

21st December 2007

Mr David Bremner
Executive Officer
National Electricity Consumers Advocacy Panel
PO Box 43
Surrey Hills Vic 3127

Dear David,

Proposed Electricity Advocacy Funding Requirement for 2008/2009 Financial Year.

CCCL welcomes the opportunity to respond to request for comments on the funding requirements for the next financial year.

We would advocate an expansion of the budget for the following reasons:
to address funding applications which do not currently fit easily within Panel categories;
to address the expansion into Gas; to take into account the different consumer advocacy environments of the States and the ACT. This includes allowance for sufficient funding for the following items:

- *Professional development in the form of master classes.* Funding support of master classes would provide welcome support for the advocacy/capacity building positions. It would keep advocates abreast of current issues and build knowledge thereby strengthening advocacy. In the past applications by CUAC to fund such proposals have been turned down by the Panel. If the Panel is to continue funding this model of advocacy then it is important to provide ongoing professional development opportunities in the form of Master classes and other opportunities.
- *National Consumers Energy Conference during 2008.* This conference is particularly timely in the development of consumer energy advocacy in the context of the NEM. It would engage consumer groups not otherwise engaged at this time. As mentioned in our previous submission on the Panel's strategic plan there is a lack of knowledge, time and resources among Queensland small end-user groups about the availability of Panel funds. The conference would provide a significant platform for bringing such players into the arena.
- *Gas.* There will be other calls on Panel funding including for the first time gas. No significant work on gas, from a consumer perspective, has been undertaken in Queensland to-date. In the absence of State Funding of energy advocacy in Queensland it is hard to conceive of the current advocate taking on additional

work loads in the gas area so a funding strategy for gas advocacy in Queensland needs to be identified. One of the key issues for consumers of gas in Queensland at present is the significant regional pricing variation (and hence significant price impacts on consumers) that has now become apparent with de-regulation. The evolution of the Gas market in Queensland has also been quite different to the evolution of the Electricity market in Queensland.

- *The lack of State or Territory funding of consumer organisations to address energy issues in some States including Queensland, South Australia, Tasmania and the ACT.* We have previously identified this issue with the Panel. Where there is recurrent State funding of consumer organisations there is more capacity for consumer representatives to respond to consumer needs in respect of the NEM issues in a far more robust manner than those States with more limited resources. The Panel has a role to play in identifying how to produce more robust advocacy in States that are less well-resourced in order to achieve jurisdictional parity in advocacy responses to NEM matters.

Finally, I would like to make a comment the Panel's response to the comments on its strategic plan in relation to funding. The Panel states that local government, rural users, small business, and residential end-users (who do not fall into the low income or disadvantaged group) are under represented in applications for funding and are not represented at the Roundtable. These observations need to be more nuanced. For instance the mandate of the Centre for Credit and Consumer Law is to promote a fairer, safer, and more efficient marketplace, particularly for low income and vulnerable consumers. There are two points to be made in respect of this mandate. Firstly CCCLs mandate covers all consumers' notably residential end-users including rural and regional consumers. Moreover, because of the shared nature of small end-user issues the advocate has also sought to understand the needs of other consumer classes notably farmers and to some extent small business. Secondly, by attending specifically to the issues faced by low income and vulnerable consumers the broader quotient of consumers receives benefit. In other words there are significant flow on effects to consumers from a focus on specific classes of consumers and this fact should be taken into account by the Panel when funding organisations which focus on low income or disadvantaged groups.

Thank you for the opportunity to respond. If you have any questions about this submission please do not hesitate to contact me.

Yours sincerely,



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