

Mr M Philipson
Essential Services Commission of SA
GPO Box 2605
Adelaide
SA 5001

6 April 2006

Dear Mr Philipson

National Energy Retail Performance Indicators

Integral Energy (Integral) welcomes the opportunity to provide comment on the proposed changes to National Energy Retail Performance Indicators as detailed in the Utility Regulators Forum Discussion Paper of March 2006.

Integral has reviewed the discussion paper and offers the following comments.

Issue 1 - Telephone Service

The proposal to retain the basic telephone responsiveness definition, but confine it to reporting on the performance of calls to an operator is supported. Integral also supports the following proposed changes to the national template telephone service indicators:

- The total number of calls should include the number of abandoned calls;
- The percentage of calls abandoned indicator is not changed; and
- The “average waiting time before a call is answered” indicator would record the average time before an operator answered the call.

Integral does not support the proposal to remove the number of overload events indicator. Network overload events do impact a Retailers call centre performance, as customers will call any available number to access information. Increasingly, Integral receives calls on the Retail telephone number from customers outside the Integral distribution area who do not have their own network contact details. Integral also receives calls from customers outside the Integral distribution area from people who are not Integral customers but who cannot get through to their own network provider and will try any energy supplier’s number.

Issue 2 - Complaints

The proposed revised complaint definition that requires a response or resolution to be explicitly or implicitly expected is acceptable to Integral. However, it should be recognized that the requirement to record all complaints resolved by the call Centre will impact on resources and thus retail costs.

Integral notes the proposal to expand the number of complaints categories from two to four. While Integral has no issue with the complaint categories it does not agree to the inclusion of a faulty meter as a billing complaint. The meters are not owned or maintained by Retailers

and Retailers would not have any information to inform them as to whether the meters were faulty or not. Integral would recommend removing faulty meters from the billing complaints.

Issue 3 – Direct Debit Payment Defaults and Instalment Plans

Direct debit payment defaults is not a current indicator used by Integral and it is arguable as to whether it is a strong indicator of hardship given the small percentage of total payment transactions that use this channel. If the indicator is to be adopted it should be made clear as to whether direct debit does or does not include Centrepay.

With regard to instalment plans, Integral believes that the definition of an instalment plan as "plans involving at least three (3) instalments" should be changed to 'more than one payment' as Integral believes that it would be easier to track the indicator with the revised definition than the proposed definition. Also, there is a proposed NSW Hardship Policy currently under development and there is a need to ensure consistency between that final version of the Policy and the instalment plan definition and indicator.

Issue 4 – Affordability Indicators

Integral supports the additional affordability indicators proposed in the Discussion Paper as they are generally in line with internal indicators used by Integral. The only issue would be with 'Concession card customers'; at the moment Integral can track those customers that are also entitled to a rebate. However, those customers who may be receiving a pension but not a rebate (for example the New Start Allowance) would be difficult to track.

Issue 5 – Gas Sector

Integral does not have any comments to offer on Issue 5.

Issue 6 – Categorisation by Fuel Type

Integral does not have any comments to offer on Issue 6.

Should you have any questions on the above or require additional information to that provided please do not hesitate to contact Frank Nevill on telephone (02) 9853 6598.

Yours sincerely

Karen Waldman
General Manager Regulatory & Corporate Affairs