

21 March 2024

Submitted by email to: [marketperformance@aer.gov.au](mailto:marketperformance@aer.gov.au)

To whom it may concern,

**AER (RETAIL LAW) PERFORMANCE REPORTING PROCEDURES AND GUIDELINES 2024 UPDATE  
SUBMISSION BY: INDIGENOUS CONSUMER ASSISTANCE NETWORK, ICAN**

Thank you for the opportunity to provide a submission in response to the AER's Performance Reporting Procedures and Guidelines Update 2024.

**ABOUT THE INDIGENOUS CONSUMER ASSISTANCE NETWORK (ICAN)**

ICAN provides consumer education, advocacy, and financial counselling and financial capability services to First Nations peoples across North and Far North Queensland, with a vision of "Empowering Indigenous Consumers". We also provide our services to non-Indigenous peoples across the region. ICAN is a registered Supply Nation entity. We have offices in Cairns, Townsville and the Atherton Tablelands and two satellite offices on Palm Island and Yarrabah. We also regularly do outreach to communities including Wujal Wujal. We are also connected to community organisations based in communities including Weipa and Napranum, Mt Isa and the surrounding communities of Mornington Island and Doomadgee.

The people we work with are strong, resilient, and knowledgeable about their lives and communities. However, structural barriers and an uncompetitive marketplace in remote and regional communities create conditions in which exploitation occurs. The cost of living is unacceptably high, with basic food and necessities costing significantly more than in cities and large regional centres. Employment is limited, and regional centres are susceptible to significant events such as pandemics, industry downturns and extreme weather. Housing is limited and costly, and the consequent rate of homelessness and overcrowding is unacceptably high. Cars are essential items in the family home as they are the only form of transport and pose a significant upfront and ongoing expense. Against this backdrop, we see many people who are struggling to keep the power on.

We commend the AER for supporting new and expanded retail performance indicators in the interests of increasing transparency about retail energy market performance and improving understanding about the needs of consumers experiencing vulnerability.

Once again, we express support for the AER's proposals to:

- Introduce a separate category of reporting to capture alternative meter types that are similar to prepayment meters (for example, card-operated meters); and
- To capture how many eligible customers receive energy concessions.

**Prepayment (card-operated) meters**

We are aware that approximately 5,000 card-operated meter households in 32 remote First Nations communities across Queensland serviced by Ergon Energy are excluded from National Energy Retail Rule

(NERR) reporting requirements. This is despite the meters being functionally identical to prepay meters with smart meter capacities.

The absence of transparency and accountability in respect of public reporting on key metrics such as numbers of card-operated meter customers, frequency and duration of so-called 'self-disconnection' events, and applicability of concessions, has long put these communities at a disadvantage in energy transition. We commend the AER for taking steps to improve this anomalous situation.

We would also encourage the AER to consider requiring retrospective reporting (ie. from the introduction of smart-meters, from 2016) so that a better understanding of energy insecurity and vulnerability in these communities can be gained. This is wholly necessary so as to inform any policy responses to address extant energy insecurity.

Thank you for the opportunity to respond to the **2024 Update** and we would be happy to discuss any aspects of our submission directly with the AER.

Yours sincerely



Jillian Williams  
**Operations Manager**  
**ICAN**