



CitiPower Pty
ACN 064 651 056
www.citipower.com.au

Head Office: 40 Market Street Melbourne Victoria
Telephone: (03) 9683 4444 Facsimile: (03) 9683 4499 DX 433 Melbourne
Postal address: Locked Bag 14090 Melbourne Victoria 8001 Australia

Powercor Australia Ltd
ACN 064 651 109
www.powercor.com.au

13th August 2010

Mr Tom Leuner
General Manager Markets Branch
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Email: AERInquiry@aer.gov.au

Dear Mr Leuner,

Retail Market Performance Reporting – Issues Paper, June 2010

CitiPower Pty and Powercor Australia Ltd (**the Businesses**) welcome the opportunity to comment on the Australian Energy Regulator (**AER**) Issues Paper “*Retail Market Performance Reporting*”.

The Businesses have reviewed the Issues Paper and are supportive of the AER’s aim to work closely with the Essential Services Commission (**ESC**) to minimise unnecessary duplication of reporting requirements on distributors. The Businesses, however, make the following submission in respect of questions 56 and 57 of the Issues Paper.

Q56 Are there other generic indicators that can be used to measure distributors’ performance in relation to small compensation claims? How might they be interpreted?

The Businesses currently have in place a Voltage Variation Compensation Scheme (**VVC**) which was set up by the ESC for small customers to make minor claims for voltage variation compensation. The Businesses’ claims policy, along with the customer charter, is published on the Businesses’ website, and is also offered to customers via the Businesses’ contact centre. The Businesses submit that these arrangements ensure that customers are able to easily access the small compensation claims regime.

The Businesses are able to report on the following criteria:

- Number of claims received;
- Number of claims paid;
- Total amount claimed by customers; and
- Total amount paid to customers.

Any changes or additions to the above reporting categories will require system changes to capture and record the new information, and incur additional costs.

Q57 Is quarterly reporting of the proposed indicators appropriate, or would less frequent reporting (e.g. six monthly, annual) be preferable.

The Businesses submit that annual reporting is sufficient for the purposes of transparency and accountability. More frequent reporting will lead to increased costs in collating, reviewing, checking and issuing the reports. The Businesses also submit that to ensure accuracy of reported information the submission date should be set no less than 2 months after the period of data required.

Should you have any further questions in relation this submission, please do not hesitate to contact Wendy Cotton on (03) 9683 4288 or at wcotton@powercor.com.au.

Yours sincerely



 Brent Cleeve
Manager Price Review
CitiPower Pty and Powercor Australia Ltd