



**South Australian Council of Social Service Inc.**

**Electricity Advocacy Project**

**Final Report – July 2007**

**For the National Electricity Consumers Advocacy Panel  
Application No 222**

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**Project Summary**

The Electricity Advocacy Project was an initiative of the South Australian Council of Social Service (SACOSS) funded and supported by the National Electricity Consumers Advocacy Panel ('The Panel'). The Project ran from September 2006 to June 2007.

The project aimed to develop the capacity of end users / consumers to participate in SACOSS policy development in respect to electricity access and affordability for low income and disadvantaged consumers. Through a measured consultation process and other communications, the project aimed to develop an understanding within the consumer of the market, the players, their roles, responsibilities and limitations. The ultimate objective has been to develop a capacity within each stakeholder organisation to advocate strategically on behalf of households on key issues that affect residential energy supplies.

**Project Highlights**

Consultation has occurred with over 40 community sector employees including consumer advocates and financial counselors from agencies providing direct personal support, information referral and advocacy services to South Australians living on low incomes.

The advocate has been able to provide support to SACOSS representatives on the Essential Services Commission Consumer Advisory Committee, the Aurora Energy Consumer Advisory Council (Aurora CAC) and the Minister for Energy's Energy Consumer Council (ECC). The project has also enabled SACOSS representation on the AGL Customer Council (until SACOSS left the Council in April 2007) and the National Consumers Roundtable on Energy. Valuable connections have been developed for SACOSS through this external involvement, particularly through the National Consumers Roundtable on Energy and have enabled us to link into the national scene through this involvement. This could not have occurred without assistance from the Panel.

The advocate has also engaged in the MCE energy market reform process, attended briefings and meetings in Melbourne, Sydney, Canberra and Adelaide and has met with advisers for the Minister for Energy, the South Australian SCO representative and the South Australian representative on the Retail Policy Working Group. A number of submissions have been made to energy consultations on a state and federal level.

A significant long term development for SACOSS policy makers from this project is the reformation of the SACOSS Essential Services Policy and Advocacy Group who are a sub committee of the SACOSS Policy Council. The Terms of Reference of the PAG are attached for the Panel's information.

### **Project Evaluation**

The project defined as its main criterion the influencing and understanding of the development, design and policy behind the NEM and the ongoing reform agenda of the MCE (as implemented by AEMC and regulated by the AER). It was noted that particular attention will be given to the processes arising from ERIG during 2006/7.

We further noted that particular attention will be on ensuring appropriate information and protection for low income consumers as regulatory processes transfer from State to National jurisdictions.

This is evidenced in our work with the Retail Policy Working Group Consolidated Paper and interest into other relevant MCE driven inquiries such as the review of Australia's Consumer Policy Framework by the Productivity Commission and the COAG driven impending review of CSO's.

SACOSS also maintained our involvement with ERIG processes by submitting as a signatory to the joint consumer response to the ERIG Discussion Paper.

SACOSS selected research development through consultation as the strategy for engaging with low income and disadvantaged South Australian consumers. Through this project, two resources are in development (both are attached to this report) through consultation with community workers in the first instance and then the community sector generally through SACOSS representative networks. Prior to the initial workshop the advocate had conceptualized a resource that would function as a 'pathway' through hardship teams and advocacy networks. The planned resource was to be considerable in length and include case and sample studies to demonstrate to advocacy workers an appropriate pathway to getting the consumer assistance. After attending the initial workshop, it was decided that a detailed resource would prove ineffective for frontline workers who stated very clearly that anything too complex would be unlikely to be used in client contacts. Therefore, in the final stages of development now is a poster based resource for advocacy workers to use as a 'reference' wall chart (a sample of the final resource is attached to this report). The advocate also developed a 'Background to the National Electricity Market' guide which aims to give interested parties a 'slice' of how the National Electricity Market works in other states as well as different energy structures and markets in Australia. Planning for dissemination of this resource and final editing is currently underway.

We have, as stated above, also re-formed the SACOSS Essential Services Policy and Advocacy Group. The Group operates as the main driver for SACOSS policy and advocacy in the area of essential services generally in setting the primary directions for and contributing to policy work. We have held 5 meetings during the final reporting period for this project and the group will continue on as an active policy forum into the next funding period.

The project was successful for SACOSS in reinvigorating our presence in both federal and state based electricity consultations and operating to activate the community sector in South Australia. This presence can only continue with Panel funding and we appreciate the Panel's willingness to continue our funding until December 2007 to allow ongoing advocacy work.

**Attached:**

Submissions

- SACOSS Submission to the Advocacy Panel's Comment on their Advocacy Agenda
- SACOSS Submission to the Advocacy Panel's Review of Fixed Costs in their Projects and the Criteria for Assessing Capacity Building Projects
- SACOSS Submission to the Australian Government Productivity Commission's review of Australia's consumer policy framework
- SACOSS submission to the Essential Services Commission of South Australia's Electricity Retail Price Path determination.
- Access details for SACOSS submission to the Retail Policy Working Group Consolidated Paper

Resources

- SACOSS Background to NEM Resource
- SACOSS Poster Resource – Contact Details for Advocacy Workers (sample only – in final stages of development)

Terms of Reference

- SACOSS Essential Services Policy and Advocacy Group



**Appendix 1**

SACOSS Submission to the Advocacy Panel's Request for Comment on their Advocacy  
Agenda

**Submitted May 2007**



# SACOSS

*South Australian Council  
of Social Service*

**National Electricity Consumers Advocacy Panel  
Submission to request for comment on advocacy  
agenda  
May 2007**

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## **About The South Australian Council of Social Service (SACOSS)**

SACOSS is the peak organisation for community service organisations in South Australia. Our membership numbers in excess of three hundred and consists of committed organisations and individuals who provide services for and are interested in the protection of the interests of low income and disadvantaged consumers in South Australia.

## **The Advocacy Panel's advocacy agenda**

We agree with the Panel's broad approach to its funding allocation and note with interest that the agenda will not rigidly exclude projects not on the current list. We agree with the Panel's observation of the need for flexibility in the advocacy approach and appreciate their willingness to consult with end user advocates to define this agenda.

SACOSS provides comment on the following elements of the agenda based on the actions of our upcoming project and from the perspective of our position as an advocacy and policy organisation with the key interest of protecting and promoting the interests of low income and disadvantaged consumers.

### **The Australian Energy Regulator**

Appropriate regulation remains a key concern for protection of the interests of low income and disadvantaged consumers within the National Electricity Market (NEM). Input from these consumers remains an essential element of well structured regulation and SACOSS agrees with the Panel's approach to advocacy in this area. We remain interested in events occurring in South Australia such as the upcoming AGL Retail Price Path and ESCOSA Retail Price Path and feel that state specific regulation should not be excluded from the Panel's advocacy agenda.

### **The Australian Energy Market Commission**

We note the Panel's 'A' priority rating given to the reviews of effectiveness of competition in the gas / electricity retail markets and agree that this process should remain a primary concern for the Panel when considering their advocacy agenda. We also note with concern, the 'B' rating given to rule changes. Rule changes have the capacity to affect all areas of electricity supply and regulation and have the potential to impact extensively on low income and disadvantaged consumers. For this reason advocacy work is essential in this area. We strongly suggest that this be given an 'A' priority rating.

### **Essential Services Commission of South Australia**

We note the Panel's intention to remain committed to funding advocacy work related to the Essential Services Commission of South Australia. We agree that this should remain part of the Panel's advocacy agenda and that consideration needs to be

given to the unique perspective of South Australia such as the demand profile and the lead legislator perspective within the NEM when allocating advocacy priorities.

#### Ministerial Council on Energy

It is critical that the Panel remain committed to funding advocacy work related to the Ministerial Council on Energy (MCE). Contributions made by consumer advocates to the 2006 / 2007 legislative package remain critical to ensuring that the perspectives of low income and disadvantaged consumers are taken into account.

We agree with the Panel's allocation of 'A' priority listings to the majority of advocacy priorities arising from the work of the MCE.

#### Other advocacy actions

An integral part of electricity advocacy for SACOSS is linking with worker advocates who aren't necessarily funded by Panel activity. By funding this kind of advocacy, the Panel would allow the funded organisation to liaise with a considerable number of other organisations, their workers and their clients rather than the effects of the work simply remaining within their own organisation. This kind of advocacy builds capacity in the community sector and empowers voluntary advocacy groups, while generally adding to the strength of advocates in South Australia to help ensure fair and equitable policy in relation to utilities. We respectfully request that the Panel consider including this important work in their advocacy agenda.



**Appendix 2**

SACOSS Submission to the Advocacy Panel's Request for Comment on their Assessment of Fixed Costs within Projects and the Criteria for Assessing Capacity Building Projects.

**Submitted May 2007**



# SACOSS

*South Australian Council  
of Social Service*

**National Electricity Consumers Advocacy Panel  
Submission on request for comment on fixed costs  
and capacity building projects  
*May 2007***

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## **About SACOSS**

SACOSS is the peak organisation for community services organisations in South Australia. Our significant membership that numbers in excess of three hundred comprises of peak bodies, health and welfare organisations and concerned individuals who provide numerous services such as financial counseling, disability advocacy, primary health care and accommodation support for low income and disadvantaged consumers in South Australia.

## **Effectiveness of capacity building projects**

SACOSS wishes to make comment on the following funding criteria:

*The Panel aims to increase the overall resources committed by end users to advocacy and not substitute resources that end users would otherwise commit.*

Input into electricity advocacy in South Australia on behalf of small consumers, particularly into the National Electricity Market (NEM) is only possible with Advocacy Panel funding. As a small state within the NEM, South Australia has a particularly relevant perspective to offer to advocacy debates that occur on a national scale with features of the market like electricity demand patterns and the lead legislator perspective that is not seen anywhere else in Australia. Opening up the NEM to a choice based system has led to a myriad of issues for low income and disadvantaged consumers and strong, well supported consumer advocacy is required to ensure that their interests are adequately protected. South Australia does not have a consumer legal organisation or state government or industry funding like other states in the NEM to resource this work. Without the positive commitment made to date by the Advocacy Panel, funded advocacy for small end consumers in South Australia would likely cease to exist altogether. There is little chance that end user organisations like SACOSS would have the resources to commit to advocacy without panel support so we respectfully suggest that from a South Australian perspective, the Panel provides critical and long term sustaining assistance to advocacy in South Australia.

SACOSS notes the Panel's increase in funding going to capacity building projects with interest and appreciate the Panel's understanding of the increased complexity of issues and advocacy opportunities arising in the NEM in recent months. We wish to make the Panel aware that the small increases in capacity building funding, while noted and appreciated, have not met the sharp increase in work for end user advocates in recent times. Advocacy in South Australia depends on funding that is commensurate with increases in workloads and we encourage the Panel to consider this perspective when defining criteria for providing future increases in funding.

## **Criteria for analysis of effectiveness of projects**

When assessing capacity building projects, there are some core considerations that must be taken into account. Advocacy in this context may not necessarily mean direct contact with consumers or provision of client services but can, as the Panel know, take several different forms depending on the resources provided to the funded organisation. The Panel has a difficult task in defining advocacy and the criteria for which advocacy work might be judged effective. This difficulty is partly due to the scope and breadth of the projects that the Panel funds.

SACOSS suggests that any criteria for advocacy that the Panel develops need to be based on a sound understanding of the capacity of the organisation and the worker(s) funded to undertake advocacy in a number of different forms. A set of criteria that the Panel could use to assess the effectiveness of projects could be based on the following:

- Number of submissions made to relevant NEM-based inquiries
- Forums conducted
- Networking events participated in (such as the National Consumers Roundtable or other state based opportunities)
- A breakdown of hours spent on different elements of the project: e.g. reading, submission analysis and direct work to support advocacy as part of the project
- Building capacity for advocacy in other organisations and the broader community
- Issues that are hard to quantify around strategy, influence, political acumen etc. This includes the capacity and ability of workers to liaise with other workers, organisations and clients to develop advocacy structures that are long term and self sustaining

## **Fixed costs**

In terms of the panel's assessment of fixed costs, SACOSS agree that the panel should not contribute funding where an organisation will make a profit as a result of a working relationship with the Panel.

SACOSS appreciates the Panel's recognition that it is difficult to provide an assessment of fixed overheads and the extent to which they may vary during an advocacy project. We find the Panel's assessment of a one third cost inclusion an appropriate assessment.



**Appendix 3**

SACOSS Submission to the Australian Government Productivity Commission's Inquiry into  
Australia's Consumer Policy Framework

**Submitted May 2007**



# SACOSS

*South Australian Council  
of Social Service*

**Australian Government Productivity Commission  
Inquiry into Australia's Consumer Policy  
Framework**

*May 2007*

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## **About SACOSS**

SACOSS is the peak organisation for community services in South Australia. Our membership numbers in excess of three hundred, including organisations and concerned individuals that provide services and advocacy for disadvantaged and low income people in South Australia such as financial counseling, crisis services, disability advocacy and accommodation support. SACOSS is an independent non-government organisation with a proud sixty year history of advocating for disadvantaged and vulnerable consumers. Our submission to this inquiry is based on the perspective of the wide ranging experience of our membership.

## **Comments on Australia's consumer policy framework**

### **Introduction**

SACOSS welcomes the review of the consumer policy framework. In our role as a peak body for community services in South Australia we cover a broad range of policy areas including essential services (utilities), many areas of health and other areas that range from the very broad (such as playing a key role in the current juvenile justice debate in South Australia) to a targeted and issue specific response (such as an interest in regional dental care for low income consumers). In respect to vulnerable and consumer issues over recent years we have led or participated in the debates and advocacy in the areas of consumer credit, electricity, gas and water, telecommunications, financial counseling, payday lenders, food security and gambling.

### **Consumer Advocacy in South Australia**

South Australia, unlike many of the larger states and territories, lacks a targeted and well coordinated system of consumer advocacy that is independent of government. The lack of dedicated and properly resourced institutions that provide assistance to vulnerable and disadvantaged consumers has been of concern for many years. While there is substantial work being undertaken by individual financial counselors, welfare support workers and community legal centres, access to and availability of independent consumer advocacy services and advice is generally ad hoc. Therefore as a core element of this review, we urge the Commission to consider ways in which smaller states can be appropriately resourced to consolidate the current knowledge base, in order to provide stronger advocacy and protections for vulnerable and disadvantaged consumers,

**Recommendation: The Commission give urgent attention to the need to support independent consumer advocacy organisations in each state and territory of Australia to ensure equity of access for vulnerable and disadvantaged consumers to advocates and information.**

The disjointed approach to consumer advocacy in Australia comes from strong need to establish a National Consumer Council to unify advocacy groups and present a national body to inform policy discussion and debate, as well as having the ability to initiate processes to tackle the complex issues that can arise in consumer advocacy. The United Kingdom's National Customer Council (see <http://www.ncc.org.uk/>) serves as an ideal model for direct application to Australia's consumer policy framework.

**Recommendation: The Commission undertake a further inquiry into the formulation of a national consumer council to undertake research and policy work, based on the**

**United Kingdom model. The Commission is requested to give particular attention to the interests of vulnerable and disadvantaged people from a small state perspective such as South Australia**

South Australian Government Consumer Advocacy

The Office of Consumer and Business Affairs (OCBA) is the primary contact point for consumer issues in South Australia. The Commissioner has statutory functions under South Australian law as both a protector of consumer rights and a regulator of traders. While OCBA maintains a comprehensive Internet site and a number of regional contact centres as well as a metropolitan 'hub', difficulties are often encountered in accessing services for many vulnerable and disadvantaged people seeking independent consumer assistance. Effectively, consumers have little choice but to seek advice from government.

There are few, if any, specific interventions or outreach services targeting disadvantaged and vulnerable consumers. The South Australian government's response to consumer protection remains largely disconnected from disadvantaged and vulnerable consumers and the organisations that support them.

This means robust and independent advice to government in the development and implementation of consumer policy at the state level is lacking.

**Recommendation: The Commission consider the impact of the lack of independent consumer advocacy services in South Australia on vulnerable and disadvantaged people. The Commission analyse the effectiveness of state government in providing effective advocacy for vulnerable and disadvantaged consumers while often remaining as the trading regulator.**

Regulatory frameworks

When dealing with consumer policy frameworks and regulations, there is a myriad of options and choice available to the consumer. One example of this is the National Electricity Market (NEM). The deregulation of the electricity market in Australia has presented consumers with the option to choose everything from their electricity retailer, supplier and metering options. With the amount of choice present in Australia's consumer policy, particularly in those elements that have been subject to deregulation, it becomes more important than ever that the interests of low income and disadvantaged consumers are subject to a high standard of protection. This means regulations must be specific and written in plain English to allow vulnerable and disadvantaged consumers equity of access to policy that has the potential to impact directly on their lives.

It is important that consumers that are low income and disadvantaged also have equity of access to 'market participation'. Again using the NEM as an example, this can include:

- The capacity to make active choices within the market that are affordable can be paid for and in the best interests of their current circumstances.
- Having the capacity to pay for their choices
- Having the capacity to decide when to make a change and if so, how best to undertake that change

- Having the ability to receive appropriate advice and information on these changes wherever possible

**Recommendation:**

**That the Commission consider the accessibility of general regulation and analyse the need to reframe regulation to plain English, issue specific documentation. The Commission consider the accessibility of information and the level at which information is received and accessed about both core and secondary consumer policies.**

Rationale behind consumer policy

SACOSS sees Australia's consumer policy strength in its thoroughness and comprehensiveness. As stated in the Issues Paper, an effective consumer policy framework is an important complement to competition policy with supply and demand intertwined. It is essential to ensure that the role that government plays within the policy framework, no matter what form it ends up taking, must be balanced and fair.

Government intervention, when it comes from a rationale of consumer protection and empowerment rather than a proscriptive approach is most effective when working to balance business regulation and consumer interest. This is especially important for the protection of the consumer rights of low income and disadvantaged people. Government involvement should promote and be based on:

- A consumer's ability to actively respond to the options for choice when presented to them – government involvement can occur effectively here in making sure clear and adequate information is available for everyone in an easily accessible format.
- A consumer's ability to access the support they need when a dispute arises – governments should facilitate access to independent advice and assistance.

The balance between empowerment and proscribing particular outcomes and protection is a difficult one to master for Australian society. The Commission must be mindful of the need to take into account differing capabilities and skills of consumers while respecting the rights of individuals to choose the way that they access consumer assistance.

Vulnerable and disadvantaged consumers often find themselves in positions that require special protections.

SACOSS notes that the Commission has recognised the need to define a clear interpretation of 'vulnerable' and 'disadvantaged' consumers within this inquiry. SACOSS endorses the following definitions of vulnerable and disadvantaged consumers as described by Consumer Affairs Victoria:

*A **vulnerable consumer** is a person who is capable of readily or quickly suffering detriment in the process of consumption. A susceptibility to detriment may arise from either the characteristics of the market for a particular product, the product's qualities or the nature of the transaction; or the individual's attributes or circumstances which adversely affect consumer decision-making or the pursuit of redress for any detriment suffered; or a combination of these*

*A **disadvantaged consumer** is a person in persistent circumstances and/or with ongoing attributes which adversely affect consumption thereby causing a continuing susceptibility to*

*detriment in consumption. As a result, a disadvantaged consumer repeatedly suffers consumer detriments or, alternatively expressed, generally obtains below-average satisfaction from consumption.*



**Appendix 4**

SACOSS Submission to the Essential Services Commission of South Australia's Retail Price  
Path Inquiry

**Submitted June 2007**

## **Background**

The South Australian Council of Social Service (SACOSS) is the peak body for social and community service organizations in South Australia. Our membership which numbers in excess of three hundred members includes peak bodies in the community sector and other membership organizations. Our members offer such services as counseling, family support, emergency relief, emergency accommodation, advocacy, information and referral to people in crisis, people with disabilities, migrants and refugees, youth, aged, people on low incomes and those otherwise disadvantaged.

## **Executive summary**

We welcome the opportunity to provide a submission to the Retail Electricity Price Path Inquiry. Collectively our organisation's members are seeing first hand the impact energy market reform is having in the community.

We are witnessing the dramatic increase in numbers of a group of households that we will refer to in this submission as 'vulnerable'. By vulnerable, we mean vulnerable to losing access to the 'essential service' of electricity (e.g. disconnection from electricity or gas) or vulnerable to having to forgo other essentials such as food, health care etc. as a result of allocating limited financial resources to meet rising energy costs. Often these households will have low income but may be otherwise disadvantaged due to age, poor health, low levels of literacy and numeracy, cultural and other factors. SACOSS stresses that electricity is an essential service for health and wellbeing and everyone is entitled to a safe supply to meet their basic life needs.

We acknowledge that all consumers have an interest in ensuring that AGL are only allowed sufficient revenue as required to sustain an efficient provider of the responsibilities of the 'declared retailer'. We certainly trust that ESCOSA, its consultants and the inputs of other stakeholders will deliver against this.

The Discussion Paper focuses on efficiency for retailers which is important to ensure that prices do not increase. However there is no guarantee that operating costs will not increase and without regulation small consumers, especially the most vulnerable will require protection against unaffordable power costs.

Our primary concern is the extent that this could involve making the situation even worse for South Australia's most disadvantaged and vulnerable households.

It is not the intention of this submission to argue one way or another about the prospect of competition benefiting all consumers on average in the longer term.

We are adamant, however, that competition in itself has and will offer nothing positive to these vulnerable households. A comprehensive review of concessions (including the Emergency Electricity Payment Scheme (EEPS)), their coverage and their relationship to movements in the relative costs of essential services is long overdue.

This submission does not intend to respond to all of the issues canvassed in the Discussion Paper or attempt to represent the interests of all residential consumers. When proposing an increase in a standing contract price, it is important to consider that consumers are unlikely to receive an increase in their income that parallels the proposed

increase in the electricity pricing. We request that the Commission carefully consider the effects of pricing beyond a CPI increase on low income and disadvantaged consumers.

#### Objectives for this inquiry and price determination

SACOSS provides the following comment on the statement of objectives for application to the current price determination process:

SACOSS broadly agrees with the Commission's methods and appreciates that the Commission has recognised that when formulating a retail price path, the Commission must have primary regard to the long term interests of consumers that establishes the lowest possible price consistent with the following principles:

*The costs that an efficient retailer would be expected to incur in meeting the responsibilities of a standing contract supply to small customers in South Australia over the period.*

SACOSS recognizes the Commission's need to promote responsible practice to retailers that deal with the Commission and that it is in the best interests of these retailers to remain committed to responsible and sustainable practices. It is SACOSS's concern however that the Commission remain motivated towards ensuring the interests of low income and disadvantaged consumers are not compromised by any formal arrangements or obligations placed on retailers.

*Encouraging the development of competition among retailers for the benefit of consumers.*

SACOSS appreciates the Commission's attention to the further development of competition needing to be structured in a way that the arrangements benefit consumers. However it is SACOSS's view that competition has not been structured in the South Australian market in a way that benefits consumers, particularly those who are low income and disadvantaged. Further encouragement of competition amongst consumers needs to be couched in terms of consumers having the ability to make active choices and understand the reasoning behind the choice. It is critical to ensure that there is enough information supplied on new retail price path issues in a culturally sensitive and appropriate manner. This may occur through the supply of translated materials or the provision of interpreters where required.

*Encouraging ongoing, efficient investment to meet consumer's long term requirements.*

SACOSS is pleased to see that the Commission recognizes that a commitment to consumers is essential to maintaining a long term viable electricity market in South Australia. However while maintaining this commitment, it is essential to ensure that the interests of low income and disadvantaged consumers remain a paramount concern in the Commission mind when considering how, where and when to undertake this investment.

*Providing an appropriate return for an efficient declared retailer.*

SACOSS agrees that retailers should have the opportunity to make a reasonable profit from their enterprise and that we are not in a position to comment on what an appropriate return may be for a particular retailer.

However we request that the Commission consider the need to ensure that business interest is balanced with obligation to provide consumers with the best possible service under regulated price structures.

### **Price Path Establishment**

- **Regulation and market effect on price control**

The South Australian electricity market has seen a price decline in recent times because of the effects of the continuance of price regulation rather than the successful competitive market forces. SACOSS is concerned that without continuance of the price control system and standing contract arrangements, that market forces will impact on price control.

We ask the Commission to consider the critical need to retain price path establishment and control and should changes be made to this arrangement that the interests of low income and disadvantaged consumers be kept as a paramount concern.

- **Retailer hardship policies**

SACOSS believes that retailers have made a genuine effort to formulate long term and meaningful policies for customers that are experiencing extended hardship. We acknowledge the growing level of skill that retailers are developing to work with customers and the community sector to develop policies. This kind of relationship is critical to ensuring continued success of engagement of low income and disadvantaged people into an extremely complex market. Any price path arrangement needs to consider the kind of impact it will have on consumers who currently pay their utilities through hardship payment arrangements.

- **ESCOSA's documentation**

SACOSS recognises that the Commission has produced valuable documentation in recent months that targets genuine consumer issues such as disconnection and hardship. The value of this documentation to low income and disadvantaged consumers and their advocates is critical in SACOSS's assessment of the current price path documentation. It is critical to ensure that ESCOSA keeps producing documentation of a similarly high standard to maintain transparency for customers and providing relevant and important data.

- **Competition and barriers to entry for new retailers**

Currently the South Australian market has 17 registered retailers, 8 of whom actively trade in the competitive market. Research within the community sector generally suggests that the South Australian market only needs two or three retailers to be effectively competitive. This means that new retailers could find it difficult to enter an already saturated market and maintain an effective and

competitive presence. ESCOSA has noted that the number of retailers in the South Australian market could have an important influence on the level of effectiveness of competition.

SACOSS requests that the Commission consider the requirements and position of retailers in the South Australian market and the effects of potential new retailers entering the market on the current price path and any future developments planned by the Commission. It is essential to keep the requirements of low income and disadvantaged people in mind in such an arrangement.

- **Consumer education**

Consumer education is critical to ensuring that market participants are capable of making active and well informed choices. The impending rollout of smart meters sees consumers with yet another element of choice to make in the National Electricity Market. Reports on the Victorian trials of smart meters noted that low income and disadvantaged people are the most likely group in society to experience detrimental effects from the installation of smart meters and dynamic price tariffs. We recommend that any new developments of the Commission, such as this price path, are accompanied by a thorough and comprehensive community education campaign and research connected to social impacts and customer behaviour. This includes appropriately translated material and culturally sensitive information to relevant customer groups.



**Appendix 5**

Access details for the SACOSS Submission to the Retail Policy Working Group Consolidated Paper

**Submitted July 2007**

SACOSS's submission to the Retail Policy Working Group Consolidated Paper is in excess of 100 pages so has not been included in this report. It can be accessed at through the MCE website at

<http://www.mce.gov.au/index.cfm?event=object.showContent&objectID=F6B32AFCC1E7-54AC-67AF026B822354F7>.



**Appendix 6**

SACOSS Background to National Electricity Market Resource



## A background guide to the National Electricity Market (NEM)

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## **What is the National Electricity Market?**

The National Electricity Market (NEM) is the network of states that were joined together as part of Australia's electricity deregulation process. The NEM connects New South Wales, Victoria, the ACT, Queensland, South Australia and Tasmania. It began operating in South Australia on 13 December 1998. The NEM is the world's longest interconnected power system, stretching across more than 4000 kilometres.

The process of deregulation in the NEM never stated that electricity operations needed to be privatised but it did state that the electricity processes needed to be split up from their existing 'monopoly' arrangements. Thus the processes were separated into generation, transmission, distribution and retailing, with the introduction of corporate management principles into each of these separate sectors.

### ***How the NEM works in South Australia***

The monopoly that controlled the NEM in South Australia was the Electricity Trust of South Australia (ETSA). The transmission and distribution functions (the 'poles and wires') of the network were considered natural monopoly features: there would be no benefit to electricity efficiency in implementing an alternative grid arrangement that would compete with the existing one. Nobody wants to see any more electricity poles and wires than are necessary! Introducing competition into the transmission and distribution phases of the grid has been somewhat difficult as ETSA has always had a 'natural' monopoly on these functions by virtue of the fact that they own the physical structures. At the introduction of the NEM, the structure of the market was therefore changed to introduce competition into the generating and retailing phases.

Through the Council of Australian Governments, South Australia is a party to a number of intergovernmental agreements that call for the restructure of the electricity market and participation in the NEM. The Commonwealth Government held back some key funding to the states until they agreed to participate in the national competition policy, or in other words agreed to undertake the deregulation process.

### ***Who are the major players in energy market regulation?***

- One of the first stages of the national competition policy was the development of some 'market rules' that were set out in the *National Electricity Code*. **The National Electricity Code Administrator (NECA)** was formed to monitor and enforce the Code and the **National Electricity Market Management Company (NEMMCO)** was formed to implement the code and monitor the system.
- The **Australian Energy Market Commission (AEMC)** is the rule maker for the NEM. AEMC is responsible for rules and policy advice covering the NEM.
- The **Australian Energy Regulator (AER)** is the body that performs the economic regulation of the wholesale electricity market and electricity transmission networks in the NEM. They enforce the National Electricity Rules and the National Electricity Law.

- South Australia, like the five other states of the NEM, has local regulatory frameworks. The **Essential Services Commission of South Australia (ESCOSA)** fulfils this role.
- The **Electricity Supply Industry Planning Council (ESIPC)** was formed to conduct an annual planning review, including a ten year forecast of supply, demand and the adequacy of the system.
- The **Energy Industry Ombudsman (EIO)** scheme has been established in South Australia to protect the interests of electricity consumers.
- The **Office of the Technical Regulator (OTR)** has also been formed to set and maintain technical and safety standards in the industry.
- There are two key businesses that operate the transmission and distribution of electricity. They are **ElectraNet** for high voltage transmission and **ETSA Utilities** for lower voltage distribution. They are heavily regulated by the Australian Competition and Consumer Commission (ACCC) in terms of the prices that they can charge and their quality of service for the transmission businesses, and by ESCOSA for the distribution businesses.

### ***The NEM ... the technical stuff ...***

The physical side of electricity supply is pretty much the same as it always was. The market and the debate that surrounds it is really all about the way all the assets and functions are owned, managed, regulated and paid for.

One of the big decisions that had to be made early in the process was how transactions between generators and retailers would occur. Australia chose to follow the UK model which is the 'wholesale pool'. In this model, all generators sell into the pool and receive the same price, known as a 'spot price', and all retailers buy from the pool at that spot price. They then have the ability to sell it on. The spot price is the going rate of electricity at that point in time, and reflects the willingness of the generators to sell their output.

In the NEM, wholesale electricity trading is conducted as a 'spot market' where supply and demand are matched instantly through a centrally coordinated dispatch process. It is the generator's job to supply the market with specific amounts of electricity at certain prices, normally at five minute intervals. The National Electricity Rules set a maximum spot price of \$10 000 per megawatt hour, which is the maximum price that generators can bid into the market.

The demand for electricity from the NEM is quite predictable and it is forecasted with reasonable accuracy, limited by the ability to predict the weather. Forecasting of this electricity allows NEMMCO to plan for the day's requirements, and for each generator to predict with reasonable certainty how much they can charge for their output and how much they will be called on to supply.

When demand for electricity increases (for example on a hot summer day), there are so few generators available to meet all of the demand that they are able to command higher and higher prices. Some of the increases in price are legitimate as they reflect an increased cost of generation. Many of the generators in South Australia subject to this price increase are only called into demand over a few days per year, so their production costs are higher than if they could recover their expenses over a longer period of time. When these generators are operating, their expectation of higher returns to cover their expenses drives up the spot price, and thus all generators sell for more at these peak times.

Someone has to own, operate and maintain the pipelines: these businesses are referred to as Network Service Providers or NSPs. Payments to NSPs are critical as they are essentially the providers of a customer's electricity and make up a large portion of a customer's bill.

### ***Dividing up the electricity dollar***

NEMMCO state that of the final price paid by end users, about 35% goes to generators, about 60% to NSPs (12% for transmission and 48% for distribution) and about 5% goes to the retailer. Out of this, various other parties are paid for a myriad of services, both technical and administrative, necessary for the operation of the system.

### ***Who uses what and when***

The price of electricity varies within a day, from one day to the next, and certainly from season to season. So an electricity retailer's cost to buy the electricity that they sell to your household or business is quite variable. The retailer's selling price to you, however, is a fixed rate regardless of when it bought the electricity that you use.

The metering attached to domestic homes is in a very simple format, so nobody knows precisely how much you use and when – only how much you used since your meter was last read. The only option for retailers under these circumstances is to calculate all the times when they are paying a higher rate than they are selling for and spread this cost across all of their customers. Simply put, everyone's electricity costs more because of the large number of refrigerated air conditioners in the state that create a high peak demand. This is unfortunate for many low income households who would probably be less than impressed in knowing they pay for subsidised electricity prices for higher energy users.

## South Australia and the NEM

South Australia holds a unique role as the lead legislator in the National Electricity Market. This means our state is a key player in developing and enacting national electricity legislation, and that all electricity legislation is initially passed through the South Australian parliament before it is enacted in other jurisdictions. The *National Electricity (South Australia) Act* was passed by South Australian parliament in 1996 and by other jurisdictions in 1997.

From 1 July 1995, the Electricity Trust of South Australia was corporatised pursuant to the *Public Corporations Act* 1993, which means that ETSA has legal standing as a corporation. Following the review of the structure of the South Australian electricity industry, the *Electricity Corporations (Generation Corporation) Amendment Act 1996* provided for the separation of electricity generation activities from the ETSA Corporation. The new SA Generation Corporation (SAGC) began trading on 1 January 1997. ETSA Corporation, its three subsidiaries and SAGC are the major players in the South Australian electricity market. ETSA Power Corporation is the single biggest distributor of electricity in the South Australian market and ETSA Transmission Corporation is the sole transmission network provider with responsibility for system control. As part of the electricity market reform process, and to prepare the state's electricity assets for disposal, the Government subdivided the generation function into three competing businesses and created a company to manage the existing gas contracts and to trade in gas. These three companies are Flinders Power, Optima Energy and Synergen, all of which deal with different functions of the generation of the market.

There are two fundamental challenges to the South Australian electricity market that affect low income consumers. These are:

- Reducing energy related greenhouse gas emissions. Australia has one of the highest rates of greenhouse gas emissions in the world on a per capita basis.
- Lessening the peak demand of electricity usage. South Australia has the most peak demand of any of the states. This means that there are high energy wholesale costs and network costs.

South Australia has a very peak electricity demand profile, due primarily to the use of domestic air-conditioners on very hot days. Due to this peak demand, the entire electricity system (encompassing all the functions of generation, transmission and distribution) must be sized to meet these infrequent peak demands. Thus extra costs are passed on to lower income consumers to cover this additional demand, even though they might not be using additional electricity. This occurs due to the method used by NEMMCO to justify the spreading of the extra costs around the market; 'demand management' can be a major issue for electricity management and is the subject of discussion both on a local and national level.

Under its legislative framework ESCOSA has focused on regulating demand management, and has the potential to reduce distribution network capital through lowering augmentation costs in parts of the network where constraints are forecasted. This means that where there are additional demands on electricity usage forecasted in different parts of the network, ESCOSA develops allowances for this.

Extensive consideration has also been given to demand side management by ETSA through a consultative process run to assess parts of the revenue requirements and pricing controls for ETSA Utilities. Under the *Essential Services Commission Act 2002*, the Essential Services Commission has the power to determine how and when different pricing points for electricity can be set. These are called Electricity Distribution Price Determinations. In April of 2005, the Commission approved \$20 million of operating expenditure to enable ETSA Utilities to trial a number of specific initiatives to reduce peak demands at constrained parts of the network. The Commission is monitoring this demand management program and is expected to report on this in 2007.

### **Summary**

#### **How does this peak demand situation affect low income consumers?**

- Low income consumers are affected in one major way: electricity costs more because of the way the system is set up to handle peak demand.
- The reason that low income consumers pay more is twofold. South Australia's electricity demand only rises in periods of extreme usage, such as when the weather is hot and air-conditioners are all turned on at the same time. The way electricity pricing is set means that when demand increases and extra electricity is required, the charge for the additional demand is evenly spread over all customers, regardless of how much electricity they use.

#### **What energy concessions are available to customers in South Australia?**

South Australia has a number of energy concessions including the Electricity Emergency Payment Scheme (EEPS). The Department of Families and Communities (DFC) provide several energy based concessions including the following:

Energy concessions of up to \$120 per year are applied to electricity accounts to help with all energy costs including electricity, gas and LPG bottled gas.

To receive these concessions, customers must satisfy all of the following requirements:

- They must receive an appropriate Centrelink / DVA payment or hold a relevant Centrelink / DVA card.
- The address for which they are claiming the concession must be their principal place of residence.
- Their name must appear on the electricity account.
- They must not share the house with someone who has an income of more than \$3000 per year unless that person is a spouse / partner / dependent or is in receipt of a Centrelink / DVA payment.

To obtain these concessions there are some supporting documents that need to be presented to ensure the application is processed appropriately. For electricity concessions, these are copies of all pages of initial accounts (not reminder notices), which must be in the customer's name or in joint names and include their name. The following are entitled to receive an energy concession:

- Pensioner Concession Card
- DVA Gold Card – Totally and Permanently Incapacitated
- DVA – Extreme Disability Adjustment
- DVA Gold Card – War Widow
- British and New Zealand War Widow
- State Concession Card
- Centrelink beneficiaries
- Austudy and Abstudy
- NEIS
- CDEP
- Commonwealth Seniors Health Card
- Farm Help / Exceptional Circumstances Payment

## **Victoria**

Victoria is positioned somewhat similarly to South Australia in the NEM in that it is connected to the NEM and the market has been operating with full retail contestability since January 2002.

The Commonwealth and Victorian governments share responsibility for policy development and regulation of the sector. In Victoria the Essential Services Commission is responsible for issuing licences to all businesses dealing with electricity but generally transmission businesses are primarily regulated by the ACCC.

The *Essential Services Commission Act 2001* (Victoria) sets up their Essential Services Commission in a very similar way to the South Australian one, giving it a primary purpose of looking after the long term interests of Victorian consumers with regards to price, quality and reliability of essential services. The ESC promotes competition, ensures minimum standards of conduct, enforces consumer protections and regulates distribution prices. The Victorian Essential Services Commission has the right to issue licences and codes and make price determinations which regulate access to natural monopoly services.

The key agency advising the Victorian Government on Energy Policy is the Energy Division in the Department of Infrastructure. This is the Victorian equivalent to the South Australian Department of Transport, Energy and Infrastructure.

### ***Energy Concessions***

There are several similar energy concessions available to Victorian customers to access if they are eligible. If you hold a pensioner's concession, a health care card or a Gold Card (issued from the Department of Veteran's Affairs), there are three energy concessions that you are entitled to:

1. Winter Energy Concession: this is a 17.5% discount on electricity bills issued in the winter period.

2. Non-Mains Winter Energy: this concession is accessible for customers who are being metered individually for their electricity consumption but who also pay a caravan park or accommodation fee.
3. Electricity Transfer Fee Waiver: Waives the connection fee when moving house.

The concessions unit also implements two grant schemes to assist concession card holders:

1. Utility Relief Grant Scheme: a once-off assistance to pay bills due to a temporary crisis
2. Emergency Capital Grant: a once off grant to repair or replace appliances for an emergency situation who otherwise cannot afford to do so.

Victoria is home to two major consumer law centres in the Consumer Law Centre of Victoria and the Consumer Utilities Advocacy Centre who act as consumer watchdogs for utilities law. These centres provide a reference point for Victorian consumers and consumer advocates and both have extremely comprehensive websites that are a good reference point for general information about the Victorian electricity scheme.

## **Queensland**

The Queensland electricity market was restructured on 1 July 1997 to prepare the industry for participation in the NEM. This included splitting the then single government-owned generation corporation into three competing generation corporations, and separating the retail activity from the electricity distribution business.

On 16 February 1999, the Queensland electricity industry was further restructured to improve governance arrangements and enhance the reliability of the State's electricity system. The main change was the amalgamation of the six regional distribution corporations into a single distributor corporation (Ergon Energy, with Ergon Energy Retail as a subsidiary company).

Queensland introduced full retail competition on 1 July 2007; they are now fully connected to the NEM and any approved retailer can offer small consumers market contracts as alternatives to the Government's uniform tariff scheme. Consumers will have the choice, as in any other arrangement for full retail competition in the electricity market, to remain on the government tariff or move to an alternative market contract with the option of returning to the government tariff.

The universal tariff scheme will undergo some modifications and Ergon areas universal tariffs will be subsidised by the government. However this will only apply to some consumers and others may not receive the subsidy. The situation depends on where you live in Queensland.

Consumer advocates in Queensland have expressed concerns about several elements of the model including:

- Consumer education: advocates have expressed concerns that information flowing down to consumers is inadequate and are concerned that they will not receive proper education about their options before the scheme is rolled out.
- Price comparison and disclosure: concerns have been expressed that consumers may not receive all the information they require about price comparison and disclosure. It is essential for consumers to be fully informed before they make a choice about which contract to sign up to before they make a committed choice. Without full disclosure and access to an adequate price comparison tool, then there is little chance that an appropriate and adequate choice could be made.
- Uniform tariffs: concerns about the regulation of and equity of access to uniform tariffs are critical for consumer advocates in Queensland.
- Ombudsman scheme: a properly constructed and planned ombudsman schemes with appropriate checks and balances is essential to making sure that consumers have an appropriate avenue for complaint.
- Monitoring and enforcement of compliance: this is essential for regulators to ensure good business practice and consumer protections are adequately followed.

Keeping an eye on the developments of full retail contestability in Queensland is an essential task for consumer advocates to serve as a good predictor for further essential services reform.

### **The Australian Capital Territory**

The Australian Capital Territory sits as one of the states joined to the NEM and is governed by all regulatory agreements as the other states attached to the grid. The entrance of AGL into the market saw a particularly interesting time for ACT energy advocates as it took the retailer some time to get their regulations in line with ACT requirements. Under ActewAGL, the dominant retailer in the ACT energy market, energy concessions are applied to holders of pensioner concession cards, health care cards or veteran's affairs cards. It is interesting to note that when assessing government energy contributions, the ACT Grants Commission dictated that as there was a lower than national average need for Commonwealth pensioner energy concessions, then government contribution to concession needed to be less than the national average.

### **New South Wales**

The New South Wales electricity market was deregulated and became part of the NEM from July 2002. The New South Wales government offers a number of energy concessions and schemes to customers. These include:

1. Energy blackouts rebates: Electricity customers in metropolitan areas can receive \$80 in compensation from their energy supplier if they suffer more than four 4-hour outages in a year or any outage longer than 12 hours. Non-

metropolitan customers can receive \$80 from their energy supplier if they suffer more than four 5-hour outages in a year or any outage of longer than 18 hours. These rebates are capped at \$320 per year and are effective from 1 July 2006.

2. The government also offers pensioner rebates of \$112 per year for pensioners as long as they are solely or jointly liable for the utilities bills at their place of residence, and they have a Centrelink Pensioner Concession Card or have a Department of Veterans Affairs Pensioner Concession Card or receive a Pension for War Widows or a Disability Pension.
3. The government also run life support rebates based on eligible equipment necessary to sustain life such as Respirators or Home Dialysis machines.
4. The Energy Accounts Payment Assistance (EAPA) scheme helps financially disadvantaged people experiencing difficulty paying their gas or electricity bills because of a crisis or emergency situation. The scheme ensures that people stay connected to essential services during a financial crisis and it is not available on an ongoing basis. The scheme does not cover assistance outside of these requirements and electricity / gas retailers are required to meet their obligations to manage customer debt in a fair and equitable manner.

NSW advocates have access to the Public Interest Advocacy Centre and the Public Interest Law Clearing House who are specialists in dealing with energy debates and disputes.

## **Tasmania**

Tasmania entered the NEM in 2005, and subsequently from 1 July 2006 became fully contestable and subject to the governing agreements of the NEM. Concessions offered in the Tasmanian electricity market include a life support concession, and health care card / pensioner concession cards offered at 48.4 cents per day. Due to Tasmania's cool climate, the government also offers a unique heating concession, which enables a twice yearly payment of \$28 to assist in heating costs. This rebate is only available to eligible pensioners.

## **Western Australia**

In 2003, the WA Government embarked on an unprecedented program of reform to the State's electricity industry. The Government's vision was to create a competitive electricity market to encourage private sector investment, improve reliability of supply and place downward pressure on prices. Western Australia has a wholesale electricity market that operates only in their state.

The key components of this program included:

- the restructure of Western Power into four Government owned entities;
- the establishment of a wholesale electricity market;

- the development of a strong and independent regulatory framework including measures to protect smaller customers in the new market;
- reduction in the contestability threshold to 50 megawatt hours; and
- The facilitation of sustainable energy options.

The Office of Energy through the Electricity Reform Implementation Unit (ERIU) managed the electricity reform process. ERIU was disbanded in April 2006 following disaggregation of the Western Power Corporation.

Current consumer protections that exist in Western Australia include:

- an independent Energy Ombudsman to provide residential and small business customers with access to a mechanism for resolving disputes with network operators and electricity retailers at no cost to the customer;
- a Code of Conduct for the Supply of Electricity to Small Use Customers that regulates and controls the behaviour of network operators and retailers and specifies levels of service;
- regulations to ensure that residential and small business customers can be connected to a distribution network at the least cost to the customer if the customer is located within a specified distance to the network;
- a standard contract that will specify the price and other terms and conditions for the supply of electricity by Western Power Retail (Synergy) to its tariff customers; and
- Development of an electricity licensing regime, which provides for the monitoring and enforcement of the various consumer initiatives.

Electricity concessions available to consumers in Western Australia include:

- Supply Charge Rebate - 100% rebate on the supply charge for electricity for war widows.
- Dependent Child Rebate - an additional amount will be deducted if widows have any dependent children.
- Standard Pensioner concessions and health care card rebates
- State Government Energy Rebate Seniors Air Conditioner Rebate
- Life Support Equipment Electricity Subsidy
- Thermoregulatory Dysfunction Subsidy Scheme
- State Energy Rebate Scheme

### **The Northern Territory and the Electricity Market**

The Northern Territory does not receive its electricity supply from the NEM as it is not physically possible to link into the grid. However reform to the market that took place in 2003 means that some consumers are eligible to choose their electricity.

Consumers who can choose their retail supplier are called contestable customers. Whether a customer qualifies as a contestable customer will be conditional on their electricity usage and is defined by the Regulations.

Currently, customers who consume more than 750MWh of electricity per annum are contestable.

The minimum customer consumption is calculated as:

- a customer's actual total power consumption at a single site during a consecutive 12 month period since 1 July 1998 was more than the set level (e.g. 4 GWh in respect of the 1 April 2000 eligibility date for contestability); or
- a customer's expected total consumption at that site during a consecutive 12 month period beginning on or after 1 April 2000 is likely to be more than the set level if the customer either:
  - did not consume electricity at that site before 1 July 1998, or
  - the customer's business or premises at that site were expanded after 1 July 1998 and the expansion causes the estimate to be more than the set level.

If a customer is a non-contestable customer, their electricity pricing and contracts remain managed by the government.

Energy concessions available in the Northern Territory include the Northern Territory Pensioners Concession rebate which is a rebate of \$150 made payable to pensioners and self funded retirees to assist with their energy costs.



**Appendix 7**

SACOSS Poster Resource

Note: Sample Only – In Final Stages of Development

**NOTE: SAMPLE ONLY – IN FINAL STAGES OF DEVELOPMENT**



Contact List for Electricity Advocacy Workers

**MY CLIENT IS WITH AGL AND CAN'T PAY THEIR BILL – WHERE DO I START?**

**AGL Staying Connected:** 1300 659 925 or at

<http://www.agl.com.au/AGLNew/At+your+service/Account+enquiries/Hardship+Program.htm>

**MY CLIENT IS WITH ORIGIN AND NEEDS INFORMATION ABOUT INSTALLMENT PLANS. WHERE DO I START?**

**Origin Energy Power On Team:** 13 24 61 or at

<http://www.origin.com.au/home/template.php?pageid=1594#Howtogetstarted>

**WHERE DO I FIND THE HARDSHIP POLICY FOR TRUENERGY?**

**TRUenergy:** 133 466 or at [http://www.truenergy.com.au/downloads/Hardship\\_Policy.pdf](http://www.truenergy.com.au/downloads/Hardship_Policy.pdf)

**WHAT DO I DO IF MY CLIENT HAS QUERIES ABOUT THEIR ELIGIBILITY FOR A PRE-PAYMENT METER?**

**Aurora Energy Pty Ltd:** 1300 13 2003 or at

[http://www.auroraenergy.com.au/charter.asp#keeping\\_you\\_connected](http://www.auroraenergy.com.au/charter.asp#keeping_you_connected)

**MY CLIENT ASKED ME ABOUT ENERGY AUSTRALIA – WHAT ARE THEIR DETAILS?**

**Energy Australia:** 13 88 08 or at <http://www.energyaustralia.com.au/>

**I NEED AN INTERPRETOR – WHERE DO I START?**

**Translating and Interpreting Service (TIS):** 131 450 (free call)

**I WANT TO REFER MY YOUNG MULTICULTURAL CLIENT TO FURTHER SUPPORT – WHO CAN HELP?**

**Multicultural Youth SA:** 8212 0085

**I NEED MORE HELP – I THINK MY CLIENT HAS A WORTHY COMPLAINT AGAINST THEIR ENERGY RETAILER. WHO CAN HELP THEM / ME?**

**Energy Industry Ombudsman:** 1800 665 565 (free call) 1800 665 165 (free fax) or at [contact@eiosa.com.au](mailto:contact@eiosa.com.au)

**WHAT ARE ETSA'S CONTACT DETAILS?**

**ETSA Utilities:** 13 12 61 or at <http://www.etsa.com.au/>



**Appendix 8**

Terms of Reference – SACOSS Essential Services Policy and Advocacy Group



## ESSENTIAL SERVICES POLICY and ADVOCACY GROUP

### **Terms of Reference**

May 2007

The Essential Services Policy and Advocacy Group (ESPAG) operate as an advisory group to the SACOSS Policy Council, which is the body responsible for determining the social policy positions for SACOSS.

#### Purpose

The ESPAG will provide advice and recommendations to SACOSS Policy Council on policies and positions regarding essential services including:

- Electricity
- Gas
- Water
- Transport
- Some aspects of telecommunications

The advice and recommendations will be prepared taking into account sustainability and the health, social and economic well-being of disadvantaged citizens, groups and communities across South Australia.

#### Membership

The membership of the ESPAG is drawn from contributors to South Australian essential services advocacy that will advance the position of SACOSS, its objects and constituency in relation to the essential services advocacy debate.

As the ESPAG deals with frequently changing issues, membership will not be restricted to current members of the SACOSS Policy Council as in the previous iteration of the Essential Services Task Group.

The ESPAG will engage with Policy Council, as well as individuals with relevant experience, including SACOSS representatives on government and industry committees. The ESPAG can engage people outside the SACOSS membership with relevant experience of regional and direct consumer issues.

The ESPAG will elect its own chair and SACOSS will provide secretariat support to the group.

### Meetings

Due to the rapid rate of significant developments in essential services, the ESPAG will meet as often as it deems necessary and will evaluate its progress, operations and meeting requirements and report to Policy Council every month.