

Hi Paul,

I hope that this does not come too late – unfortunately things have been rather busy here of late. We here at WACOSS were very pleased with the initial list of reports which have been posited by the ERA as we feel that many of these will provide good indicators of many aspects of social wellbeing and effective market participation (by that I mean the identification of vulnerable consumers).

There were a few other reports, however, which we felt may be useful, for a number of reasons. We understand that some of these reports may be difficult to produce by dint of the availability of appropriate information from the provider, however, here goes:

Figure 1

Number of re-negotiated Installment Plans: This is a valuable indicator of the appropriateness of instalment arrangements being proposed by the provider and agreed to by the customer. All of our anecdotal evidence suggests that inappropriate instalment plans are a major source of hardship for consumers. High rates of renegotiation may indicate the need for additional staff training in the area of hardship or necessitate addition referral to financial counsellors.

Figure 2

Further information regarding the number of failed, attempted transactions may give a good indicator of the provider's efficacy of recovering debt in a socially responsible way. Anecdotally, this is a major problem as customers have reported providers (not just in gas) trying to direct debt on 4-5 successive occasions over a couple of days, leading to significant dishonour fees for consumers.

Figure 6

Average Amount Requested Prior to Reconnection: Anecdotally, this amount varies greatly and there is no evidence of a consistently applied internal policy. The amount required prior to reconnection poses significant barriers to lower-income consumers or people facing financial hardship reconnecting. Greater clarity regarding any trend or averages may provide both indicators into the amount of government funding required by ER agencies as well as the efficacy and fairness of provider hardship policies.

Average Arrears at Reconnection: Indicative of showing the level of barriers faced to reconnection and continued connection thereafter. Also, see above.

Figure 7

Number of Concession-Holders Required to Supply Security Deposit: Indicative of barriers to initial connection for people living on lower incomes or facing hardship.

Figure 9

Number of complaints referred or progressed to the Energy Ombudsman: Possible indicator of efficacy of internal complaints processes.

Hope all is well,

Contact me if you have any questions,

Regards,
Aden

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