



Utility Regulators Forum

Steering Committee on National Regulatory Reporting
Requirements (SCONRRR)

National Energy Retail Performance Indicators
Discussion paper

March 2006



Origin Energy Submission

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1. Introduction

Origin Energy (Origin) would like to thank the SCONRRR working group for the opportunity to comment on the effectiveness of the National Energy Retail Performance Indicators.

Origin supports the efforts of SCONRRR to further develop and assess the National Energy Retail Performance Indicators to provide clarity and consistency between all Retailers.

Origin would like to offer the following comments for your consideration.

2. Specific Comments Relating to the Proposed changes to the National Reporting Requirements

Issue 1 - Telephone Service

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.

Origin would like to comment on the following proposed changes to the telephone service indicators.

Calculation of supplied data

- The 'percentage of operator calls responded to within 30 seconds' should be calculated using the total number of customers who selected an option to speak to an operator as opposed to the 'total number of telephone calls'
- The above calculation will reflect more accurately the telephone service standards of Retailers.

Positioning of Data in the Template

- By positioning "number of operator calls responded to within 30 seconds directly below the "total number of telephone calls" Origin feels that it would be easy to misinterpret the calculation for "percentage of operator calls responded to within 30 seconds".
- To avoid any misinterpretation of telephone service standards it should be noted in the template that not all telephone calls are directed to an operator.

Origin supports the removal of the 'number of overload events' indicator from future National Reporting Templates.

Issue 2 - Complaints

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.

Origin supports extending the complaint indicators from two to four categories including the separation of Residential and Business customers as this would assist in identifying the customer groups impacted.

Origin supports the proposed definition of a complaint.

Origin suggests that the reporting of the number of contacts in addition to the number of complaints may impose additional cost on the industry due to potential system enhancements and would question any industry benefits gained by supplying this additional data.

Issue 3 - Direct Debit Defaults/ Instalment Plans

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.

Origin supports the proposed definition for the Direct Debit Defaults as 'number of direct debit plans terminated as a result of default/non payment'.

Origin agrees that the definition for the instalment plan should remain the same and supports the 'working' definition for the instalment plan indicator to specify at least three instalments.

Issue 4 - New Affordability Indicators

- Comment is sought on the proposed changes to affordability indicators.

Origin does not support the proposed new affordability indicators.

We suggest to the Working Group that there are no objective characteristics of hardship, and thus no robust 'definitions' or indicators. There is no 'science' to this issue that is as yet undiscovered, and continuing to search for definitions does little to assist those in actual hardship.

Retailers can thus only identify customers in hardship by talking to these customers and understanding their individual circumstances, where the way to differentiate those who 'won't pay' from those who 'can't pay', is to *view those who identify themselves as unable to pay, or requiring more assistance, as requiring assistance*.

The philosophy behind Origin's approach is about *providing the most conducive environment for customers to self-identify*. This involves retailers providing sufficient information to customers about the approachability of the company, as well as delivering services oriented specifically to customers in hardship in a way which is respectful and responsive to their needs.

Further, retailers can provide assistance in the broader matter of household energy use, with the aim being to reduce unnecessary consumption and thus reduce the bill.

Issue 5 - Gas Sector

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

To achieve consistency in performance indicator reporting, Origin supports the proposed inclusion of the Retail Gas Sector in the National Reporting Template.

Issue 6 - Categorisation by Fuel Type

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.

Origin supports SCNR's view that it is not sufficient to be classed as dual fuel merely by having both fuels purchased from the same retailer by the customer but there is a need for a contractual link between the two fuel types.

Furthermore, Origin supports the proposed national reporting of performance in telephone services on the basis of a generic energy category.