

7 April 2006

Attention: Mike Philipson
National Energy Retail Performance Indicators
Essential Services Commission of SA
GPO Box 2605
Adelaide SA 5001

Dear Mr Philipson

RE: National Energy Retail Performance Indicators

Thank you for the opportunity to submit a response to the discussion paper, issued 2 March 2006.

Aurora has prepared a response to the paper and our comments are enclosed. Please contact me if further information is required.

Yours sincerely

Darren Hill
Retail Regulatory Manager

Aurora Energy

Response to:

Utility Regulators Forum

**Steering Committee on National Regulatory Reporting
Requirements – Retail Working Group**

**National Energy Retail Performance Indicators -
Discussion Paper March 2006**

April 2006

Issue 1

Comment is sought on the proposed changes to the telephone service indicators, particularly if there are any implementation problems with the proposal.

Aurora currently already measures telephone responsiveness from the time that the customer selects an option that will connect them with an operator and the time that the customer service agent actually answers the call.

Aurora reporting currently targets performance to the Office of the Tasmanian Energy Regulator to a level of 80% of calls being answered within 20 seconds, not a percentage within 30 seconds as outlined in the discussion paper. To meet the criteria of a percentage of calls answered within 30 seconds in other jurisdictions, Aurora would need to implement a parallel reporting system.

Comment is sought on the proposed removal of the ‘number of overload events’ indicator.

Aurora has no issue with the removal of the ‘number of overload events’ indicator.

Issue 2

Comment is sought on the proposed definition of a complaint.

Aurora supports the proposed complaint definition.

Comment is sought on the draft complaints guideline (Appendix 1).

Aurora’s complaints management approach is consistent with the Draft “National Reporting Guideline – Complaints”. We support the decision to clarify the difference between complaints and enquiries, making it easier for customer service staff to delineate between the two. Aurora’s approach to complaints and enquiries is consistent with the definitions included in this guideline.

Comment is sought on the revision of complaint indicators including the proposed categorisation.

Aurora’s systems are structured to support the recording of the required information, however system and reporting modifications will need to be made to cater for the proposed categorisations, business/non-business split and complaint numbers/customer contacts in the manner that is suggested in this discussion paper.

Issue 3

Comment is sought on the proposed changes in the definition of Direct Debit Payment Defaults and Instalment Plans.

Direct Debit Payment Defaults

Aurora does not currently split Direct Debit agreements and therefore terminations into Residential and Non-Residential. This would have to be achieved via a manual process.

As part of the commercial arrangement that we have with our bank and considering the privacy of our customers, reasons for payment defaults or rejections are not provided to us. Aurora does not currently store Direct Debit termination reasons in a reportable field.

Excluding from reporting those Direct Debit terminations where a customer has elected to change to a different payment option would have to be managed as a manual process.

Instalment Plan

Aurora agrees with the definition provided in the paper. The Instalment Plans agreed between Aurora and its customers allow for payment of both continued usage and recovery of arrears.

Comment is sought on the appropriateness of the proposed working definition for the instalment plan indicator, of at least three instalments.

It is suggested that the requirement for an Instalment Plan to address both continued usage and the recovery of arrears be emphasized even further. Simple extensions to due dates can involve three (3) or more instalments.

Issue 4

Comment is sought on the proposed changes to affordability indicators.

All of the proposed new affordability Indicators can be accommodated by Aurora, but are not included in current system generated reporting. There are considerations for the business in that a reasonable lead time would be required to produce potentially complex reports and the potential cost of report creation/modification.

Issue 5

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

In the emerging Gas market in Tasmania, performance indicators for individual retailers could provide market intelligence for competitors, therefore collected data should be treated as commercial in confidence and not be made publicly available.

Issue 6

Comment is sought on the proposed introduction of electricity, gas and dual fuel categories.

Aurora has no issue with the introduction of the electricity, gas and dual fuel categories.

Comment is sought on whether telephone service or other indicators should be reported nationally on the basis of a generic energy category.

Aurora perceives no issues reporting against a generic energy category.