

POWER+WATER

NEWSLETTER OF THE CONSUMER UTILITIES ADVOCACY CENTRE

ISSUE 5 • JUNE 2012

The year ahead

energy and water in 2012-13



**consumers and
the Carbon Price**



**energy networks
reform on the
way?**



**National Energy
Customer
Framework in
Victoria**



**extension of
water debt
management
powers**

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CUAC is an independent consumer advocacy organisation which ensures the interests of Victorian electricity, gas and water consumers—especially low income, disadvantaged, rural and regional, and Indigenous consumers—are effectively represented in the policy and regulatory debate.

CUAC believes all Victorians have a right to:

- affordable and sustainable electricity, gas and water
- have their interests heard in policy and regulatory decisions on electricity, gas and water
- not be disconnected from electricity, gas and/or water due solely to an inability to pay

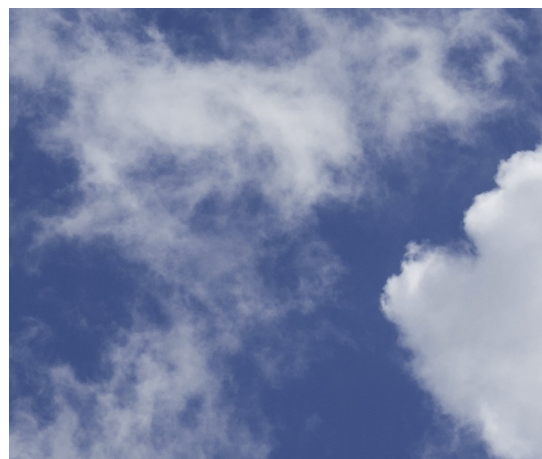
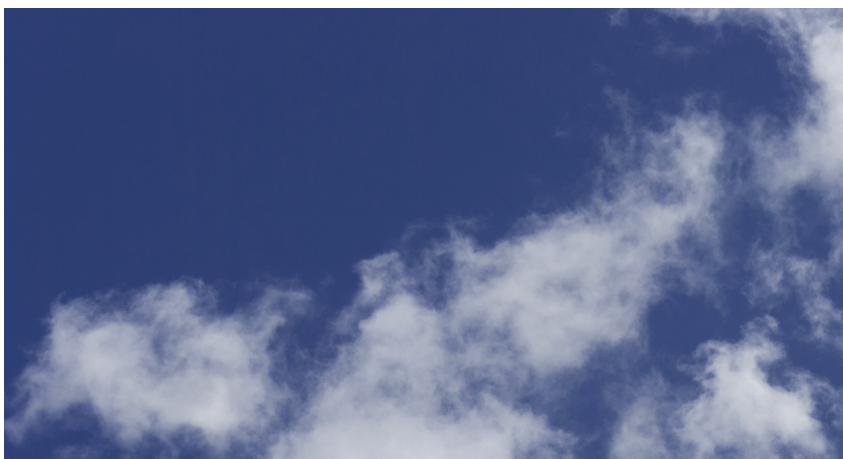
CUAC:

- Provides a voice for, and strengthens the input of Victorian utility consumers—particularly low income, disadvantaged, and rural and regional consumers—in the policy and regulatory debate
- Initiates and supports research into issues of concern to Victorian utility consumers, through in-house research and building the capacity of consumers through its Grants program
- Investigates and responds to systemic issues affecting Victorian consumers in the competitive electricity and gas markets and with regard to water.

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The year ahead in energy and water

At around this time each year, CUAC turns our collective mind to our annual work plan for the next financial year. We reflect upon our work and achievements and consider what will likely occupy our time over the coming twelve months. As part of this process, we also ask members of our Reference Group about the issues they see arising in their work. These are our conclusions on what will be some of the big issues for Victorian energy and water consumers in 2012-13.

Smart meters

Smart meters and associated policy challenges will continue to be a major feature of the Victorian energy policy landscape. With the Victorian Government's ongoing commitment to the roll out, the coming year will see the detail of the Government's policy commitments developed and implemented.

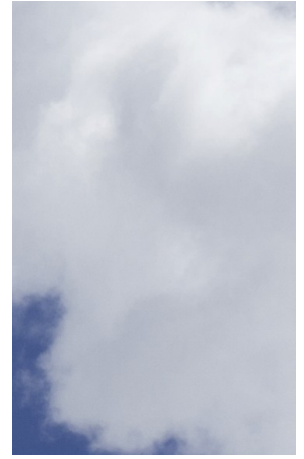
A key issue will be the approach to the implementation of, and transition to, time-of-use pricing. CUAC has long been concerned about consumer readiness for this additional layer of complexity in an already complex energy market, and our Reference Group also called attention to the issue of consumer understanding of new tariffs. Preparing the ground in the community for this significant reform is crucial and presents a challenge to government and industry.

CUAC is pleased that the government has committed to the continued availability of flat (or non-time variant) tariffs for consumers who may not be ready for the change, or for whom the change may not be beneficial.

The coming year should also see the introduction of technologies that support consumers to monitor and manage their energy use. It is likely that an online web portal that allows consumers to view their energy consumption data sourced from their smart meter will be available from one distributor around the time this issue of POWER+WATER goes to print. In addition, the Government's inclusion of in-home displays (that allow for consumption and cost data to be provided in real time to consumers) in the Energy Saver Incentive program will likely see these devices introduced soon.

The introduction of national energy retail regulation

Regular readers of POWER+WATER would know that CUAC has long been a vocal advocate for best practice consumer protections in the proposed National Energy Customer Framework (NECF). The NECF aims to replace existing state-based retail regulation of energy with a single nationally harmonised regime overseen by the Standing Council on Energy and Resources (SCER), the Australian Energy Market Commission (AEMC) and the Australian Energy Regulator (AER). In the last year, the AER has been busy preparing the supplementary regulatory guidelines to support the NECF, and CUAC has consistently provided feedback in this development process.



The states and territories were due to finalise legislative changes in readiness for a 1 July 2012 start date for the NECF. The Victorian legislation to support the change has been drafted and is ready to go before parliament. However, with some further negotiations occurring between several state governments and the Commonwealth, it is possible that there may be further delays to the introduction of this national scheme.

Regardless of this, it is likely that the new national regulations will come into force sometime in the next twelve months. CUAC will be closely monitoring the transition to see that it occurs smoothly and that the responsible regulators undertake adequate compliance and enforcement activities to ensure the success of the new regime.

Victorian Water Price Review 2013-18

As the Victorian water businesses are monopolies, price regulation is necessary to ensure an efficient price is paid by consumers. During 2011-12 the Essential Services Commission (ESC) began lead-in work on the next water price review. CUAC was an active participant in these processes, including preliminary work on tariff structures and customer engagement strategies.

This year the Water Price Review will get underway in earnest, with Victorian businesses submitting their draft and final pricing proposals, known as water plans, for the regulatory period commencing in 2013. All of Victoria's water retailers provide details of their revenue requirements (supported by associated investment plans and demand forecasts) as well as their pricing proposals to meet their revenue requirement. The ESC assesses these plans against principles contained in the Water Industry Regulatory Order and decides whether to accept the

businesses proposals or to require modifications to them.

CUAC will ensure that consumer perspectives are provided to the ESC in the hope of encouraging a fair outcome for Victorian water consumers. We have also met with a number of water businesses to discuss their water plans and will continue to work directly with businesses in 2012-13.

The introduction of a carbon price and accompanying income support compensation

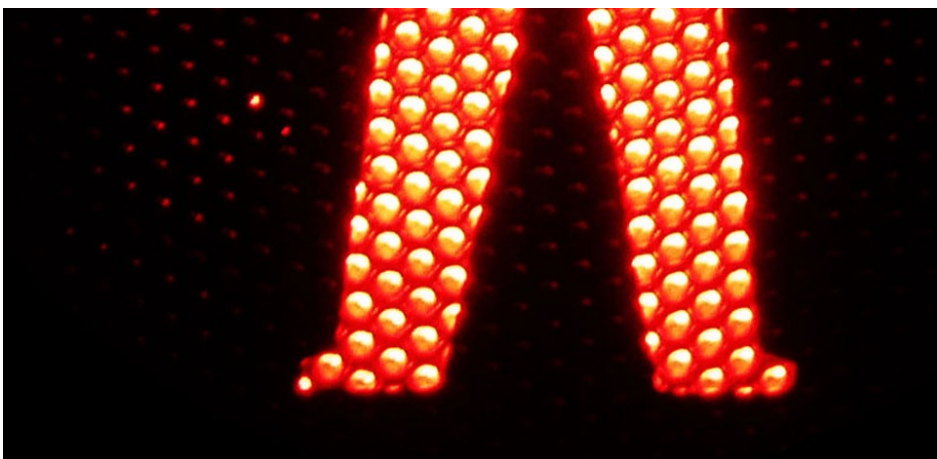
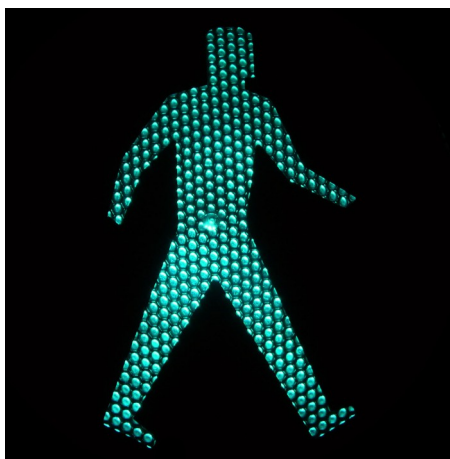
The Commonwealth Government's carbon price is due for introduction on 1 July 2013. This will affect the price of many basic products, but electricity and gas will be particularly affected. CUAC will engage with policy makers to encourage them to provide appropriate support to consumers. We will also be monitoring any retail pricing issues that may emerge as a consequence of carbon pricing. You can read more about the consumer impacts of the carbon price in our related article on page 8 of POWER+WATER.

Energy network regulation

As one of the few areas where consumers can have a direct influence on price, energy networks will feature prominently in 2012-13 as they have in recent years. You can read more about this important regulatory area in our related article on page 12 of POWER+WATER.

Other issues

Other issues high on the agenda for CUAC's Reference Group members in 2012-13 include door-to-door selling, energy efficiency, energy retail market concentration and problems to do with marketing, installation and billing in solar power.



National Energy Customer Framework:

Developments in Victoria

Over the course of the development of the National Energy Customer Framework (NECF), CUAC's advocacy has focused on ensuring that Victorian consumers are not made worse off in the move from state to national protections. With the NECF likely to come into force shortly, we take a look at the changes that consumers can expect.

National Energy Retail Law (Victoria) Bill 2012

The *National Energy Retail Law (Victoria) Bill 2012* was read a second time on 28 March 2012 in the Assembly. The National Energy Retail law (NERL) establishes a national framework for regulating retailers and distributors who sell and supply electricity and gas to consumers, and contains energy-specific consumer protections which complement the general consumer law. The Bill will apply the NERL in Victoria.

To ensure that Victorian consumers are not worse off in the transition to the national framework, the government has incorporated a number of key Victorian specific customer protections directly into the Bill and other instruments.

Smart meter provisions

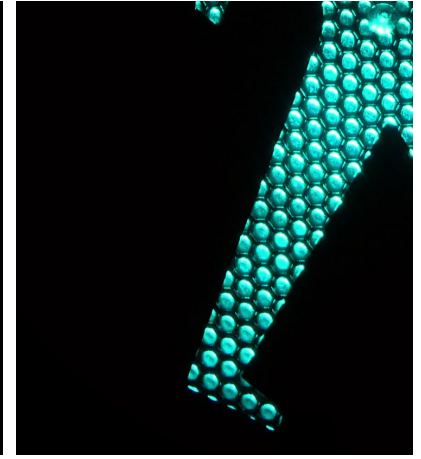
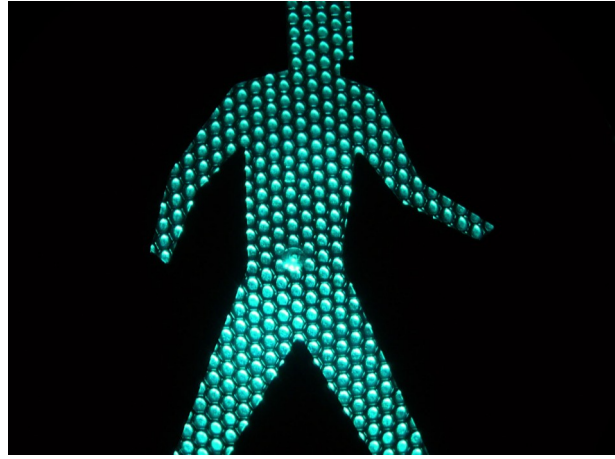
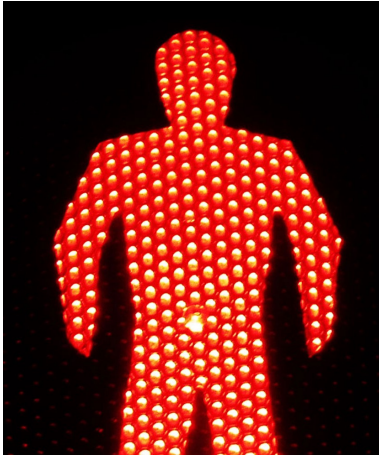
Following on from the Essential Services Commission's *Smart Meter Regulatory Review*, the bill

also includes smart-meter related consumer protections that are absent from the NECF but necessary for Victorian consumers in light of the ongoing roll-out of smart meters.

Many of these provisions relate to consumer information, including consumption data. The Bill sets out requirements on retailers to provide certain information on customer bills, including an index read (i.e. the total accumulated consumption read from smart meters) at the start, and end, of the billing period as well as the total amount of electricity (kWh) consumed in each period of which a relevant tariff applies. The Bill also gives customers rights to access their smart meter data. Should a retailer wish to change a smart meter tariff, they will be required to give customers at least 20 business days prior notification. Distributors will be required to display a 24-hour phone number on the smart meter.

A number of provisions deal with matters relating to payment difficulty, hardship and disconnection. CUAC is particularly pleased that the Bill prohibits late payment fees and provides for the continuation of Victoria's wrongful disconnection compensation scheme. Hardship policies will be required to include energy efficiency assistance options for hardship customers (that is: free or subsidised home energy consumption audits and flexible options for purchase or supply of energy efficient appliances).

With regard to disconnection and reconnection, disconnection warning notices will need to state that



that the customer may be de-energised remotely. Following disconnection, if a customer is eligible for a Utility Relief Grant they will also have a right of reconnection. Reconnection timeframes will need to afford customers who are disconnected from supply an opportunity to be reconnected on the same day, and an opportunity to remedy non-urgent health and safety related concerns that may lead to disconnection. CUAC is also pleased to see the introduction of a provision prohibiting disconnection for non-payment in extreme weather events (that is: where a Heat Health Alert has been issued by the Department of Health).

Importantly, the Bill bans pre-payment meters and also prohibits the use of supply capacity control for credit management purposes before 1 January 2014.

Payment Plans

While these protections are overwhelmingly positive, we remain concerned at the lack of universal access to payment plans. Last August, we highlighted the importance of universal access to payment plans in a joint submission with other consumer organisations to the Department of Primary Industries' (DPI)'s discussion paper on the *Victorian Specific Regulatory Requirements under the NECF*. We again raised this in a May 2012 joint submission to DPI on the subordinate instruments to the National Energy Retail Law (Victoria) Bill.

The definition of "payment plan" in Section 50 of the National Energy Retail Law (NERL) suggests that only customers who are *currently* experiencing payment difficulties are entitled to a payment plan. This excludes consumers who would like to use payment plans as a means to reduce financial stress or to

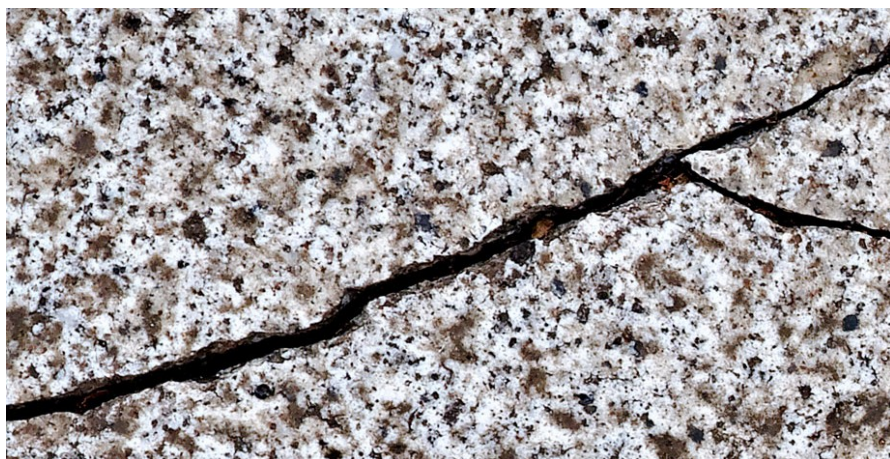
avoid payment difficulties, anticipated in the foreseeable future. A person's personal circumstances may change because of a job loss or an addition to the family.

Universal access to payment plans has been an essential component of the Victorian customer protection framework. Omitting universal access to payment plans in the National Energy Retail Law (Victoria) Bill limits the ability for consumers to be pro-active in managing their financial affairs. This potentially results in poorer outcomes for customers, retailers and community support agencies.

Small Compensation Claims Regime

CUAC is also concerned about the Bill's non-retention of *Guideline No 11 Voltage Variation Compensation*. Sometimes, variations in voltage levels supplied to a premises occur, and this can cause damage to appliances and equipment. Guideline 11 states that in the event of a voltage variation, consumers must be compensated for property damage without proving fault. This is particularly important for consumers who are unable to afford insurance, such as renters and low-income households.

There is also an economic justification for the no-fault approach to voltage variation. That is, it would be very costly to resolve and determine disputes if voltage variation claims had to be considered on individual merits. The no-fault approach eliminates these dispute resolution costs. CUAC is of the view that placing the onus on the network to pay up where a voltage variation has occurred, without having to prove fault, also aligns incentives appropriately by encouraging networks to take efforts to reduce voltage variations.



Wrongful disconnection a growing problem

EWOV data shows that billing-related energy disconnections continue to rise. Victoria's Wrongful Disconnection Payment scheme has helped limit disconnections—but now more needs to be done.

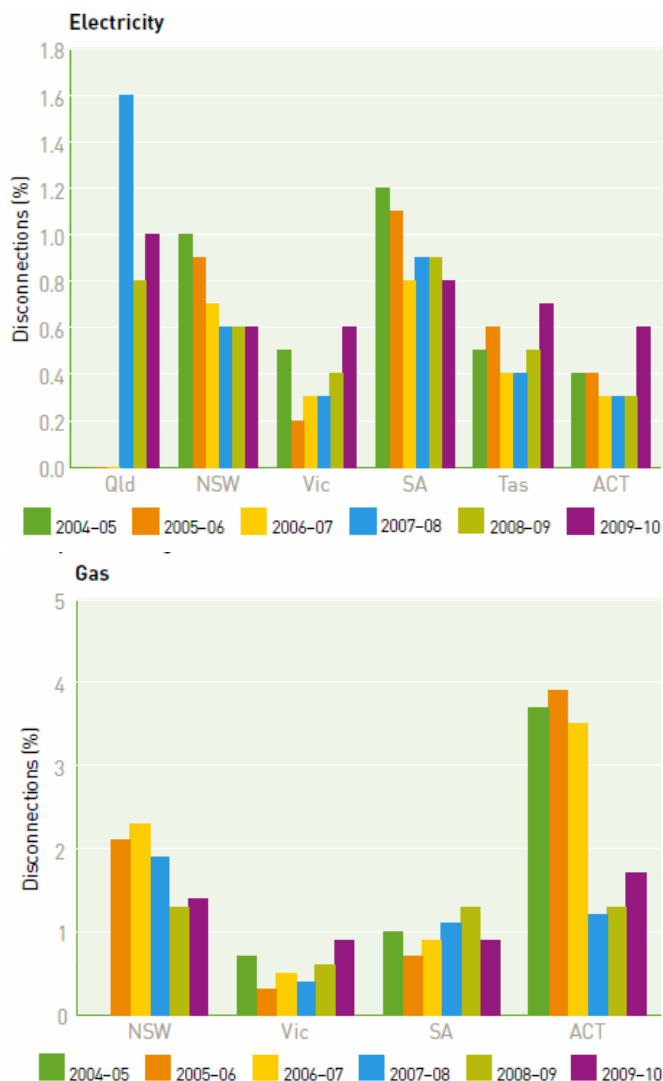
In 2004, Victoria introduced the Wrongful Disconnection Payment (WDP) legislation, requiring retailers to automatically compensate customers who were wrongfully disconnected. The WDP's introduction resulted in a sharp fall in disconnections for non-payment (see graphs). However, from 2005 onwards, disconnections for non-payment began to creep back up. Although Victoria still has the lowest disconnection rates, the upward trend is worrying.

The Essential Services Commission has expressed concern that the Energy and Water Ombudsman (EWOV) has been increasingly required to negotiate payment plans and WDP—regulatory requirements with which retailers should comply of their own accord. From October to December 2011, WDP was found to be payable in 173 out of 358 EWOV disconnection complaints (mostly residential). In 51% of these, customer financial hardship was a factor. CUAC is worried that there may be customers who are not compensated when wrongly disconnected because they did not seek EWOV's assistance.

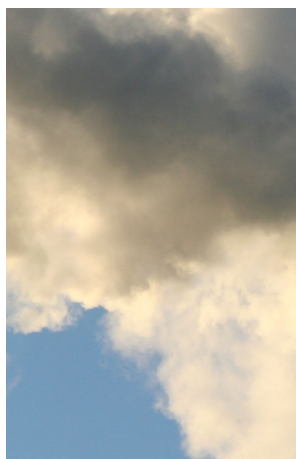
CUAC is pleased that the *National Energy Retail Law (Victoria) Bill 2012* retains the WDP provisions for Victorian consumers. While disconnection rates for non-payment have risen, we believe that WDP still provides an incentive to industry to ensure that they have proper checks and processes in place to prevent

wrongful disconnections. However, more needs to be done to assist customers who are experiencing payment difficulties.

Residential disconnections for failure to pay amount due, as a percentage of small customers



Source: AER, *State of the Energy Market 2011*, p. 117



Consumers and the carbon price

Following years of discussion, debate and uncertainty, Australia will soon see the introduction of a carbon price. What will it mean for consumers?

From 1 July 2012, companies that emit more than 25,000 tonnes of carbon dioxide into the atmosphere each year will be required to pay the \$23 a tonne carbon price. This price will continue to be fixed by government until 1 July 2015, at which point it will become a floating price set by the market.

Bill impacts

Around 60 of the businesses required to pay the carbon price are primarily involved in electricity generation, while a further 40 are gas retailers. This means that the introduction of the carbon price will have electricity and gas price impacts.

The exact impact on energy bills will be dynamic (and difficult to predict with certainty). Alternative energy sources will become more competitive as the carbon price takes effect, and the exact cost of these energy sources is not clear. The carbon price liability passed on to consumers might even change from month to month. Despite these uncertainties, the Commonwealth Treasury has modelled the impact of the carbon price, estimating an average household electricity bill increase in Australia of \$3.30 per week, or around ten per cent. The average gas bill impact is estimated to be \$1.50 a week (approximately nine per cent).

To compensate for the impacts of the carbon price, the Commonwealth government has introduced tax benefits and welfare payment increases for many

Australians through its Clean Energy Future Household Assistance Package. Some of the welfare payment benefits began in May, while tax rate changes will take place in the new financial year. Individuals can calculate their own individual tax or welfare compensation for the carbon price at www.cleanenergyfuture.gov.au/helping-households/household-assistance-estimator.

The Victorian Government has subsequently announced changes to its concessions to take account of the price on carbon, meaning that the state concessions will not be applied to the part of the energy bill covered by Commonwealth compensation. In dollar terms, the Annual Electricity Concession will not apply to the first \$171.60 of an eligible consumer's bill, while the Winter Energy Concession on gas will be applied to amounts over the \$62.40 threshold. There will also be changes to other energy-related Victorian Government concessions.

Misleading carbon price claims

One concern for consumers is that businesses may take advantage of the carbon price to increase prices over and above the level that would be justified by the carbon price. Alternatively, they might make misleading claims about the impacts of the carbon price on their or a competitor's products.

The Australian Competition and Consumer Commission (ACCC) has prepared guidance on carbon price claims for both consumers and businesses. Their 'Consumers and carbon price claims' brochure can be found at <http://www.accc.gov.au/content/index.phtml/itemId/807902>



CUAC energy market report launched

On Wednesday 7 March 2012, CUAC held an event to formally launch its research report 'Improving energy market competition through consumer participation'. The event was well attended by senior figures in the energy industry, regulators, policymakers and consumer advocates.

Research findings

As readers will recall from previous issues of POWER+WATER, the research found a range of barriers to effective competition in the Victorian retail market. The report found that consumers find it difficult, and are not particularly motivated, to engage effectively with the energy market. Adding to this, the report identified problems with the quality and nature of information in the market, further limiting the ability of consumers to make effective decisions. The report also sets out a range of creative approaches that CUAC believes could be used to overcome some of the issues identified.

Different perspectives

CUAC invited speakers with contrasting perspectives on the report's findings in order to further the debate and make the launch interesting and engaging. CUAC was very pleased to have the Victorian Minister for Energy and Resources, the Hon. Michael O'Brien MP, the Chair of Victoria's energy regulator the Essential Services Commission, Dr. Ron Ben-David, and the policy chief at AGL, Tim Nelson, speaking alongside report author David Stanford.

Speakers voiced support for approaches to raise the capacity of Victoria's consumers to participate effectively in the market, including further information

and education initiatives. At the same time, the invited speakers were less supportive of some of the more interventionist solutions around price regulation discussed in the research.

Opening the event, the Victorian Minister for Energy and Resources, the Hon. Michael O'Brien MP, applauded CUAC for creating a discussion on the issues. While disagreeing with some of CUAC's conclusions and recommendations, he acknowledged the importance of quality consumer information and emphasised his commitment to maintaining the existing level of consumer protections in Victoria's transition to the National Energy Customer Framework.

Dr Ron Ben-David disagreed with CUAC's analysis of the causes of observed problems in the market, instead attributing these to concentrations of market power in the hands of the major retailers, and to the significant challenges facing new entrants.

CUAC is pleased that the report has encouraged further debate of the state of retail energy markets and the best approach to future reform.

Future CUAC work on consumer participation

In the coming year, we hope to further advance some of the recommendations of the research and conduct further analysis of the Victorian retail market. 2012-13 will also see CUAC begin work on development of a retailer rating scheme. The rating scheme will provide customers with additional non-price information about the quality of energy retailers' service, based on an analysis of existing performance data.



Water governance reforms extend interest charging powers

Legislation recently passed by the Victorian Parliament has made a range of changes to water governance in the state. Despite the advocacy efforts of CUAC and other consumer and welfare groups, the new Act will also see the extension of strong debt management powers to Melbourne's water businesses.

The *Water Amendment (Governance and Other Reforms) Act 2012*

In April this year, the Victorian Parliament approved changes to water governance in the state, passing the *Water Amendment (Governance and Other Reforms Act 2012*.

The major purpose of the new legislation has been to streamline governance of the state's water businesses by making the Melbourne businesses (previously licensees under the *Water Industry Act 1994*) into statutory corporations under the *Water Act 1989*. At the same time, a number of amendments were made to the latter act.

Implications for debt management and recovery powers

Disappointingly, while there were some positive amendments to the *Water Act 1989*, provisions granting businesses the right to charge interest on overdue accounts to their customers have been retained. Similarly, under the amended Act, water

businesses retain the power to recover outstanding amounts via a charge over the customer's property.

Having advocated for a number of years to see this power removed from regional-urban and rural water businesses (for background see *POWER+WATER* Issue 2, June 2011), CUAC was extremely disappointed to see them instead extended to Melbourne's water businesses.

In our view, charging interest on overdue accounts is equivalent to a late payment fee. Interest charges penalise consumers who are already experiencing difficulties in paying for water, in particular low-income and vulnerable households, which are less likely to be able to pay bills by the due date. Rather than imposing interest on overdue accounts, water businesses should be pro-actively assisting consumers experiencing payment difficulties, through a variety of initiatives such as payment plans, hardship programs, incentives, the writing off of debt and advice on concessions and grants.

In the energy sector, for example, energy retailers in Victoria are prohibited from charging late payment fees. This important customer protection has been re-affirmed by the Victorian government in the *National Energy Retail Law (Victoria) Bill 2012*. The Bill implements the National Energy Customer Framework in Victoria. Section 14 of the Bill retains the current ban on late payment fees for Victorian consumers. As a matter of principle, CUAC believes that the same customer protection which exists in the energy sector



should extend to the water sector; both are essential services.

Regulating and overseeing the debt management powers

Under the new legislation, the Essential Services Commission (ESC) will be responsible for regulating the use of these debt management powers, setting out when and to whom they may be applied, as well as the rate of interest that water businesses can charge.

To take account of this and other changes, the ESC is now in the process of reviewing and amending its Customer Service Codes. Acknowledging the importance of the issues, the ESC has said that it will conduct an extensive consultation on the amendments relating to debt management powers. To this end, a consultation paper specifically addressing these issues is expected later this month. In the meantime, as a transition arrangement, the Commission has proposed a continuation of the status quo—regional urban and rural water businesses may continue to charge interest to non-hardship customers, while metropolitan businesses are prohibited from doing so.

CUAC intends to make a detailed submission to this process, and will be encouraging other consumer and welfare organisations to also have their say on regulation of the extended powers. In addition, over the coming year, we will be monitoring any developments in water businesses' debt management practices, as well as any attendant consumer impacts. If necessary, we will advocate directly with businesses to see that they use more appropriate, service-oriented approaches to debt recovery and payment issues.

Extended hardship GSL

During the previous Water Price Review, CUAC and other consumer groups championed the idea of a hardship-related Guaranteed Service Level (GSL). After a year of successful operation in some businesses, the GSL is now to be rolled out across the state.

In September 2010 the Essential Services Commission (ESC) mandated that 9 urban retail water businesses implement the hardship related GSL from 1 January 2011. The GSL requires a water business to take reasonable steps to contact a residential customer and provide information about help available if the customer is experiencing payment difficulties, before restricting water supply or taking legal action. A water business which fails to do this must pay a fixed amount of \$300 to the customer, either directly to the customer or through a rebate on the customer's bill.

After a year in operation, the ESC has undertaken a review of the GSL. As reported in the last issue of POWER+WATER, data from the 2010-11 ESC Water Performance Report indicated a substantial fall in domestic restrictions; this is likely to have resulted from the implementation of the hardship related GSL to the 9 urban retail water businesses.

In May 2012, the ESC issued its Final Decision on the Review. CUAC is pleased that the Final Decision extends the hardship related GSL to all 16 of the urban water businesses as of 1 July 2012, an action that CUAC supported in its submission. This decision will mean that consumers in regional areas now enjoy the same protection as Melbourne water customers in this crucial area.



Reform on the way for Australia's energy networks?

Concern has been growing that the regulatory system in place to set the prices for Australia's energy networks is not sufficiently well designed to fulfil its objective. With a number of reviews currently underway, CUAC hopes that change is on the way.

The effective economic regulation of a monopoly business is not a simple task. A vast amount of information must be considered by a regulator in order to make a robust and defensible decision on price. Furthermore, the rules that govern the regulation need to be well-designed so that there are appropriate incentives for businesses to provide accurate information to the regulator, and so that the regulator is empowered to undertake its task effectively.

Growing concerns

The significant escalations in network costs since the transition to the new national regulatory framework suggest that the design of the new framework may not be what it should be. As Professor Ross Garnaut pointed out in his recent Climate Change Review paper *Transforming the Electricity Sector*, "there is a prima facie case that weaknesses in the regulatory framework have led to overinvestment in networks and unnecessarily high prices for consumers."

Similarly, the Australian Energy Regulator (AER) itself noted that "the sharp and significant step change in

expenditure forecasts draws into question whether the current framework is meeting the National Electricity Objective (NEO) in 'promoting efficient investment' or whether it is stimulating investment above efficient levels." Needless to say, consumer groups have been concerned at rising costs and have also been questioning the effectiveness of the regulatory framework.

AEMC rule change process

CUAC is pleased that a number of regulatory processes now underway will examine some of these issues, and may result in reform to the economic regulation of Australia's networks. The first of these is the current rule change process being undertaken by the Australian Energy Market Commission (AEMC).

The regulatory system for energy networks in the eastern states of Australia is based in the National Electricity and National Gas Laws. These provide for the creation of a set of energy market rules and are the primary source of regulation in the market. These rules are overseen by the AEMC and may be changed if a stakeholder submits a rule change request that outlines their proposal and the reasons for it. To test the proposal, the rule change request then undergoes a review and consultation process overseen by the AEMC.

The AER recently submitted a rule change request that is now going through the process of consultation and review. In its request the AER identified areas in the regulation where it thought it was not equipped with



appropriate powers to effectively regulate the revenues of the network businesses.

The key reforms proposed by the AER were a change to the way that they assess and approve the expenditure forecast of businesses and a change to the way that they assess the rate of return on network businesses' assets. The AER rule change request is being considered in parallel with a rule change request from a committee of large industrial users of energy proposing an alternative methodology on the assessment of rate of return on assets.

In submissions, CUAC has been supportive of many of the reforms proposed, seeing them as a first step to addressing some of the problems of the regulatory regime. Network businesses have been less enthusiastic about the rule change proposals, and this has been reflected in their submissions to the AEMC. The AEMC will deliver a draft determination on the rule change proposals for public consultation by 26 July 2012.

Review of the Limited Merits Review Regime

Another process currently underway is the review of the appeals mechanism whereby network businesses can appeal the economic regulatory decision of the AER to the Australian Competition Tribunal. Many POWER+WATER readers will have learned about the CUAC experience with this process, and will be aware of our grave concerns that it disproportionately favours network business interests at the expense of consumers. Specifically, we are concerned that the use of the "limited merits review" appeal has become automatic and that, in a [process that does not allow for consumer involvement, the

outcomes are always in favour of network businesses.

In the wake of a CUAC/Consumer Action joint report detailing these and further issues, on 9 December 2011 the Standing Council on Energy and Resources (SCER) (the ministerial council responsible for oversight of the national energy market) agreed to bring forward the review of this appeals mechanism.

The expert panel commissioned to undertake the review has subsequently released a number of papers for public comment. CUAC has shared with the panel our views on the need to replace the merits review appeals mechanism. Specifically, we have suggested that the mechanism should be replaced with a well-designed judicial review mechanism that would reduce the incentive for automatic appeals of regulatory decisions.

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- To find out more about the AEMC rule change process and to read CUAC and other stakeholder submission go to www.aemc.gov.au/Electricity/Rule-changes/Open/Economic-Regulation-of-Network-Service-Providers-.html
 - To read more about the review of the limited merits review regime go to www.scer.gov.au/workstreams/energy-market-reform/limited-merits-review/
 - To read the CUAC/Consumer action paper and other materials on appropriate appeals mechanisms visit http://www.cuac.org.au/index.php?Itemid=30&option=com_docman

CUAC news — CUAC turns 10

On Thursday, 3 May 2012, CUAC together with friends, supporters and colleagues celebrated 10 years of advocacy on behalf of Victorian energy and water consumers. CUAC is delighted to achieve this milestone and looks forward to many more years of influencing policy and regulatory outcomes on behalf of consumers.

Over the last ten years, CUAC has made some substantial contributions to both policy debate and decisions. In that time, CUAC has:

- helped influence the approach to supporting utility consumers experiencing hardship;
- ensured that consumer perspectives were considered through a period of rapid reform to the energy and water sectors;
- consistently advocated for the consumer interest in regulatory pricing determinations;
- highlighted some major barriers to distributed generation in the National Electricity Market;
- influenced the policy agenda on smart meters to ensure consumer benefits are realised and are tangible; and
- conducted sector-leading research into major policy issues including competition effectiveness and the experience of Victoria's indigenous consumers.



Our birthday event was well attended by representatives of the community sector, government and the energy and water industries. It was a great opportunity for old friends to share experiences and stories.

CUAC Submissions, January—April 2012

CUAC made the following submissions between January—April 2012:

- Essential Services Commission — Proposed amendments to the Energy Retail Code
- Essential Services Commission—Barwon Water Application for Price Adjustment
- Department of Sustainability, Environment, Water, Population and Communities—Water Efficiency Labelling and Standards (WELS) Scheme—Consultation Paper
- Australian Energy Regulator—AER Approval of Minimum Amount Owing for Disconnection, r. 116 of the National Energy Retail Rules
- Standing Council on Energy and Resources Energy Market Reform Working Group—National Smart Meter Consumer Protections and Pricing Draft Policy Paper Two
- Department of Resources, Energy and Tourism—Draft Energy White Paper
- Essential Services Commission—Hardship-Related Guaranteed Service Level Review Draft Decision
- Expert Panel for the Review of the Limited Merits Review Regime—Review of the Limited Merits Review Regime—Consultation Paper
- Australian Energy Market Commission—Directions Paper on the Energy Network Rule Changes

All CUAC public submissions can be viewed on the CUAC website at www.cuac.org.au