



## **Submission to Queensland Competition Authority**

### **Consumer Advisory Committee**

Centre for Credit and Consumer Law, Griffith University with funding from the National Consumers Electricity Advocacy Panel

16th March 2007

## **About the Centre for Credit and Consumer Law**

The Centre for Credit and Consumer Law is an academic centre, hosted by Griffith University Law School. The Centre for Credit and Consumer Law was established in March 2004 to be a source of expertise, and a centre of excellence, on credit and consumer law issues, and it 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.

The Centre for Credit and Consumer Law is funded by the Queensland Government's Consumer Credit Fund (administered by the Office of Fair Trading) and Griffith University. However, this submission is possible because of funding received by the Centre for Credit and Consumer Law from the National Consumers Electricity Advocacy Panel.

## **General Comments**

We welcome the establishment of the Consumer Advisory Committee under the new energy legislation and the efforts by the Queensland Competition Authority (QCA) to have this Committee established as soon as practicable. We are supportive of the proposed charter but have a few specific comments to make that we believe would improve it and also seek points of clarification that may also assist with this process.

We note that the concept of a consultation charter is new to the Queensland Competition Authority. We envisage that in future the proposed charter could be further refined and amended pending the operation of the Advisory Committee. We also see benefit in the establishment of a broader charter of consultation by the QCA to facilitate more input from stakeholders, particularly small end-users. We commend the Essential Services Commission, Victoria 'Charter of Consultation and Regulatory Practice' which has been recently revised – see <http://www.esc.vic.gov.au/public/About+ESC/Consultation+Policy/>

We note, for your information, that the National Consumers Electricity Advocacy Panel funded position is based at the Centre for Credit and Consumer Law, Griffith University. This position is funded to participate in debates and discussions about electricity matters including participation in the proposed Committee. This position deals specifically with electricity issues from a small consumer/policy perspective in respect of the National Energy Market. This position is advised by two committees comprising a broad cross-section of consumer representatives from Queensland.

## **Specific comments**

### **Background**

What does the Authority deem is a regular basis for meetings? Could this be more time specific?

## **Interpretation**

As outlined under the Charter objective the committee acts as an advocacy body on behalf of 'small consumers'. A definition of small consumers should also be provided or somehow incorporated into the current definition of "Consumer" which is too broad to take into account the Committee's brief.

## **Establishment of the Committee and Proceedings**

We support the proposal to appoint organisations as members rather than individuals as this will ensure that consumers are represented appropriately. We also believe that the committee's formal standing in QCA would be assisted by having a formal link with the Board.

We believe this list is representative of the main organisations in Queensland that represent the interests of small consumers. However we note that the Queensland Farmers Federation, Commerce Queensland and the Queensland Retail Traders and Shopkeepers Association also represent the interests of large consumers. It should be made clear somewhere in the charter that these organisations should be representing the interests of small consumers on the Committee and that any other interests are declared. We also note that this list is not exclusive and would recommend that the Tenants Union of Queensland be included on this list because they represent the interests of residential tenants – a significant group of residential electricity users in Queensland. Scope should also be allowed in the Charter for the inclusion in the future of other Queensland organisations who may also represent the needs of small end-users and have a Queensland wide-brief but are not listed here.

## **Committee Support**

The support for the Committee as outlined is welcome. We note that some small consumer organisations are not well funded and therefore ancillary support would be helpful such as reimbursement for car parking.

Yours sincerely,

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