

Electricity Code Consultative Committee

Review of the Code of Conduct for the supply of electricity for small use customers

Submission from Gosnells Community Legal Centre Inc.

Centre Background:

Gosnells Community Legal Centre Inc. provides free legal services to low income and other disadvantaged clients in the South East Metropolitan corridor. These services include a range of Family Law, Child Support and Domestic Violence related services, Financial Counselling Services, Tenancy Advocacy, Welfare Rights and the provision of Emergency Relief Funds.

The Centre receives Federal and State Government grants and has been operating since 1981.

The Centre assists with information, advice and casework. Through the Centre's client casework, a number of issues have been identified that relate to the ECCC's review of the Code.

GCLC support the following recommendations by the ECCC in the draft review report dated February 2009

1. Recommendation 9

Amend clause 4.5(1)(h) to read:

a reference that the customer may be eligible to receive concessions and how the customer may find out its eligibility for those concessions.

- GCLC recommends that clients on concessions would also benefit from
 - I. a policy to back date rebates for up to 3 months
 - II. a possibility of an automated system to update customer concession details when relevant concession cards expire

2. Recommendation 10 regarding estimations.

3. Recommendation 11 regarding over charging.

4. Recommendation 12 regarding a cap on late payments fees that can be charged in one year.
5. Recommendation 12 regarding consumer representative organizations.
6. Recommendation 17 regarding historical consumption data.

Further, based on the consumer experiences brought to our attention through various services at the Centre we recommend changes in the following areas.

1. **Historical Debt**

Section 4.4 Particulars on each bill
(3) If a **retailer** identifies a **historical debt** and wishes to bill the **customer** for that **historical debt**, the **retailer** must advise the **customer** of—
(a) the amount of the **historical debt**; and
(b) the basis of the **historical debt**,
before, with or on the **customer's** next bill.
[Note: This clause aims to ensure that a retailer does not add a historical debt to the current amount due without informing the customer.]

Although the current amount is set apart from the historical debt, we have come across instances where the historical debt has made it difficult for clients to establish new connections.

Even where new connections are established, clients often face disconnection shortly after as they struggle to keep on top of the current usage and the historical debt.

This is especially apparent in large historical debts stemming from life threatening medical conditions and in cases of domestic violence.

- GCLC recommends a debt discount scheme in severe cases of hardship such as these would be of great assistance to clients in difficult situations.

2. **Meter Testing**

4.10 Customer requests testing of meters or metering data
If a *customer*—
(a) requests the *meter* to be tested; and

(b) pays the *retailer's* reasonable charge for testing the *meter* (if any),
the *retailer* must request the *distributor* or *metering agent* to test the *meter*.

[Note: A retailer may require a customer to pay in advance the retailer's (and, where appropriate, the distributor's or metering agent's) reasonable charge for testing the meter. If the meter is found to be defective, the charge will be refunded to the customer.]

Customers in the low income bracket are not always able to afford the charge for getting their meter tested for possible faults. Their inability to afford this can lead to high electricity bills that are no fault of these consumers. To prevent the customer being disadvantaged,

- GCLC recommends a proposal for free meter testing for low income earners on request, a means test would be appropriate. Irregular or unusual consumption patterns as criteria for eligibility.

3. Deadline for temporary suspension of action

6.2 Temporary suspension of actions

(2) A *temporary suspension of actions* must be for at least 10 days.

- GCLC recommends this be increased to 14 days. This is mainly due to the increasing demand for assistance and the limited avenues of assistance available.

For additional information relating to this submission please contact:

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