

1 July 2020

Submitted via Engage Victoria

Ms Kate Symons  
Chairperson Essential Services Commission

Dear Ms Symons

**Essential Service Commission's (ESC) Electricity Distribution Code review – customer service standards draft decision (Draft Decision)**

I am making this submission as an electricity customer living in a rural area. My interest in energy issues is based on my experience working as a financial counsellor in a regional town for more than 25 years and my recent involvement as an AusNet Services Customer Forum Member for the 2021-2025 Electricity Distribution Price Review

My submission builds on the comments I made in the Draft Decision Public Webinar on 25 June 2020.

While I generally support the proposals in the Draft Decision, I am concerned that this review focuses more on the needs of the ESC, Distributors and Retailers than on the needs of customers. I believe there needs to be a greater emphasis on consultation with customers by All parties.

I am concerned at the difficulty a customer faces in participating in this Review and similar reviews. To ensure a greater customer voice, funding needs to be provided to grassroots Consumer Advocacy Organisations and Groups who represent customers who are vulnerable (both residential and small business) and who may have particular needs like rural and regional customers.

**Communications and Outages (Planned & Unplanned)**

While I support Retailers providing information to Distributors, customers should also be allowed to provide their communication preferences direct to their Distributor and Distributors should be obliged to collect customer's preferences when the customer makes this request.

My experience and observation is that there is level of dysfunction in the relationship between Retailers and Distributors. I have little confidence that this dysfunction will end anytime soon so customers should have the right to contact either their Retailer or Distributor for matters like communication on electricity outages.

While it is true that many electricity customers see their relationship solely with their Retailer, customers who experience frequent planned and unplanned outages often also have a relationship with their electricity Distributor. This will be more so for rural and regional customers. For these customers, it is unreasonable to send them to their Retailer so that they can lodge their preferred communication preferences with their Distributor. Any process that has multiple steps is more likely to fail than a process that allows a customer to communicate directly with their Distributor.

Good communication during an unplanned outage is critical. Customers should be permitted to request that Distributors send outages information to multiple mobile numbers and/or email addresses to ensure that all household members have direct access to information about their electricity supply during an outage. This will help ensure that household members at home during an outage are accurately informed.

I note that the ESC expressed a view in the Webinar on 25 June that there may be nothing preventing a Distributor collecting communications information directly from a customer. This should be clearly set out in the ESC final decision.

The AusNet Services Customer Forum made observations about this issue in their Customer Forum Final Engagement Report for the AusNet Services 2021-2025 Electricity Distribution Price Review. See Section 7.3 on pages 25-28 and Section 14.5 on page 59 <https://www.ausnetservices.com.au/-/media/Files/AusNet/About-Us/Electricity-distribution-network/2020/AusNet-Services-Customer-Forum-Final-Engagement-Report-FINAL.ashx?la=en>

Distributors need to consult customers about the planning of Planned Outages. This should be mandated when there are frequent or multiple Planned Outages in a locality. Planned Outages can have a significant impact on customers and particularly business customers. Consultation with customers should lessen the negative impact of outages on customers.

Distributors should provide an explanation to customers of the reasons for all Planned and Unplanned Outages, cancelled Planned Outages and overruns & underruns of Planned Outages

### **Guaranteed Service Level (GSL) payments**

I believe that in relation to Outages and GSLs, these issues have a significant impact on rural and regional customers. But I am unsure if the needs of rural and regional customers have been adequately considered by this review.

Customers receiving a GSL payment should receive a notification from their Distributor explaining why they are receiving a GSL payment and details of the reasons for the payment.

Customers should be able to track outages at their property. Unplanned Outage information needs to be visible to individual customers on a continuous basis so that they can monitor the cause of the outages and their potential eligibility for a future GSL.

Who should pay for GSLs?

Currently customers pay the cost of GSLs. AusNet Services have recently agreed to self-fund controllable GSL payments such as missed appointments and connections failing to be done by the advised date. Page 133/272 of AusNet Services REGULATORY PROPOSAL 2022-26 31 JANUARY 2020.

[https://www.ausnetservices.com.au/-/media/Files/AusNet/About-Us/Electricity-distribution-network/2020/EDPR-2022-26\\_Part-III-PUBLIC.ashx?la=en](https://www.ausnetservices.com.au/-/media/Files/AusNet/About-Us/Electricity-distribution-network/2020/EDPR-2022-26_Part-III-PUBLIC.ashx?la=en)

As a minimum, all Distributors should agree to self-fund controllable GSL payments.

There should be a discussion about Distributors self-funding an additional amount of GSL payments. This may provide greater incentive for Distributors to improve service and provide a small reduction in customers' bills.

Please contact me with any questions

Regards



John Mumford

