

2015 Annual Performance Report

Energy Retailers

January 2016

Economic Regulation Authority

WESTERN AUSTRALIA

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Key Points

- Competition in the natural gas market intensifies: in 2015, Kleenheat supplied 7% (up from 3.3% last year) of residential, and 9.7% (up from 2.7% last year) of non-residential customers.
- Total residential gas disconnections were higher in 2015 (up from 1.55 to 2.25 per 100 customers), but were still lower than the six year peak in 2010 (2.85 per 100 customers).
- Total residential (0.97 per 100 customers) and non-residential electricity disconnections (0.55 per 100 customers) were unchanged in 2015.
- Benchmarking shows that, in 2015, Western Australia's total residential gas disconnection rate was higher, and the total residential electricity disconnection rate was lower, than those in New South Wales, South Australia and Victoria.
- More residential electricity customers were granted more time to pay a bill (9.4% in 2014, 11.3% in 2015), but fewer residential gas customers were granted more time to pay (11.5% in 2014, 10.1% in 2015).
- Synergy and Alinta Energy both reported significant increases in residential direct debit plan terminations (due to customer default) in 2015.
- There were across the board increases in the percentage of electricity and gas customers who were reconnected within seven days of disconnection in 2015.
- Residential and non-residential electricity complaints both reached six year lows, down to 0.31 and 0.26 complaints per 100 customers respectively.

Overview

This is the latest in a series of annual reports¹ published by the Economic Regulation Authority (**ERA**) that examines the performance of energy retailers who supply small use customers² in Western Australia.

The purpose of this report is to bring transparency and accountability to the performance of energy retail³ businesses that supply small use customers and to benchmark, where possible, performance against similar businesses in other energy markets.

This report covers three key areas of the customer's interaction with their energy retailer: affordability (on-time billing and assistance with paying a bill), access to a supply (disconnections and reconnections), and customer service (complaints and telephone service).

¹ Each report covers the year ending 30 June.

² Customers who consume less than 160MWh of electricity or 1 Terajoule of gas per annum.

³ Electricity retail licensees and electricity integrated regional licensees who retail to small use customers, along with gas trading licensees.

Customers

Electricity Customers

Restricted competition in the South West and Goldfields

In 2015, the area supplied through the South West Interconnected System (**SWIS**)⁴ contained 96.1% of residential customers and 92.6% of non-residential customers in the state. The remaining customers are supplied by Horizon Power, who supply all areas of the state outside the SWIS other than Rottnest Island, which is supplied by the Rottnest Island Authority (**RIA**). The areas supplied by Horizon Power and the RIA are all contestable, but there are no competing retailers, and have not been since the electricity retail market was deregulated in 2005.

Within the SWIS, the Prescribed Customers Order⁵ prevents retailers other than Synergy from supplying customers who consume less than 50MWh of electricity per annum. In 2015, 99.97% of residential and 91.3% of non-residential customers supplied by Synergy were unable to choose an alternative retailer. There was increased competition for contestable non-residential customers in 2015; Synergy's customer base fell by 12%, while both Alinta Energy and Perth Energy were up, by 29.5% and 59%, respectively.⁶

In early 2014, the government launched the Electricity Market Review (EMR) to examine the structures and operation of the Western Australian electricity market. The first phase of the review was completed in March 2015, and work has now commenced on designing the reforms needed to improve the efficiency of the market, and to introduce full retail contestability. This is discussed further in Appendix 2.

Gas Customers

Competition intensifies in the South West natural gas market

The 2013 and 2014 reports show increased competition for residential and non-residential customers in the natural gas market in the south west of the state, which is supplied through the gas distribution systems operated by ATCO Gas Australia (**ATCO**).

Prior to March 2013, due to the operation of the Gas Market Moratorium,⁷ Alinta Energy did not have any competition for residential customers, and very limited competition (from Synergy) for non-residential customers. Kleenheat (who is not subject to the Moratorium) entered the market in March 2013 and by 30 June 2014 had acquired 3.3% (21,700) of residential, and 2.7% (232) of non-residential customers. The growth in Kleenheat's customer base has continued in 2015: residential customers grew to 47,353 (or 7% of the total) and non-residential customers grew to 871 (or 9.7% of the total).

⁴ The South West Interconnected System (SWIS) comprises the transmission and distribution networks operated by Western Power, which includes the coastal area from Kalbarri to Bremer Bay and the Goldfields.

⁵ *Electricity Corporations (Prescribed Customers) Order 2007*

⁶ In 2015, Synergy's market share of non-residential contestable customers in the SWIS was 67%, Alinta Energy's was 28.7%, and Perth Energy's was 4.1%.

⁷ The Gas Market Moratorium prohibits Synergy from supplying customers who consume less than 180GJ of gas per annum in the areas supplied by Alinta Energy. See Appendix 2 for more information.

The data suggests that Kleenheat's customer growth is a mixture of transfers from Alinta Energy and new customers entering the market for the first time.

Affordability

Customers granted more time to pay a bill

More electricity customers granted a payment extension for a bill

In 2015, 9.4% of residential electricity customers (up from 9.1% in 2014), and 5.9% of non-residential electricity customers (up from 5.6% in 2014), were granted more time to pay a bill. Horizon Power reported the largest percentage of customers granted more time to pay in 2015: 21.3% of residential customers and 17.0% of non-residential customers.

Fewer gas customers granted a payment extension for a bill

In 2015, 10.1% of residential gas customers (down from 11.5%) and 12.1% of non-residential gas customers (down from 15.3% in 2014) were granted more time to pay a bill.

Placing customers on instalment plans

Fewer residential electricity customers were placed on an instalment plan in 2015

The percentage of residential electricity customers placed on an instalment plan fell to 2.6% in 2015, which is significantly lower than the previous four years. Both Horizon Power and Synergy placed fewer customers on plans (Horizon Power down from 9.7% to 7.5%, and Synergy down from 3.5% to 2.4%).

The percentage of total non-residential customers placed on a plan was almost unchanged – down from 1.2% in 2014 to 1.1% in 2015.

More non-residential gas customers were placed on an instalment plan in 2015

The percentage of non-residential gas customers placed on an instalment plan rose to a six year peak of 0.8% in 2015, (up from 0.4% in 2014). The overall increase in instalment plans was due to Kleenheat (up from 1.3% to 3.4%) and Synergy (up from 0 to 0.9%).

On-time Billing

Mixed results for on-time billing of electricity customers

The overall proportion of residential electricity customers who received (due to a fault on the part of the retailer) a bill outside the prescribed timeframes⁸ (a non-compliant bill) rose from 0.4% of total bills in 2014, to 0.6% in 2015. The percentage of Synergy customers receiving a non-compliant bill also rose from 0.4% of total bills in 2014, to 0.6% in 2015, while the proportion of Horizon Power's customers who received a non-compliant bill fell from 1.4% of total bills in 2014, to 0.3% in 2015.

⁸ Refer to footnote 28 on page 13.

On-time billing of non-residential electricity customers improved: non-compliant bills were 1.3% of the total in 2015, significantly lower than the three peak of 5.9% in 2013. Both Horizon Power and Synergy reported improved on-time billing performance in 2015.

On-time billing of gas customers similar to last year

The percentage of residential gas customers who (due to a fault on the part of the retailer) received a bill outside the prescribed timeframes⁹ fell from 1.3% of total bills in 2014, to a three year low of 1.2% in 2015. Kleenheat reported a 90% reduction in non-compliant residential bills, down from 1.0% of total bills in 2014, to 0.1% in 2015.

The percentage of non-residential gas customers who received a non-compliant bill rose from 4.7% of total bills in 2014, to 5.0% in 2015. In 2015, non-compliant bills issued by Kleenheat fell by just over 50% (to 7.6% of total bills), and 45.8% of bills issued by Synergy were non-compliant bills. This is the first time that Synergy has issued non-compliant bills to its non-residential customers since reporting commenced in 2013.

Termination of Direct Debit Plans

Synergy and Alinta Energy terminated significantly more direct debit plans

The number of residential (7,698 plans) and non-residential (315 plans) electricity direct debit plans terminated (due to default by the customer) by Synergy both reached six year peaks in 2015. Horizon Power terminated fewer residential direct debit plans (down from 39 plans in 2014 to 17 plans in 2015).

Alinta Energy was the only gas retailer to terminate residential direct debit plans; in 2015, the number of plans terminated by Alinta Energy reached a six year peak of 893, following on from a six year low of 238 plans last year.

Disconnections

Electricity Disconnections

Residential electricity disconnection rates remained unchanged from 2014

The overall residential electricity disconnection rate in 2015 was unchanged from the previous year, at 0.97 per 100 customers, matching the six year peak first reached last year. The underlying data shows that Horizon Power's disconnection rate fell (down from 3.03 to 2.83 per 100 customers), while Synergy's disconnection rate remained unchanged at 0.89 per 100 customers.

The overall residential electricity disconnection rate in Western Australia was lower than in the three other states that the ERA was able to benchmark against: New South Wales (1.06 per 100 customers), South Australia (1.36 per 100 customers) and Victoria (1.45 per 100 customers). The 2015 disconnection rates in all four states were almost unchanged from last year.

⁹ Refer to footnote 32 on page 14.

The ERA collects additional information about residential disconnections that provides insights into the financial status of customers at the time of disconnection, and those customers who have been previously disconnected. The results for 2015 show that (2014 data in brackets): 41.5% (33.0%) of disconnections involved customers previously on an instalment plan; 16.8% (14.8%) involved customers who had been previously disconnected at the same address within the past 24 months; and 30.6% (27.4%) involved concession card holders.

Non-residential electricity disconnection rates were also unchanged from 2014

The overall non-residential electricity disconnection rate in 2015 was unchanged from the previous year, at 0.55 per 100 customers, matching the six year peak first reached last year. Perth Energy was the only retailer to report a significant change in its disconnection rate: down from 1.75 per 100 customers in 2014 to 0.82 per 100 customers in 2015.

Gas Disconnections

Residential and non-residential gas disconnection rates increased in 2015

The overall residential gas disconnection rate rose by 45% in 2015, up from 1.55 per 100 customers in 2014 to 2.25 per 100 customers in 2015, although this was below the six year peak of 2.85 per 100 customers in 2010. The increase in the overall disconnection rate reflects increased disconnection rates for all three retailers: Alinta Energy (up from 1.56 to 2.31 per 100 customers), Kleenheat (up from 1.06 to 1.35 per 100 customers) and EGDC¹⁰ (up from 1.94 to 4.29 per 100 customers).

The additional residential disconnection information shows that, in 2015, 12.1% (up from 7.7% in 2014) of disconnections involved customers previously on an instalment plan, and 20.3% (25.0% in 2014) involved customers who had been previously disconnected within the past 24 months at the same address.

There was a more modest increase in the overall non-residential gas disconnection rate, up from 1.65 per 100 customers in 2014 to 1.78 per 100 customers in 2015, although this was below the six year peak of 1.93 per 100 customers in 2010. Compared to last year, both Alinta Energy (up from 1.70 to 1.89 per 100 customers) and Kleenheat (up from 0.43 to 1.03 per 100 customers) reported higher disconnection rates.

Western Australia's total residential gas disconnection rate (2.25 per 100 customers) was much higher than the three other states that the ERA was able to benchmark against: New South Wales (0.62 per 100 customers), South Australia (1.12 per 100 customers) and Victoria (1.20 per 100 customers).

Reconnections

The first measure of reconnections used by the ERA counts the customers who were reconnected within seven days of disconnection for non-payment of a bill. This measure is used as an indication of customers whose disconnection may have been avoided had they engaged with their retailer to agree to an arrangement in respect of the outstanding debt. The second measure looks at the total number of

¹⁰ Esperance Gas Distribution Company

reconnections, which captures the customers who have been reconnected more than seven days after disconnection.

Electricity Reconnections

Reconnection rates for residential electricity customers were higher

Reconnection of residential electricity customers within seven days of disconnection reached a six year peak of 64.1% in 2015. Horizon Power's reconnections (21.3%) were just below the six year peak of 24%, while Synergy's reconnections reached a six year peak of 69.7%.

Total reconnections (without the seven day limit) of residential electricity customers reached a three year peak of 80.6%. Just under one in every five of Synergy's disconnections, and two in every five of Horizon Power's disconnections, did not result in a reconnection at all.¹¹

Reconnection rates for non-residential electricity customers were also up

Reconnection of non-residential electricity customers within seven days of disconnection reached a six year peak of 56.4% in 2015. Removing the seven day limit saw total reconnections rise to a three year peak of 75.7% in 2015. Almost all of the reconnections were performed by Synergy, whose performance reached new peaks of 58.6% (within seven days) and 78.4% (without the seven day limit).

Gas Reconnections

Residential gas reconnection rates rose in 2015

Gas retailers reconnected more residential customers within seven days of disconnection; reconnections reached 41.3% in 2015, but remained below the six year peak of 64%. Removing the seven day limit saw total reconnections rise to 67.5%. Almost all of the reconnections were performed by Alinta Energy.

Non-residential gas reconnections reached a six year peak in 2015

Total non-residential gas customer reconnections performed within seven days reached a six year peak of 50.3% in 2015. Removing the seven day limit saw total reconnections also rise, to 69.9%. Almost all of the reconnections were performed by Alinta Energy, whose reconnections within seven days also reached a six year peak of 51.3%.

Caution should be exercised when interpreting non-residential gas reconnection percentages because they are based on a relatively small number of reconnections.

¹¹ It is important to note that this does not mean that the supply remains disconnected; the reconnections data excludes customers moving out of premises after the supply has been disconnected, or situations where a new account is established at the premises in a different person's name.

Customer Service

Electricity Customer Complaints

Residential electricity customer complaints fall to a six year low

In 2015, the total number of complaints from residential electricity customers reached a six year low of 0.31 complaints per 100 customers. Residential electricity complaints have been trending downwards since 2011.¹²

The majority of complaints from residential customers relate to billing; in 2015, 68.5% of Horizon Power's complaints, and 87.4% of Synergy's complaints, were about billing.

Horizon Power resolved 74% of complaints (up from 61.6% in 2014), and Synergy resolved 95.5% of complaints (up from 94.2%), within 15 business days.

Non-residential electricity customer complaints are also at a six year low

The total number of complaints from non-residential electricity customers also reached a six year low in 2015, falling to 0.26 per 100 customers. Non-residential complaints have also been trending downwards since 2011, tracking the reductions in Synergy's complaints.

Four of the five retailers resolved over 95% of complaints from non-residential customers within 15 business days; the exception was Horizon Power (60%).¹³

Gas Customer Complaints

Residential gas complaints remain steady in 2015

In 2015, the total number of complaints from residential gas customers was 0.18 per 100 customers. There has been relatively little variation in the number of complaints over the past six years. Until Kleenheat entered the natural gas market in 2013 Alinta Energy received nearly all of the residential gas complaints.¹⁴

The number of complaints received by Kleenheat fell from 0.91 per 100 customers last year to 0.51 complaints per 100 customers this year.

Both of the retailers that received complaints from residential customers, Alinta Energy and Kleenheat, resolved just over 96% of complaints within 15 business days.

As is the case for electricity, the majority of residential complaints relate to billing: 66.4% of Alinta Energy's complaints, and 71.2% of Kleenheat's complaints, were about billing in 2015.

¹² Synergy saw a large spike in complaints in 2011, due to ongoing problems with the introduction of their new billing system in late 2009. The downward trend in residential customer complaints is almost entirely due to the year on year reductions in Synergy's complaints as the system problems have been resolved.

¹³ Horizon Power commented that their standard business process for complaints determines that complaints are not closed until customer satisfaction is reached, and all appropriate actions have been completed. All customer complaints received appropriate responses within 15 business days. The Code [Electricity Customer Code] does not require complaints to be closed within 15 days. Horizon Power's position is in line with the Code and ensures customer satisfaction.

¹⁴ Alinta Energy received approximately 75% of the total residential complaints in 2015.

Call Centre Performance

Electricity Retailer Call Centre Performance

The volume of calls to electricity retailers fell for the fourth consecutive year

The total number of calls to electricity retailer call centres fell by 5.1% in 2015 (down from 1.239 million in 2014 to 1.176 million in 2015), continuing a downward trend that started in 2011. Because the Synergy call centre receives approximately 90% of total calls each year, the downward trend reflects the number of calls to Synergy's call centre.

In 2015, the performance of three out of the four electricity retailer call centres (Horizon Power, Rottnest Island Authority and Synergy) was broadly similar to last year. Alinta Energy was the exception, reporting significant improvements in all three performance measures in 2015.

Gas Retailer Call Centre Performance

The volume of calls to gas retailer call centres reached a six year peak in 2015

Alinta Energy and Kleenheat are the only gas retailers who operate call centres. The total volume of calls increased by 5.1% in 2015, reaching a six year peak of 1.012 million. The volume of calls to the Alinta Energy call centre also reached a six year peak of 778,427 calls.

The increased volume of calls to Alinta Energy's call centre in 2015 was accompanied by improvements in all three call centre performance measures.

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Purpose of this Report

The Economic Regulation Authority (**ERA**) is the independent economic regulator for Western Australia, whose purpose is to benefit the WA community by promoting an efficient and customer focused economy.

The ERA regulates third party access to electricity, gas and rail infrastructure and administers licences for electricity, gas and water providers. The ERA also undertakes surveillance of the Western Australia's wholesale electricity market and undertakes inquiries on a wide range of economic issues.

This is the latest in a series of reports published by the ERA that examines the service provided by Western Australian electricity and gas retailers to their small use residential and business customers (customers who consume less than 160MWh of electricity or less than 1 Terajoule of gas per annum). Throughout this report, small use customers (defined in detail in Appendix 1) will be referred to as customers.

The purpose of this report is to bring transparency and accountability to the performance of energy retailers¹⁵ who supply customers and to benchmark, where possible, their performance against similar retailers in other energy markets. The data presented in this report is for each financial year, unless otherwise stated.¹⁶

This report examines the service provided by electricity and gas retailers in relation to:

- **Affordability:** information about the number of customers on instalment plans and shortened billing cycles, customers being granted more time to pay a bill, the level of direct debit plan terminations and on-time billing.
- **Access:** information about the rates of customer disconnection for non-payment and reconnection of these customers, with further attention being paid to customers on instalment plans, receiving a government funded concession and those who have been previously disconnected within the past 24 months.
- **Customer Service:** information about customer satisfaction with the service provided by their retailer, as measured by complaints and customer contact centre responsiveness.
- **Compensation Payments:** information about the number of compensation payments made by electricity retailers for failing to meet the service standards prescribed in the *Code of Conduct for the Supply of Electricity to Small Use Customers* (**Electricity Customer Code**).

¹⁵ Electricity retail licensees, and electricity integrated regional licensees who retail to small use customers, and gas trading licensees.

¹⁶ Reference to a year in this report means the 12-month period ending 30 June of that year, e.g. 2015 means the year ending 30 June 2015.

Energy Retail Market

This section of the report looks at the electricity and gas retail markets as measured by the number of retailers who are supplying the market and the number of customers that are supplied by each retailer. The remainder of this section provides information about:

- the total number of licensed electricity and gas retailers;¹⁷
- the number of retailers who supply electricity or gas to small use customers; and
- the number of electricity and gas customers.

Energy Retailers

Table 1 details the number of licensed electricity and gas retailers over the past six years.

Table 1: Number of licensed energy retailers

Licensed Retailers	2010	2011	2012	2013	2014	2015 ¹⁸
Electricity						
All retailers	17	16	17	19	24	28
Permitted to supply small use customers	6	6	6	6	6	7
Gas						
	6	5	5	5	5	5

When the *Electricity Industry Act 2004 (Electricity Act)* commenced in 2005, existing retailers were required to obtain a licence from the ERA by 30 June 2006. There were a total of 11 electricity retail licences granted in 2006.

Between 1 July 2014 and 30 June 2015, four new retail licences have been granted by the ERA: NewRet Pty Ltd, TEC Hedland Pty Ltd, A-Star Electricity Pty Ltd (**A-Star**), and Alinta Sales Pty Ltd.¹⁹ A-Star is licensed to supply small use customers, while the other three new licensees supply large use customers only.

In July 2015, Kleenheat's²⁰ licence was amended, permitting it to supply small use customers.²¹ In September 2015, the ERA approved amendments to the electricity licences held by AER Retail Pty Ltd and Amanda Energy Pty Ltd, permitting both licensees to supply small use customers.

Under the *Energy Coordination Act 1994 (Gas Act)*, only gas retailers who supply small use customers need to be licensed. The ERA took over responsibility for licensing gas retailers in 2005.²² At that time there were three licensed gas retailers: Alinta Energy,²³ Kleenheat and WorleyParsons Asset Management (**WorleyParsons**). Between

¹⁷ This includes electricity retailers who only supply large use customers (who consume more than 160MWh per annum).

¹⁸ As at 30 June 2015.

¹⁹ Alinta Sales Pty Ltd was issued Licence EIRL8, to supply and retail electricity in the Pilbara region.

²⁰ Kleenheat is the trading name of Wesfarmers Kleenheat Gas Pty Ltd.

²¹ On 1 July 2015, Kleenheat transferred the electricity retail licence (ERL5) held by their subsidiary, Premier Power Sales, to Kleenheat and also, at the same time amend the licence to permit supply to small use customers. The commencement date of Kleenheat's electricity licence supplying small use customers, is after 30 June 2015, therefore, Kleenheat's electricity customer data is not included in this report.

²² Prior to 2005, gas licences were administered by the then Office of Energy, now the Public Utilities Office.

²³ Alinta Energy is the trading name of Alinta Sales Pty Ltd.

1 July 2006 and 30 June 2015, three new licences have been issued (Origin Energy, Perth Energy and Synergy) and one licence has been surrendered (Origin Energy). In March 2014, WorleyParsons Asset Management transferred its gas trading licence to Esperance Gas Distribution Company (**EGDC**).

At 30 June 2015, there were three retailers licensed to supply both electricity and gas to small use customers: Alinta Energy, Perth Energy and Synergy. Alinta Energy commenced supplying electricity to business customers in 2006, while Synergy commenced supplying gas to business customers in 2007. Perth Energy was granted a gas licence in November 2010 but has not yet commenced supplying customers.²⁴

Customers

Electricity Customers

Table 2 provides the total number of residential and non-residential electricity customers over the past six years.

During 2015, the total number of electricity customers grew by 2.1%, comprising a 2.4% increase in residential customers and a 0.07% decrease in non-residential customers. Due to its large customer base, the overall growth in the total number of customers closely correlates with the growth in Synergy's customers.

Table 2: Total number of electricity customers – change from the previous year

	Residential	Non-Residential	Total	Change from previous year
2010	881,470	100,176	981,646	1.0%
2011	921,374	100,491	1,021,865	4.1%
2012	928,841	97,131	1,025,972	0.4%
2013	930,593	107,986	1,038,579	1.2%
2014	950,598	110,865	1,061,463	2.2%
2015	973,016	110,790	1,083,806	2.1%

Table 3 provides a breakdown of the number of customers supplied by each retailer over the past two years.²⁵ Horizon Power and Synergy both grew their residential customer base by 2.4%.

Three of the six retailers who supply non-residential customers increased their customer base in 2015, the exceptions were Horizon Power, who experienced a sharp fall in the number of customers, and Rottneest Island Authority which was unchanged. Alinta Energy and Perth Energy both reported strong growth, while Synergy reported more modest growth. Because 2015 is the first full year of operation for A-Star a customer growth rate is not available.

Alinta Energy, A-Star, Perth Energy and Synergy retail to customers supplied through the SWIS;²⁶ while Horizon Power and Rottneest Island Authority supply customers through networks that they own and operate. In 2015, the SWIS accounted for 96.1% of residential, and 92.6% of non-residential customers in the State (Table 3). Within the SWIS, Synergy

²⁴ Kleenheat's electricity retail licence was amended allowing it to retail to small use customers from 1 July 2015. As this is outside the timeframe covered by this report, no information on Kleenheat's small use electricity customers is provided.

²⁵ Clear Energy has been excluded from this table because they have not supplied any customers since their licence was granted in 2010.

²⁶ The South West Interconnected System (SWIS) comprises the transmission and distribution networks operated by Western Power, which includes the coastal area from Kalbarri to Bremer Bay and the Goldfields.

supplies 100% of residential, and 97.1% of non-residential, customers, with the remaining non-residential customers shared between Alinta Energy, A-Star and Perth Energy. Within the SWIS (i.e. excluding Horizon Power's customers) the total growth in the number of non-residential customers was 0.9%.

Table 3: Electricity residential and non-residential customers by retailer

Retailer	Residential			Non-residential			Total		
	2014	2015	Change from 2014	2014	2015	Change from 2014	2014	2015	Change from 2014
Alinta Energy	0	0	0%	1,967	2,548	29.5%	1,967	2,548	29.5%
A-Star	0	0	0%	0	17	n/a	0	17	n/a
Horizon Power	37398	38299	2.4%	9,235	8,224	-10.9%	46,633	46,523	-0.2%
Perth Energy	0	0	0%	229	364	59.0%	229	364	59.0%
Rottnest Island Authority	0	0	0%	26	26	0.0%	26	26	0.0%
Synergy	913,200	934,717	2.4%	99,408	99,611	0.2%	1,012,608	1,034,328	2.1%
All Retailers	950,598	973,016	2.4%	110,865	110,790	-0.1%	1,061,463	1,083,806	2.1%

The customers supplied by retailers outside of the SWIS are all contestable, but the retailers supplying customers in these areas, Horizon Power and Rottnest Island Authority, do not currently have any competitors.²⁷ Table 4 provides a breakdown of the number of contestable customers²⁸ supplied by each retailer (in the area supplied through the SWIS) over the past two years.²⁹

Table 4: Contestable electricity customers

Retailer	Residential			Non-residential		
	2014	2015	Change from 2014	2014	2015	Change from 2014
Alinta Energy	0	0	0%	1,967	2,548	29.5%
A-Star	-	0	-	-	17	n/a
Horizon Power	37,398	38,299	2.4%	9,235	8,224	-10.9%
Perth Energy	0	0	0%	229	364	59.0%
Synergy	315	290	-7.9%	6,767	5,947	-12.1%
Total	37,713	38,589	2.3%	18,198	17,100	-6.0%

Comparing Table 3 with Table 4 shows that, in 2015, only 0.03% of residential and 8.7% of non-residential customers in the area supplied through the SWIS were contestable, which is unchanged from 2014. Compared to 2014, Synergy reported falls of 7.9% and 12.1% in the number of contestable residential and non-residential customers in 2015, respectively. 2015 is the fourth consecutive year that Synergy's contestable non-residential customer base has declined. Synergy has previously offered three alternative possibilities for this decline: customers churning to another retailer, increasing their consumption above 160 MWh, or exiting the market.

²⁷ The Rottnest Island Authority customers do not have a choice of retailer because of legal barriers that prevent other retailers operating on Rottnest Island.

²⁸ See Appendix 2 for the definition of contestable electricity customers.

²⁹ Table 30 in Appendix 3 provides full details of contestable electricity customers over the past six years.

Horizon Power reported that, between 2014 and 2015, their non-residential customer base fell by 10.9%. Horizon Power has advised that this significant reduction was due, in part, to improving the accuracy of their customer data.³⁰

Electricity Pre-Payment Meter Customers

A pre-payment meter is a meter that requires a customer to pay for the supply of electricity prior to consumption. The regulatory framework governing pre-payment services within Western Australia restricts these services to areas of the State that have been declared by the Minister for Energy by notice published in the *Government Gazette*. Until 2010, the deployment of pre-payment meters was restricted to Aboriginal and Remote Communities Power Supply Project or Town Reserves Regularisation Program communities that are supplied by Horizon Power in the north of the State. In 2010, Synergy commenced supplying customers through prepayment meters when the Ninga Mia Aboriginal Community in the Goldfields was gazetted by the Minister.

Table 5 shows the number of pre-payment meter customers supplied by Horizon Power and Synergy. The growth in the total number of pre-payment meter customers during 2015 was 19.6%; the new customers were all supplied by Horizon Power. Since 2010, the number of pre-payment meter customers has grown by 64.8%.

Table 5: Electricity pre-payment meter customers by retailer

Retailer	2010	2011	2012	2013	2014	2015
Horizon Power	608	705	784	811	845	1,014
Synergy	17	20	17	17	16	16
Total	625	725	801	828	861	1,030

Since 2010, and up to 2014, the rate of growth in pre-payment meter customers slowed considerably because of Horizon Power's difficulties in obtaining a pre-payment meter that complies with the requirements of Part 9 of the Electricity Customer Code. In mid-2014, Horizon Power successfully completed the trial of a new, compliant, pre-payment meter in the Mid-West. In 2015, Horizon Power commenced the rollout of the new pre-payment meters in Cheeditha Community in the Pilbara.

Gas Customers

Table 6 provides the total number of residential and non-residential gas customers over the past six years.

Table 6: Total number of gas customers – change from the previous year

	Residential	Non-Residential	Total	Change from previous year
2010	604,609	8,338	612,947	3.3%
2011	616,431	8,513	624,944	2.0%
2012	629,142	8,612	637,754	2.0%
2013	632,822	8,552	641,374	0.6%
2014	657,899	8,626	666,525	3.9%
2015	675,874	9,139	685,013	2.8%

³⁰ Caution should be exercised when comparing Horizon Power's non-residential customer base for 2014 and 2015. Horizon Power has advised the 10.9% fall is due to improved reporting accuracy, and removing the number of 'slave' (i.e. non-revenue) meters from its information systems and reporting.

During 2015, the total number of gas customers grew by 2.8%, comprising a 2.7% increase in residential customers and a 5.9% increase in non-residential customers (Tables 6 and 7).

Table 7 shows that the residential gas customer market grew by 2.7% during 2015. Alinta Energy was the only gas retailer to report a fall in customer numbers; where, compared to 2014, both residential and non-residential customer numbers were down.

Table 7 shows that the residential and non-residential natural gas markets became more competitive during 2015, with Kleenheat increasing its share of the residential market to 7% (up from 3.3% in 2014), and the non-residential market to 9.7% (up from 2.7% in 2014). The growth is the result on an ongoing sales campaign in the areas supplied through the ATCO distribution networks.³¹ Analysis of the changes in customer numbers for each retailer in Table 7 indicates the growth in Kleenheat's customer base is a mixture of customers switching away from another retailer and acquiring new customers as they enter the gas market.

Prior to March 2013, Kleenheat's gas retail activity was limited to supplying Liquefied Petroleum Gas (**LPG**) to customers on small scale distribution networks that it owns and operates.

Table 7: Gas residential and non-residential customers by retailer

Retailer	Residential			Non-residential		
	2014	2015	Change from 2014	2014	2015	Change from 2014
Alinta Energy	635,893	628,171	-1.2%	8,282	8,127	-1.9%
Synergy	0	0		79	107	35.4%
Kleenheat	21,697	47,353	118.2%	232	871	275.4%
EGDC	309	350	13.3%	33	34	3.0%
Total	657,899	675,874	2.7%	8,626	9,139	5.9%

Table 8 compares the number of residential and non-residential customers covered by the Gas Market Moratorium (**Moratorium**) in 2014 and 2015.³²

Table 8: Residential and non-residential customers covered by the Gas Market Moratorium

Retailer	Residential			Non-residential		
	2014	2015	Change from 2014	2014	2015	Change from 2014
Alinta Energy	635,701	628,007	-1.2%	6,361	6,342	-0.3%
Kleenheat	21,058	47,350	124.9%	142	492	246.5%
Total	656,759	675,357	2.9%	6,503	6,834	5.1%

Data for the number of Kleenheat customers covered by the Moratorium was collected for the first time in 2014, their first full year of operation in the market. In 2015, the total number of residential and non-residential customers covered by the Moratorium rose by 2.9% and 5.1% respectively. In 2015, Kleenheat reported significant gains in the number of residential

³¹ ATCO Gas Australia Pty Ltd is the largest gas distribution network operator in the State. ATCO operates natural gas distribution networks in the coastal area from Geraldton to Busselton and Kalgoorlie, as well as a LPG network in Albany. The other retailers supplying customers through the ATCO networks are Alinta Energy and Synergy.

³² In the areas supplied by Alinta Energy, the Moratorium prevents Synergy only from supplying customers who consume less than 0.18 Terrajoules (**TJ**) (or 180 Gigajoules (**GJ**)) of gas, but it does not prevent other retailers from supplying these customers. Refer to Appendix 2 for more information on the operation of the Gas Market Moratorium.

and non-residential customers covered by the Moratorium but, despite these gains, Alinta Energy still supplies 93% of residential customers and 92.8% of non-residential customers.

Affordability

Affordability of energy is influenced by price, consumption levels, income, and competing demands for expenditure. The credit management policies of electricity and gas retailers can impact significantly on those customers who are experiencing financial hardship or payment difficulties. This section of the report provides information about some of the measures implemented by retailers to facilitate customer access to an energy supply.

Retailers who supply small use customers are required to have a standard form contract (**SFC**) that is approved by the ERA. A SFC specifies the terms and conditions upon which a retailer will supply electricity and gas to its customers. These terms and conditions form a “safety net” for small use electricity and gas customers.³³

The ERA’s energy customer protection framework is articulated in the Electricity Customer Code, the *Compendium of Gas Customer Licence Obligations (Gas Compendium)* and the *Gas Marketing Code of Conduct (Gas Code)*. In both the Electricity Customer Code and the Gas Compendium, the customer protection framework is based on the principle that disconnecting a customer from supply because they are unable to pay is a last resort measure. Energy retailers are required to provide assistance to customers to stay connected to their electricity and gas supply by offering special billing arrangements, access to concessions and government grants and energy efficiency advice. Retailers can also refer residential customers experiencing financial difficulties to the Hardship Utility Grants Scheme (**HUGS**). The HUGS scheme provides grants to customers at risk of disconnection to help them stay connected.

The Electricity Customer Code and the Gas Compendium both require electricity and gas retailers to develop a financial hardship policy to assist small use residential customers in meeting their financial obligations and responsibilities to the retailer. The Codes and the ERA’s Energy Financial Hardship Policy Guidelines specify the minimum contents of such policies and require the retailer to develop their hardship policy in consultation with relevant consumer representative organisations. Retailers are required to review their hardship policy and procedures when directed to by the ERA, and submit the updated policy and procedures to the ERA for review.

The Electricity Customer Code and the Gas Compendium specify a number of payment assistance options to assist customers in temporary or longer-term financial difficulties:

- granting the customer more time to pay a bill;
- offering the customer an instalment plan to pay arrears and continued usage on their account, according to an agreed payment schedule and capacity to pay; and/or
- placing the customer on a shortened billing cycle.

Customers may be offered one or more of the above options at the same time.

Retailers are required to report to the ERA annually on the number of customers (and percentage of their customer base) that have accessed each of the three payment assistance options detailed above.

³³ A retailer and small use customer may also negotiate terms and conditions different from the retailer’s standard form contract, referred to as a “non-standard contract”. Even though a non-standard contract does not require the ERA’s approval, it must still comply with relevant legislation

Rottneest Island Authority has reported that none of their customers accessed any of the above payment options since the licence was granted. Accordingly, Rottneest Island Authority has been excluded from the coverage under this section.

Retailers are also required to report on their on-time billing performance. The Electricity Customer Code and the Gas Compendium regulate the minimum and maximum period of time between bills, with an option for the retailer to bill outside these time limits with the consent of the customer. Retailers are required to identify the number of customers who have received a bill outside the regulated or, if applicable, agreed time limits.

Granting customers more time to pay a bill

Granting the customer more time to pay all, or part of, a bill may be a useful approach to addressing temporary financial difficulties, particularly where the customer has a short-term cash flow problem, or faces competing demands for their limited financial resources.

Electricity customers granted more time to pay

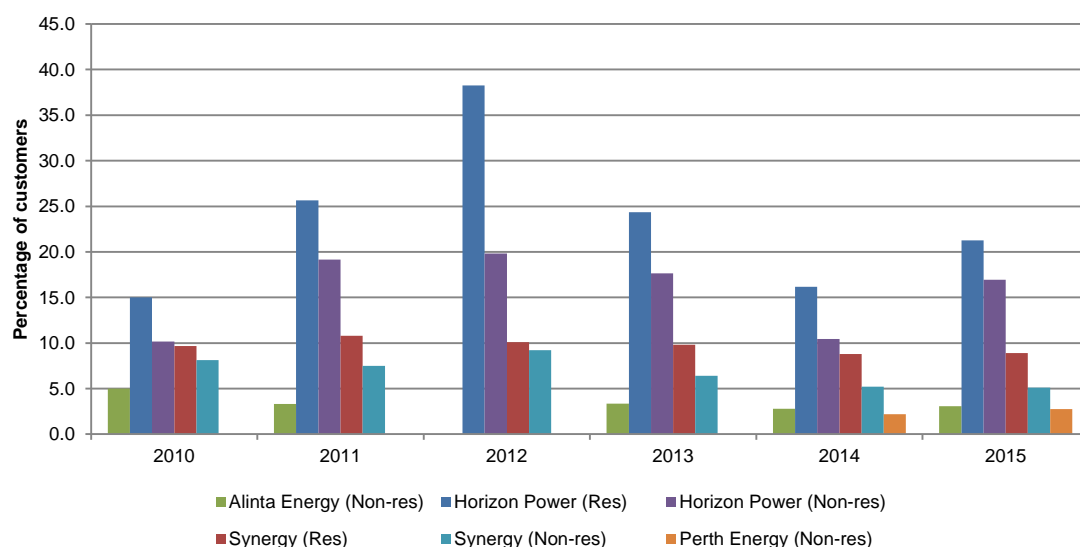
Figure 1 shows the number of residential and non-residential electricity customers granted more time to pay a bill over the past six years. The percentage of residential and non-residential customers granted more time to pay during 2015 are both slightly higher than in 2014, but were still below the six year peaks in 2011 and 2012 respectively.

Figure 1: Percentage of electricity customers granted more time to pay a bill



Figure 2 provides a breakdown of residential and non-residential electricity customers granted more time to pay a bill by each retailer.

During 2015, Horizon Power recorded increases in the percentage of residential and non-residential customers granted more time to pay: residential was up from 16.2% in 2014 to 21.3% in 2015; while non-residential was up from 10.4% in 2014 to 17% in 2015. Horizon Power commented that more residential customers requested more time to pay, preferring this option to entering into an instalment plan. Also, some of their larger non-residential customers requested a payment extension because of changes in their internal payment processes. The level of residential and non-residential customers granted more time to pay by the other retailers in 2015 were broadly similar to those reported in 2014.

Figure 2: Percentage of electricity customers granted more time to pay a bill by each retailer

Gas customers granted more time to pay

Table 9 provides a breakdown of the percentage of residential and non-residential gas customers granted more time to pay a bill, by retailer over the past three years.³⁴

The percentage of total residential customers granted more time to pay fell, down from 11.5% in 2014 to 10.1% from 2015. The percentage of Alinta Energy's residential customers granted more time to pay fell, while the percentage of EGDC and Kleenheat customers granted more time to pay both rose.

Table 9: Percentage of gas customers granted more time to pay a bill by each retailer

Retailer	2013	2014	2015
Residential			
Alinta Energy	9.8	11.9	10.9
Kleenheat	0.0	0.5	0.6
EGDC	6.8	3.2	4.3
Total	9.7	11.5	10.1
Non-residential			
Alinta Energy	9.0	15.8	13.0
Synergy	92.2	0.0	17.8
Kleenheat	0.0	7.3	4.0
EGDC	5.6	0.0	0.0
Total	10.3	15.3	12.1

The percentage of total non-residential customers granted more time to pay also fell, driven by falls in the number of Alinta Energy and Kleenheat customers granted more time to pay. Almost one in five of Synergy's non-residential customers were granted more time to pay in 2015, up from zero in 2014. Synergy attributed the increase to:

[the introduction of] an enhanced collection strategy in May 2014, with increased utilisation of electronic messaging (SMS/email) and outbound collection calls, that increased the

³⁴ The requirement for gas retailers to report the number of customers granted more time to pay commenced in 2013.

number of contact points with a customer earlier encouraging customers to be more proactive when experiencing difficulties in paying their accounts. At the same time Synergy aligned its SME [small and medium enterprise] payment plan guidelines with those implemented for residential customers allowing more gas business customer flexibility and ease of management.

Instalment Plans

Electricity customers on instalment plans

Figure 3 shows that the percentages of residential and non-residential customers on an instalment plan during 2015 were both lower than in 2014. There has been a significant year on year variance in the level of residential customers on instalment plans over the past six years, while the level of non-residential customers on plans has remained relatively constant.

Figure 3: Percentage of residential and non-residential electricity customers on instalment plans

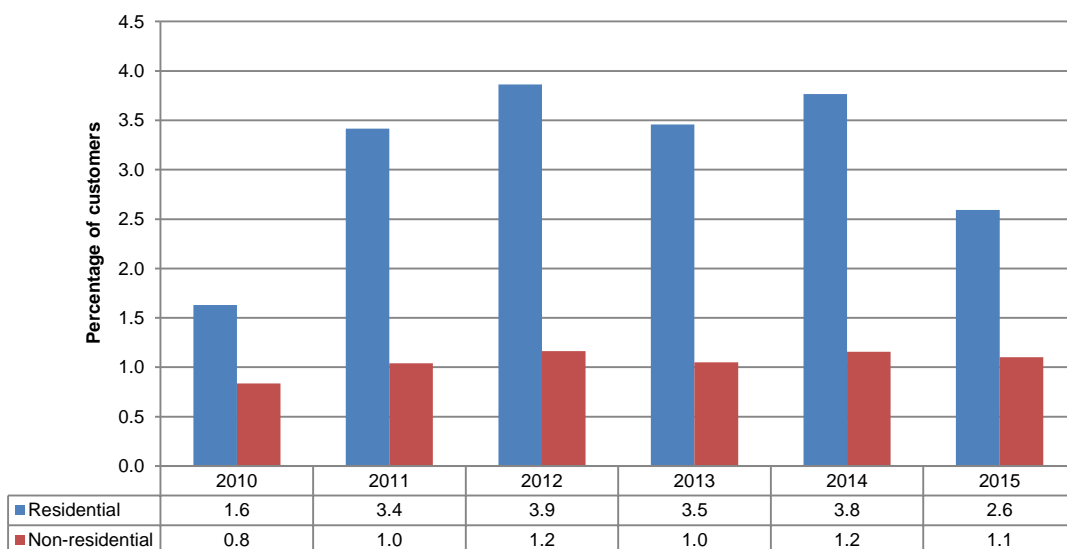


Figure 4 provides a breakdown of electricity customers on instalment plans for each retailer.

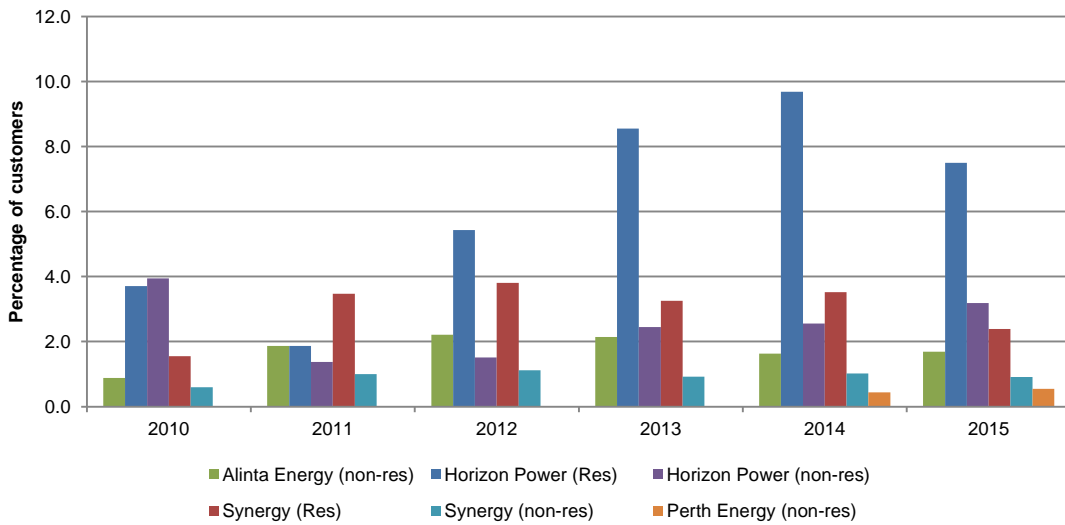
The percentage of Horizon Power's residential electricity customers on instalment plans fell to 7.5% in 2015, reversing the upward trend of the previous four years, while the percentage of non-residential customers on plans continued its recent upward trend, rising to 3.2% in 2015, but it is still below the 3.9% reached in 2010. Horizon Power commented that customers preferred being given more time to pay a bill rather than enter into an instalment plan.

The percentage of Synergy's residential customers on plans was lower in 2015, reaching a five year low of 2.4%, due to:

increased contact points via SMS / email to customers and a more timely outbound call process [which] has seen a decrease in the number of customers requiring additional time to pay and [customers] are more likely to be able to pay in one instalment (payment extension). Assistance from the Hardship Utility Grant Scheme reduced the outstanding amount for many residential customers to a level where the remaining balance did not require a payment plan, but could be covered by a once off payment extension.

The reported levels of non-residential customers on plans reported by Alinta Energy and Perth Energy in 2015 were almost unchanged from those in 2014.

Figure 4: Percentage of electricity retailer’s residential and non-residential customers on instalment plans



Gas customers on instalment plans

Figure 5 shows that, compared to last year, the overall percentage of residential gas customers on an instalment plan in 2015 was unchanged, while the percentage of non-residential customers on plans doubled, reaching a six year peak.

Figure 5: Percentage of residential and non-residential gas customers on instalment plans

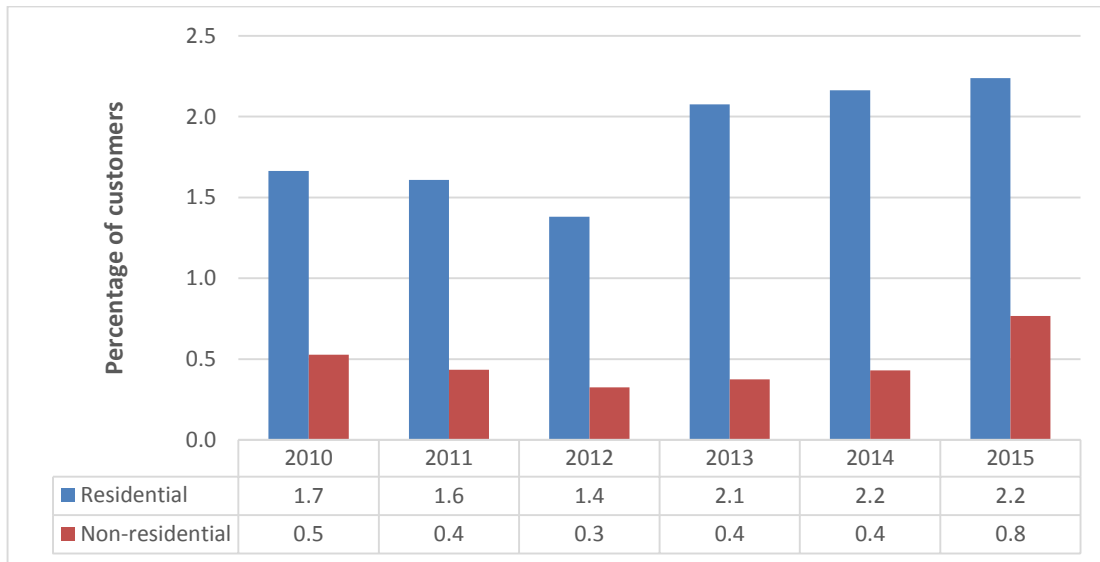


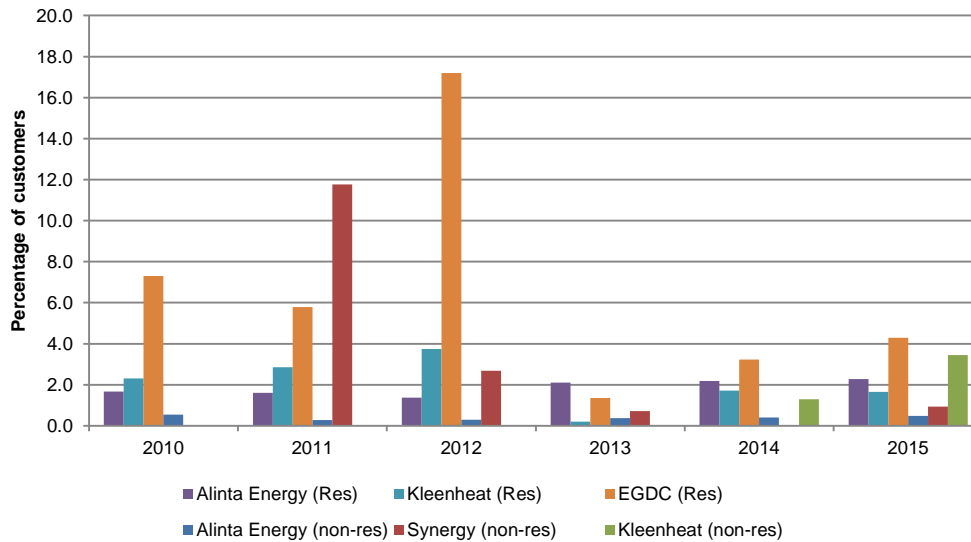
Figure 6 provides a breakdown of gas customers on instalment plans for each retailer. Looking at residential customers, EGDC reported the biggest increase in the percentage of customers on plans, up 34.4% compared to 2014, but this was still well below the 17.2% reported in 2012. EGDC commented that they have been encouraging customers in receipt of Centrelink to use Centrepay when they sign up for a contract.

With the exception of Kleenheat, the percentage of non-residential customers on instalment plans in 2015 reported by each retailer were similar to last year; Kleenheat reported an

increase from 1.3% in 2014 to 3.4% in 2015. Kleenheat commented that the increase is the result of:

[...] a combination of customer initiated requests for instalment payment plans and earlier intervention approach being actioned by our credit team to assist its customers manage temporary or longer term financial difficulties.

Figure 6: Percentage of gas retailer's residential and non-residential gas customers on instalment plans



Customer Billing

On-time Billing

Electricity customer billing

This is the third year that electricity retailers are required to report their on-time billing performance. Horizon Power and Synergy were the only electricity retailers to issue bills outside the prescribed timeframes during 2015.³⁵ Retailers are not required to provide a single aggregated figure for bills issued to residential customers outside the prescribed timeframes but provide three different indicators identifying the cause of the problem (fault on the part of the retailer, delayed billing date from the distributor, or actions on the part of the customer).³⁶

Table 10 shows the number and percentage of residential customers that received bills outside of the prescribed timeframes, due to the fault of the retailer.

Compared to last year, Synergy reported a rise in the number of customers who were billed outside the prescribed timeframes in 2015, while Horizon Power reported a significant fall in the customers who received non-compliant bills. Horizon Power stated the fall in non-compliant bills is the result of significant improvements they have made in streamlining their metering to billing process. Synergy attributed the increase in non-compliant bills to the inclusion of situations where a bill has been issued beyond three months due to the actions of customers and the network operator in addition to their own actions. Notwithstanding the

³⁵ The Electricity Code of Conduct requires retailers to bill customer no more than once a month (unless the customer is placed on a shortened billing cycle, or agrees to a shorter billing interval), or no less than once every three months (unless the customer agrees to a longer billing interval, or the retailer is unable to obtain metering data from the distributor).

³⁶ For example, denying the distributor access to the meter.

increase in non-compliant bills, Synergy's residential on-time billing performance for 2015 was in excess of 99%.

Table 10: Residential electricity customers billed outside prescribed timeframes (due to fault on the part of the retailer)

Retailer	Number of customers			Percentage of customers		
	2013	2014	2015	2013	2014	2015
Horizon Power	37	516	108	0.0	1.4	0.3
Synergy	12,231 ³⁸	3,720	5,935	1.4	0.4	0.6
Total	12,231	4,236	6,043	1.3	0.4	0.6

Table 11 shows the number and percentage of non-residential customers that received bills outside of the prescribed timeframes, for any reason. Both Synergy and Horizon Power reported substantial reductions in the number of non-residential customers that received non-compliant bills.

Table 11: Total non-residential electricity customers billed outside prescribed timeframes

Retailer	Number			Percentage		
	2013	2014	2015	2013	2014	2015
Horizon Power	-	637	220	0.0	6.9	2.7
Synergy	6,397	1,749	1,273	6.5	1.8	1.3
Total	6,397	2,386	1,493	5.9	2.2	1.3

Gas customer billing

This is also the third year that gas retailers are required to report their on-time billing performance. Alinta Energy and Kleenheat were the only gas retailers to issue bills outside the prescribed timeframes during 2015.³⁹

Table 12 shows that, in 2015, Alinta Energy's on-time billing performance was almost unchanged from last year, whereas Kleenheat reported an 89% fall in the number of customers who received non-compliant bills.

Table 12: Residential gas customers billed outside prescribed timeframes (due to fault on the part of the retailer)

Retailer	Number			Percentage of Customers		
	2013	2014	2015	2013	2014	2015
Residential						
Alinta Energy	9,256	8,080	8,213	1.5	1.3	1.3
Kleenheat	0	220	25	0.0	1.0	0.1
Total	9,256	8,300	8,238	1.5	1.3	1.2

Table 13 shows that the percentage of Alinta Energy's non-residential customers who received non-compliant bills was almost unchanged between 2014 and 2015, while the percentage of Kleenheat's customers who received non-compliant bills almost halved in 2015. Kleenheat's performance improved despite a near doubling in the number of

³⁷ Horizon Power was not able to report separate values for residential and non-residential customers. The total number of late bills issued in 2013 was 19,655.

³⁸ There was an error in the data in the 2013 report, which stated 29,098 customers received late bills.

³⁹ The Gas Compendium requires retailers to bill customer no more than once a month (unless the customer is placed on a shortened billing cycle, or agrees to a shorter billing interval), or no less than once every three months (unless the customer agrees to a longer billing interval, or the retailer is unable to obtain metering data from the distributor).

customers who received a non-compliant bill, because there was a large increase in the number of non-residential customers (see Table 7).

EGDC did not issue any non-compliant bills to non-residential customers in 2015, while Synergy issued non-compliant bills to non-residential customers for the first time. Synergy commented that a number of their gas customers are on quarterly meter read routes. Consequently, it is not uncommon for a bill to be issued more than 90 days after the last bill, depending on when the gas meter reading is received from the distributor.

Table 13: Total non-residential gas customers billed outside the prescribed timeframes

Retailer	Number of Customers			Percentage of Customers		
	2013	2014	2015	2013	2014	2015
Alinta Energy	271	365	343	3.2	4.4	4.2
Kleenheat	0	36	66	0.0	15.5	7.6
EGDC	0	3	0	0.0	9.0	0.0
Synergy	0	0	49	0.0	0.0	45.8
Total	271	404	458	3.2	4.7	5.0

Shortened Billing Cycle

Retailers may place customers on a shortened billing cycle (i.e. issuing bills at a frequency greater than the standard billing interval). With the exception of Horizon Power in 2014, gas and electricity retailers have not placed any customers on a shortened billing cycle since these performance reports commenced.⁴⁰ In 2015 no gas or electricity customers were placed on a shortened billing cycle by their retailer.

Security Deposits

A security deposit is a refundable advance payment made by a customer to secure connection or reconnection to an electricity or gas supply. Requiring a security deposit before supplying energy to a customer can go some way towards insuring the retailer against default, particularly for those customers with poor credit history.

Historically, Synergy was the only retailer that had required customers to provide a security deposit to obtain a supply. Between 2009 and 2010, a total of 52 of Synergy's non-residential customers provided security deposits.

In 2015, Kleenheat was the only gas retailer to require a customer to pay a security deposit; one non-residential gas customer provided a deposit.

Termination of Direct Debit Plans

Retailers are required to keep records of the number of direct debit plans they have terminated as a result of default or non-payment by a customer covering two or more successive payment periods. Customers often use direct debit arrangements to smooth the cost of their energy consumption over the year. The number of direct debit defaults is an indicator of financial stress among the customers who have these plans.

⁴⁰ In 2014, Horizon Power placed 154 customers on a shortened billing cycle, representing 0.41% of its customer base.

Electricity direct debit terminations

Table 14 details the number of residential and non-residential direct debit plans terminated by Horizon Power and Synergy.

Compared to last year, Horizon Power reported a 56% fall, and Synergy reported a 39.6% increase, in residential direct debit plans terminated in 2015. Synergy also reported a 52.9% increase in the number of non-residential direct debit terminations. Synergy attributed the increased plan terminations to the increasing number of customers who are selecting direct debit plans and direct debit instalment plans as their preferred payment method.⁴¹

Table 14: Customer direct debit plans terminated by electricity retailers

	Horizon Power		Synergy	
	Residential	Non-residential	Residential	Non-residential
2010	-	-	2,087	93
2011	-	-	3,925	100
2012	-	-	4,164	134
2013	27	1	5,093	169
2014	39	0	5,707	206
2015	17	1	7,968	315

Gas direct debit terminations

Table 15 shows that, in 2015, Alinta Energy and Synergy were the only gas retailers to report terminating direct debit plans due to default by the customer.

Table 15: Gas Customer direct debit plans terminated

	Alinta Energy		Synergy	
	Residential	Non-residential	Residential	Non-residential
2010	624	2	-	1
2011	642	1	-	0
2012	512	2	-	0
2013	722	2	-	1
2014	238	1	-	0
2015	893	5	-	1

The number of residential direct debits terminated by Alinta Energy in 2015 reached a six year peak, coming off a six year low last year. Alinta Energy has provided an explanation for the rise in plan terminations:

Alinta Energy establishes direct debit instalment plans to assist customers by maintaining their debt at a more manageable level. This scheme, combined with the proactive initiatives implemented in managing customers with overdue debt, resulted in other options or arrangements being offered to customers, which required their existing direct debit arrangements to be terminated.

⁴¹ This implies that that the number of plan terminations is in proportion to an increase in the number of customers who are being placed on a plan.

Disconnections and Reconnections

Disconnections

The Electricity Customer Code and the Gas Compendium require retailers to help assist customers by putting in place effective policies that assist customers who are in financial hardship or experiencing payment difficulties. The Code and Compendium also prescribe a process to be followed by retailers that provides adequate opportunity for customers to enter into an arrangement with the retailer to avoid disconnection.

The effectiveness of the retailer's hardship policies can be assessed by customer's access to, and use of, the affordability measures covered earlier in this report in conjunction with the disconnection and reconnection data presented below. For residential customers this information is brought together in the additional disconnection and reconnection indicators reported by retailers:

- customers previously on an instalment plan;
- concession card holders; and
- customers who have been disconnected multiple times in the past 24 months.

The impact of disconnection on customers can be significant; access to an essential service is removed for the duration of the disconnection, and the customer faces additional fees and charges to secure reconnection of their supply following disconnection. Consequently, retailers are expected to treat disconnection as a last resort, to be applied when all other reasonable attempts to secure payment of an outstanding debt have been exhausted.

Equally, it is important to recognise that it is reasonable for retailers to use disconnection as a means of persuading customers to pay for the energy they have consumed, which enables them to operate a financially viable business for the benefit of all their customers, as well as preventing customers from increasing the debt they owe to the retailer.

Residential Customer Disconnections

Figure 7 shows the overall level of residential electricity and gas customer disconnections over the past six years.

In 2015, the overall residential electricity disconnection rate (per 100 customers) remained the same as the previous year at 0.97 per 100 customers, which is a six year peak. In practice, Synergy's large residential customer base means that the overall residential disconnection rate tracks its disconnection rate (see Table 16).

In contrast to electricity, the overall residential gas disconnection rate (per 100 customers) rose sharply, up from 1.55 per 100 customers in 2014 to 2.25 per 100 customers in 2015, but below the six year peak (2.85 per 100 customers) in 2010. Again, Alinta Energy's large customer base means that the overall residential disconnection rate tracks its disconnection rate (see Table 16).

The ratio of residential gas customer disconnection rate to the residential electricity customer disconnection rate increased, up from 1.6 in 2014 to 2.3 in 2015.⁴² The increase is reflective of the rise in the gas disconnection rate.

Figure 7: Residential energy customer disconnections

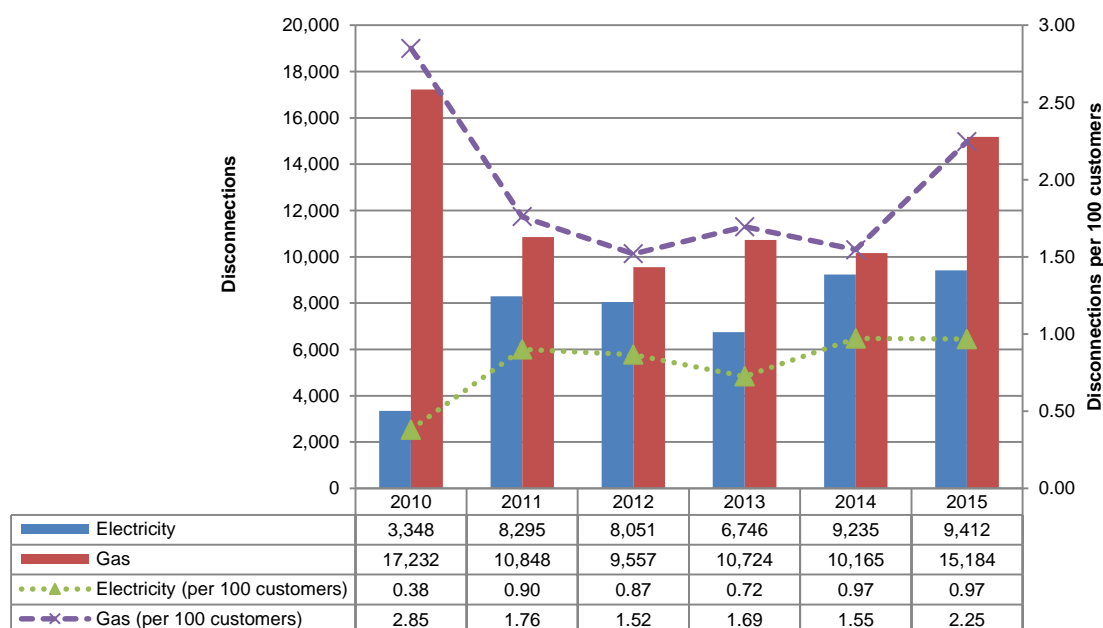


Table 16 provides a six year view of residential disconnection rates for each electricity and gas retailer.

Horizon Power's residential disconnection rate in 2015 was 2.83 per 100 customers, down from the six year peak of 3.03 per 100 customers last year. Horizon Power stated that the reduction in the disconnection rate is linked to an increase in the number of customers who were granted more time to pay a bill.

Synergy's residential disconnection rate in 2015 was unchanged from last year. Synergy advised that it has implemented a new strategy aimed at improving debt recovery, which includes early communication with customers who may be experiencing financial hardship (when the level of debt is often more manageable) and contacting indebted customers more often, so those customers who need to are able to access assistance measures more promptly.

Table 16: Residential energy customer disconnection rates for each retailer (per 100 customers)

Retailer	2010	2011	2012	2013	2014	2015
Electricity						
Horizon Power	1.97	2.19	0.96	1.18	3.03	2.83
Synergy	0.30	0.86	0.86	0.71	0.89	0.89
Total	0.38	0.90	0.87	0.72	0.97	0.97
Gas						
Alinta Energy	2.85	1.76	1.52	1.72	1.56	2.31
Kleenheat	0.0	0.0	0.0	0.09	1.06	1.35
EGDC	3.86	2.70	0.0	1.69	1.94	4.29
Total	2.85	1.76	1.52	1.69	1.55	2.25

⁴² Some caution should be applied to interpreting this ratio because of the large difference in the numbers of residential electricity and gas customers (Table 2 and Table 5). Nonetheless, the ratio does provide a useful comparator of the respective disconnection rates.

Alinta Energy's residential disconnection rate in 2015, 2.31 per 100 customers, was 48.1% higher than last year, but below the six year peak (2.85) recorded in 2010. Alinta Energy provided the following explanation for the increase in the disconnection rate:

Over the past 12 months, Alinta Energy has implemented a number of new initiatives and campaigns, including SMS messaging to customers, additional outbound telephone contact and working with financial counsellors to assist customers with overdue debt. This has assisted many customers in successfully managing their level of debt. However, for the customers who fail to respond despite the various methods of communication, including site visits, then disconnection action is carried out as a last resort.

Kleenheat reported a 27.4% increase in its residential customer disconnection rate in 2015, compared to last year. The increase in the level of customer disconnections between 2013 and 2015 correlates with the increase in Kleenheat's residential customer base over the past year (see Table 7).

Over the past six years, EGDC's residential disconnection rate has been quite variable; this is the result of having a small customer base against which to measure the disconnection rate. In 2015, EGDC's disconnection rate reached a six year peak of 4.29 per 100 customers, up from 1.94 per 100 customers last year. EGDC attributed the increase in disconnections to the impact that the downturn in the resources sector has had on customers in Esperance.

Table 17 provides a breakdown of the additional residential electricity and gas disconnection information for each retailer in 2015, compared to 2014.

Table 17: Residential disconnections - additional disconnection information

Retailer	Total disconnections		Customers previously on an instalment plan		Customers disconnected at the same supply address within the past 24 months		Concession card holders ⁴³	
	2014	2015	% of disconnections 2014	% of disconnections 2015	% of disconnections 2014	% of disconnections 2015	% of disconnections 2014	% of disconnections 2015
Electricity								
Horizon Power	1,132	1,084	43.2	34.6	7.5	16.7	25.7	26.2
Synergy	8,103	8,328	31.6	42.4	15.8	16.8	27.6	31.2
Total	9,235	9,412	33	41.5	14.8	16.8	27.4	30.6
Gas								
Alinta Energy	9,930	14,530	7.7	12.3	25.3	20.6	-	-
Kleenheat	229	639	10.5	8.6	12.7	13.8	-	-
EGDC	6	15	0.0	20.0	0.0	13.3	-	-
Total	10,165	15,184	7.7	12.1	25.0	20.3	-	-

The percentage of Horizon Power's residential disconnections involving customers who were previously disconnected at the same address within the last two years in 2015 was more than double that of last year. Conversely, the percentage of residential disconnections involving customers previously on an instalment plan fell, while those involving concession card holders was almost unchanged. Horizon Power commented:

Customers who have been disconnected previously are more likely to not adhere to arrangements or instalment plans that have previously been agreed upon. The introduction of more flexible instalment plans along with an increased focus on working with customers to keep their power connected has led to an overall reduction in disconnections for customers previously on an instalment plans.

⁴³ Because government subsidies and concessions are paid through electricity bills, the gas retailers do not know which of their customers are receiving a concession.

The percentage of Synergy's residential disconnections involving customers who were previously on an instalment plan increased in 2015, while disconnections involving concession card holders and customers who had been previously disconnected were almost unchanged. Synergy explained that their collections strategy had:

identified some customers [who had] failed to honour their instalment plan commitments on multiple occasions. The increase in customers being disconnected on an instalment plan reflects Synergy's actions to address this issue, as failure to do so will increase customer debt, both to the detriment of the customer and retailer.

Alinta Energy reported mixed results for its residential disconnections in 2015. Compared to last year, there was a large increase in disconnections involving customers who were previously on an instalment plan, while disconnections involving customers who had previously been disconnected fell. Alinta Energy commented:

Consistent with the initiatives outlined [earlier in this report] in assisting customers with overdue debt, the establishment of affordable instalment payment plans combined with assistance through other channels is a key tool and option made available to customers to enable them to manage their account and maintain their gas supply. Customers subsequently disconnected are as a result of non-adherence and non-payment despite all previous efforts to assist, including alternative forms of assistance made available.

The decrease in customers disconnected at the same supply address within the last two years is an indicator that the initiatives being undertaken to support customers who were previously disconnected are showing successful outcomes and positive results.

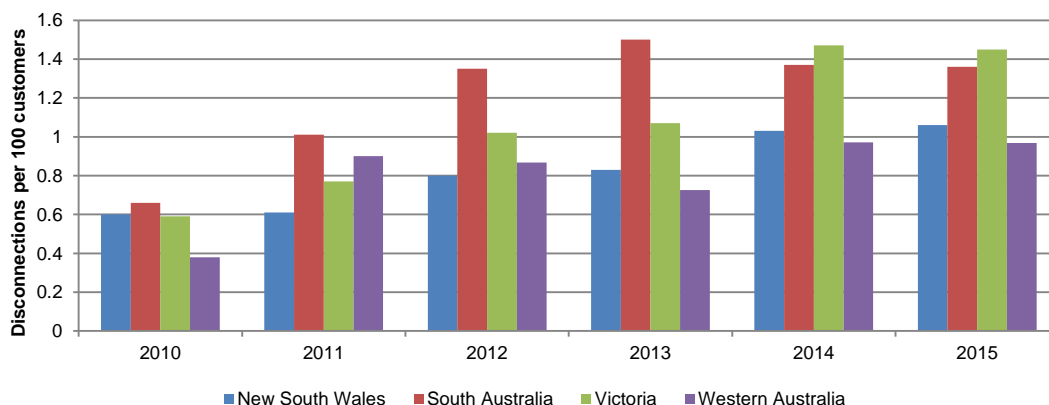
Kleenheat also reported mixed results for its residential disconnections in 2015. Compared to last year, the percentage of customer disconnections involving customers who were previously on an instalment plan fell slightly, while there was a modest increase in the percentage of disconnections involving customers who had been previously disconnected.

For the first time since 2010, EGDC reported disconnections involving customers who were previously on an instalment plan, and for the first time since 2011, customers who had been previously disconnected. EGDC commented that these results correlate with the increase in the number of disconnections, which is discussed earlier in this report.

Inter-jurisdictional comparison of residential electricity and gas disconnections

Figure 8 benchmarks the overall residential electricity disconnection rate for Western Australian retailers with the residential disconnection rates for retailers in New South Wales, South Australia and Victoria.

Figure 8: Jurisdictional comparison of residential electricity disconnection rates (per 100 customers)



The 2015 residential electricity disconnection rates in New South Wales, South Australia and Western Australia are broadly similar to those in 2014. For the fourth consecutive year, Western Australia's residential electricity disconnection rate (0.97 per 100 customers) remains the lowest of the states for which data is available.

Table 18 benchmarks the overall residential gas disconnection rate for Western Australian retailers with the residential disconnection rates for retailers in New South Wales, South Australia and Victoria.⁴⁴ Western Australia's overall residential gas disconnection rate was the highest of the states for which data is available for the second consecutive year.

Table 18: Jurisdictional comparison of residential gas disconnection rates (per 100 customers)

	New South Wales	South Australia	Victoria	Western Australia
2014	0.39	0.86	1.33	1.55
2015	0.62	1.12	1.20	2.25

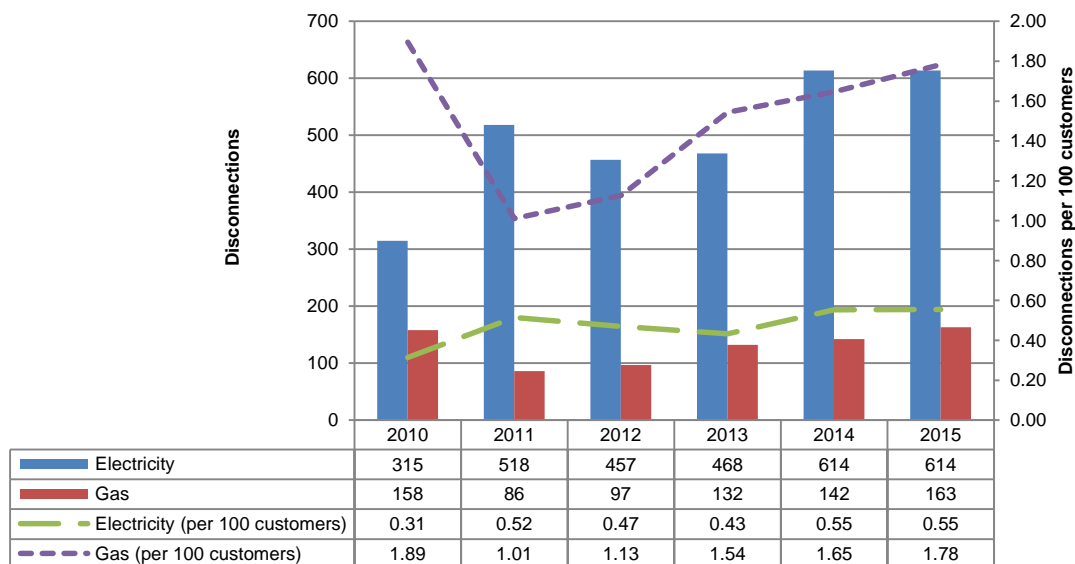
Non-residential Customer Disconnections

Figure 9 shows the overall level of non-residential electricity and gas customer disconnections over the past six years.

In 2015, the non-residential electricity disconnection rate was unchanged from last year, 0.55 per 100 customers, which is a six year peak. The non-residential gas disconnection rate, 1.78 per 100 customers, was higher than last year, but still below the six year peak of 1.89 per 100 customers in 2010.

The ratio of the non-residential gas customer disconnection rate to the non-residential electricity customer disconnection rate increased in 2015, up from 3.0 in 2014 to 3.2 in 2015.⁴⁵

Figure 9: Non-residential energy customer disconnections



⁴⁴ 2014 was the first year that benchmarking data became available. The data for Victoria was provided by the Essential Service Commission, while the Australian Energy Regulator provided the data for New South Wales and South Australia.

⁴⁵ Some caution should be applied to interpreting this ratio because of the large difference in the numbers of non-residential electricity and gas customers (Table 2 and Table 5). Nonetheless, the ratio does provide a useful comparator of the respective disconnection rates.

Table 19 provides a six year view of the non-residential disconnection rates for each electricity and gas retailer.

Table 19: Non-residential energy customer disconnection rates for each retailer (per 100 customers)

Retailer	2010	2011	2012	2013	2014	2015
Electricity						
Alinta Energy	0.0	0.0	0.14	0.81	0.36	0.39
Horizon Power	1.82	0.27	0.15	0.09	0.41	0.50
Synergy	0.20	0.54	0.50	0.46	0.57	0.56
Perth Energy	-	-	-	-	1.75	0.82
Total	0.31	0.51	0.47	0.43	0.55	0.55
Gas						
Alinta Energy	1.93	1.03	1.15	1.58	1.70	1.89
Kleenheat	-	-	-	-	0.43	1.03
Total	1.89	1.01	1.14	1.54	1.65	1.78

Horizon Power's non-residential disconnection rate increased by 22% in 2015, while Perth Energy's disconnection rate halved, and the disconnection rates for Alinta Energy and Synergy were similar to last year.

Looking at non-residential gas disconnections, in 2015, Alinta Energy reported an increased disconnection rate for the fourth consecutive year. Their 2015 gas disconnection rate is just below the six year peak of 1.93 per 100 customers in 2010. Alinta Energy commented:

Consistent with operating in a commercial environment, disconnection for non-residential customers due to non-payment is a final resort after all other avenues and efforts to assist those customers have been exhausted.

Kleenheat's non-residential gas customer disconnection rate rose significantly in 2015, the second consecutive year that they have disconnected non-residential customers. Kleenheat commented that the increase in disconnections is related to the current economic climate contributing to increased business failures, or businesses being sold on.

Pre-Payment Meter Disconnections

Part 9 of the Electricity Customer Code requires pre-payment meters to incorporate functionality that is capable of informing the retailer of:

- the number of instances where a pre-payment meter customer has been disconnected (i.e. when the meter has run out of credit, including any applicable emergency credit available outside of normal business hours); and
- the duration of each disconnection.

There are two measures of pre-payment meter disconnections that retailers are required to report on:

- the first measure is the total number of pre-payment meter disconnections per annum;⁴⁶ and
- the number of pre-payment meter customers who have been disconnected two or more times in a month (where each disconnection is for longer than two hours).

⁴⁶ If a pre-payment meter is disconnected more than once during the reporting year then each disconnection is counted in the total number of disconnections.

Horizon Power was the only electricity retailer with the ability to report on the disconnection of pre-payment meter customers in 2015. Caution should be exercised when interpreting these results as Horizon Power has advised that their capability to capture detailed records of disconnections only commenced part way through 2015. There will be more analysis of pre-payment meter disconnections in future reports as the data becomes available.

Table 20 shows that Horizon Power reported 1,193 disconnections of customers with prepayment meters in 2015, which equates to 1.17 disconnections per pre-payment meter customer per annum on average. Also, 11% of pre-payment meter customers were disconnected more than twice in a month, where each disconnection exceeded 2 hours in duration.

Table 20: Prepayment meter customer disconnections

	No. of prepayment meter customers	Horizon Power	
		No. Prepayment Meter disconnections	Customers disconnected two hours plus, more than once a month
2014	845	56	7
2015	1,014	1,193	112

Reconnections

The standard reconnection measure counts customers who have been reconnected in the same name and at the same address within seven (calendar) days of being disconnected for non-payment of a bill. The rationale for setting a seven day measurement window is that this counts the customers whose disconnection might have been avoided had they taken action to engage with their retailer earlier in the disconnection process, or customers who were experiencing financial difficulties. However, in the absence of any information about whether the customer was in financial hardship immediately prior to disconnection, which is the case currently, it is not possible to separate the customers who could not pay from those who chose not to pay.

In general, reconnections within seven days will always be less than the corresponding disconnections because it excludes customers who are reconnected later than seven days after disconnection, customers who reconnect in a different name at the same address within seven days and customers who have already abandoned the property.

A more reliable figure of the total number of reconnections performed each year can be obtained by removing the seven day limit, so retailers are also required to report on the total number of reconnections that they have requested each year. This provides additional information on the number of customers who needed more time to arrange their reconnection, and those customers who were not reconnected.

Residential Customer Reconnections

Figure 10 shows overall residential electricity and gas reconnections (within seven days of disconnection) for the past six years. Residential electricity customer reconnections and residential gas customer reconnections were both higher in 2015, compared to last year; electricity reconnections reached a six year high of 64.1%.

Figure 10: Residential energy customer reconnections within seven days

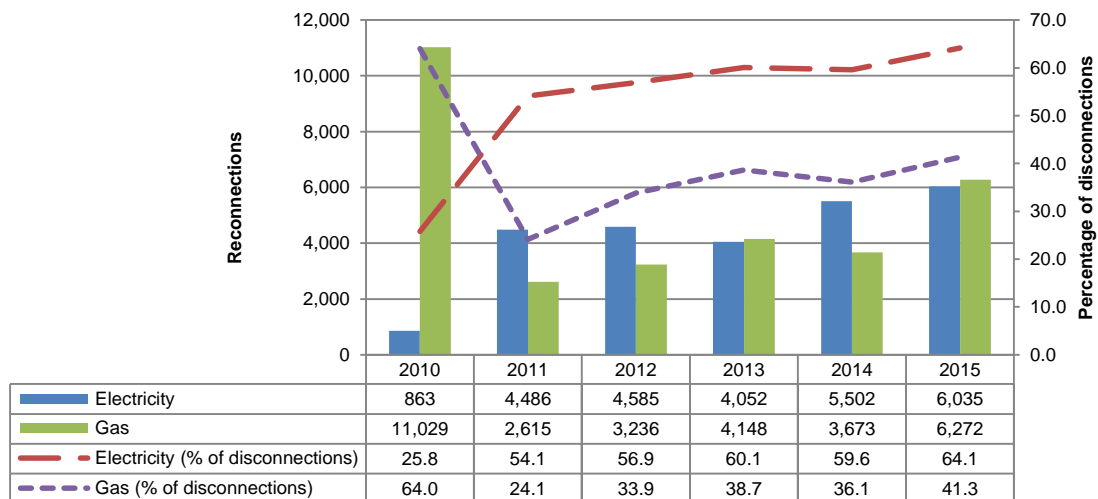


Table 21 and Figure 11 show the residential reconnections (within seven days) performed by each electricity and gas retailer over the past six years.

In 2015, the percentage of reconnections (within seven days) performed by both electricity retailers rose, but Horizon Power's reconnection rate was significantly lower than Synergy's. Horizon Power reconnections were up from 19.6% in 2014 to 21.3% in 2015 (just below the six year peak of 24% in 2010), while Synergy's reconnections also rose, up from 65.2% in 2014 to 69.7% in 2015 (a six year peak). Horizon Power commented that:

In most of Horizon Powers network the reconnection requirements is to reconnect customers within 5-6 business days from the receipt of payment or application from the customer. In 99% of these instances, Horizon Power has provided the reconnection before or on the [Code of Conduct] required timeframes.

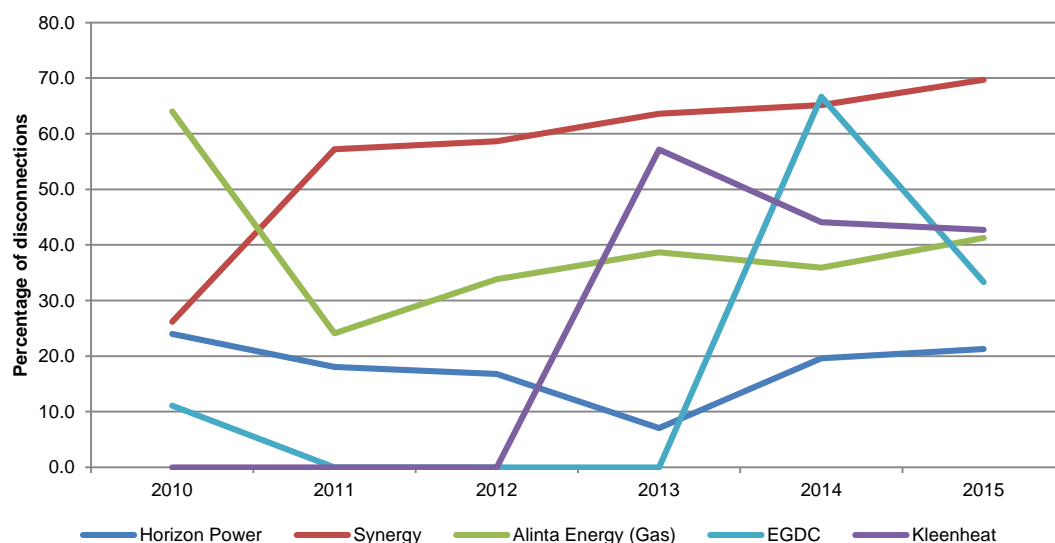
Alinta Energy's residential gas reconnections (within seven days) rose, up from 35.9% in 2014 to 41.3% in 2015, which was below the six year peak of 64%. Kleenheat's reconnections (within seven days) were almost unchanged,⁴⁷ while EGDC's reconnections were based on a very small number of disconnections, which makes it difficult to identify any underlying trends.

Table 21: Residential electricity and gas customer reconnections within seven days

Retailer	2010	2011	2012	2013	2014	2015
Electricity						
Horizon Power	145	120	55	30	222	231
Synergy	718	4,366	4,530	4,022	5,280	5,804
Total	863	4,486	4,585	4,052	5,502	6,035
Gas						
Alinta Energy	11,028	2,615	3,236	4,144	3,568	5,994
Kleenheat	0	0	0	4	101	273
EGDC	1	0	0	0	4	5
Total	11,029	2,615	3,236	4,148	3,673	6,272

⁴⁷ The number of disconnections and reconnections both increased in 2015, which left the ratio of reconnections to disconnections almost unchanged.

Figure 11: Percentage of residential energy customers reconnected by retailers within seven days



From 2013, electricity and gas retailers have also been required to provide data on the total number of residential customer reconnections they have performed during the year.⁴⁸ Table 22 provides information on the total number of residential reconnections performed by electricity and gas retailers.

Table 22: Total residential energy customers reconnected at same supply address after disconnection

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power	-	-	-	95	237	668	-	-	-	22.4	20.9	61.6
Synergy	-	-	-	4,396	5,962	6,916	-	-	-	69.5	73.6	83.0
Total	-	-	-	4,491	6,199	7,584	-	-	-	66.6	67.1	80.6
Gas												
Alinta Energy	-	-	-	8,082	6,350	9,897	-	-	-	75.4	64	68.1
Kleenheat	-	-	-	4	138	340	-	-	-	57.1	60.3	53.2
EGDC	-	-	-	0	5	10	-	-	-	-	83.3	66.7
Total	-	-	-	8,086	6,493	10,247	-	-	-	75.4	63.9	67.5

Horizon Power's total reconnection rate increased, to 61.6% in 2015, which was attributed to improvements in reconnection performance by field staff and customer responsiveness. Synergy commented that the increase in their reconnection rate, to 83.0% in 2015, was the result of:

The increased reconnection rate reflects disconnection for non-payment occurring sooner than historically was the case. For example, many customers on a 6 or 12 month lease were vacating premises at the end of their lease without paying their electricity account. Disconnection prior to lease expiry meant many customers remained at their premises and hence sought reconnection at those premises.

Comparing the 2015 total reconnection rate (Table 22) with the reconnections (within seven days) (Table 21) rates for Horizon Power and Synergy shows that the majority of Synergy's

⁴⁸ This metric measures customers disconnected and subsequently reconnected during the same year, regardless of the time that has passed between the disconnection and reconnection. See the explanation in the introduction to this section of the report.

residential reconnections were performed within seven days of disconnection. In contrast, only one third of Horizon Power's residential reconnections occurred within seven days. Just under one in every five of Synergy's disconnections and two in every five of Horizon Power's disconnections, did not result in a reconnection at all.⁴⁹

Alinta Energy's 2015 total reconnection rate (68.1%) was slightly higher than last year (64.0%). Just over two in every five reconnections were performed more than seven days after disconnection in 2015.

Kleenheat's total 2015 reconnection rate (53.2%) was lower than last year (60.3%). Nearly four in every five of Kleenheat's reconnections involved customers who were reconnected within seven days.

EGDC's reconnections were based on a very small number of disconnections, which makes it difficult to identify any underlying trends.

Retailers are also required to provide a breakdown of their residential reconnections into those involving customers: receiving concessions; customers previously on an instalment plan (prior to disconnection); and customers who had previously been disconnected within the past two years at the same address.

Table 23 compares the percentage of reconnections falling into these three categories in 2014 and 2015.

Table 23: Residential reconnections within seven days - additional reconnection information

Retailer	Total reconnections		Customers previously on an instalment plan		Customers disconnected at the same supply address within the past 24 months		Concession card holders	
	2014	2015	% of disconnections	% of disconnections	% of disconnections	% of disconnections	% of disconnections	% of disconnections
Electricity								
Horizon Power	222	231	11.6	0.1	1.2	3.6	6.5	7.1
Synergy	5,280	5,804	29.5	35.4	12.4	13.5	20.1	25.7
Total	5,502	6,035	27.3	31.3	11	12.4	18.4	23.5
Gas								
Alinta Energy	3,568	5,994	3.2	5.9	7	5.8	-	-
Kleenheat	101	273	3.5	8.8	7.9	7.0	-	-
EGDC	4	5	16.7	0.0	16.7	13.3	-	-
Total	3,673	6,272	3.2	6.0	7.1	5.8	-	-

Looking at the electricity retailers, Synergy reported increases in the percentage of reconnections involving customers who fall into all three categories.

Horizon Power reported modest increases in reconnections involving customers receiving concessions and customers who had previously been disconnected. However, reconnections involving customers previously on an instalment plan fell to 0.1% of the total in 2015, down from 11.6% last year. Horizon Power explained the fall as being due to the majority of customers failing to make payment, or enter payment arrangements, within a time frame that allowed for the property to be reconnected within seven days.

⁴⁹ It is important to note that not reconnecting a supply address does not mean that the supply remains disconnected; the reconnections data excludes customers moving out of premises after the supply has been disconnected, or situations where a new account is established at the premises in a different person's name.

In gas, both Alinta Energy and Kleenheat reported increases in reconnections of customers previously on an instalment plan: 5.9% of Alinta Energy's reconnections in 2015, up from 3.2% last year, and 8.8% of Kleenheat's reconnections in 2015, up from 3.5% last year. EGDC's reconnections were based on a very small number of disconnections, which makes it difficult to identify any underlying trends.

Non-residential Customer Reconnections

Figure 12 shows the overall level of non-residential electricity and gas customer reconnections (within seven days) over the past six years. In 2015, both non-residential electricity reconnections and non-residential gas disconnections (within seven days) reached six year peaks, at 56.4% and 50.3% respectively. Comparing Figure 12 with Figure 13 shows that, because of their large customer bases, the electricity reconnection rate tracks Synergy's rate, while the gas reconnection rate tracks Alinta Energy's rate.

Figure 12: Non-residential energy customer reconnections within seven days

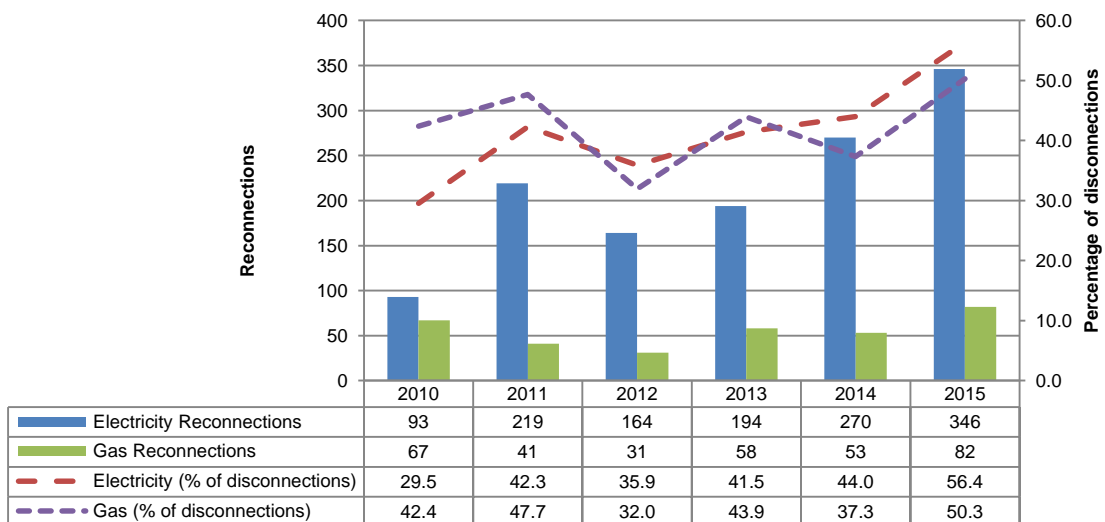


Table 24 and Figure 13 show the reconnections (within seven days) for each electricity and gas retailer. The reconnection rates for Alinta Energy (electricity), Horizon Power and Perth Energy need to be treated with caution because of the small number of disconnections performed by these three retailers each year.

Table 24: Non-residential energy customers reconnected by retailers within seven days

Retailer	2010	2011	2012	2013	2014	2015
Electricity						
Alinta Energy	0	0	9	1	5	10
Horizon Power	44	1	1	0	5	5
Synergy	49	218	154	193	256	328
Perth Energy	0	0	0	0	4	3
Total	93	219	164	194	270	346
Gas						
Alinta Energy	67	41	31	58	53	79
Kleenheat	-	-	-	-	-	3
Total	67	41	31	58	53	82

Figure 13: Percentage of non-residential energy customers reconnected by retailers within seven days

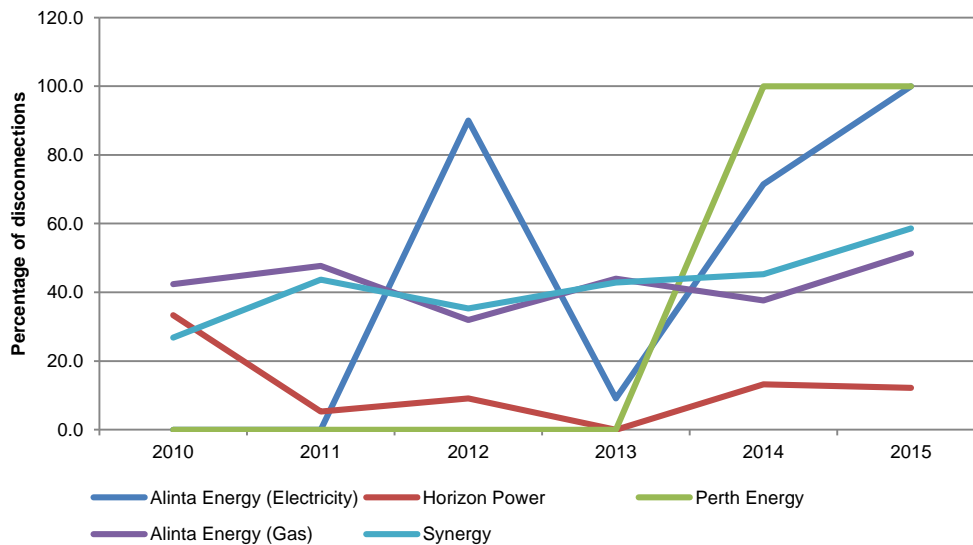


Table 25 shows the total non-residential electricity and gas reconnection rates for each retailer. Comparing the 2015 total reconnection rates (Table 25) with the reconnections within seven days rates (Table 24) for both Horizon Power and Synergy shows that nearly 75% of Synergy's non-residential reconnections were performed within seven days of disconnection, while just under 40% of Horizon Power's residential reconnections were performed within seven days.

Table 25: Total non-residential energy customers reconnected at same supply address after disconnection

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	-	-	-	1	5	10	-	-	-	9.1	71.4	100.0
Horizon Power	-	-	-	0	15	13	-	-	-	0.0	39.5	31.7
Synergy	-	-	-	222	322	439	-	-	-	49.3	57.0	78.4
				0	4	3					100.0	100.0
Total	-	-	-	223	346	465	-	-	-	47.6	56.4	75.7
Gas												
Alinta Energy	-	-	-	96	83	111	-	-	-	72.7	58.9	72.1
Kleenheat	-	-	-	0	1	3	-	-	-	-	100.0	33.3
Total	-	-	-	96	84	114	-	-	-	72.7	59.2	69.9

Table 25 and Table 52 show that almost 70% of the non-residential customer disconnections performed by Horizon Power, and approximately 20% of the disconnections performed by Synergy did not result in a reconnection at all. As is the case for residential reconnections, it is important to note that not reconnecting a supply address does not mean that supply remains disconnected from the premises.

Looking at gas reconnections, just over half of Alinta Energy's, and one third (based on a total of nine disconnections) of Kleenheat's, non-residential disconnections were reconnected within seven days of disconnection. Comparing Table 25 with Table 52 shows that just under three in every ten of Alinta Energy's, and two in every three of Kleenheat's, non-residential disconnections did not result in a reconnection.

Complaints

Both the Electricity Customer Code and the Gas Compendium require retailers to develop, maintain and implement an internal process for handling complaints and resolving disputes that complies with AS ISO 10002 – 2006.⁵⁰

AS ISO 10002 – 2006 defines a complaint as:

An expression of dissatisfaction made to an organisation, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.⁵¹

The Electricity Customer Code and the Gas Compendium also require retailers to comply with any guideline developed by the ERA that distinguishes customer queries from customer complaints. The ERA published the [Customer Complaints Guidelines](#) in 2008 to further clarify the distinctions between queries, complaints and other customer communications.

Complaints are further separated into four categories to provide further information about the underlying cause(s) of each complaint:

- **Billing complaints** - includes billing errors, incorrect billing of fees and charges, failure to receive relevant Government rebates, high billing, credit collection, disconnection and reconnection, and restriction due to billing discrepancy.
- **Marketing complaints** - includes advertising campaigns, contract terms, sales techniques and misleading conduct.
- **Transfer complaints** - includes failure to transfer a customer within a certain time period, disruption of supply due to transfer and billing problems directly associated with the transfer (e.g., delay in billing, double billing).
- **Other complaints** - includes poor service, privacy considerations, failure to respond to complaints in a timely manner, health and safety issues, and any other matter not falling into the billing, marketing and transfer categories.

The retailers who supply pre-payment meter customers are required to separately record complaints from customers that relate to pre-payment meter services.

A key measure of the effectiveness of the complaints handling process implemented by a retailer is how quickly a complaint is concluded. A complaint is concluded when all of the relevant parts of the retailer's complaints handling process have been exercised in an attempt to resolve the complaint. Energy retailers are required to report on the percentage of complaints from residential and non-residential customers that are concluded within both 15 business days and 20 business days. For the purposes of complaint handling performance analysis, the ERA measures the proportion of complaints concluded within 15 days.

Residential Complaints

Figure 14 shows the total complaints made to electricity and gas retailers by residential customers. Residential complaints (per 100 customers) received by electricity retailers

⁵⁰ Standard AS ISO 10002-2006, Customer satisfaction – Guidelines for complaints handling in organisations.

⁵¹ The Codes have slightly modified this definition by adding the words “or services” immediately after “products” because energy retailers provide a service rather than a product to their customers.

were down in 2015, for the fourth consecutive year, while complaints received by gas retailers were relatively unchanged.

Figure 14: Total residential energy complaints (per 100 customers)

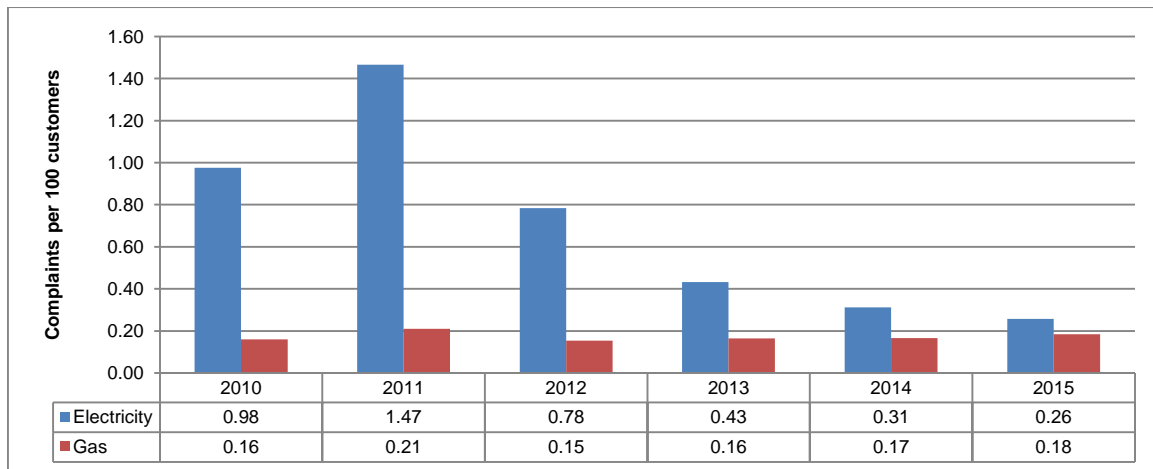


Table 26 details the number of residential customer complaints (per 100 customers) received by each retailer over the past six years. As expected, given their large customer bases, Synergy received the majority of the residential electricity complaints, and Alinta Energy received the majority of the residential gas complaints.

Table 26: Residential energy complaints by retailer (per 100 customers)

Retailer	2010	2011	2012	2013	2014	2015
Electricity						
Horizon Power	0.57	0.33	0.39	1.06	0.72	0.57
Synergy	0.99	1.50	0.80	0.41	0.30	0.24
Total	0.98	1.47	0.78	0.43	0.31	0.26
Gas						
Alinta Energy	0.16	0.21	0.15	0.16	0.14	0.16
Kleenheat	0.00	0.00	0.37	0.54	0.91	0.51
EGDC	0.43	0.00	0.00	0.00	0.00	0.00
Total	0.16	0.21	0.15	0.16	0.17	0.18

Both Horizon Power and Synergy received fewer complaints from residential customers in 2015; Synergy's residential complaints (0.24 per 100 customers) fell to a six year low.

Synergy's residential customer complaints peaked in 2011, caused by a combination of rapidly increasing residential electricity tariffs and problems with their change of billing system implemented in late 2009. Over the past four years, complaints received by Synergy have fallen by 83%; the reasons for the reduction in complaints include:

- system and process changes to reduce late bills;
- proactive management of customers in debt;
- improved website and online requests;
- improved service levels by Western Power {in relation to meter reads};
- improved training for customer service staff regarding compliance with internal processes; and
- focus on resolving customer enquiries at the first point of contact.

Compared to last year, Kleenheat's residential customer complaints fell by almost 50% in 2015, due to:

- significant reductions in complaints about product understanding and the calculation of instalment payments because of improvements made to the way Kleenheat communicates and explain its product to customers; and
- a significant reduction in the number of marketing complaints [see Table 26].

Table 27 compares the residential complaints received by each retailer in 2014 and 2015, broken down into the four complaint categories. Consistent with previous years, the majority of complaints made to electricity retailers still relate to billing matters. However, Horizon Power's billing complaints as a percentage of the total was significantly lower in 2015.

The percentage of Kleenheat's complaints that relate to billing was much higher in 2015, offset by a substantial reduction in the percentage of complaints related to marketing. Kleenheat commented:

the largest trend in billing complaints was from customers that had been disconnected (following correct procedures); however the customers had expressed that they were not happy with being disconnected and complained about their bills.

Table 27: Residential energy complaints by complaint category

Retailer	Percentage of complaints in each category							
	Billing complaints		Marketing complaints		Transfer complaints		Other complaints	
	2014	2015	2014	2015	2014	2015	2014	2015
Electricity								
Horizon Power	83.6	68.5	0.4	0.0	1.1	0.0	14.9	31.5
Synergy	88.8	87.4	8.4	8.9	0.9	1.0	1.9	2.8
Gas								
Alinta Energy	66.4	66.4	4.7	6.8	0.0	1.1	28.9	25.7
Kleenheat	35.5	71.2	54.4	7.4	6.6	4.5	33.5	16.9

Residential customer complaint resolution

Table 28 compares the percentage of residential complaints resolved by each retailer within 15 business days in 2014 and 2015. As discussed earlier in this report, this is an important measure of the effectiveness of the retailer's complaint resolution processes.

Table 28: Residential energy complaints resolved within 15 business days

Retailer	Complaints resolved within 15 days		% of complaints received	
	2014	2015	2014	2015
Electricity				
Horizon Power	165	162	61.6	74.0
Synergy	2,539	2,186	94.2	95.5
Gas				
Alinta Energy	805	960	90.2	96.3
Kleenheat	194	235	98.5	96.7

Horizon Power's complaint resolution performance improved in 2015; 73.97% of complaints were resolved within business 15 days. Although an improvement on 2014, this is still

significantly lower than the 100% achieved between 2010 and 2012 (see Table 65).⁵² The increase in complaint resolution performance in 2015 corresponds with a drop in the number of electricity complaints received (see Table 26).

Alinta Energy's residential complaint resolution performance also improved in 2015; 96.3% of complaints were resolved within 15 days in 2015. Alinta Energy attributed the improved complaint resolution performance to:

[...] the following activities and actions undertaken as part of Alinta Energy's customer service standards:

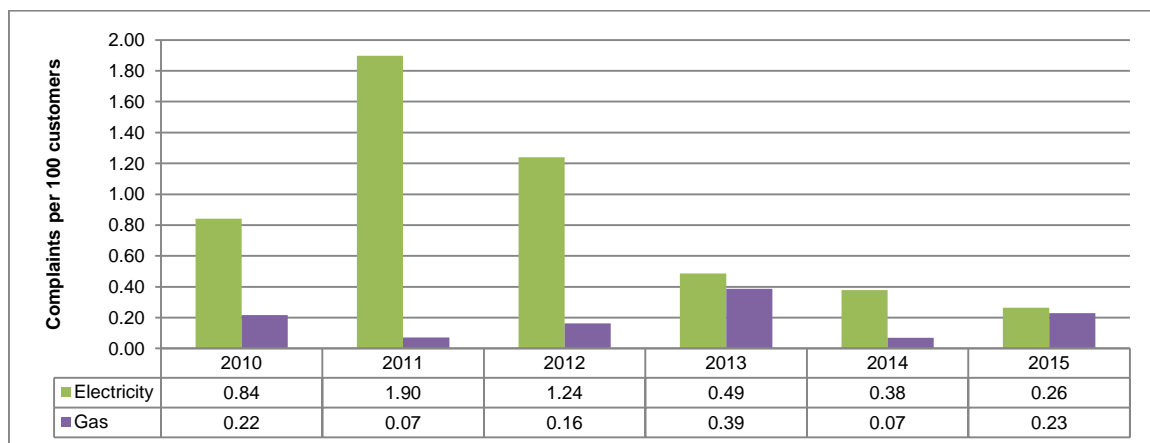
- Training and development of staff;
- Continued focus on managing customer complaints; and
- Enhanced system and reporting functionality.

The complaint resolution performance of Synergy and Kleenheat was relatively unchanged.

Non-residential Complaints

Figure 15 shows the total complaints received by electricity and gas retailers from non-residential customers.

Figure 15: Total non-residential energy complaints (per 100 customers)



In 2015, non-residential complaints received by electricity retailers fell for the second consecutive year, mirroring the trend in residential complaints (Figure 14). Conversely, complaints received by gas retailers rose sharply in 2015, recording an almost fourfold rise compared to last year.

Table 29 details the number of non-residential customer complaints received by each retailer over the past six years. For four of the past six years, Alinta Energy received all of the non-residential gas complaints, while, as expected with its large customer base, Synergy received the majority of the non-residential electricity complaints.

⁵² Horizon Power commented that, from 2014, their standard business process for complaints determines that complaints are not closed until customer satisfaction is reached and appropriate actions have been completed. All customer complaints received appropriate responses within 15 business days.

Compared to last year, the number of non-residential complaints received by Horizon Power nearly halved in 2015, which they attribute to improvements in on-time billing and customer management. Non-residential electricity complaints received by Synergy continued the downward trend that started in 2011; complaints in 2015 reached a six year low. The reasons for the reduction in the number of non-residential complaints are the same as those that apply to residential complaints.

The non-residential gas customer complaints received by Alinta Energy have been highly variable over the past six years; in 2015, they received 0.98 complaints per 100 customers.

Table 29: Non-residential energy complaints by retailer (per 100 customers)

Retailer	2010	2011	2012	2013	2014	2015
Electricity						
Alinta Energy	0.66	0.41	0.11	0.96	0.51	0.98
A-Star	-	-	-	-	-	0.00
Horizon Power	0.06	0.41	0.05	1.08	0.58	0.30
Perth Energy	0.18	0.00	0.14	0.58	0.00	0.27
Rottnest Island Authority	0.00	0.00	0.40	0.00	23.08	3.85
Synergy	0.91	2.03	1.35	0.43	0.35	0.24
Total	0.84	1.90	1.24	0.49	0.38	0.26
Gas						
Alinta Energy	0.05	0.06	0.17	0.39	0.07	0.26
Kleenheat						0.00
Synergy	12.50	0.84	0.00	0.00	0.00	0.00
Total	0.22	0.07	0.16	0.39	0.07	0.23

Table 30 compares the non-residential complaints received by each retailer in 2015 with last year, broken down into the four complaint categories described at the beginning of this section.

The majority of complaints from non-residential customers relate to billing matters. With the exception of Synergy, the second highest category of complaints was 'Other', which includes administrative processes, privacy issues and responsiveness to complaints.

Table 30: Non-residential energy complaints by complaint category

Retailer	Percentage of complaints in each category							
	Billing complaints		Marketing complaints		Transfer complaints		Other complaints	
	2014	2015	2014	2015	2014	2015	2014	2015
Electricity								
Alinta Energy	70.0	68.0	30.0	0.0	0.0	4.0	0.0	28.0
Horizon Power	92.6	72.0	0.0	0.0	0.0	0.0	7.4	28.0
Perth Energy	-	100.0	-	0.0	-	0.0	-	0.0
Rottnest Island Authority	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Synergy	86.2	84.6	9.8	9.2	2.0	2.5	2.0	3.8
Gas								
Alinta Energy	83.3	60.0	16.7	5.0	0.0	0.0	0.0	35.0

Non-residential customer complaint resolution

Table 31 compares the percentage of non-residential complaints resolved by each retailer within 15 business days in 2014 and 2015.

In 2015, three of the five electricity retailers resolved all of the complaints from non-residential customers within 15 business days: Alinta Energy, Perth Energy and Rottnest Island Authority. Horizon Power's non-residential complaint resolution performance was almost unchanged, and Synergy improved its complaint resolution performance, resolving just under 96% of non-residential complaints within 15 business days in 2015.

Alinta Energy reported a rise in complaint resolution performance for its non-residential gas business. Alinta Energy commented that the improved performance was consistent with their ongoing focus on complaint management; enhanced system and reporting functionality ensured [there was] better monitoring and timely management of complaints.

Table 31: Non-residential energy complaints resolved within 15 business days

Retailer	Complaints resolved within 15 days		Percentage of complaints received	
	2014	2015	2014	2015
Electricity				
Alinta Energy	10	25	90.0	100.0
Horizon Power	34	15	63.0	60.0
Perth Energy	-	1	-	100.0
Rottnest Island Authority	4	1	66.7	100.0
Synergy	313	230	89.7	95.8
Gas				
Alinta Energy	5	20	83.3	95.2

Inter-jurisdictional comparison of complaints

The ERA has previously benchmarked total electricity and gas complaints against New South Wales, South Australia and Victoria. However, after the Australian Energy Regulator (AER) took over the role of retailer performance reporting for New South Wales and South Australia in 2014 it was no longer possible to benchmark electricity and gas complaints for these states.⁵³ Given the limited utility of benchmarking against the single remaining state, Victoria, the ERA has decided to discontinue this data series. The historical data for the five years to 2013 has been retained in Appendix 3 (Table 67).

⁵³ The AER does not publish separate data for electricity and gas complaints.

Call Centre Performance

The majority of a customer's interaction with their retailer is by telephone. Accordingly, it is important that retailers are able to provide ready telephone access for customers to contact them about service related issues during business hours. The larger retailers operate call centres which employ multiple customer service agents to handle customer enquiries and complaints.

Smaller retailers offer a simpler telephone service, which is often based on the customer calling their switchboard, which then connects them to the appropriate contact person.

The retailers that have a call centre to handle customer calls are able to record a range of information about the incoming calls, including performance statistics. Some of the call centres operated by retailers handle other calls in addition to calls about the electricity or gas retail service. Unless the retailer can separately record the statistics for the retail calls from all other calls, the call centre performance reported for retail customers is based on the overall performance of the call centre.

Measuring the telephone service provided by the retailer helps to assess the customer experience when they contact their retailer. There are three key responsiveness measures that are uniformly measured across service industries:

- percentage of calls answered within 30 seconds;
- average duration before a call is answered, measured in seconds; and
- percentage of unanswered calls.

The remainder of this section presents electricity and gas retailer call centre performance in relation to these responsiveness measures. If the retailer call centre uses Interactive Voice Response equipment⁵⁴ to handle calls then the responsiveness measures only apply to those calls where the customer has indicated that they wish to speak to an operator.

Electricity Retailer Call Centres

Of the six active electricity retailers covered by this report,⁵⁵ only Perth Energy and A-Star do not operate call centres. Perth Energy and A-Star provide telephone support to their customers using simpler telephone systems that do not record performance statistics.

The Rottnest Island Authority call centre handles calls for both retail and distribution customers, and also handles calls related to other areas of their business.

Horizon Power's call centre handles calls for both their retail and distribution businesses. This is the second year that Horizon Power has been able to separately report performance for their retail calls.

Table 32 shows that the total volume of calls to electricity retailer call centres fell by 5.1% in 2015, the fourth consecutive year of decline. The decline in total call volume is the result of a 5.3% reduction in the volume of calls to Synergy's call centre and a 4.2% reduction in calls to Horizon Power's call centre.

⁵⁴ Interactive Voice Response equipment allows a call centre telephone system to detect voice and keypad tone signals and then respond with pre-recorded or dynamically generated audio to further direct callers to the service they require.

⁵⁵ The seventh electricity retailer, Clear Energy, has not supplied any small use customers since they were first granted a retail license.

Alinta Energy and Rottnest Island Authority both reported an increased volume of calls to their call centres during 2015, up by 18.2% and 8.2%, respectively.

Table 32: Volume of calls to electricity retailer call centres

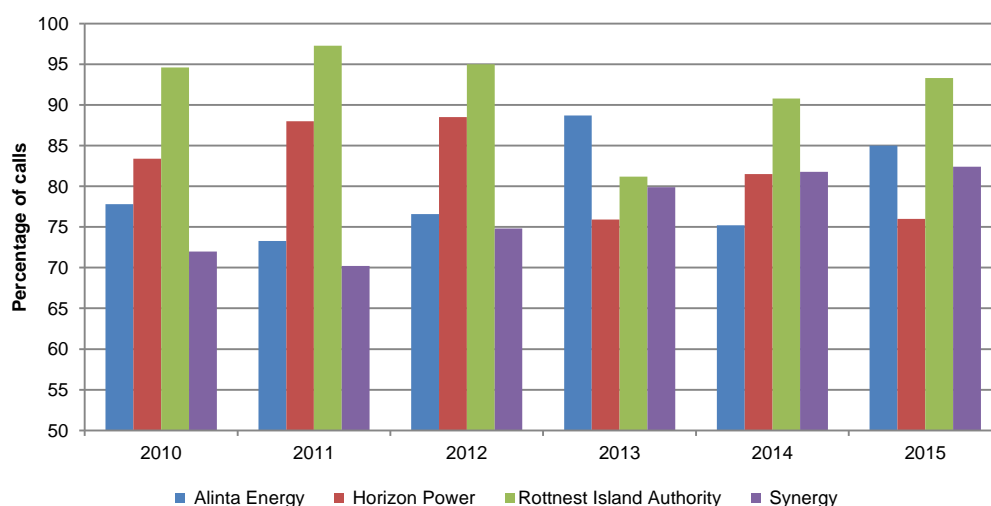
Retailer	2010	2011	2012	2013	2014	2015
Alinta Energy	2,173	2,452	2,426	2,728	2,828	3,342
Horizon Power	89,200	71,215	82,587	103,301	99,347	95,203
Rottnest Island Authority	1,027	5,272	5,840	6,173	4,850	5,250
Synergy	1,257,153	1,439,432	1,315,881	1,223,000	1,132,395	1,072,272
Total	1,349,553	1,518,371	1,406,734	1,335,202	1,239,420	1,176,067

In order to assess the overall performance of retailer call centres it is prudent to examine all three responsiveness measures together. Figures 16, 17, and 18 show each retailer's performance against the three measures over the six years to 2015.

The notable changes in electricity retailer call centre performance between 2014 and 2015 are:

- **Alinta Energy** – 85% of calls were answered within 30 seconds (up from 75.2%), while the average wait for a call to be answered decreased from 22 seconds to 14 seconds, and the percentage of unanswered calls fell from 2.3% to 0.4%.
- **Horizon Power** - 76% of calls were answered within 30 seconds (down from 81.5%),⁵⁶ while the average wait for a call to be answered rose from 25.7 seconds to 36 seconds.
- **Rottnest Island Authority** - 93.3% of calls were answered within 30 seconds (up from 90.8%).
- **Synergy** – the average wait for a call to be answered increased from 17.8 seconds to 22.7 seconds, and the percentage of unanswered calls increased from 1.1% to 1.5%.

Figure 16: Percentage of electricity retail calls answered within 30 seconds



⁵⁶Horizon Power informed the Authority that it has reduced the internal SLA (service level agreement) for calls answered within 30 sec to 70%. The intention is to reduce the contact centre staffing/ costs and therefore contribute to the corporate objective of reducing the government subsidy.

Figure 17: Average duration before a call is answered by electricity retail call centres

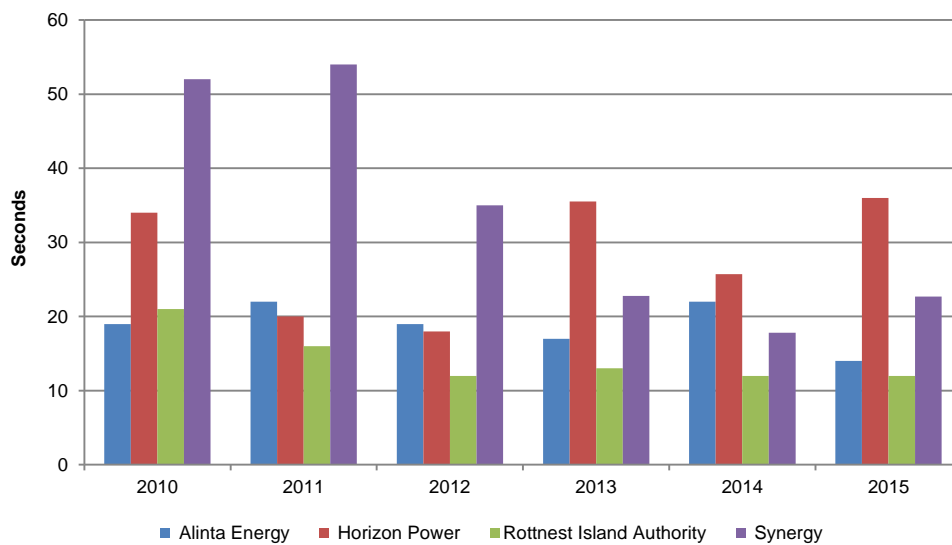
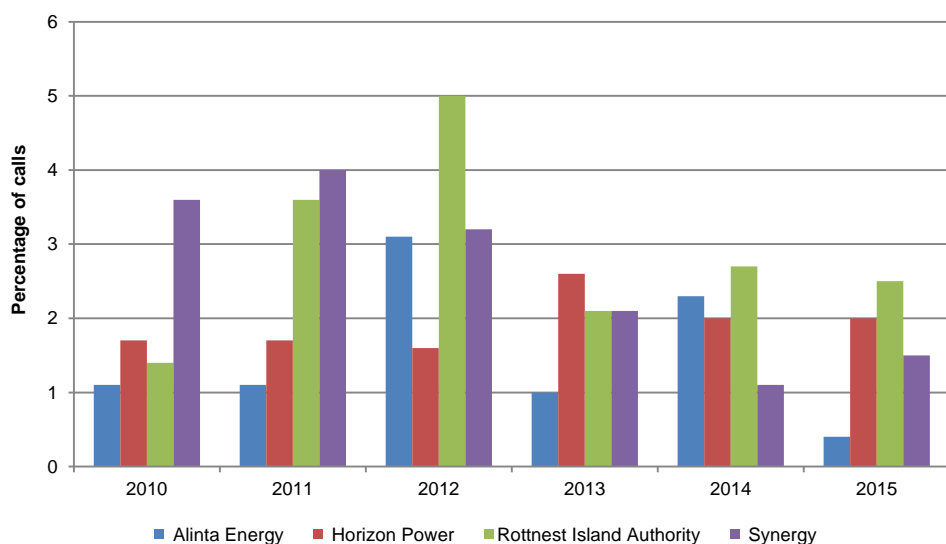


Figure 18: Percentage of calls that are unanswered by electricity retailers



Gas Retailer Call Centres

Only two of the four active gas retailers, Alinta Energy and Kleenheat,⁵⁷ operate call centres.⁵⁸ Synergy and EGDC provide telephone support to their customers using simpler telephone systems that do not record performance statistics.

Table 33 shows that the total volume of calls to gas retailer call centres increased by 4.1% in 2015: Alinta Energy reported a 5.8% increase in call volume; and Kleenheat reported a 1% fall in call volume.

⁵⁷ The calls to the Kleenheat call centre include calls related to gas retailing, gas distribution and all other Kleenheat services, which needs to be considered when interpreting the data provided.

⁵⁸ Perth Energy has not supplied any customers since the licence was granted.

Table 33: Volume of calls to gas retailer call centres

Retailer	2010	2011	2012	2013	2014	2015
Alinta Energy	727,524	720,439	686,935	696,694	735,884	778,427
Kleenheat	172,080	190,764	214,280	220,710	235,698	233,363
Total	899,604	911,203	901,215	917,404	971,582	1,011,790

Figures 19, 20 and 21 show the retailer's performance against the three responsiveness measures for the six years to 2015.

The notable changes in gas retailer call centre performance between 2014 and 2015 are:

- **Alinta Energy** – 81.6% of calls were answered within 30 seconds (up from 79.7%), and the percentage of unanswered calls fell from 3.0% to 2.3%.
- **Kleenheat** – 76.6% of calls were answered within 30 seconds (down from 77.8%), while the percentage of unanswered calls increased from 2.2% to 2.9%.

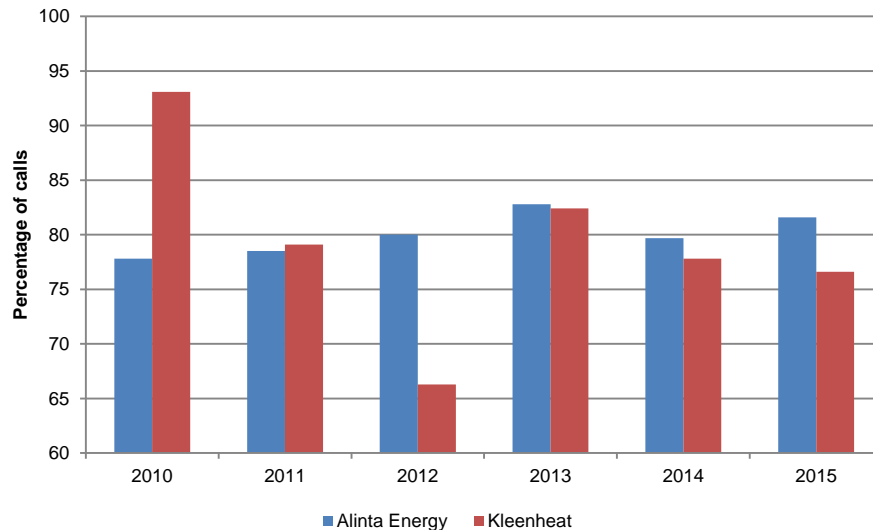
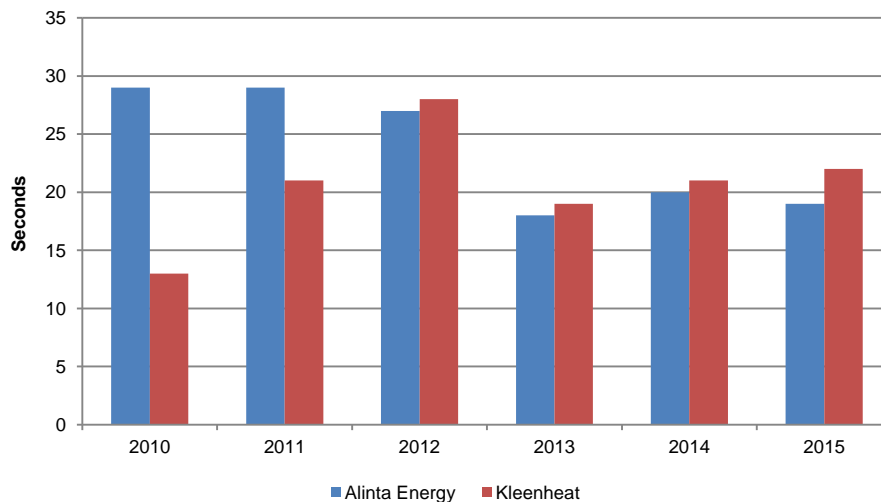
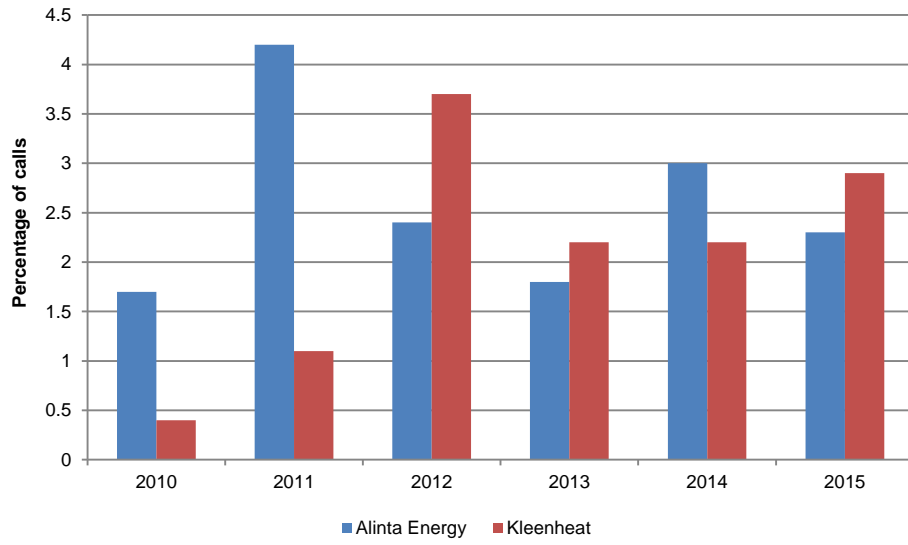
Figure 19: Percentage of gas retail calls answered within 30 seconds**Figure 20: Average duration before a call is answered by gas retailers**

Figure 21: Percentage of calls that are unanswered by gas retailers



Service Standard Payments by Electricity Retailers

Under the Electricity Customer Code, service standard payments are available for:

- requesting a customer reconnection (following disconnection for non-payment of a bill) after the prescribed timeframe, at a rate of \$60 per day up to a maximum of \$300 total (clause 14.1);⁵⁹
- wrongful disconnection, at a rate of \$100 per day (clause 14.2); and
- failure to acknowledge or respond to a customer query or complaint within the prescribed timeframes at a rate of \$20 for each written query or complaint (clause 14.3).

Horizon Power and Synergy are the only electricity retailers that have made service standard payments over the past six years. Table 34 details the number of service standard payments made by these retailers.

Comparing 2014 with 2015:

- Horizon Power has reported an increase in total number of service standard payments: payments for late reconnection were down 16.7% while wrongful disconnection payments were up 45.5%. Horizon Power has commented that wrongful disconnections were due to either the wrong supply address being provided, or they related to non-application disconnections⁶⁰ not being cancelled [i.e. the customer has established an account with them prior to disconnection].
- Synergy reported a fall in the number of service standard payments in all three categories, with payments for wrongful disconnections falling 39.2%, and payments for late reconnections falling 58.3%. Synergy attributes the reductions in payments to improved reconnection processes, staff training and improved communications with Western Power, which have led to increases in the number of customers being reconnected within regulatory timeframes. Synergy also made changes to its disconnection process to reduce the risk of wrongful disconnection.

Table 34: Number of service standard payments made by electricity retailers

	Horizon Power			Synergy		
	Late reconnection	Wrongful disconnection	Timely response to customer complaints	Late reconnection	Wrongful disconnection	Timely response to customer complaints
2010	0	1	0	0	0	0
2011	6	3	0	44	4	24
2012	6	2	0	13	14	1
2013	5	4	0	16	40	0
2014	12	11	0	12	51	4
2015	10	16	0	5	31	1

⁵⁹ The Electricity Customer Code requires a retailer to forward a reconnection request to the relevant distributor within a prescribed timeframe, depending on when the customer meeting specified conditions. The customer is eligible for a service standard payment if the retailer fails to forward the reconnection request on time.

⁶⁰ A non-application disconnection is where a person consumes electricity at a premises without establishing an account with the relevant retailer.

Appendix 1: Background information about energy retail

Definition of a customer

Throughout this report, unless otherwise stated, the following definitions of a customer are used:

- Customer - means a customer account that:
 - consumes less than 1TJ of gas per annum,⁶¹ or
 - consumes less than 160MWh of electricity per annum.⁶²
- Contestable customer - means a customer who is able to choose their retailer. This applies even if there is only a single retailer supplying energy within the supply area:
 - Gas: full retail contestability exists, allowing all customers to choose their retailer. However, in the areas supplied by Alinta Energy, the Gas Market Moratorium⁶³ prevents Synergy from supplying customers who consume less than 0.18TJ (or approximately \$6,200) of gas per annum.
 - Electricity: full retail contestability exists outside the area supplied through the South West Interconnected System (**SWIS**).⁶⁴ Within the SWIS, customers who consume less than 50MWh (or approximately \$14,200) of electricity per annum are non-contestable. These customers can only be supplied by Synergy.

Retail Licence Performance Reporting Obligations

All energy retail licences include obligations for the licensee to provide information to the ERA in respect of the activities covered by the licence.

Electricity Licences

Electricity retail licences include a condition that the licensee must provide to the ERA any information that the ERA may require to fulfil its functions under the Electricity Act. The Electricity Compliance Reporting Manual (**Electricity Manual**) published by the ERA requires the electricity retail licensees who supply small use customers to provide non-financial performance information to the ERA each year.⁶⁵ The Electricity Manual

⁶¹ 1TJ of gas costs between \$28,500 and \$43,000, depending on where the customer resides. Refer to the ERA's Switched On Energy Consumer Guide available at: <https://www.erawa.com.au/electricity/switched-on-energy-consumers-guide>.

⁶² 160MWh of electricity costs approximately \$58,000, although there may be tariffs available from some retailers that reduce this amount, see the ERA's Switched On Energy Consumer Guide.

⁶³ See the discussion on the operation of the Gas Market Moratorium in Appendix 2.

⁶⁴ South West Interconnected System, which includes the coastal area from Kalbarri to Bremer Bay and the Goldfields.

⁶⁵ The most recent version of the Electricity Manual was published in June 2013.

incorporates the record keeping requirements of the Electricity Customer Code, which in turn references the 2007 SCONRRR Framework.⁶⁶

Gas Licences

Gas trading licences include a condition that the licensee must provide to the ERA any information that the ERA may require to fulfil its functions under the Gas Act. The Gas Compliance Reporting Manual (**Gas Manual**) published by the ERA requires gas trading licensees to provide non-financial performance information to the ERA each year.⁶⁷ The Gas Manual incorporates the record keeping requirements in Gas Compendium, which in turn references the 2007 SCONRRR Framework.

Standard Form Contracts

Electricity Retailers

Retailers who supply electricity to small use customers are required to have a standard form contract approved by the ERA. The *Electricity Industry (Customer Contracts) Regulations 2005* prescribes the format and content of the standard form contract, including the requirement that the standard form contract include pricing information. Section 54A of the Electricity Act mandates that Horizon Power and Synergy must offer a standard form contract to supply small use customers who request supply, subject to the limitations specified in those regulations.

The Energy Operators (Powers) Act 1979 includes powers for the Governor to approve By-Laws to regulate the retail tariffs, fees and charges that Horizon Power and Synergy can charge customers. Small use customers, who request supply from Synergy and Horizon Power, must be offered a standard form contract which includes the regulated tariffs. Small use customers supplied by Horizon Power and Synergy have the option to contract at regulated tariffs under a standard form contract, or may seek to negotiate a separate non-standard supply contract.

The other six electricity retailers (Alinta Energy, A-Star, Clear Energy, Kleenheat, Perth Energy and Rottnest Island Authority) who supply small use customers are not obliged to offer to supply, nor to offer regulated tariffs.⁶⁸ However, under the *Electricity Industry (Customer Contracts) Regulations 2005* these retailers are required to make pricing information available to customers in their standard form contract.

Gas Retailers

Retailers who supply gas to small use customers are required to develop a standard form contract. The standard form contract must be approved by the ERA. The ERA will only approve a standard form contract if it considers that the contract meets all relevant legal and regulatory requirements.

A retailer and customer may also negotiate terms and conditions different from the retailer's standard form contract. This is referred to as a non-standard contract. Although a non-

⁶⁶ National Energy Retail Performance Indicators, Utility Regulators Forum Steering Committee on National Regulatory Reporting Requirements – Retail Working Group, May 2007.

⁶⁷ The most recent version of the Gas Manual was published in March 2013.

⁶⁸ Kleenheat only began retailing to small use electricity customers from 1 July 2015.

standard contract does not require ERA's approval, it must still comply with the relevant legislation.

The Energy Coordination (Gas Tariffs) Regulations 2000 require retailers who wish to supply customers in the areas supplied by the ATCO Gas Australia distribution networks (that cover over 99% of gas customers in the State) to have at least one capped tariff for the supply area. The regulations also require retailers to offer to supply a new customer under a standard form contract at a capped tariff.

Supplier of Last Resort

Under section 68(1) of the Electricity Act, the ERA can designate supply areas for which there is to be an electricity supplier of last resort (**SoLR**) plan. In the event that a licensed electricity retailer exits the market and is unable to supply existing customers, the nominated SoLR is required to supply electricity to affected customers. The SWIS has been designated a SoLR area, with Synergy nominated as the SoLR.

Under Part 2A, Division 6A of the Gas Act, the ERA must ensure that for each gas supply area in which there is small use customers, there is at all times a last resort supply plan that has been approved or determined by the ERA. The ERA may designate any holder of a gas trading licence in the supply area as a SoLR. At present, no retailer has been nominated by the ERA as a SoLR. The nomination of a SoLR in the areas supplied through the ATCO Gas Australia distribution network is under review following the entry of Kleenheat into these markets.

Review of the Electricity Customer Code

Under section 88 of the Electricity Act, the Electricity Code Consultative Committee (**ECCC**) must carry out a review of the Electricity Customer Code as soon as practicable after the first anniversary of its commencement and then every two years. The ECCC has completed reviews of the Electricity Customer Code in 2007, 2009, 2011 and 2013. The 2013 review concluded on 4 June 2014, and the new Code came into effect from 1 July 2014.

The 2015 review of the Code is currently underway at the time of writing.

Review of the Gas Compendium and the Gas Marketing Code of Conduct

Gas Marketing Code of Conduct

Under section 11ZPM of the Gas Act, the ERA may, in consultation with the Gas Marketing Code of Conduct Committee (**GMCCC**), approve a code of conduct to regulate and control the conduct of the holders of trading licences and gas marketing agents, with the object of protecting customers from undesirable marketing conduct and defining standards of conduct in the marketing of gas to customers. The code of conduct is called the Gas Marketing Code of Conduct (**Marketing Code**).

Under section 11ZPV of the Gas Act, the GMCCC must carry out a review of the Marketing Code as soon as practicable after the first anniversary of its commencement and then every two years. The GMCCC has previously carried out reviews of the Marketing Code in 2008 and 2011.

The most recent review of the Marketing Code was undertaken by the GMCCC between December 2014 and May 2015. The ERA approved the new Marketing Code on 19 May 2015, which commenced on 1 July 2015.

Gas Compendium

The Gas Compendium contains licence conditions made by the ERA under section 11(M)(1) of the Gas Act. The Gas Compendium forms Schedule 2 of gas trading licences.

In 2009, the ERA introduced the Gas Compendium into the licences of retailers who supply small use customers to ensure these customers received, where possible, protection equal to that provided for electricity customers under the Electricity Customer Code. This objective is realised by the combination of the Gas Compendium and the Marketing Code, with the latter being inserted into Part 2 of the Gas Compendium.

On 7 November 2014, the ERA approved a new version of the Gas Compendium, which commenced on 1 January 2015. The next review of the Gas Compendium is due to begin in 2016.

Appendix 2: The development of the Western Australian energy market

Historically, the Western Australian energy sector for small use customers has been dominated by government owned monopoly utilities. The State Energy Commission of Western Australia (**SECWA**) was established on 1 January 1975 as an amalgamation of the State Electricity Commission of Western Australia (established in 1945) plus the Fuel and Power Commission.

On 1 January 1995 SECWA was split into separate gas and electricity utilities: AlintaGas and Western Power Corporation. Both of these entities have subsequently been disaggregated further into businesses that focus on particular segments of the market. The following sections provide further details of the disaggregation in the electricity and gas markets.

Electricity market development

In 2006, the Government restructured Western Power Corporation into four new statutory Corporations:

- Electricity Networks Corporation (t/a Western Power): operates the transmission and distribution network in the South West Interconnected System;
- Electricity Retail Corporation (t/a Synergy): retails electricity within the SWIS;
- Regional Power Corporation (t/a Horizon Power): vertically integrated electricity business that operates in areas of the State outside the SWIS; and
- Electricity Generation Corporation (t/a Verve Energy): operates the former Western Power generation facilities.

The restructuring of the former Western Power Corporation followed the deregulation of electricity supply in the State, with the passing into law of the Electricity Act.

On 1 January 2014, the state government merged the Electricity Retail Corporation with the Electricity Generation Corporation to create the Electricity Generation and Retail Corporation (t/a Synergy).

The Electricity Act includes provisions for the licensing of electricity supply and in particular, Part 2 of the Electricity Act sets out the provisions pertaining to the licensing scheme for electricity service providers. The Electricity Act prescribes five classes of electricity licence:

- Distribution – construct and operate electricity distribution networks.
- Generation – construct and operate electricity generation plant.
- Retail – sell electricity to customers.
- Transmission – construct and operate electricity transmission networks.
- Integrated Regional – undertake one or more of the activities listed above.

Details of electricity licences can be found on the ERA's website (www.erawa.com.au).

From 1 January 2005, the Government introduced measures to make all electricity customers within the SWIS who consume 50MWh or more of electricity per annum at a

network exit point eligible to choose their electricity retailer. This created two classes of small use customer in the SWIS:

- Contestable customers: consume 50-160MWh of electricity per annum.
- Non-contestable customers: consume <50MWh of electricity per annum.

Non-contestable customers in the SWIS are currently only supplied by the government owned electricity retailer, Synergy.⁶⁹

Across the State, customers who consume more than 160MWh of electricity per annum are also contestable customers, but these customers are not covered by the Electricity Customer Code. Please also refer to the comments below regarding the Electricity Market Review.

Electricity Retail Contestability

Section 55 of the *Electricity Corporations Act 2005* requires that the Government review the introduction of full retail contestability (**FRC**) by April 2009. The WA Office of Energy⁷⁰ undertook a review to assess:

- electricity tariff arrangements to make tariffs more cost reflective, promote competition and to examine the merits of time of use tariffs and critical peak pricing;
- the costs and benefits associated with the implementation of FRC in Western Australia; and
- the costs and benefits associated with the rollout of smart meters.

The Office of Energy stated that the rollout of smart meters and the introduction of FRC will be the subject of a separate consultation process to that used to assess electricity tariff arrangements.

In January 2009, the Office of Energy released its Final Recommendation Report on electricity tariffs.⁷¹ The report recommended a move towards cost reflective electricity tariffs, commencing in 2009. Since the report was published, and up until 30 June 2015, regulated residential electricity tariffs have been increased by a total of 76.7% and small business tariffs have increased by 61.3%.⁷² However, despite these increases in tariffs, most regulated electricity tariffs will remain below the cost of supply and will continue to be subsidised by Government. In the year ending 30 June 2013 the subsidy amounted to \$371 million.⁷³

Electricity Market Review

On 6 March 2014, the Minister for Energy launched the Electricity Market Review (**EMR**). The EMR examines the structures of the electricity generation, wholesale and retail sectors

⁶⁹ In May 2010, Clear Energy was granted a licence to retail electricity to customers, including customers consuming less than 50MWh per annum, within the SWIS area. However, they have not supplied electricity to customers since the licence was granted.

⁷⁰ Now the Public Utilities Office.

⁷¹ Office of Energy, Final Recommendations Report – Review of Electricity Tariff Arrangements, which is available on the Public Utilities Office website: www.finance.wa.gov.au.

⁷² Source: Public Utilities Office website: <http://www.finance.wa.gov.au/cms/content.aspx?id=15096>

⁷³ Ibid.

within the SWIS and the incentives for industry participants to make efficient investments and minimise costs.

Currently, there are three projects underway pertaining to the Market Competition workstream – Full Retail Contestability; Removing Barriers to Entry; and Advanced Metering and Competition in Metering Services.

The Full Retail Contestability project (**FRCP**) involves designing the systems and structures to allow electricity retailers to compete to supply all electricity customers in the SWIS by mid-2018.

The FRCP will deliver legislation and regulations to:

- remove, at an appropriate time, the current statutory prohibition of the supply of electricity to customers below 50 MWh per annum;
- amend the customer protection framework to ensure that it provides adequate coverage, efficient processes and is compatible with new regulatory arrangements for networks;
- codify retail price setting processes to provide an effective safety net for consumers, whilst supporting retail competition; and
- support the Australian Energy Market Operator's implementation of new retail market operation arrangements.

The Removing Barriers to Entry project will encourage effective retail competition by identifying material barriers to entry for generation and retail businesses and making recommendations in relation to market structure, government policy and regulations so that such barriers can be minimised or removed and attract greater private sector investment.

The Advanced Metering and Competition in Metering Services project is considering the best way to transition the metering framework in the SWIS to the new national metering framework that is expected to apply under the National Electricity Rules. The national metering framework is currently being reviewed by the Australian Energy Market Commission to facilitate a market-led approach to the deployment of advanced meters, including promoting private sector investment in metering assets and consumer choice of metering products and services.

For further information please refer to the Public Utilities Office website.⁷⁴

Gas Retail Contestability

The Western Australian government introduced full retail contestability to the gas retail market on 31 May 2004. Unlike in electricity, all gas network infrastructure and gas retailing in Western Australia is being undertaken by privately owned businesses, with the exception of Synergy, which is government owned.

Gas licensing is regulated by the Gas Act. Part 2A of the Gas Act deals with the licensing of gas supply. The functions of the ERA⁷⁵ in respect of licensing are to:

⁷⁴ http://www.finance.wa.gov.au/cms/Public_Utility_Office/Electricity_Market_Review/Electricity_Market_Review.aspx

⁷⁵ Section 11AA of the Gas Act.

- administer the licensing scheme;
- monitor and report to the Minister for Energy on the operation of the licensing scheme and the compliance of licensees with their licences; and
- inform the Minister of any failure by a licensee to meet the requirements of its licence.

The Gas Act prescribes two classes of gas supply licence:

- Distribution - which authorises the licensee to construct a distribution system and transport gas through it, or to transport gas through an existing distribution system.
- Trading - which authorises the licensee to sell gas to small use customers that is transported through a distribution system.

Gas trading licences permit the retailer⁷⁶ to supply gas in one or more supply areas, or one or more parts of one or more supply areas. Details of the eight gas supply areas in the State are available on the ERA's website (www.erawa.com.au).

Gas Market Moratorium

Synergy entered the small use gas retail market in July 2007. This followed the changes to the Gas Market Moratorium (**Moratorium**)⁷⁷ that reduced the contestable customer consumption threshold applying to Synergy from 1TJ to 0.18TJ per annum. The purpose of the Moratorium is to provide equity, in the absence of full retail contestability,⁷⁸ between the small use electricity market in areas supplied by Synergy and the gas market in areas supplied by Alinta Energy.

The Moratorium prohibits Synergy from supplying customers who consume less than 0.18TJ (or 180GJ) of gas in the supply areas that are specified in Alinta Energy's gas trading licence. The Moratorium does not apply to other retailers supplying customers in the areas that are supplied by Alinta Energy.⁷⁹

The FRCP (discussed above, with relation to the Electricity Market Review) will also advise on removing the moratorium preventing Synergy from supplying gas to residential customers, to accompany the creation of full and effective retail market access in electricity.

⁷⁶ For the purposes of this report, the terms 'gas trader' and 'gas retailer' are interchangeable.

⁷⁷ The *Western Power Corporation (Gas Supply) Direction 2000* was repealed and replaced by the *Electricity Corporation (Gas Supply) Direction 2007*.

⁷⁸ As discussed earlier in this report, the Government introduced market reforms to the Western Australian gas retail market on 31 May 2004. These reforms included the introduction of practical full retail contestability. Achieving full retail contestability means that all of the legal and technical requirements are now in place to allow new gas companies to enter the marketplace, thereby providing retail choice for all gas customers in the State.

⁷⁹ Kleenheat commenced supplying natural gas to customers in the areas supplied by the ATCO Gas Australia distribution systems in March 2013.

Appendix 3: Additional Retailer Performance Information

Customers

Table 35: Number of electricity customers by retailer

Retailer	Residential customers						Retailer	Non-residential customers					
	2010	2011	2012	2013	2014	2015		2010	2011	2012	2013	2014	2015
Alinta Energy	0	0	0	0	0	0	Alinta Energy	903	1,447	1,449	1,351	1,967	2,548
A-Star						0	A-Star	-	-	-	-	-	17
Horizon Power	30,595	30,371	34,037	36,051	37,398	38,299	Horizon Power	7,249	7,159	7,939	8,050	9,235	8,224
Perth Energy	0	0	0	0	0	0	Perth Energy	568	32	68	171	229	364
Rottnest Island Authority ⁸⁰	85	85	0	0	0	0	RIA	90	90	25	25	26	26
Synergy	850,790	890,918	894,804	894,542	913,200	934,717	Synergy	91,366	91,763	87,650	98,389	99,408	99,611
State Total	881,470	921,374	928,841	930,593	950,598	973,016	State Total	100,176	100,491	97,131	107,986	110,865	110,790

Table 36: Number of gas customers by retailer

Retailer	Residential customers						Retailer	Non-residential customers					
	2010	2011	2012	2013	2014	2015		2010	2011	2012	2013	2014	2015
Alinta Energy	603,943	615,717	628,328	624,314	635,893	628,171	Alinta Energy	8,191	8,359	8,468	8,355	8,282	8,127
Synergy	0	0	0	0	0	0	Synergy	112	119	112	141	79	107
Kleenheat	433	455	535	8,212	21,697	47,353	Kleenheat	2	1	1	20	232	871
EGDC	233	259	279	296	309	350	EGDC	33	34	31	36	33	34
State Total	604,609	616,431	629,142	632,822	657,899	675,874	State Total	8,338	8,513	8,612	8,552	8,626	9,139

⁸⁰ RIA informed the ERA that it had incorrectly reported customer numbers prior to 2012, which has resulted in significant changes to customer numbers from 2012 onwards.

Table 37: Contestable and non-contestable residential electricity customers by retailer

Retailer	Contestable						Retailer	Non-contestable					
	2010	2011	2012	2013	2014	2015		2010	2011	2012	2013	2014	2015
Alinta Energy	0	0	0	0	0	0	Alinta Energy	0	0	0	0	0	0
A-Star	-	-	-	-	-	0	A-Star	-	-	-	-	-	0
Horizon Power	30,595	30,371	34,037	36,051	37,398	38,299	Horizon Power ¹	0	0	0	0	0	0
Perth Energy	0	0	0	0	0	0	Perth Energy	0	0	0	0	0	0
Synergy	4,227	1,095	1,749	333	315	290	Synergy	846,563	889,823	893,055	894,209	912,885	934,427
Rottnest Island Authority	0	0	0	0	0	0	Rottnest Island Authority	85	85	22 ⁸¹	0	0	0
State Total	34,822	31,466	35,786	36,384	37,713	38,589	State Total	846,648	889,908	893,077	894,209	912,885	934,427

Table 38: Customers covered by the Gas Moratorium in areas supplied through the ATCO distribution networks

Retailer	2010	2011	2012	2013 ⁸²	2014	2015
Residential						
Alinta Energy	603,687	615,454	628,084	624,122	635,701	628,007
Kleenheat	-	-	-	-	21,058	47,350
State Total	603,687	615,454	628,084	624,122	656,759	675,357
Change from previous year	3.2%	2.0%	2.0%	-0.6%	5.2%	2.9%
Non-residential						
Alinta Energy	6,340	6,513	6,496	6,541	6,361	6,342
Kleenheat	-	-	-	-	142	492
State Total	6,340	6,513	6,496	6,541	6,503	6,834
Change from previous year	-17.5%	2.7%	-0.3%	0.7%	-0.6%	5.1%

⁸¹ RIA has advised the ERA that it had misinterpreted the definition of a customer and this figure has been over reported during previous years.

⁸² The 2013 data values are an estimate based on the data provided by Alinta Energy. Kleenheat commenced supplying customers in the areas supplied by the ATCO distribution networks in March 2013. Some of the customers that they have acquired will be covered by the Moratorium.

Table 39: Contestable and non-contestable non-residential electricity customers by retailer

Retailer	Contestable						Retailer	Non-contestable					
	2010	2011	2012	2013	2014	2015		2010	2011	2012	2013	2014	2015
Alinta Energy	903	1,447	1,449	1,351	1,967	2,548	Alinta Energy	0	0	0	0	0	0
A-Star	-	-	-	-	-	17	A-Star	-	-	-	-	-	0
Horizon Power	1,375	1,354	7,939	8,050	9,235	8,224	Horizon Power	5,874	5,805	0	0	0	0
Perth Energy ⁸³	568	32	68	171	229	364	Perth Energy	0	0	0	0	0	0
Synergy	9,032	8,781	7,849	7,173	6,767	5,947	Synergy	82,334	82,982	79,801	91,216	92,641	93,664
Rottnest Island Authority	7	7	3	0	0	0	Rottnest Island Authority	83	83	22	25 ⁸⁴	26	26
State Total	11,885	11,621	17,308	16,745	18,198	17,100	State Total	88,291	88,870	79,823	91,241	92,667	93,690

⁸³ Previous reports incorrectly reported a zero value for Perth Energy's contestable customers. All of Perth Energy's non-residential customers are, in fact, contestable, which is reflected in this year's report.

⁸⁴ Rottnest Island is a marine reserve covered by legislation. Under the legislation, other retailers can only commence operation if approved by the Rottnest Island Authority. Because there are no other retailers approved to supply customers on the island, the ERA is of the view that the existing customers supplied by Rottnest Island Authority are non-contestable.

Affordability

Table 40: Residential energy customers issued with a bill outside of the prescribed timeframes (due to fault on the part of the retailer)

Retailer	Number						Percentage of customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power				. ⁸⁵	516	108				-	1.4	0.3
Synergy				12,231 ⁸⁶	3,720	5,935				1.4	0.4	0.6
Gas												
Alinta Energy				9,256	8,080	8,213				1.5	1.3	1.3
Kleenheat				0	220	25				0.0	1	0.1
EGDC				0	0	0				0.0	0.0	0.0

Table 41: Non-residential energy customers issued with bill outside of the prescribed timeframes

Retailer	Number						Percentage of customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power				. ⁸⁷	637	220				-	6.9	2.7
Synergy				6,397	1,749	1,273				6.5	1.8	1.3
Gas												
Alinta Energy				271	365	343				3.2	4.4	4.2
Kleenheat				0	36	66				0.0	15.5	7.6
EGDC				0	3	0				0.0	9.0	0.0
Synergy				0	0	49				0.0	0.0	45.8

⁸⁵ Horizon Power was not able to report separate values for residential and non-residential customers. The total number of late bills issued in 2013 was 19,655.

⁸⁶ There was an error in the data in the 2013 report, which stated 29,098 customers received late bills.

⁸⁷ Refer to the previous footnote.

Table 42: Residential energy customers on instalment plans

Retailer	Number						Percentage of customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power	1,134	566	1,848	3,084	3,622	2,871	3.7	1.9	5.4	8.6	9.7	7.5
Synergy	13,229	30,893	34,026	29,098	32,190	22,359	1.6	3.5	3.8	3.3	3.5	2.4
Electricity Total	14,363	31,459	35,874	32,182	35,812	25,230	1.6	3.4	3.9	3.6	3.8	2.6
Gas												
Alinta Energy	10,031	9,890	8,622	13,119	13,845	14,336	1.7	1.6	1.4	2.1	2.2	2.3
Kleenheat	10	13	20	16	372	784	1.2	3.0	3.7	0.2	1.7	1.7
EGDC	17	15	48	4	10	15	8.1	6.4	17.2	1.4	3.2	4.2
Gas Total	10,058	9,918	8,690	13,139	14,227	15,135	1.7	1.6	1.4	2.1	2.2	2.2

Table 43: Non-residential energy customers on instalment plans

Retailer	Number						Per 100 customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	8	27	32	29	32	43	0.9	1.9	0.3	2.1	1.6	1.7
Horizon Power	286	98	120	197	236	262	3.9	1.4	2.8	2.4	2.6	3.2
Synergy	545	920	977	907	1,013	912	0.6	0.9	1.1	0.9	1.0	0.9
Perth Energy	0	0	0	0	1	2	0.0	0.0	0.0	0.0	0.4	0.5
Electricity Total	839	1,045	1,129	1,133	1,282	1,219	0.8	1.0	0.9	1.0	1.2	1.1
Gas												
Alinta Energy	44	23	25	31	34	39	0.5	0.3	0.3	0.4	0.4	0.5
Synergy	0	14	3	1	0	1	0.0	12.5	2.7	0.7	0.0	0.9
Kleenheat	0	0	0	0	3 ⁸⁸	30	0.0	0.0	0.0	0.0	1.3	3.4
EGDC	0	0	0	0	0	0	0.0	0.0	0.0	0.0	0.0	0.0
Gas Total	44	37	28	32	37	70	0.5	0.4	0.3	0.4	0.4	0.8

⁸⁸ The 2014 Performance Report incorrectly reported this figure as 30.

Table 44: Residential and non-residential electricity customers who have been granted additional time to pay a bill

Retailer	Number						Per 100 customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Residential												
Horizon Power	4,589	7,790	13,022	8,781	6,040	8,147	15.0	25.6	38.3	24.4	16.2	21.3
Synergy	82,223	96,148	90,262	87,601	80,264	83,086	9.7	10.8	10.1	9.8	8.8	8.9
Residential Total	86,812	103,938	103,284	96,382	86,304	91,233	9.8	11.3	11.1	10.4	9.1	9.4
Non-residential												
Alinta Energy	45	48	0	45	55	78	5.0	3.3	0.0	3.3	2.8	3.1
Horizon Power	736	1,372	1,573	1,420	964	1,394	10.2	19.2	19.8	17.6	10.4	17.0
Synergy	7,411	6,867	8,069	6,296	5,158	5,089	8.1	7.5	9.2	6.4	5.2	5.1
Perth Energy	0	0	0	0	5	10	0.0	0.0	0.0	0.0	2.2	2.8
Non-residential Total	8,192	8,287	9,642	7,761	6,182	6,571	8.2	8.2	10.1	7.2	5.6	5.9

Table 45: Residential and non-residential gas customers who have been granted additional time to pay a bill

Retailer	Number						Per 100 customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Residential												
Alinta Energy				61,204	75,523	68,166				9.8	11.9	10.9
Kleenheat				0	102	284				0.0	0.5	0.6
EGDC				20	10	15				6.8	3.2	4.3
Residential Total				61,224	75,635	68,465				9.7	11.5	10.1
Non-residential												
Alinta Energy				748	1,307	1,054				9.0	15.8	13.0
Synergy				130	0	19				92.2	0.0	17.8
Kleenheat				0	17	35				0.0	7.3	4.0
EGDC				2	0	0				5.6	0.0	0.0
Non-residential Total				880	1,324	1,108				10.3	15.3	12.1

Table 46: Residential and non-residential energy customers with direct debit plans terminated as result of default

Retailer	2010		2011		2012		2013		2014		2015	
	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential
Electricity												
Horizon Power	-	-	-	-	-	-	27	0	39	0	17	1
Synergy	2,087	93	3,925	100	4,164	134	5,093	169	5,707	206	7,968	315
Gas												
Alinta Energy	624	2	642	1	512	2	722	2	238	1	893	5
Kleenheat	-	-	-	-	-	-	-	-	-	-	0	0
Synergy	0	1	0	0	0	0	0	1	0	0	0	1

Table 47: Residential and non-residential energy customers who have provided a security deposit

Retailer	2010		2011		2012		2013		2014		2015	
	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential
Electricity												
Synergy	0	1	0	0	0	0	0	0	0	0	0	0
Gas												
Kleenheat	-	-	-	-	-	-	-	-	-	-	0	1

Disconnections and Reconnections

Table 48: Residential energy customers disconnected for a failure to pay a bill

Retailer	Number						Per 100 customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power	604	664	328	424	1,132	1,084	1.97	2.19	0.96	1.18	3.03	2.83
Synergy	2,744	7,631	7,723	6,322	8,103	8,328	0.32	0.86	0.86	0.71	0.89	0.89
Electricity Total	3,348	8,295	8,051	6,746	9,235	9,412	0.38	0.90	0.87	0.72	0.97	0.97
Gas												
Alinta Energy	17,223	10,841	9,557	10,712	9,930	14,530	2.85	1.76	1.52	1.72	1.56	2.31
Kleenheat	-	-	-	7	229	639	-	-	-	0.09	1.06	1.35
EGDC	9	7	0	5	6	15	3.86	2.70	0.00	1.69	1.94	4.29
Gas Total	17,232	10,848	9,557	10,724	10,165	15,184	2.85	1.76	1.52	1.69	1.55	2.25

Table 49: Additional residential electricity disconnection indicators

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Previously the subject of an instalment plan												
Horizon Power	138	214	135	169	489	375	22.8	32.2	41.2	39.9	43.2	34.6
Synergy	711	1,993	2,342	2,193	2,559	3,533	25.9	26.1	30.3	34.7	31.6	42.4
Total	849	2,207	2,447	2,362	3,048	3,908	25.4	26.6	30.4	35.0	33.0	41.5
Disconnected at the same supply address within the past 24 months												
Horizon Power	55	153	62	29	85	181	9.1	23.0	18.9	6.8	7.5	16.7
Synergy	200	858	1,546	1,170	1,284	1,397	7.3	11.2	20.0	18.5	15.8	16.8
Total	255	1,011	1,608	1,199	1,369	1,578	7.6	12.2	20.0	17.8	14.8	16.8
Concession card holders												
Horizon Power	19	68	57	48	291	284	3.1	10.2	17.4	6.8	25.7	26.2
Synergy	1,066	2,189	2,369	1,853	2,237	2,595	38.9	28.7	30.7	29.3	27.6	31.2
Total	1,085	2,157	2,426	1,901	2,528	2,879	32.4	26.0	30.1	28.2	27.4	30.6

Table 50: Additional residential gas disconnection indicators

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Previously the subject of an instalment plan												
Alinta Energy	274	151	351	477	761	1786	1.6	1.4	3.7	4.5	7.7	12.3
Kleenheat	-	-	0	0	24	55	-	-	0.0	0.0	10.5	8.6
EGDC	1	0	0	0	0	3	11.1	0.0	0.0	0.0	0.0	20.0
Total	275	151	351	477	327	1,844	1.6	1.4	3.7	4.5	7.7	12.1
Disconnected at the same supply address within the past 24 months												
Alinta Energy	7,784	2,946	1,960	2,806	2,510	2,990	45.2	27.2	20.5	26.2	25.3	20.6
Kleenheat	-	-	0	0	29	88	-	-	0.0	0.0	12.7	13.8
EGDC	0	3	0	0	0	2	0.0	20.5	0.0	0.0	0.0	13.3
Total	7,784	2,949	1,960	2,806	2,539	3,080	45.2	27.2	20.5	26.2	25.0	20.3

Table 51: Inter-jurisdictional comparison of residential electricity disconnections (per 100 customers)

	New South Wales	South Australia	Victoria	Western Australia
2010	0.60	0.66	0.59	0.38
2011	0.61	1.01	0.77	0.90
2012	0.80	1.35	1.02	0.87
2013	0.83	1.5	1.07	0.72
2014	1.03	1.37	1.47	0.97
2015	1.06	1.36	Not Available ⁸⁹	0.97

⁸⁹ This figure was unavailable at the time of publication of this report.

Table 52: Non-residential energy customers disconnected for a failure to pay a bill

Retailer	Number						Per 100 customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	0	0	10	11	7	10	0.0	0.0	0.14	0.81	0.36	0.39
Horizon Power	132	19	11	7	38	41	1.82	0.27	0.15	0.09	0.41	0.50
Synergy	183	499	436	450	565	560	0.20	0.54	0.50	0.46	0.57	0.56
Perth Energy	0	0	0	0	4	3	0	0	0	0	1.75	0.82
Electricity Total	315	518	459	468	614	614	0.31	0.51	0.47	0.43	0.55	0.55
G a s												
Alinta Energy	158	86	97	132	141	154	1.93	1.03	1.15	1.58	1.70	1.89
Kleenheat	-	-	0	0	1	9	-	-	0	0	0.43	1.03
Gas Total	158	86	97	132	142	163	1.89	1.01	1.14	1.54	1.65	1.78

Table 53: Residential energy customers reconnected at same supply address within 7 days of disconnection

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power	145	120	55	30	222	231	24.0	18.1	16.8	7.1	19.6	21.3
Synergy	718	4,366	4,530	4,022	5,280	5,804	26.2	57.2	58.7	63.6	65.2	69.7
Electricity Total	863	4,486	4,585	4,055	5,502	6,035	25.8	54.1	56.9	60.1	59.6	64.1
Gas												
Alinta Energy	11,028	2,615	3,236	4,144	3,568	5,994	64.0	24.1	33.9	38.7	35.9	41.3
Kleenheat	-	-	-	4	101	273	-	-	-	57.1	44.1	42.7
EGDC	1	0	0	0	4	5	11.1	0.0	0.0	0.0	66.7	33.3
Gas Total	11,029	2,615	3,236	4,148	3,673	6,272	64.0	24.1	33.9	38.7	36.1	41.3

Table 54: Total residential energy customers reconnected at same supply address after disconnection

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power	-	-	-	95	237	668	-	-	-	22.4	20.9	61.6
Synergy	-	-	-	4,396	5,962	6,916	-	-	-	69.5	73.6	83.0
Electricity Total	-	-	-	4,491	6,199	7,584	-	-	-	66.6	67.1	80.6
Gas												
Alinta Energy	-	-	-	8,082	6,350	9,897	-	-	-	75.4	63.9	68.1
Kleenheat	-	-	-	4	138	340	-	-	-	57.1	60.3	53.2
EGDC	-	-	-	0	5	10	-	-	-	0.0	83.3	66.7
Gas Total	-	-	-	8,086	6,493	10,247	-	-	-	75.4	63.9	67.5

Table 55: Additional residential electricity reconnection indicators

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2015	2015
Previously the subject of an instalment plan												
Horizon Power	54	46	38	29	131	1	8.9	6.9	11.6	6.8	11.6	0.1
Synergy	566	1,805	2,073	1,984	2388	2,949	20.6	23.7	26.8	31.4	29.5	35.4
Total	620	1,851	2,111	2,013	2,519	2,950	18.5	22.3	26.2	29.8	27.3	31.3
Reconnected at the same supply address within the past 24 months												
Horizon Power	6	24	13	6	14	39	1.0	3.6	4.0	1.4	1.2	3.6
Synergy	111	544	1,048	1,033	1,006	1,128	4.1	7.1	13.6	16.3	12.4	13.5
Total	117	568	1,061	1,039	1,020	1,167	3.5	6.8	13.2	15.4	11	12.4
Concession card holders												
Horizon Power	6	21	14	10	74	77	1.0	3.2	4.3	2.4	6.5	7.1
Synergy	681	1,512	1,565	1,567	1,626	2,138	24.8	19.8	20.3	23.2	20.1	25.7
Total	687	1,533	1,579	1,577	1,700	2,215	20.5	18.5	19.6	23.4	18.4	23.5

Table 56: Additional residential gas reconnection indicators

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Previously the subject of an instalment plan												
Alinta Energy	284	147	156	231	318	860	1.7	1.4	1.6	2.2	3.2	5.9
Kleenheat	-	-	-	0	8	56	-	-	-	0.0	3.5	8.8
EGDC	1	0	0	0	1	0	11.1	0.0	0.0	0.0	16.7	0.0
Total	285	147	156	231	327	916	1.7	1.4	1.6	2.2	3.2	6.0
Disconnected at the same supply address within the past 24 months												
Alinta Energy	2,546	573	491	825	700	839	14.8	5.3	5.1	7.7	7.0	5.8
Kleenheat	-	-	-	0	18	45	-	-	-	0.0	7.9	7.0
EGDC	0	0	0	0	1	2	0.0	0.0	0.0	0.0	16.7	13.3
Total	2,546	573	491	825	719	886	14.8	5.3	5.1	7.7	7.1	5.8

Table 57: Non-residential energy customers reconnected at same supply address within 7 days of disconnection

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	0	0	9	1	5	10	0.0	0.0	81.8	9.1	7.14	100.0
Horizon Power	44	1	1	0	5	5	33.3	5.3	8.3	0.0	13.2	12.2
Synergy	49	218	154	193	256	328	26.8	43.7	35.3	42.9	45.3	58.6
Perth Energy	0	0	0	0	4	3	0	0	0	0	100	100.0
Electricity Total	93	219	164	194	270	346	29.5	42.3	35.7	41.5	44.0	56.4
Gas												
Alinta Energy	67	41	31	58	53	79	42.4	47.7	32.0	43.9	37.6	51.3
Kleenheat	-	-	-	-	0	3	-	-	0-	-	0	33.3
Gas Total	67	41	31	58	53	82	42.4	47.7	32.0	43.9	37.3	50.3

Table 58: Total non-residential energy customers reconnected at same supply address after disconnection

Retailer	Number						Percentage of disconnections					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	-	-	-	1	5	10	-	-	-	9.1	71.4	100.0
Horizon Power	-	-	-	0	15	13	-	-	-	0.0	39.5	31.7
Synergy	-	-	-	222	322	439	-	-	-	49.3	57.0	78.4
Perth Energy	-	-	-	0	4	3	-	-	-	-	100	100.0
Electricity Total	-	-	-	223	346	465	-	-	-	47.6	56.4	75.7
Gas												
Alinta Energy	-	-	-	96	83	111	-	-	-	72.7	58.9	72.1
Kleenheat	-	-	-	0	1	3	-	-	-	-	100	33.3
Gas Total	-	-	-	96	84	114	-	-	-	72.7	59.2	69.9

Customer Complaints

Table 59: Residential energy complaints

Retailer	Number						Per 100 customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power	174	100	133	382	268	219	0.57	0.33	0.39	1.06	0.72	0.57
Synergy	8,432	13,403	7,144	3,635	2,694	2,290	0.99	1.50	0.80	0.41	0.30	0.24
Electricity Total	8,606	13,503	7,277	4,017	2,962	2,509	0.98	1.47	0.78	0.43	0.31	0.26
Gas												
Alinta Energy	964	1,298	968	996	892	997	0.16	0.21	0.15	0.16	0.14	0.16
Kleenheat	0	0	2	44	197	243	0.00	0.00	0.37	0.54	0.91	0.51
EGDC	1	0	0	0	0	0	0.43	0.00	0.00	0.00	0.00	0.00
Gas Total	965	1,298	970	1,040	1,089	1,240	0.16	0.21	0.15	0.16	0.17	0.18

Table 60: Residential electricity complaints by complaint category

Retailer	Billing (%)						Marketing (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Horizon Power	36.2	42.0	63.2	88.7	83.6	68.5	0.0	0.0	0.0	0.0	0.4	0.0
Synergy	89.1	94.3	83.0	83.9	88.8	87.4	1.5	1.3	5.6	13.7	8.4	8.9
Retailer	Transfer (%)						Other (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Horizon Power	0.0	0.0	0.0	0.0	1.1	0.0	63.8	58.0	36.8	11.3	14.9	31.5
Synergy	0.0	0.0	0.4	0.0	0.9	1.0	9.4	4.4	11.0	0.03	1.9	2.8

Table 61: Residential gas complaints by complaint category

Retailer	Billing (%)						Marketing (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Alinta Energy	39.5	41.4	47.3	70.9	66.4	66.4	1.6	1.3	1.9	3.1	4.7	6.8
Kleenheat	-	-	50.0	6.8	35.5	71.2	-	-	0.0	56.8	54.4	7.4

Retailer	Transfer (%)						Other (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Alinta Energy	0.0	0.0	0.0	0.0	0.0	1.1	58.9	57.3	50.8	26.0	28.9	25.7
Kleenheat	-	-	0.0	11.4	6.6	4.5	-	-	50.0	25.0	33.5	16.9

Table 62: Non-residential energy complaints

Retailer	Number						Per 100 customers					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	6	6	17	13	10	25	0.66	0.41	0.11	0.96	0.51	0.98
A-Star	-	-	-	-	-	0	-	-	-	-	-	0.00
Horizon Power	4	37	4	87	54	25	0.06	0.41	0.05	1.08	0.58	0.30
Perth Energy	1	0	1	1	0	1	0.18	0.00	0.14	0.58	0.00	0.27
Rottneest Island Authority	0	0	1	0	6	1	0.00	0.00	0.40	0.00	23.08	3.85
Synergy	832	1,865	1,182	425	349	240	0.91	2.03	1.35	0.43	0.35	0.24
Electricity Total	843	1,908	1,205	526	419	292	0.84	1.90	1.24	0.49	0.38	0.26
Gas												
Alinta Energy	4	5	14	33	6	21	0.05	0.06	0.17	0.39	0.07	0.26
Kleenheat	-	-	-	-	0	0						0.00
Synergy	14	1	0	0	0	0	12.50	0.84	0.00	0.00	0.00	0.00
Gas Total	18	6	14	33	6	21	0.22	0.07	0.16	0.39	0.07	0.23

Table 63: Non-residential electricity complaints by complaint category

Retailer	Billing (%)						Marketing (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Alinta Energy	50.0	83.3	100.0	100.0	70.0	68.0	33.3	16.7	0.0	0.0	30.0	0.0
Horizon Power	50.0	43.3	50.0	86.2	92.6	72.0	0.0	0.0	0.0	0.0	0.0	0.0
Perth Energy	100.0	0.0	100.0	100.0	-	100.0	0.0	0.0	0.0	0.0	-	0.0
Rottnest Island Authority	0.0	0.0	100.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Synergy	88.3	95.2	83.0	91.8	91.8	68.0	1.2	1.3	5.6	4.9	9.8	9.2

Retailer	Transfer (%)						Other (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Alinta Energy	0.0	0.0	0.0	0.0	0.0	4.0	16.7	0.0	0.0	0.0	0.0	28.0
Horizon Power	0.0	0.0	0.0	0.0	0.0	0.0	50.0	56.7	50.0	13.8	7.4	28.0
Perth Energy	0.0	0.0	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0	-	0.0
Rottnest Island Authority	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Synergy	0.0	0.1	0.4	0.0	2.0	2.5	10.6	3.4	11.0	3.3	2.0	3.8

Table 64: Non-residential gas complaints by complaint category

Retailer	Billing (%)						Marketing (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Alinta Energy	0.0	60.0	71.4	56.7	83.3	60.0	0.0	20.0	21.4	3.3	16.7	5.0
Kleenheat	-	-	-	-	-	-	-	-	-	-	-	-
Synergy	57.1	100.0	0.0	0.0	-	-	0.0	0.0	0.0	0.0	-	-

Retailer	Transfer (%)						Other (%)					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Alinta Energy	0.0	0.0	0.0	0.0	0.0	0.0	100.0	20.0	7.1	40.0	0.0	35.0
Kleenheat	-	-	-	-	-	-	-	-	-	-	-	-
Synergy	0.0	0.0	0.0	0.0	-	-	42.9	0.0	0.0	0.0	-	-

Table 65: Complaints from residential energy customers resolved within 15 business days

Retailer	Number						Percentage of complaints					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Horizon Power	174	100	133	205	165	162	100.0	100.0	100.0	53.7	61.6	73.97
Synergy	6,793	5,672	5,097	3,632	2,539	2,186	80.6	42.3	71.4	99.9	94.2	95.46
Gas												
Alinta Energy	964	1,298	948	874	805	960	100.0	100.0	97.9	87.8	90.2	96.29
Kleenheat	-	-	2	44	194	235	-	-	100.0	100.0	98.5	96.71
EGDC	0	-	-	-	-	-	0.0	-	-	-	-	-

Table 66: Complaints from non-residential energy customers resolved within 15 business days

Retailer	Number						Percentage of complaints					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	1	6	16	13	9	25	16.7	100.0	94.1	100.0	90.0	100.0
Horizon Power	4	37	4	39	34	15	100.0	100.0	100.0	44.8	63.0	60.0
Perth Energy	1	-	1	1	-	1	100.0	-	100.0	100.0	-	100.0
Rottnest Island Authority	-	-	1	-	4	1	-	-	100.0	-	66.7	100.0
Synergy	587	603	720	425	313	230	70.6	32.3	60.9	71.4	89.7	95.8
Gas												
Alinta Energy	4	5	13	30	5	20	100.0	100.0	92.9	90.9	83.3	95.2
Synergy	9	1	-	-	-	-	64.3	100.0	-	-	-	-
Kleenheat	-	-	-	-	-	-	-	-	-	-	-	-
EGDC	-	-	-	-	-	-	-	-	-	-	-	-

Table 67: Inter-jurisdictional comparison of electricity and gas complaints (per 100 customers) (Archived)

State	2009	2010	2011	2012	2013
Electricity complaints					
NSW	0.4	0.7	1.0	1.6	2.8
SA	1.26	1.54	2.5	2.7	n/a
VIC	2.22	2.10	4.2	4.7	5.5
WA	0.22	0.96	1.51	0.83	0.44
Gas Complaints					
NSW	0.51	0.97	1.23	1.54	2.3
SA	0.50	0.53	1.47	1.8	n/a
VIC	0.80	0.74	1.18	1.5	2.4
WA	0.09	0.16	0.21	0.15	0.17

Call Centre Performance

Table 68: Total number of calls received by energy retailer call centres

Retailer	2010	2011	2012	2013	2014	2015
Electricity						
Alinta Energy	2,173	2,452	2,462	2,728	2,828	3,342
Horizon Power	89,200	71,215	82,587	103,301	99,347	95,203
Rottnest Island Authority	1,027	5,272	5,840	6,173	4,850	5,250
Synergy	1,257,153	1,439,432	1,315,881	1,223,000	1,132,395	1,072,272
Electricity Total	1,349,553	1,518,371	1,406,770	1,335,202	1,239,420	1,176,067
Gas						
Alinta Energy	727,524	720,439	686,935	696,694	735,884	778,427
Kleenheat	172,080	190,764	214,280	220,710	235,698	233,363
Gas Total	899,604	911,203	901,215	917,404	971,582	1,011,790

Table 69: Average duration before a call is answered and the percentage of calls that are answered within 30 seconds

Retailer	Average duration before a call is answered (seconds)						Percentage answered within 30 seconds					
	2010	2011	2012	2013	2014	2015	2010	2011	2012	2013	2014	2015
Electricity												
Alinta Energy	19.0	22.0	19.0	17.0	22.0	14.0	77.8	73.3	76.6	88.7	75.2	85.0
Horizon Power	34.0	20.0	18.0	35.5	25.7	36.0	83.4	88.0	88.5	75.9	81.5	76.0
Rottnest Island Authority	21.0	16.0	12.0	13.0	12.0	12.0	94.6	97.3	95.0	81.2	90.8	93.3
Synergy	52.0	54.0	35.0	22.8	17.8	22.7	72.0	70.2	74.8	79.9	81.8	82.4
Gas												
Alinta Energy	29.0	29.0	27.0	18.0	20.0	19.0	77.8	78.5	80.0	82.8	79.7	81.6
Kleenheat	13.0	21.0	28.0	19.0	21.0	22.0	93.1	79.1	66.3	82.4	77.8	76.6

Table 70: Percentage of unanswered calls

Retailer	Percentage of unanswered calls					
	2010	2011	2012	2013	2014	2015
Electricity						
Alinta Energy	1.1	1.1	3.1	1.0	2.3	0.4
Horizon Power	1.7	1.7	1.6	2.6	2.0	2.0
Rottnest Island Authority	1.4	3.6	5.0	2.1	2.7	2.5
Synergy	3.6	4.0	3.2	2.1	1.1	1.5
Gas						
Alinta Energy	1.7	4.2	2.4	1.8	3.0	2.3
Kleenheat	0.4	1.1	3.7	2.2	2.2	2.9