

Ref: PE:LB:C186369

7 April 2006

Mr Mike Philipson
Manager Performance Monitoring
Essential Services Commission of South Australia
GPO Box 2605
Adelaide SA 5001

Dear Mr Philipson

National Energy Retail Performance Indicators – Discussion Paper

Country Energy is pleased to submit to the Commission the following in relation to the invitation for comments on the Proposed National Retailing Quality of Service Reporting.

Country Energy is supportive of attempts to seek uniformity in reporting requirements through the introduction of a National Energy Retail Performance Indicator.

Specific to the issues highlighted in the Commission's Discussion Paper, Country Energy offers the following comments.

Issue 1 – Telephone Service

The Commission seeks comments on the proposed changes to the telephone service indicators, particularly if there are any implementation problems with the proposal

Country Energy considers the proposed changes to the telephone service indicators to be acceptable and would have no foreseeable implementation problems.

The Commission seeks comments on the proposed removal of the 'number of overload events' indicator

Country Energy agrees with the proposal to delete the 'number of overload events' indicator as such events rarely occur except in the case where a distributor may be following a significant outage.

Issue 2 – Complaints

The Commission seeks comments on the proposed definition of a complaint

Country Energy believes the proposed definition of a complaint successfully provides greater clarification, and agrees that the change would further ensure the consistent interpretation within and across jurisdictions.

The Commission seeks comments on the draft complaints guideline

Country Energy considers the draft complaints guideline to be informative, and believes it will streamline and clarify the process in which retailers interpret, record and report complaints.

The Commission seeks comments on the revision of complaint indicators including the proposed categorisation

Country Energy considers the revision of complaint indicators to be acceptable, and believes the proposed categorisation between divisions, and further disaggregation between Residential and Non-residential to be beneficial and will provide a greater degree of reporting.

Issue 3 – Instalment Plan

The Commission seeks comments on the proposed changes in the definition of Direct Debit Payment Defaults and Instalment Plans

Country Energy agrees with the proposed changes to the Direct Debit Payment Defaults and Instalment Plans definition, and believes it will provide the required clarification regarding such things as number of payments involved in an instalment plan.

The Commission seeks comments on the appropriateness of the proposed working definition for the instalment plan indicator, of at least three instalments

Country Energy agrees that the definition for the instalment plan indicator, of at least three instalments is appropriate and will assist in clarification of an instalment plan.

Issue 4 – Proposed New Affordability Indicators

The Commission seeks comments on the proposed changes to affordability indicators

Country Energy believes that reporting on the indicators proposed successfully increases awareness of and provides further information on financially disadvantaged residential customers.

Issue 5 - Performance Indicators- Gas Sector

The Commission seeks comments on the proposed inclusion of gas in the national retail template

Country Energy considers the proposed inclusion of gas in the national retail template to be beneficial, and as disclosed in the discussion paper will enable consistency in reporting and enable comparisons of retailers' performance across jurisdictions and fuel types.

Issue 6 - Categorisation by Fuel Type

The Commission seeks comments on the proposed introduction of electricity, gas and dual fuel categories

Country Energy agrees with the proposal to introduce electricity, gas and dual fuel categories. This will be beneficial to retailers' reporting for more than one fuel type as it will simplify the reporting process.

The Commission seeks comments on whether telephone service or other indicators should be reported nationally on the basis of a generic energy category

Country Energy does not believe it to be beneficial to split call centre indicators between fuel types and therefore agrees that reporting on call centre performance should be based on a generic energy category.

Country Energy is grateful for this opportunity to comment on the National Energy Retail Performance Indicators Discussion Paper.

Should you have any comments in relation to the responses offered above, please contact Patrick Edwards, Manager Compliance and Retail Regulation on 02 6589 8418.

Yours sincerely



Natalie Banicevic
General Manager Regulatory Affairs