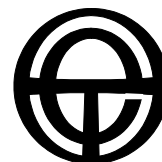


TOTAL ENVIRONMENT CENTRE INC.

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1 September 2006

David Bremner
Executive Officer
National Electricity Consumers Advocacy Panel
635 Canterbury Road
Surrey Hills 3127

Dear Mr Bremner,

Re: Panel funding allocation

Total Environment Centre (TEC) would like to take this opportunity to thank the Advocacy Panel for its past and continuing support for our advocacy on behalf of consumers. We also congratulate the Panel for its attempt to canvass a more rigorous approach to the allocation of its funds.

Structured approach

One of the persistent problems of advocacy within the National Electricity Market (NEM) is the time allocated for responses to issues papers and so on. Non-profit community organisations are usually low in resources – and hence use the Panel's funding program – and can find it difficult to quickly produce responses. A structured approach by the Panel would certainly be very helpful in planning our participation, both from funded staff and for individual projects.

As a corollary to this, a recommendation from TEC would be that sufficient time is allowed by the Panel for applicant organisations to put together responses on any proposed work program. We would regard four weeks as a minimum, mainly because of the strictures on part-time staff for coordinating a response from within our organisations.

We support the structured approach as presented. In particular, it would be extremely helpful for the Panel to "outline the work programs of regulatory organisations and policy making bodies". It has proved to be very difficult to schedule advocacy responses due to the number of bodies involved – with new ones being regularly created – as well as the lack of a coordinated timetable. It would also be helpful if this outline were updated through the financial year as timetables change and new bodies appear.

A structured approach would certainly assist with consumer advocacy, as it would help us identify any oversights in the work of salaried positions as well as highlighting the potential for new projects.

Proposed work program

One small point – TEC is and has been addressing a number of the tasks in the listed work program, although there is no specific funding allocated against them. We have been responding to issues papers etc as they are released in terms of their relevance to green consumer interests and the time that staff have available.

The work program presented is impressive in its coverage of tasks that could be addressed and will indeed be of benefit to us for future planning. There seems to be no point in deleting any of the tasks listed, since presumably they are potential issues of interests and the greater coverage given by the Panel the more useful for us in planning. However, anticipated dates for comment by the public – and anticipated dates for completion – would be an essential component for any future work programs produced by the Panel.

Another possible oversight is the subjects addressed by the Standing Committee of Officials (SCO) working groups. Possibly these were referred to under one of the general headings, but they need to be spelled out in more detail in the Ministerial Council on Energy (MCE) section to make the information more accessible. There are for instance the Retail Policy Working Group and the Renewable and Distributed Generation Working Group.

Allocation of priorities

Suggested changes:

- Since the roll out of smart meters is given “A” priority, “Metrology harmonisation” should be given the same priority.
- The Rules are the foundation of the operation of the NEM; therefore “Other Rule changes” should be given “A” priority.

Applicants

Much as we appreciate current applicants being able to comment on work programs and content of agendas, we are concerned that this should not become an exclusive group that filters out new or emerging priority issues of importance to consumers within the NEM. Therefore, how would the Advocacy Panel deal with recruiting new groups; soliciting new interests/issues; and developing flexibility in the weighting system?

Emergency residue

It is also essential that there be a residue within the Panel’s annual budget for funding of emerging issues. One of the barriers to advocacy within the NEM is the fact that organisations are essentially at the mercy of COAG’s discretion and new national bodies and issues regularly arise.

Yours faithfully,



Jeff Angel
Executive Director