



19 February 2018

Essential Services Commission Victoria
Level 37, 2 Lonsdale Street
Melbourne VIC 3000
exemptionregister@esc.vic.gov.au

**Re: Draft Decision: Register of non-licensed electricity providers: registration guideline
(information for registration and public register)**

To the Commission,

Uniting Kildonan (Kildonan) welcomes the introduction of the register of Non-Licensed Electricity Providers (NLEPs) as a timely recognition of this growing segment within the electricity sector.

About Uniting Kildonan

Uniting Kildonan is a community services arm of the Uniting Church in Victoria and Tasmania. Uniting is the coming together of 22 UnitingCare agencies, including Kildonan, and two church business units, on 1 July 2017. Uniting for greater change.

Previously one of Australia's oldest community organisations, founded in 1881, Uniting Kildonan has worked in the area of vulnerability for 135 years. Our main emphasis is on family preservation, early intervention and the prevention of family breakdown. Programs include youth, family and children's services, financial counselling, energy efficiency programs and community based support programs. Today, Uniting Kildonan is seen as an influential voice and adviser to State and Commonwealth government on issues of consumer hardship and is represented on many public sector and corporate consumer advisory councils.

Uniting Kildonan & Barwon Cluster

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Our Response to the Draft Decision

In our experience working alongside households in financial difficulty, we have observed for some time now that people who have recently moved into an apartment, retirement home or permanent residence in a caravan park often don't realise they are now buying electricity from an embedded network or an onseller rather than a typical high-profile electricity retailer.

All too often the resident doesn't find out that this crucial piece of information until they try to switch retailers, get access to a meter, apply for a concession, go to query an unseasonably high bill or find out why they haven't received a bill for several months. For a customer feeling the early bite of financial difficulty, it can be a confusing and ultimately frustrating process to discover they cannot access concessions, readily switch retailers to get a better deal, or receive emergency assistance through channels they may have successfully used before.

Our energy advisors, who work with customers with energy-related debts and difficulties, report that customers of NLEPs frequently feel frustrated that their queries to the company that provides their invoices simply go unanswered or that when they are able to reach the onseller, discover that the company is not properly informed or trained to explain how they can receive concessions or grants to ensure their electricity supply is uninterrupted.

Understandably the lack of clarity for consumers connected to non-licensed networks about who their provider is, how to get in touch with them, how to access financial assistance and how to resolve queries and complaints, results in some electricity consumers missing out on the protections that the majority of Victorian electricity consumers can readily access.

As such Kildonan welcomes this initiative of the Commission as a vital and important first step towards ensuring that customers of NLEPs are afforded the same protections as customers of traditional grid-related networks. We have sought to provide a brief response to each of the questions put forward in the Draft Decision.

Question 1 – Additional information in identifying providers

The inclusion of the proposed details such as the provider's trading name and the site where the supply or selling activity is occurring is a sensible and logical step in ensuring that the register meets the Commission's objective of ensuring clearer visibility within this segment of the market.

Multiple lines of information will allow users of the register to search for contact details of their provider in a format that is familiar to them such as the trading name or their own residential address.

Kildonan considers it essential that customer contact details entered on the public register be accurate and reviewed by the Commission on a regular basis to ensure consumer confidence in the effectiveness of the register. Further we consider it appropriate to require a provider (or

associated third party) to notify the Commission of any changes to contact details such as phone number, email or web address within a specified timeframe. The requirement to notify the Commission would also extend to where transfer of ownership occurs or where the whole business (or part thereof effecting consumers of the electricity provider) is sold to a new or existing provider.

The inclusion of ABN/ACN details is an important element of the publicly accessible component of the register as will assist interested parties in the establishing the scale of NLEPs in Victoria and the market distribution. Kildonan considers this information to be of public interest as it will enable the Commission to alert interested and affected parties where issues of insolvency arise which may jeopardise the continual supply of electricity to residences or businesses serviced by a particular NLEP.

Question 2 – Additional, non-public information to establish scale of segment

The proposal for additional information is a welcome initiative in improving visibility of the scale and scope of the NLEP market in Victoria and ensuring appropriate monitoring and enforcement of consumer protections for customers of NLEPs is able to occur efficiently and effectively.

While this information will assist the regulator with vital monitoring and compliance issues, Kildonan considers the proposed information to also be of public interest. As such, we would welcome the inclusion of this information in an accessible format such as the Commission's annual Victorian Energy Market Report. This would allow interested parties to monitor sector growth, concentration, consumption levels, network supply charges and electricity consumption charges as well as tracking trends in the handling of customer complaints.

Such an initiative would allow EDR services, consumer advocates and other interested parties to monitor and review developments in this growing sector of the energy market.

Question 3 – Inclusion of additional information to improve understanding

Consistent with the purpose of providing greater visibility of NLEPs to consumers, the register needs to include current registered business contact details as well details for all the relationships of subsidiary, parent and any third party providers involved in the supply, metering, maintenance or billing of a particular property. The purpose of including this information would be to make it easier for a customer to contact the appropriate part of the NLEP in order to resolve a query about their account, supply, or meter, or to receive information on accessing a concession or grant, or information about raising a complaint either internally or externally.

It is essential to the integrity of the register that contact details be current and regularly reviewed to ensure the register is accurate at any point in time so that customers of NLEPs can be confident that they will receive a response from their provider when they make an enquiry.

Question 4 – Usefulness of the guideline

The Commission's draft decision clearly and succinctly outlines the process and requirements for NLEPs to register their network and is by no means onerous.

In addition to the above responses, Kildonan encourages the Commission to give consideration to including additional information for consumers of NLEPs on the register portal that will help them better navigate the existing consumer protections.

Useful information for customers of NLEPs would include how they can access the Non-Mains Energy Concession and the Non-Mains Utility Relief Grant as well as outlining the steps they might take to resolve a query or complaint with their provider. This would serve as an interim measure while the Commission consults further with stakeholders on the provision of additional consumer protections.

Ideally links to information about concessions and complaint resolution would be positioned for high visibility on the front page for the register.

Kildonan further suggests that the Commission consider including a weblink to the NLEP register on the Victoria Energy Compare website so that consumers can check whether they are part of a non-licensed network. Such an initiative will assist in raising consumer awareness about the existence of NLEPs within the wider energy network.

If you require further clarification of any of the issues raised, please contact Peter Appelman on [REDACTED] or by email at [REDACTED].

Yours sincerely,

[REDACTED]

Joanna Leece
Executive Officer
Uniting Kildonan & Barwon Cluster