



25 October 2019

SUBMISSION TO ENERGY CHARTER INDEPENDENT ACCOUNTABILITY PANEL

BACKGROUND

The Queensland Consumers' Association (the Association) is a non-profit organisation established over 40 years ago and which exists to advance the interests of Queensland consumers. The Association's members work in a voluntary capacity and specialise in particular policy areas.

The Association is a member of the Consumers' Federation of Australia, the peak body for Australian consumer groups, and works closely with many other consumer and community groups.

The Association has been especially active for many years on energy issues in Queensland and nationally and is currently represented on the:

- Queensland Competition Authority's Consumer Consultative Committee
- Energy and Water Queensland Ombudsman's Advisory Council

The Association is also a member of the Queensland Council of Social Service's Essential Services Consultative Group and the Queensland Energy Minister's Consumer and Industry Reference Group, and has been a member of Origin Energy's National Consultative Customer Council and Energex's Customer Council.

The Association has participated in, and made numerous submissions to inquiries etc. on energy issues conducted at national level, in Queensland, and in other states.

The Association has a strong interest in policies and other arrangements which result in highly effective markets and especially the need for effective consumer protections and ongoing effective consumer demand created by many engaged consumers making well informed choices.

The Association participated in the development of the Energy Charter and welcomes the opportunity make this brief submission on the disclosures covering the period 1 January to 30 June 2019.

The contact person for this submission is: Ian Jarratt, email ijarratt@australiainmail.com

COMMENTS

Unfortunately, we only have the resources to be able to comment, and only briefly on, **Energy Queensland's (EQ) Energy Charter Report**.

Our comments are:

Principle 2 – We will improve energy affordability for customers.

Although there is some mention in the Report of measures taken to assist customers to better manage their energy consumption, we would have liked to have seen more evidence of EQ proactively doing this via its distribution businesses and especially via Ergon Energy Retail which is in regular contact with most household customers in regional Queensland. This is because we believe there is great scope for many consumers to significantly improve energy affordability by making relatively simple and easily achieved changes to how much energy they consume and when.

We would like EQ to do more to encourage and help customers to better manage their energy consumption, including where appropriate using mass advertising and mailouts to customers, and to include more reporting of work on this matter in the next Report.

Principle 3 – We will provide energy safely, sustainably and reliably

We are concerned that measures to improve/manage **power quality** (voltage, frequency, harmonic distortions, etc.) do not appear to be mentioned in the Report even though this is an extremely important matter for all consumers and a significant problem for some.

This has probably occurred partly because quality is not included in the high level description of Principle 3 of the Charter which only says “**We will provide energy safely, sustainably and reliably**”.

It is however, included in the National Energy Objective viz:

“To promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, **quality**, safety, reliability and security of supply of energy.”

Therefore, we believe that energy quality should also be included in Principle 3. This could be easily done, for example by changing it to "We will provide **quality** energy, safely, sustainably and reliably".

Even if Principle 3 is not changed to include quality, we would like EQ to include more about its work on this important matter in the next Report.