

15th August 2006

The Director
ERIG Secretariat
Level 4, 33 Allara Street
Canberra City ACT 2601

Dear Ms Taylor,

Re: Letter of Support –Consumer Law Centre Victoria and Public Interest Advocacy
Centre Submissions to Energy Reform Implementation Group’s Issues Paper

The Centre for Credit and Consumer Law Griffith University has the overall objective of promoting the attainment of a fairer, safer, and more efficient marketplace, particularly for low income and vulnerable small end-users. We write in support of the above two submissions.

In Queensland the current roll out of Full Retail Competition has meant that our resources are devoted to responding to those changes and we are therefore unable to respond substantively to the ERIG Issues Paper at this time.

As outlined in these two submissions we believe it is important that ERIG integrate consumer welfare/public policy into the economic and competition policy it is reviewing with respect to transmission, market structures and financial markets. As the PIAC submissions concludes: ‘The views and interests of consumers must be integral to efforts to achieve future gains in this area.’ We understand that in pure market terms there is not yet a satisfactory language or structure for integrating these ‘views and interests’ particularly with respect to an essential service like electricity. In this respect we welcome the participation of consumer representatives in ERIG and the capacity of CLCV and PIAC to respond to the issues paper where others cannot.

In Queensland full retail competition is being introduced into south-east Queensland where it has been deemed viable. However it is clear that for particular classes of customers including those on the long rural network in Queensland, full retail competition is not a viable proposition. In this respect we ask how can greater market place efficiencies be achieved without resulting in detriment to particular classes of small end-users who may or may not be able to participate in the market?

As the ERIG Issues Paper notes, ERIG must ‘...take into account possible linkages that have the potential to inform and assist the implementation of ...other processes’ such as the MCE reforms. We support this focus on these linkages with respect to consumer needs as it provides a platform for integration of small end-user needs.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Bathgate', written in a cursive style.

Dr Jane Bathgate
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