

E-mail Message

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Sent: 18/03/2009 at 11:15 AM
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Subject: Review of Code of Conduct for the Supply of Electricity to Small Use Customers 2008

Attention: Mr Paul Kelly

Dear Mr Kelly

Thank you for the opportunity to comment on the Draft Review Report.

The recommendations in the report are generally supported with the exception of Recommendation 3 and Recommendation 20. Amendments to Recommendation 6 in the Recommendations (Recommendation 7 in the body of the Report) and Recommendation 21 are also suggested.

Recommendation 3 - It appears unfair that a customer cannot aggregate their electricity consumption at different exit points for contestability purposes and thereby potentially be denied the opportunity to purchase their electricity from another supplier but if Recommendation 3 is accepted will have their electricity consumption at different exit points aggregated for complaint purposes and thereby potentially be denied access to the Code of Conduct provisions and the electricity ombudsman. If Recommendation 3 is accepted the Energy Ombudsman will not be able to easily determine whether a customer is a small use customer as we do not have access to account information. This is currently not an issue because we can simply ask customers about their consumption at the exit point relevant to their complaint.

Recommendation 20 - The proposal to remove the requirement for retailers and distributors to publish a Customer Service Charter is not supported. There would be some value in keeping the requirement for retailers and distributors to publish a Customer Service Charter as these charters are currently required to provide useful information for customers including their rights under the Code of Conduct, an explanation of the retailer's or distributor's complaint handling process and contact details of the electricity ombudsman.

Recommendation 6 (Recommendation 7 in the body of the Report) - It is suggested that proposed sub-clause 2.4(5) be amended by replacing the word "where" with "if" and the word "and" after the semi-colon with the word "or".

Recommendation 21 - It is suggested that proposed clause 2.11 be amended by adding the words "within twenty-eight days of receiving the request" after the words "give to the electricity ombudsman".

Yours sincerely

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