to a complaint/enquiry line. Factors to be taken into account include:

- a telephone call is answered when a caller speaks to a human operator or to an interactive service that provides the information requested by a caller;
- being placed in an automated queuing system does not constitute a response; and
- calls to automated payment lines are not included.

To date, the March 2002 Report definition has yet to be applied in a consistent manner across all jurisdictions. In seeking to correct this, the Working Group has considered whether there might be a more appropriate definition that could be employed in this area.

The proposal is to retain the basic telephone responsiveness definition, but confine it to reporting on the performance of calls to an operator, i.e. recording the number and percentage (%) of calls forwarded to an operator that are responded to within 30 seconds by an operator. Calls responded to by an Integrated Voice Response (IVR) system, other than when the option to talk to an (human) operator is selected by the customer, would no longer be monitored. As a result, it would be referred to as the 'operator responsiveness' indicator, to avoid its scope being misinterpreted should it continue to be referred to as a 'telephone responsiveness' indicator.

Where IVR systems are used, recorded time would be from when the caller selected the operator option until an operator picked up the call to deal with the inquiry.

The March 2002 Report notes that industry representatives on the original working group were keen to see the inclusion of IVR, in that it is an accepted and widely employed practice in customer service and that the electricity retail industry should not be penalised for its use of this technology. The Working Group recognises the effective use that many retailers have made of IVR systems, and does not purport to devalue the improvements in customer service that such systems have created. The revision to the definition is intended to focus reporting on aspects of telephone responsiveness that continue to cause concern.

The Working Group does not believe that the proposed revised definition will penalise retailers that adopt IVR systems, as these retailers can maintain a call centre with fewer staff to achieve the same telephone responsiveness (as defined) as a retailer without an IVR system.

There is always likely to be some debate over the best definition to use, however, in the absence of an agreed approach going forward, the benefits of having a single definition applied in a consistent manner nationally would be lost. This represents an underlining theme for a number of the changes proposed in this paper.

In relation to the other national template telephone service indicators, the Working Group proposes the following:

- the total number of calls should include the number of abandoned calls;
- the percentage of calls abandoned indicator would not be changed;
- the ‘average waiting time before a call is answered’ indicator would record the average time before an operator answered the call. As indicated above, where a IVR system is used, the average time should be calculated from when the caller selects the operator option; and
- it is proposed to delete the ‘number of overload events’ indicator, as such events are generally rare for retailers and are more relevant for distributors following a significant outage. However, the Working Group notes that small retail customers do not always appreciate the difference between a retailer and network operator. As a consequence, a network overload event may impact a retailer’s call centre performance as customers can incorrectly call the retailer regarding supply problems.

Issue 1

Comment is sought on:

- ***The proposed changes to the telephone service indicators, particularly if there are any implementation problems with the proposal.***
- ***The proposed removal of the ‘number of overload events’ indicator.***

2.2 Complaints

The Working Group has focused on three areas in respect to customer complaint indicators. The Working Group believes that:

- the current definition of complaints should be amended to provide greater clarity;
- consistency in reporting between retailers needs to be improved; and
- changes to the current indicators are warranted to gain a better appreciation of the key customer groups that are making complaints and the nature of those complaints.

Definition

The current (March 2002 Report) definition of a complaint is:

“A written or verbal expression of dissatisfaction about an action, or a failure to act, or in respect of a product or service offered or provided by an electricity entity.”

The proposed revised complaint definition is:

“An expression of dissatisfaction made to an organisation, related to its products/services, or the complaints-handling process itself where a response or resolution is explicitly or implicitly expected”.⁶

The key change is the requirement for a response or resolution to be explicitly or implicitly expected. This is designed to eliminate vexatious complaints, in that a customer must be seeking a response or resolution of some kind.⁷ However, such a response can include an acknowledgement or an apology.

As with any of the indicators, it is important that retailers interpret the definitions in as consistent manner as possible (both within and across jurisdictions). This suggests the development of guidelines for retailer staff recording data, which in the case of the consistent reporting of complaints is addressed in the next section.

Consistency in reporting

The need to provide clarity in categorising enquiries and complaints has been identified by regulators through a variety of mechanisms, including regulatory audits⁸ and noting that in reviewing published template data national comparisons proved difficult, with differences in performance appearing to be driven, at least in part, by inconsistency in the data collected.

In response to this problem, a draft national reporting complaints guideline has been developed, which is provided as Appendix 1 to this paper.⁹ The purpose of this guideline is to assist retailers' frontline staff to identify and categorise complaints and enquiries in a consistent manner.

⁶ Based on International Standards Organisation (ISO) definition of complaint - ISO 10002.

⁷ A potential category of complaint would be to isolate vexatious from other complaints. However, in practice defining a vexatious complaint could prove difficult. Also, unless there was a change in the level of vexatious complaints, monitoring trends in the level of overall complaints should indicate whether there are any emerging issues, rather than be concerned with the absolute number of complaints.

⁸ ESC Victoria regulatory audits in 2003 identified inconsistencies in the categorising of complaints.

⁹ This draft guideline was developed by representatives of jurisdictional energy regulators in consultation with a cross section of retail energy businesses operating in the Australian energy market. Interviews were also conducted with energy ombudsmen from a number of jurisdictions.

Proposed changes to current indicators

The Working Group believes that changes to current indicators are necessary for the following reasons:

- categories of complaints should be expanded to take account of market developments, particularly the introduction of retail competition;
- complaints should be disaggregated between residential and non-residential customers to better identify the customer group impacted; and
- complaint contacts should be recorded, as well as the number of complaints. This approach acknowledges that one customer contact may result in a number of complaints regarding different aspects of customer supply/ service.

It is proposed that the following indicators should be collected:

- total number of customer contacts where complaints regarding the retailer are made; and
- total number of complaints regarding the retailer.

Comparing these two indicators (i.e. the total number of customer complaint contacts with the total number of complaints across categories) indicates the level of multiple complaints for each contact.

It is considered that the total number of complaints should be disaggregated under residential and non-residential categories. This greater degree of disaggregation is necessary to gain a better appreciation of the key customer groups that are making complaints.

It is also proposed to expand the number of complaint categories from two to four. Further disaggregation of this information will better enable regulators to assess the types of complaints being received by energy retailers and, where applicable, investigate systemic issues. The proposed complaint categories are:¹⁰

- **Billing complaints**¹¹: includes billing errors, incorrect billing of fees and charges, failure to receive relevant government rebates, high billing, faulty meter, credit collection, disconnection and reconnection, and restriction due to billing discrepancy.
- **Marketing complaints**: includes advertising campaigns, contract terms, sales techniques and misleading conduct.
- **Transfer complaints**: includes failure to transfer customer within a certain time period, disruption of supply due to transfer.

¹⁰ These are minimum reporting requirements for retailers in respect of reporting complaints. Where a regulatory authority seeks additional information from retailers this will be expected to be provided in addition to the information collected and reported as part of this process.

¹¹ Already collected for electricity, for the national reporting template.

- **Other complaints:** includes poor service, privacy consideration, failure to respond to complaints, and health and safety issues.

These categories will also be disaggregated between residential and non-residential customers.

Issue 2

Comment is sought on:

- ***The proposed definition of a complaint.***
- ***The draft complaints guideline (Appendix 1).***
- ***The revision of complaint indicators including the proposed categorisation.***

2.3 Direct Debit Payment Defaults

The direct debit payment defaults indicator is part of a suite of financial disadvantage indicators, with a recorded increase in the level of defaults possibly indicating that there was a heightened level of customers struggling to pay their energy bills.

The current direct debit payment default indicator is the number and percentage (%) of customers who default on direct debit payments. The current definition of this indicator varies slightly among jurisdictions.

The Working Group considers that, at a minimum, it is important to establish a consistent definition to be applied. It considered a definition where 'defaults or rejections in two successive payment periods should be recorded'. However, this still begged a definition of payment periods and might cause difficulty for retailers in linking such defaults and rejections.

Given the intention that this be an indicator of financial stress, the Working Group proposes that this indicator be varied to report the 'number of direct debit plans terminated as a result of default/ non payment'. This definition would exclude the termination of direct debit payment plans by choice, such as where a customer elects to move to a different payment option. It would generally require a default or rejection to occur in two successive payment periods, to reflect as far as possible true default on payments, rather than an error or a transitory shortfall.

2.4 Instalment Plan

The instalment plan indicator is another of the suite of financial disadvantage indicators, with a recorded increase in the number of instalment plans possibly indicating a heightened level of customers struggling to pay their energy bills.¹²

The current definition of instalment plan is as follows:

“An arrangement between a retailer and a customer for the customer to pay arrears and continued usage on their account according to an agreed payment schedule and capacity to pay. It does not include customers using a payment plan as a matter of convenience or for flexible budgeting purposes.”

Whilst the review undertaken by the Working Group indicated some inconsistency in the application of this definition, the Group concluded that the definition is generally sound and should only be varied slightly to provide further clarification in respect to the following matters:

- the definition should state that instalment plans are generally considered as plans involving at least three (3) instalments.¹³ In the past, some retailers have incorrectly reported “extensions to payment due date” against this indicator;
- the definition should acknowledge that the plans enable customers to make payments in instalments, by arrears or advance, taking into account their capacity to pay; and
- the key point is that the arrangements enable the customer to continue to receive supply and avoid disconnection.

Issue 3

Comment is sought on:

- ***The proposed changes in the definition of Direct Debit Payment Defaults and Instalment Plans.***
- ***The appropriateness of the proposed working definition for the instalment plan indicator, of at least three instalments.***

¹² An increase could also result from retailers adopting a policy change of providing enhanced assistance to financially disadvantaged customers (i.e. through encouraging such customers to take out instalment plans) in an effort to avoid disconnection. The impact of such a policy change on indicator trends would be expected to be relatively short term, with the number of instalment plans settling to a new base (reflecting the policy change) within a couple of years.

¹³ Definition currently employed by NSW and SA energy regulators.

3 Proposed New Affordability Indicators

A key aspect of jurisdictional regulators' work in monitoring the operation of retail codes and the health of the competitive retail market in general, is to check that protections put in place for customers are working adequately (particularly as they impact financially disadvantaged customers).

Since the release of the March 2002 Report, the extent to which financially disadvantaged customers are being disconnected has emerged as an issue in a number of jurisdictions. There is some concern that by themselves the current indicators of total disconnections and reconnections are not sufficient to identify the extent to which financially disadvantaged customers are being disconnected.

The ESC Victoria has recently adopted a range of additional disconnection indicators, following a report undertaken on disconnections and financial hardship.¹⁴ These indicators build on the current set of performance indicators. They are designed to provide information on the affordability of supply by reporting the current disconnections and reconnections indicators broken down by a number of characteristics observed to reflect potential financial hardship. The collection of these indicators for both electricity and gas would also provide a consistent specification for indicators between fuel sectors and enable consistent comparison between retail fuel sectors.

It is proposed that the following additional affordability information be collected from retailers:¹⁵

- ***Disconnection of customers previously on a budget instalment plan (residential only)***: customer whose supply was disconnected for non payment of amount owed and the customer is, or has been in the previous 24 months, repaying arrears through a budget instalment plan.
- ***Reconnection in the same name of customers previously on a budget instalment plan (residential only)***: customer whose supply has been reconnected and the customer is, or has been in the previous 24 months, repaying arrears through a budget instalment plan.
- ***Disconnections in the same name and address within past 24 months (residential only)***: customers whose supply was disconnected for non-payment of an amount owed and who have been disconnected for non-payment of an account on one or more occasions in the previous 24 months.

¹⁴ The Allen Consulting Group, November 2003, 'Disconnection and financial hardship performance indicators'. Refer www.esc.vic.gov.au/apps/page/user/pdf/ESCAffordab_Draft2_11Nov.pdf.

¹⁵ ESC Victoria has already approved the collection of this information from electricity and gas retailers operating in Victoria. The Essential Services Commission of South Australia (ESCOSA) has recently amended its information requirements to require SA licensed retailers to commence reporting on these indicators from 1 July 2006 (refer "Energy Retailer Information Requirements: Revised Energy Industry Guideline No.2, Final Decision, December 2005, available at www.escosa.sa.gov.au/site/page.cfm?u=4&c=1583).

- **Reconnection in the same name and address within past 24 months (residential only):** customers whose supply was reconnected in the same name at the same premises following a disconnection for non-payment and who have been disconnected for non-payment on one or more occasions in the previous 24 months.
- **Disconnections of Concession card customers (residential only):** disconnection of customers who receive a State Government administered energy concessions through the Federal Concession Card Scheme.
- **Reconnection in the same name of Concession card customers (residential only):** customers who receive a State Government administered energy concessions through the Federal Concession Card Scheme and whose supply was reconnected in the same name at the same premises following a disconnection for non-payment and who have been disconnected for non-payment on one or more occasions in the previous 24 months.

As indicated, these additional indicators would only be collected for residential customers.

Issue 4

Comment is sought on the proposed changes to affordability indicators.

4 Performance Indicators – Gas Sector

Currently the national retail template is restricted to information reported by electricity retailers to regulators, consistent with the national reporting requirements agreed by the URF in the March 2002 Report.

There has been convergence between electricity and gas supply as a number of retailers operating in various jurisdictions offer dual supply contracts to customers who wish to enter the competitive energy market. As a consequence, regulation of electricity and gas retailers has also converged.

Victorian, New South Wales, South Australian and ACT regulators currently require retail gas businesses to report indicators consistent with the current national retail template for electricity. The electricity retail template data is seen to be the minimum core set of data to monitor performance in an energy retail market and as such should also apply to monitoring of the gas retail market.

The Working Group believes that the full set of electricity retail indicators, including definitions, be collected for gas retailers. A uniform set of national performance indicators for gas retailers will enable consistency in reporting and enable comparisons of retailer's performance across jurisdictions and for some indicators across fuel types.

Issue 5

Comment is sought on the proposed inclusion of gas in the national retail template.

5 Categorisation by Fuel Type

To ensure consistency in reporting there is a need to provide guidance on the categorisation of statistics against performance indicators.

In general, the Working Group considers that performance data should be recorded against separate fuel type categories (as opposed to a combined fuel category). Given that electricity and gas FRC are still in their relative infancy in most jurisdictions and not commenced in some, there is merit, at least for the next few years, in continuing to monitor performance separately by fuel type in areas such as complaints and affordability indicators (i.e. instalment plans, direct debit defaults and disconnections). Continued separate reporting of affordability indicators (i.e. by electricity and gas categories) will also allow better identification of any problem areas and assist industry, regulators, and Governments to tailor appropriate responses.

However, given that some retailers sell both electricity and gas, there are instances where a single matter may relate to both fuels (eg. a single marketing complaint covering both fuel types). In these circumstances, some retailers find it difficult to classify such issues into the existing electricity and gas categories. In some jurisdictions this has led to double counting of dual fuel customer issues. The Working Group believes that a much simpler and cost effective approach would be to create an additional dual fuel category. It is therefore proposed that for the majority of retail performance indicators, performance data should be reported against electricity, gas or dual fuel categories.

It is proposed that the specific definition of 'dual fuel' would be tailored to the particular indicator. Taking the example of a marketing complaint, a relatively loose definition is proposed which would cover any complaints against retailers offering both electricity and gas, whether as a combined product or separate. In this case, customers may not know the precise nature of the product that was being offered. The Working Group's aim in this instance is to avoid retailers recording such dual fuel complaints as both an electricity and gas complaint, and hence effectively double-counting the number of complaints reported.

However, in relation to the disconnection and reconnection indicators a narrower definition is proposed, as in some jurisdictions retail codes have specific requirements in relation to how dual fuel customers as defined in the codes can be disconnected (e.g. some codes require that electricity and gas cannot be disconnected together). Jurisdictions having such code requirements wish to monitor the rates of disconnection for this more narrowly defined category of dual fuel.

To provide further clarity of the Working Group's preferred approach, a definition of the proposed dual fuel category is provided, together with some examples of categorising of retail performance data.

It is intended to define the dual fuel category as follows:

dual fuel category captures performance data involving:

- 1) customers holding a ‘dual fuel contract’¹⁶; and /or
- 2) any marketing complaint involving the offer to supply both gas and electricity during one marketing contact.

There is considered benefit in using the same definition of ‘dual fuel contract’ across all indicators that would adopt a dual fuel category (other than marketing complaint), rather than seek to employ a specialised definition only for the disconnection and reconnection indicators.

There would be some practical issues associated with reporting performance against indicators using the proposed definition of dual fuel, particularly in relation to the disconnection and reconnection indicators.

Examples of categorising retail performance data include the following:

- A complaint concerning an electricity and gas marketing offer would be categorised as a dual fuel complaint.
- A person on a dual fuel supply contract gets both their gas and electricity disconnected within a six week period for non payment of bills. This would be recorded as a dual fuel disconnection (and implicitly determined to be both an electricity and gas disconnection). Gas and electricity disconnections that fall outside the six-week period of each other would need to be recorded separately against the respective electricity and gas indicators (as there needs to be some limit placed on the timing of an electricity disconnection subsequent to a gas disconnection, to enable retailers to be able to report these indicators)¹⁷.
- A person on a dual fuel contract whose gas supply is disconnected for non-payment or partial payment of bills. This situation is remedied and their gas supply is reconnected. At no time was their electricity disconnected. This incident should be recorded against gas disconnection and reconnection indicators only. To do otherwise (i.e. assume that all dual fuel customers have both electricity and gas disconnected) would lead to reporting

¹⁶ Dual fuel contract is defined as an energy contract for the sale of electricity and for the sale of gas by a retailer to a customer, with some jurisdictional retail codes also defining it to include two energy contracts between the same customer and the same retailer, one an electricity contract and one a gas contract, under which a single bill or simultaneous bills are issued. A key point for indicators that would employ a dual fuel category, other than marketing complaints, is that merely having both fuels purchased from the same retailer is not sufficient to be classed as dual fuel, there is a need for a contractual link between the two fuel types.

¹⁷ For instance, the South Australian Energy Retail Code (clause 9.2.3(b)(ii)) permits a retailer to “... *only disconnect a residential customer’s electricity supply 15 business days after disconnecting the residential customer’s gas supply if the residential customer has refused or failed to take any reasonable action towards settling the debt since the date of disconnection of the residential customer’s gas supply...*”. Thus there would be a gap of at least 15 business days between electricity and gas disconnections, but at the discretion of the retailer there might be an even larger gap, hence the arbitrary setting of a six week period, so that retailers are not expected to monitor such a gap indefinitely.

disconnections in excess of the actual level of electricity and gas disconnections that occurred.

- Where a person on a dual supply contract is disconnected from both gas and electricity supply within a six week period and the two disconnections span the end of a reporting period and the beginning of the next reporting period, this should be reported as a dual fuel disconnection in the later reporting period only. This is to avoid any double counting.

Notwithstanding the proposed general adoption of a dual fuel category, the Working Group considers that one exception to this approach is warranted. In light of development of full retail competition within the energy market, the Working Group considers that greater focus should be placed on retailers' call centre performance without the need to distinguish between fuel types.

A number of retailers are participating in both the electricity and gas retail markets, and there is considered to be less reason to distinguish call centre performance based on fuel type. Whilst some jurisdictions may wish to continue to receive performance data by separate fuel types or call centres, it is proposed that national reporting of performance in this area would be based on a generic energy category.

Issue 6

Comment is sought on:

- ***The proposed introduction of electricity, gas and dual fuel categories.***
- ***Whether telephone service or other indicators should be reported nationally on the basis of a generic energy category.***

6 Summary of Proposed Changes to National Retail Template

Table 1 below displays the proposed changes to the national retail reporting template incorporating the discussion in sections 2, 3, 4 and 5 of this paper. It shows the additional reporting requirements for electricity and gas.

Table 1 also shows the customer categories by which the data will be sought, i.e. all customers combined, residential only or separate residential and non-residential.

Table 1. Current and Proposed Information Collected for the National Retail Template

Indicator	Customer Type	Electricity	Gas	Dual Fuel⁽²⁾	Energy⁽³⁾
Affordability					
• Instalment payment plans	res. + non-res. ⁽¹⁾	X	•	•	-
• Refundable advances/security deposits	res. + non-res.	X	•	•	-
• Direct debit defaults	res. + non-res.	X	•	•	-
• Disconnections for non-payment	res. + non-res.	X	•	•	-
• Reconnections in the same name	res. + non-res.	X	•	•	-
• Disconnection of customers previously on a budget instalment plan	res. only	◇	◇	◇	-
• Reconnection in the same name of customers previously on a budget instalment plan	res. only	◇	◇	◇	-
• Disconnections in the same name and address within past 24 months	res. only	◇	◇	◇	-
• Reconnection in the same name and address within past 24 months	res. only	◇	◇	◇	-
• Disconnections of Concession card customers (residential only)	res. only	◇	◇	◇	-
• Reconnection in the same name of Concession card customers	res. only	◇	◇	◇	-
Customer service					
• Calls to account line answered within 30 second	total customers	Delete	-	-	•
• Average waiting time before a call is answered	total customers	Delete	-	-	•
• Abandoned calls	total customers	Delete	-	-	•
• Number of overload events	total customers	Delete	-	-	-
• Total number of telephone calls	total customers	Delete	-	-	•

• Total number of customer complaints contacts	total customers	Δ	Δ	Δ	-
• Total number of complaints	res. + non-res. ⁽⁴⁾	X	•	•	-
• Complaints – billing	res. + non-res. ⁽⁴⁾	X	•	•	-
• Complaints – marketing	res. + non-res. ⁽⁴⁾	Δ	Δ	Δ	-
• Complaints – transfer	res. + non-res. ⁽⁴⁾	Δ	Δ	Δ	-
• Complaints – other	res. + non-res. ⁽⁴⁾	X	•	•	-

Notes:

- (1) res. = residential and non-res. = non-residential, with ‘res. + non-res.’ meaning that the data is to be collected and reported for residential and non-residential separately.
- (2) refer to section 5 of this paper for definition of “dual fuel”.
- (3) refers to generic “energy” category. For those retailers only selling one fuel, performance for the relevant indicator will still be reported under the “energy” category. For retailers having multiple call centres, jurisdictional performance data will need to be combined across these centres.
- (4) currently only collected for total customers.

Legend:

- | | | | |
|---|-------------------------------------|---|----------------------------|
| X | Currently collected | • | New indicator |
| ◇ | New affordability information | Δ | New complaints information |
| - | data not collected by this category | | |

Appendix 2 provides a copy of a draft consolidated national energy retail template, incorporating all of the proposals outlined in this discussion paper.

7 Next steps

Submissions on this discussion paper are sought by Friday, 7 April 2006.

Following receipt of such submissions, the Working Group will consider any issues raised before preparing an update to the March 2002 Report, for the consideration of the URF.

The expansion of the indicators to include gas, greater clarification of definitions and improved affordability indicators, will enhance consistency in reporting and enable better comparison to be made between retail fuel sectors across jurisdictions. This aims to support the current climate of national energy reform. The Working Group believes that the further limited refinement of performance indicators as outlined in this paper will assist in the transition to a national energy regulatory framework.

It is expected that regulators will implement in their respective jurisdictions the proposed changes to the national retail template to apply from the 2007/08 financial year.

APPENDIX 1

Draft “National Reporting Guideline – Complaints”

1. Introduction

The Steering Committee on National Regulatory Reporting Requirements (SCONRRR) Retail Working Group has developed a national complaints reporting guideline for the use of retailers’ call centre staff. The approach will assist in achieving consistency in the way complaints are recorded and reported and enable more effective comparisons between retail businesses operating in the national electricity and gas markets.

This guideline will provide a consistent approach for identifying customer contacts as either a ‘complaint’ or ‘enquiry and other communication’, and for those contacts identified as a complaint, the appropriate complaint category.

The Working Group engaged PricewaterhouseCoopers (PwC) to assist in developing the guideline. PwC, in conjunction with Working Group representatives, interviewed a cross section of retailers operating in the national market to discover how complaints are being categorised and what issues businesses face in differentiating ‘complaints’ from ‘enquiries and other communications’. This process included a visit to a retail energy business call centre. Furthermore, interviews were conducted with energy ombudsmen from a number of jurisdictions.

Also, representatives from some jurisdictional energy regulators were interviewed as part of this process.

As a result of this discovery process several key issues were identified:

- inconsistencies in the interpretation of the complaints definitions by energy retailers;
- inconsistencies in the way retailers record complaints; and
- inconsistencies in the way complaints are reported.

Given these problems, it was evident that an approach to assist energy retailers was required to ensure that all parties were reporting information on a consistent basis to the jurisdictional regulators.

2. ‘Complaints’ and ‘enquiries and other communication’

The purpose of this guideline is to assist in the interpretation of what customer contacts should be deemed complaints. Whilst this guideline provides a definition of a complaint and provides examples of case studies deemed to portray customers complaining, it can also be of assistance to consider what might constitute an ‘enquiry and other communication’.

Each time a customer contacts an energy retailer they are seeking answers to, or help with, specific problems encountered in the delivery of the services provided.

The working definition of a customer contact as a complaint rather than an enquiry should be seen in the context of the key components of the definition (refer section 2.1.1); that is, the customer expressing dissatisfaction and where a resolution is expected. This includes the following overarching principles for assessing a complaint:

- (a) the customer has contacted the retailer and has expressed dissatisfaction and seeks resolution; and

- (b) the matter is the result of some action undertaken by the retailer, or some action that could or should have been undertaken by the retailer.

Only complaints need to be classified, collected and reported to regulators. If dissatisfaction has not been expressed, or the customer has not sought resolution, the matter should not be classified as a complaint. Likewise any issues that are not the responsibility of a retailer should not be included as a complaint. Any distribution matters referred to a retailer, including matters referred to retailers on behalf of a distributor (as in the case of gas), should not be counted as retail complaints. Rather these are distribution complaints and should be classified, collected and reported accordingly.

This section provides a definition for a ‘complaint’ and an ‘enquiry and other communication’. It also provides guidance to customer service agents on how to differentiate ‘complaints’ and ‘enquiry and other communication’, how to record a complaint, and how to categorise a complaint.

2.1 Definitions

2.1.1 Complaint

A complaint is defined as:

An expression of dissatisfaction made to an organisation, related to its products/services, or the complaints-handling process itself where a response or resolution is explicitly or implicitly expected.

Where the following interpretations apply:

- (a) **An expression of dissatisfaction:** could be anger, customer states they have a complaint, clearly annoyed or unhappy.
- (b) **A response or resolution explicitly expected:** the caller would need to state that they are seeking some action to address their concern, even if not able to state clearly what particular action was required and, indeed, in some instances there may be no obvious response or resolution.
- (c) **A response or resolution implicitly expected:** requires the customer service agent to interpret that the retailer is expected to take action to deal with the problem. For example, if a caller has called more than once regarding a specific concern the customer service agent should be aware that there is an implied reaction required to ensure that this concern is appropriately dealt with.

A key component of the definition is the requirement for a response or resolution to be explicitly or implicitly expected. This is designed to eliminate vexatious complaints, in that a customer must be seeking a response or resolution of some kind. However, such a response can include an acknowledgement or an apology.

This will include the following types of contacts:

- I. Where a customer expresses dissatisfaction and continues to seek resolution.
- II. Where a customer states that they are making a complaint.
- III. Where a customer threatens to involve a third party, for example the energy Ombudsmen, media outlets, a Member of Parliament.
- IV. Where a customer indicates that they are dissatisfied with the service provided by a customer service agent.
- V. Where a customer indicates that they are dissatisfied with the conduct of agents operating on behalf of the retailer, for example field sales representatives.
- VI. Where a customer indicates that they are dissatisfied with a particular business process used by the retailer, for example transfer or billing processes.
- VII. Where a complaint is directed to the retailer on behalf of a customer by another body (e.g. an ombudsman).
- VIII. Where a customer has called two or more times on the same issue with no resolution.

It is important to note that even if the customer service agent can resolve the complaint, it must still be categorised and logged as a complaint. While it is hoped that retailers will be able to resolve most complaints quickly, it is important that all complaints received be recorded as such.

2.1.2 Enquiries and other communication

An 'enquiry' is defined as:

A request by a customer for information about a product or service provided by the retailer that does not reflect dissatisfaction.

This will include the following contacts:

- I. Where a customer is seeking confirmation of policy and procedure of the retailer.
- II. Where a customer is seeking confirmation of a customer service agent's response from a manager.
- III. Where a customer seeks to confirm the billing data provided, including payment options.
- IV. Where a customer seeks to confirm the products and services offered by the retailers.
- V. Where a customer seeks information for comparison between available retailers.
- VI. Where the customer seeks information relating to products and services offered by a third party, for example, government concessions, network businesses.
- VII. Where the customer is referred to another business unit but no expression of dissatisfaction is made.

'Other communication' is:

Where a customer contacts the retailer with an actionable request.

This will include the following contacts:

- I. Where a customer contacts a retailer to provide information on a change of address details.
- II. Where a customer contacts a retailer seeking a disconnection of premises, in which case the person is neither complaining nor seeking information.

As noted above, customer contacts which are clearly defined as ‘enquiries or other communication’ should be treated as such. Likewise, contacts that are easily identified as complaints should be classified as such. However, there may be a significant number of customer contacts which fall somewhere between a ‘complaint; and an ‘enquiry or other communication’. Where a contact could be deemed as a complaint, customer service agents should err on the conservative side and record such contacts as complaints. This includes where a complaint is being made about the retail process.

2.2 Recording a Complaint

The following principles provide direction to customer service agents on when to log a customer contact as a complaint:

- I. A complaint can be recorded at any stage during the interaction between a retailer and a customer.
- II. A complaint can be recorded at the operator level, elevation level or at any stage during communication between the customer and the retailer. A complaint does not have to be escalated to be recorded as a complaint.
- III. A customer may voice their dissatisfaction at a service/product. They may do this in a manner where their voice is not raised and their manner remains calm.
- IV. Regardless of the outcome/resolution of the issue, if a customer expresses dissatisfaction at a service/product that the retailer is responsible for, the retailer should record a complaint.
- V. More than one complaint can be made per customer/call. For example if a customer makes a billing complaint and then makes a marketing complaint during the same call then two complaints should be registered. Potentially, this will result in the number of customer contacts classified as complaints being less than the sum total number of complaints recorded against each category.
- VI. Each individual customer contact that is a complaint should be recorded and categorised as a complaint irrespective of the number of times the caller has made contact with a retailer on an issue.

As noted above, this guideline sets out the minimum reporting requirements for retailers in respect of reporting complaints. Where a state based regulatory authority seeks additional information from retailers, then this will need to be provided in addition to the information collected and reported as part of this process.

2.3 Categorising Complaints

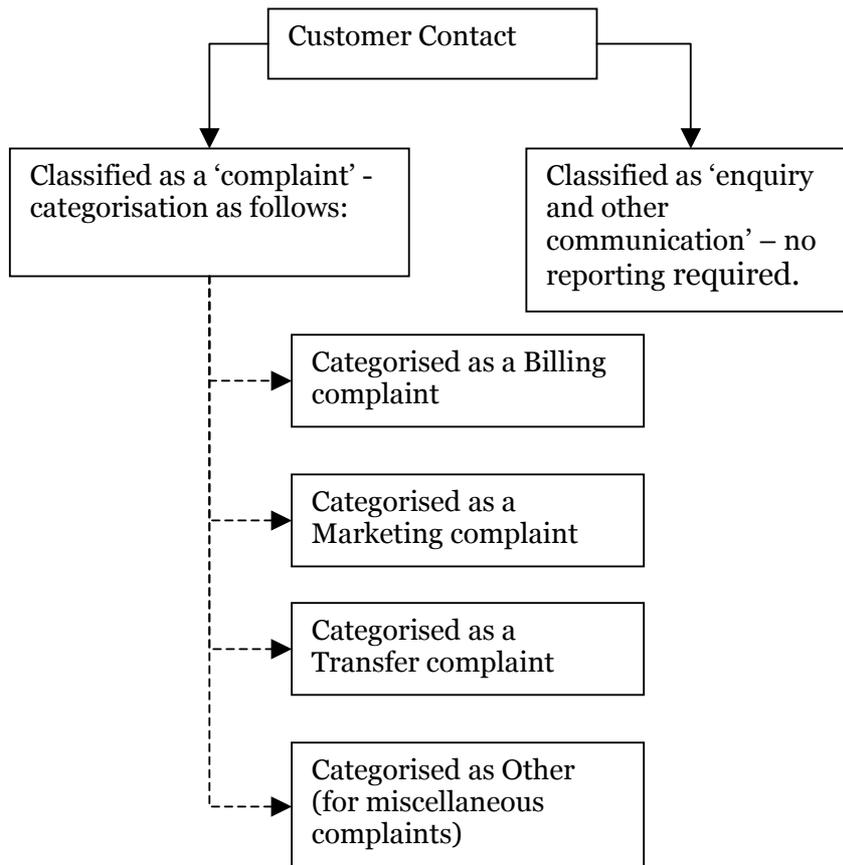
Where a customer contact is classified as a complaint it will be categorised into one of four different complaint categories:

- Billing, for example billing errors, incorrect billing of fees and charges, failure to receive relevant government rebates, high billing, faulty meter, credit collection, disconnection, reconnection and restriction due to billing discrepancy.
- Marketing, for example advertising campaigns, contract terms, sales techniques, misleading conduct.

- Transfer, for example failure to transfer customer within a certain time period, disruption of supply due to transfer.
- Other, for example poor service, privacy consideration, failure to respond to complaints, health and safety issues.

The process of classification and categorisation of calls between ‘complaints’ and enquiries and other communication’, and then the different complaint types is outlined in Figure 1.

Figure 1: Complaints classification and categorisation process



As stated above, it is important to note that a single contact can generate more than one category of complaint.

3. Case Studies

It is noted that there are cases where difficulties exist in categorising a customer contact as a ‘complaint’ or ‘enquiry and other communication’. The following case studies are intended to assist retail customer service agents distinguish between a ‘complaint’ and ‘enquiry and other communication’, and further categorise the complaint.

Billing/ Disconnections

1. Case Study

Customer contact: I wish to complain about the information presented on my bill. In addition, I wish to complain about the additional marketing material included with my bill.

Justification: The customer has identified the call as a complaint.

Reference: Section 2.1.1 (a)

Classification: Complaint

Categorisation: Billing complaint and Marketing Complaint.

In this example the number of Complaints that should be reported to jurisdictional regulator is two. The number of complaints recorded against billing should be one. The number of complaints recorded against Marketing should also be one.

2. Case Study

Customer contact: I'm calling to make a complaint regarding my current bill.

Scenario 1

Retailer: (having confirmed caller's identification) I see that you made a complaint on the 15th of this month regarding your bill.

Justification: If the solution proposed during the previous bill is currently occurring the customer has had to contact the retailer twice on the same issue. An additional billing complaint would be recorded.

Reference: Section 2.2 VI

Classification: Complaint

Categorisation: Billing complaint.

Scenario 2

Where the customer is now complaining that the action proposed during the first contact has not occurred and wishes to complain about this inaction on this call.

Justification: There is an additional complaint over the first complaint due to the complaint registered about the complaint handling process as well as the original complaint.

Reference: Section 2.2 V and VI.

Classification: Complaint

Categorisation: Billing and Other complaint (2 complaints).

3. Case Study

Customer contact: The gas bill that I've just received is significantly higher than the bills I've received over the past few years.

Retailer: Sir has there been a change in circumstances over the past three months, for example have you installed a new heater or an additional person has moved into the house?

Scenario 1

Customer: Yes I've recently changed over my hot water system from electric to gas.

Retailer: Does that explain the increase in consumption?

Customer: Yes, thank you very much.

Justification: The information provided is sufficient to explain the variation in the customer's bill, and was not due to anything for which the retailer is responsible. There was also no evidence that the customer was complaining or dissatisfied.

Reference: Section 2.1.2 III

Classification: Enquiry and other communication

Categorisation: Not required.

Scenario 2:

Customer: No

Retailer: I see that your bill has been estimated which could be why it is too high, I'll conduct a special read for you immediately.

Customer: Thankyou

Justification: The customer is happy with the response provided and accepts that the estimated read could be potentially too high. In this case, the customer has not expressed any dissatisfaction.

Reference: Section 2.1.2 III

Classification: Enquiry and other communication

Categorisation: Not required.

Scenario 3

Customer: No

Retailer: Sir according to my records this was the correct meter read as at the 15th of last month.

Customer: It is incorrect.

Retailer: I'll arrange for a special meter immediately.

Customer: Good!

Justification: The customer is unhappy with the level of the bill. The customer has expressed dissatisfaction and has sought resolution.

Reference: Section 2.1.1 I

Classification: Complaint

Categorisation: Billing complaint.

4. Case Study

Customer contact: I'm an 85 year old pensioner and I have extreme difficulty reading the information provided on your bill.

Retailer: I'm sorry about that can I help you with the information?

Scenario 1

Customer: Yes what is the amount outstanding and when is it due for payment?

Retailer: \$200.25 and its due on the 15th of this month.

Customer: Thankyou.

Justification: The customer has been provided with the appropriate information to fulfil their query. There was no indication that the customer was expecting the retailer to have been aware of her circumstances and for the retailer to have provided the bill in a larger font.

Reference: Section 2.1.2 III

Classification: Enquiry and other communication

Categorisation: Not required.

Scenario 2

Customer: No that's not good enough I want you to send me out another bill in bigger font.

Retailer: That's not a problem, I'll send it out today.

Customer: Fine.

Justification: The customer is voicing their displeasure with the services provided and is expecting a resolution of the problem

Reference: Section 2.1.1 I

Classification: Complaint

Categorisation: Billing complaint.

Scenario 3

Customer: That is still not good enough you should provide bills in larger size font to pensioners.

Justification: The customer is voicing their displeasure with the services provided.

Reference: Section 2.1.1 I

Classification: Complaint

Categorisation: Billing complaint.

5. Case Study

Customer Contact: I've just been disconnected from the network, but I paid my bill by the required date.

Retailer: I'm sorry, but we received the money after the disconnection notice period and were not able to contact you, so had no option but to cut you off.

Customer: That's not acceptable.

Retailer: Sir we can send a reconnection crew out there for tomorrow.

Customer: That's still not good enough.

Justification: The customer is voicing their displeasure with the services provided, or indeed the lack thereof. It is implicit that the required response is that the retailer will reconnect today.

Reference: Section 2.1.1 VI

Classification: Complaint

Categorisation: Billing complaint (where appropriate this should be recorded as a disconnection complaint).

6. Case Study

Customer contact: Both my electricity and gas bills are with you, why do I get the bills at different times.

Retailer: It is due to the different billing cycles for the two services.

Customer: Is there any way I change that so I get my bills at the same time?

Retailer: We can either put you on an estimated monthly account, at no cost, or we can organise special meter reads for your electricity service so that it is consistent with your gas service, however, you will incur a cost for this service.

Scenario 1

Customer: Yes an estimated reading by the month is sufficient.

There was no clear indication of customer dissatisfaction, with the customer enquiring as to whether there was an alternative method of being billed.

Reference: Section 2.1.2 I

Classification: Enquiry and other communication

Categorisation: Not required.

Scenario 2

Customer: No! An estimated reading is not acceptable and I'm not interested in paying for a special meter reading.

Justification: The products and services have been discussed with the customer, but the customer is still unhappy. While there is nothing that the retailer can do for the customer in the short term, the complaint still relates to a retailer function. The retailer could take up the issue with the appropriate authorities and seek change. In any case, this represents a legitimate complaint directed at a retailer and should be recorded as such.

Reference: Section 2.1.1 VI

Classification: Complaint

Categorisation: Billing complaint.

7. Case Study

Customer contact: I would like to complain as to why I have not received my bill.

Justification: Even though there may be a logical explanation, the customer is lodging a complaint and has clearly stated that the contact is a complaint.

Reference: Section 2.1.1 I

Classification: Complaint

Categorisation: Billing.

8. Case Study

Customer contact: I am not happy that I have received a disconnection notice even though I have paid my bill.

Justification: Once again, even though there may be a logical explanation, this is to be lodged as a complaint as the customer has stated they are making a complaint.

Reference: Section 2.1.1 I
Classification: Complaint
Categorisation: Billing.

Marketing/ Promotion

9. Case Study

Customer contact: I received some advertising material from your company despite having a 'no junk mail' sticker on the letter box. This information did not come with my bill and was not separately delivered by Australia Post.

Retailer: I'm sorry about that, I'll make sure that it does not happen again.

Justification: The customer would not have had to contact the business if the normal operation of the marketing function was performed in the appropriate manner.

Reference: Section 2.1.1 I
Classification: Complaint
Categorisation: Marketing complaint.

10. Case Study

Customer contact: I've got a dual fuel arrangement with you and I can't understand why I get two different bills for my gas and electricity.

Retailer: It is due to the different billing cycles for the two services. This should have been explained to you when you signed up to the dual fuel deal.

Customer: Well it wasn't, I was told when I signed up that I would only get one account.

Retailer: I'm sorry, but we cannot change it.

Customer: That's not good enough.

Justification: The customer is unhappy with the processes. They have accepted the information provided at the time of signing the contract as the truth. Although there is nothing the retailer can do to resolve this customer's complaint, information about the sending out of accounts should have been provided as part of the marketing disclosure of the product.

Reference: Section 2.1.1 I
Classification: Complaint
Categorisation: Marketing.

11. Case Study

Customer contact: I've just got my most recent bill and I've received some promotional material. When I signed the contract with you I specifically stated that I did not want to receive such information.

Retailer: I'll adjust your account accordingly.

Scenario 1

Customer: Good. Thank you.

Justification: Even though the customer is happy with the outcome of the telephone conversation, the retailer should have already adjusted the records and the call should not have been made by the customer.

Reference: Section 2.1.1 I
Classification: Complaint
Categorisation: Marketing complaint.

Scenario 2

Customer: You're missing the point I didn't want this material.

Justification: The customer is unhappy with the fact that their wishes not to receive marketing data have gone unheeded.

Reference: Section 2.1.1 I
Classification: Complaint
Categorisation: Marketing complaint.

Transfers

12. Case Study

Customer contact: I have transferred to a new retailer but I received a bill from you (original retailer) today. Why are you sending me bills when I'm not one of your customers anymore?

Retailer: The transfer process takes up to three months to complete during which time you may receive a bill from your original retailer.

Scenario 1

Customer: Fine, I'll pay this one as the last bill.

Justification: The customer is happy with the response provided by the business and is happy to pay the final bill. Also, there is no indication that the customer was expressing dissatisfaction and that had any intent in ringing other than to understand why they were receiving a bill from their original retailer.

Reference: Section 2.1.2 I
Classification: Enquiry and other communication
Categorisation: Not required.

Scenario 2

Customer: That's not acceptable I transferred away from you six months ago!

Justification: There has been a break down in the transfer process which has lead to the call. The customer has expressed dissatisfaction in stating that the circumstances were unacceptable.

Reference: Section 2.1.1 VI
Classification: Complaint
Categorisation: Transfer complaint.

Electricity Supply

13. Case Study

Customer contact: I'm calling to complain about the power being out in our street.

Retailer: I'll transfer you to the distribution business who is responsible for outages in your area.

Justification: This call is unrelated to the functions of the retail business.

Reference: Section 1.2

Classification: Enquiry and other communication

Categorisation: Not required.

14. Case Study

Customer contact: In last night's black out, I was working on my computer and it was subsequently short circuited by the power surge and now it's broken.

Retailer: You can make a claim for any out of pocket expenses as a result of the power surge through Guaranteed Service Level (GSL) agreements between the Distribution business and yourself. I'll post out the forms for you.

Scenario 1

Customer: Great.

Justification: The retailer has provided the customer with an avenue to address the issue at hand, but more directly the black out was not an issue for which the retailer could be considered responsible.

Reference: Section 1.2

Classification: Enquiry and other communication

Categorisation: Not required.

Scenario 2

Customer: That's not good enough I want to speak to the person responsible.

Retailer: I'll transfer you to the Distribution business.

Justification: The GSL functions are outside the responsibilities of the retailer. No action could be taken by the retailer to address the problem, except to transfer the call to the distribution business.

Reference: Section 1.2

Classification: Enquiry and other communication

Categorisation: Not required.

15. Case Study

Customer contact: Every time your meter man reads my meter he walks all over my prize winning garden.

Retailer: The meters are read by the distribution business in your area. You'll need to speak to them about this problem. I can transfer you if wish.

Customer: Thankyou

Justification: The meter function is outside the responsibilities of the retailer. No action could be taken by the retailer to address the problem, except to transfer the call to the distribution business.

Reference: Section 1.2

Classification: Enquiry and other communication

Categorisation: Not required.

APPENDIX 2 Proposed National Energy Retail Template

National Retailing Quality of Service Reporting Template**(Annual - Financial Year Data)****AFFORDABILITY AND ACCESS**

Data relates to small customers: defined as consuming below 160 MWh p.a.
See Definitions section for definitions of indicators (Note that a detailed definitions section would be incorporated with the final adopted template).

1. Instalment Payment Plans

	Electricity	Gas	Dual Fuel	Energy	Total
Residential Customers					
- Total number of residential customers					
- Number of residential customers on instalment plans					
- Percentage of residential customers on plans					
Non-Residential Customers					
- Total number of non-residential customers					
- Number of non-res. customers on instalment plans					
- Percentage of non-res. customers on instalment plans					

2. Direct Debit Plan Terminations (for non-payment)

	Electricity	Gas	Dual Fuel	Energy	Total
Residential Customers					
- Number of direct debit plan terminations					
- Percentage of direct debit customer plans terminated					
Non-Residential Customers					
- Number of direct debit plan terminations					
- Percentage of direct debit customer plans terminated					

3. Disconnections (for non-payment)

	Electricity	Gas	Dual Fuel	Energy	Total
Residential Customers					
- Number of customers disconnected for failure to pay					
- Percentage of customers disconnected					
Non-Residential Customers					
- Number of customers disconnected for failure to pay					
- Percentage of customers disconnected					

Additional Residential Disconnection Indicators

	Electricity	Gas	Dual Fuel	Energy	Total
- Number of customers disconnected previously on a budget instalment plan					
- Percentage of customers disconnected					
- Number of customers disconnected previously within past 24 months					
- Percentage of customers disconnected					
- Number of concession card customers disconnected					
- Percentage of customers disconnected					

4. Reconnections

	Electricity	Gas	Dual Fuel	Energy	Total
<u>Residential Customers</u>					
- Number of disconnected customers reconnected within 7 days					
- Percentage of disconnected customers reconnected					
<u>Non-Residential Customers</u>					
- Number of disconnected customers reconnected within 7 days					
- Percentage of disconnected customers reconnected					

Additional Residential Reconnection Indicators

	Electricity	Gas	Dual Fuel	Energy	Total
- Number of customers reconnected previously on a budget instalment plan					
- Percentage of customers reconnected					
- Number of customers reconnected who were disconnected previously within past 24 months					
- Percentage of customers reconnected					
- Number of concession card customers reconnected					
- Percentage of customers reconnected					

5. Security Deposits

	Electricity	Gas	Dual Fuel	Energy	Total
<u>Residential Customers</u>					
- Number of customers who have lodged security deposits					
- Percentage of customers who have lodged security deposits					
<u>Non-Residential Customers</u>					
- Number of customers who have lodged security deposits					
- Percentage of customers who have lodged security deposits					

CUSTOMER SERVICE

6. Complaints

	Electricity	Gas	Dual Fuel	Energy	Total
Total number of customer complaints contacts					

	Electricity	Gas	Dual Fuel	Energy	Total
<u>Residential Customers</u>					
Total number of complaints					
Billing complaints as a percentage of total complaints					
Marketing complaints as a percentage of total complaints					
Transfer complaints as a percentage of total complaints					
Other complaints as a percentage of total complaints					

	Electricity	Gas	Dual Fuel	Energy	Total
<u>Non-Residential Customers</u>					
Total number of complaints					
Billing complaints as a percentage of total complaints					
Marketing complaints as a percentage of total complaints					
Transfer complaints as a percentage of total complaints					
Other complaints as a percentage of total complaints					

7. Telephone Service (all customers)

	Electricity	Gas	Dual Fuel	Energy	Total
<u>Total Customers</u>					
Total number of telephone calls					
Number of operator calls responded to within 30 seconds					
Percentage of operator calls responded to within 30 seconds					
Average wait before call answered by operator (secs)					
Percentage of calls abandoned					